



South Dakota Board of Pharmacy

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WHAT: Board Policy Statement Number 22-06-24

WHY: On June 17, 2022, the U.S. Food and Drug Administration (FDA) Authorized emergency use of Moderna and Pfizer-BionTech COVID-19 Vaccines for children as young as 6 months of age.

This approval is reassuring as it provides a level of COVID-19 protection for the youngest South Dakotans. Notably, the Public Readiness and Emergency Preparedness (PREP) Act was not amended for anyone ages 6 months up to 3 years of age to provide liability protections for pharmacists prescribing and administering or for pharmacists, interns, or technicians administering these vaccines as it was for previous COVID countermeasures.

The Board of Pharmacy reviewed this important new approval and noted that there are many details that provide a level of concern for pharmacists. With no liability protection and with the increased amount of time and effort this will require, as well as administration of vaccines for young children is not practicable with a lack of or physical limitations of pharmacy private vaccine rooms. For these reasons, the Board feels this administration is best left to pediatric professionals.

The Board knows that pharmacists have been on the front lines saving thousands of South Dakotans' lives providing adult and older childrens' vaccines, subcutaneous/intravenous antivirals, and additional oral treatments against COVID-19. The Board is grateful for pharmacists undertaking this and hopes this will to continue; however, the Board feels that the administration of vaccines for the youngest children is not in the best interest of the patients.

The Board's guidance is that without PREP Act allowances and liability protections, there is no authority in state law or administrative rules for pharmacists to order these vaccines or for technicians to administer them. In the past, when vaccine administration was in question, pharmacists could generally provide them to patients based upon a signed prescription or a protocol. In the case of these infant vaccines for ages 6 months up to 3 years, and for the reasons included here, the Board does not currently condone this practice.