

# Washington State Department of Health

## List of Providers Authorized to Administer Vaccines

### Introduction

Administering a vaccine to a patient in Washington typically requires holding a state license to practice a particular type of health care profession. Given the need to swiftly and efficiently vaccinate our state's population, the Washington State Secretary of Health and the Secretary of the United States Department of Health and Human Services (HHS) have issued authorizations under the federal Public Readiness and Emergency Preparedness Act (PREP Act) for certain other types of providers, students, out-of-state license holders, and inactive or expired license holders to administer COVID-19 vaccines in Washington who otherwise would not be permitted to do so under state law.<sup>1</sup>

**You can determine whether and how you are authorized to administer COVID-19 vaccines in Washington by finding the scenario in the list below that applies to you and referring to the column(s) in the chart to which you are directed and the row for your particular profession. For many professions, holding an active Washington license provides sufficient authority to administer vaccines. For others, additional requirements may need to be met before you may begin administering vaccines.**

**You need to be authorized under only one column, but you may be authorized under two. If you are authorized under two columns, both are legally valid alternative pathways to administering vaccines, but one of the columns may have less burdensome requirements for you to meet. If you meet the requirements of one column, you do not need to meet the requirements of another column. For instance, if you meet the requirements of the HHS PREP Act authorization, then you do not need to meet state law requirements, such as those for supervision or training.**

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<sup>1</sup> The PREP Act generally provides immunity from suit and liability with respect to all claims for loss caused by, arising out of, relating to, or resulting from the administration of COVID-19 vaccines. This immunity applies equally to people who are eligible to administer COVID-19 vaccines under an active Washington license and those who are eligible pursuant to an authorization issued under the PREP Act.

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
May 2021

Active license holders

- If you have an active Washington license, refer to columns (A) and (B).
- If you have an active license in good standing from another state, but not from Washington, and you are registered with DOH as an [emergency volunteer health practitioner](#),<sup>2</sup> refer to column (A) or (B).
- If you have an active license in good standing from another state, but not from Washington, and you are not registered with DOH as an emergency volunteer health practitioner, refer to column (B).

Students

- If you are a student in Washington, refer to columns (C) and (D).
- If you are a student in a state other than Washington, refer to column (D).

Expired or inactive license holders

- If you have a currently expired or inactive Washington license that was active at any time in the last five years, refer to columns (E) and (F).
- If you have a currently expired or inactive Washington license that was active at any time between July 1998 and five years ago, refer to column (E).
- If you have a currently expired or inactive out-of-state license that was active at any time in the last five years, refer to column (F).

If none of the scenarios above applies to you, then you are not currently authorized to administer COVID-19 vaccines in Washington. This may change in the future, so please consult this chart again at a later date.

If you have questions about how to read this chart, please contact Jules Kolln at [Julianne.kolln@doh.wa.gov](mailto:Julianne.kolln@doh.wa.gov).

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<sup>2</sup> Information on eligibility and requirements for registering with DOH as an emergency volunteer health practitioner can be found at <https://www.doh.wa.gov/Emergencies/COVID19/HealthcareProviders/EmergencyVolunteerHealthPractitioners>.

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

Profession	Active license holders		Students		Expired/inactive license holders	
	(A)	(B)	(C)	(D)	(E)	(F)
	Authorized by state law to administer COVID-19 vaccines in WA?	Authorized by HHS PREP Act declaration to administer COVID-19 vaccines in WA? (See below chart for full requirements)	Authorized by state law to administer COVID-19 vaccines in WA?	Authorized by HHS PREP Act declaration to administer COVID-19 vaccines in WA? (See below chart for full requirements)	Authorized by state PREP Act declaration to administer COVID-19 vaccines in WA? (See below chart for full requirements)	Authorized by HHS PREP Act declaration to administer COVID-19 vaccines in WA? (See below chart for full requirements)
Physician (MD or DO)	Yes	No	Yes. Requirements of <a href="#">RCW 18.71.030(7)</a> or (8) must be met.	Yes	Yes	Yes
Physician Assistant (allopathic or osteopathic)	Yes. Requirement for delegation agreement is currently waived by the Governor.	Yes	Yes. Must be pursuant to a regular course of instruction in approved program and under the supervision and control of a licensed physician or PA.	Yes	Yes	Yes
Emergency Medical Services (EMS) Providers (EMTs, AEMTs, and Paramedics)	Yes, during a declared emergency. Must be trained, competent, and acting under the medical oversight and direction of the county Medical Program Director (MPD) or an MPD delegate physician, such as the local health officer, and a DOH-approved MPD protocol must be in place.	Yes	Yes, during a declared emergency. Must be done pursuant to the course of training and under the medical oversight and direction of the county Medical Program Director (MPD) or MPD delegate physician, and a DOH-approved MPD protocol must be in place.	Yes	No	Yes

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

Profession	Active license holders		Students		Expired/inactive license holders	
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Nursing Technician (NT)	Yes. Limited to hospitals, clinics, and nursing home settings. Validation of skill is required. RN must be on site and immediately available. Must administer pursuant to prescription of MD, DO, ARNP, PA. Can follow standing order if within scope of education.	No	No	No	No	No

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

Profession	Active license holders		Students		Expired/inactive license holders	
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Licensed Practical Nurse (LPN)	Yes. Must be supervised by MD, DO, dentist, PA, ARNP, RN, or midwife. Must be competent (training, knowledge, skill, and ability). Must administer pursuant to prescription or standing order of MD, DO, ARNP, PA. Prescriber does not need to be on the premises. No limitations on setting.	No	Yes. Must be under guidance and supervision of the nursing program policies and protocols or as a nurse tech (NT) under the guidance of an employer.	Yes	Yes	Yes

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

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Registered Nurse (RN)	Yes. Must be competent (training, knowledge, skill, and ability). Must administer pursuant to prescription or standing order of MD, DO, ARNP, PA. Prescriber does not need to be on the premises. No limitations on setting.	No	Yes. Must be under guidance and supervision of the nursing program policies and protocols or as a nurse tech (NT) under the guidance of an employer.	Yes	Yes	Yes
Advanced Registered Nurse Practitioner (ARNP)	Yes. Must be competent (training, knowledge, skill, and ability).	No	Yes. ARNP students may administer vaccine since they must have an active RN license.	Yes	Yes	Yes
Naturopathic Physician	Yes	No	Yes. Must be pursuant to a course of instruction or assignments from an instructor and under the supervision of the instructor, who must be a WA-licensed naturopath.	No	Yes	No

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

Profession	Active license holders		Students		Expired/inactive license holders	
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Medical assistant-certified	Yes. Task must be delegated by a provider with the activity in their scope of practice: MD/DO, RN, ARNP, Naturopathic Physician, PA/DOPA. Per Governor proclamation, supervisor only has to be immediately available, which may be by remote means.	No	Yes. Must be participating in an externship as part of an approved medical assistant training program under the direct supervision of an on-site health care provider.	No	No	No
Medical assistant-registered	Yes. Delegation and supervision is the same as MA-C. Need "vaccination" authorized on endorsement form.	No	No	No	No	No
Pharmacist	Yes	Yes	See Pharmacy Intern	Yes	Yes	Yes

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

Profession	Active license holders		Students		Expired/inactive license holders	
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Pharmacy Intern	Yes. Must be within education, skill, and experience. Must be under immediate supervision of pharmacist, which may be by technological means, per WAC 246-945-315.	Yes	Yes, pharmacy interns who are students may administer COVID-19 vaccines. Must be within education, skill, and experience. Must be under immediate supervision of pharmacist, which may be by technological means, per WAC 246-945-315.	Yes	No	Yes



**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

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Pharmacy Technician	Yes. Must be under immediate supervision and control of pharmacist, which may be by technological means, per WAC 246-945-315. Requirement for Ancillary Utilization Plan (AUP) is currently waived by the Governor.	Yes	Yes. Must be enrolled in pharmacy-technician training programs and have technician-in-training endorsement under WAC 246-945-203. Limited to sites identified on application. Must be under immediate supervision and control of pharmacist, which may be by technological means, per WAC 246-945-315. Requirement for Ancillary Utilization Plan (AUP) is currently waived by the Governor.	No	No	No

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

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Midwife	Yes. Must be prescribed by a physician.	Yes	Yes. Must be pursuant to regular course of instruction or assignment from instructor while enrolled in Secretary-approved and accredited midwifery program and under supervision and control of WA-licensed midwife.	Yes	No	Yes
Dentist	Yes. Must have appropriate training.	Yes	Yes. Must be under direction and supervision of Washington state-licensed dental school faculty while enrolled in accredited and approved school or college.	Yes	No	Yes

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
 May 2021

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Dental Hygienist	Yes. Must have appropriate training and close supervision by a licensed dentist.	No	Yes. Must be under direction and supervision of persons licensed under chapter <a href="#">18.29</a> or <a href="#">18.32</a> RCW acting as instructors.	No	No	No
Respiratory Therapist	No	Yes	No	Yes	No	Yes
Podiatrist	No	Yes	No	Yes	No	Yes
Optometrist	No	Yes	No	Yes	No	Yes
Veterinarian	No	Yes	No	Yes	No	Yes

Requirements for people authorized by **HHS' PREP Act authorizations under** column (B), (D), or (F) (except the pharmacy professions)

If you are authorized by the HHS PREP Act declaration to administer COVID-19 vaccines in WA under columns (B), (D), or (F), you must meet the requirements set forth in that declaration, which are outlined below and can be found in full detail in the [PREP Act Guidance](#).

Requirement applicable only to people authorized under column (B)

If you are an active license holder authorized under column (B), you must be licensed or certified to practice under the law of any state, which can include Washington.

Requirements applicable only to people authorized under column (D)

If you are a student authorized under column (D), you must have appropriate training in administering vaccines as determined by your school or training program and supervision by a currently practicing healthcare professional experienced in administering intramuscular injections.

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
May 2021

Requirements applicable only to people authorized under column (F)

If you are an expired/inactive license holder authorized under column (F) above:

- Your license must have been:
  - Active within the last five years;
  - In good standing prior to the date it went inactive or expired;
  - Not revoked by the licensing authority, surrendered while under suspension, discipline, or investigation by a licensing authority, or surrendered following an arrest; and
- You must not be on the List of Excluded Individuals/Entities maintained by the HHS Office of Inspector General.

Requirements applicable to all people authorized under column (B), (D), or (F)

Everyone who is authorized to administer COVID-19 vaccines under either column (B), (D), or (F) must meet all of the following requirements:

- The vaccine must be authorized, approved, or licensed by the FDA;
  - Explanation: This includes the Pfizer, Moderna, and Janssen/Johnson & Johnson COVID-19 vaccines that have received emergency use authorization from the FDA.
- Vaccination must be ordered and administered according to ACIP's COVID-19 vaccine recommendation(s);
  - Explanation: This means that the Pfizer vaccine must be ordered for and administered to only people age 12 or older and the Moderna and Janssen/Johnson & Johnson vaccines must be ordered for and administered to only people age 18 or older.<sup>3</sup>
- The healthcare professionals and students must have documentation of completion of the Centers for Disease Control and Prevention COVID-19 Vaccine Training Modules and, if applicable, such additional training as may be required by the State, territory, locality, or Tribal area in which they are prescribing, dispensing, or administering COVID-19 vaccines;
  - Explanation: See the [CDC COVID-19 Vaccine Training Modules](#). The State of Washington is not requiring additional training at this time.
- The healthcare professionals and students must have documentation of an observation period by a currently practicing healthcare professional experienced in administering intramuscular injections, and for whom administering vaccinations is in their ordinary scope of practice, who confirms competency of the healthcare provider or student in preparation and administration of the COVID-19 vaccine(s) to be administered and, if applicable, such additional training as may be required by the State, territory, locality, or Tribal area in which they are prescribing, dispensing, or administering COVID-19 vaccines;
  - Explanation: The healthcare professional or student is not required to submit this documentation to DOH or any other agency or individual. Such documentation should be maintained in the healthcare professional's or student's personal possession.

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<sup>3</sup> See *Advisory Opinion 21-02 on the Public Readiness and Emergency Preparedness Act and the Secretary's Declaration Under the Act*, January 12, 2021, accessible at [https://www.hhs.gov/guidance/sites/default/files/hhs-guidance-documents/AO-21-02-PREP-Act\\_1-12-2021\\_FINAL\\_SIGNED.pdf](https://www.hhs.gov/guidance/sites/default/files/hhs-guidance-documents/AO-21-02-PREP-Act_1-12-2021_FINAL_SIGNED.pdf).

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
May 2021

- The healthcare professionals and students must have a current certificate in basic cardiopulmonary resuscitation;
  - Explanation: This requirement is satisfied by, among other things, a certification in basic cardiopulmonary resuscitation by an online program that has received accreditation from the American Nurses Credentialing Center, the ACPE, or the Accreditation Council for Continuing Medical Education.
- The healthcare professionals and students must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including informing the patient’s primary-care provider when available, submitting the required immunization information to the State or local immunization information system (vaccine registry), complying with requirements with respect to reporting adverse events, and complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine; and
  - Explanation: If a healthcare professional or student is only administering vaccines in support of another provider’s or entity’s vaccination program, then the latter is responsible for reporting this vaccination information. But if a healthcare professional or student wants to request the allocation of vaccine to themselves, he or she must request to enroll in the CDC COVID-19 Vaccination Program through DOH, sign the provider agreement, and meet all the relevant requirements, including the reporting requirements above.
- The healthcare professionals and students comply with any applicable requirements (or conditions of use) as set forth in the Centers for Disease Control and Prevention (CDC) COVID–19 vaccination provider agreement and any other federal requirements that apply to the administration of COVID– 19 vaccine(s).

Requirements for pharmacists, pharmacy interns, and pharmacy technicians authorized **by HHS’ PREP Act** authorizations under column (B), (D), or (F)

HHS has imposed separate requirements that pharmacy professionals must meet in order to be authorized to administer COVID-19 vaccines pursuant to HHS’ PREP Act authorization.<sup>4</sup> Many of these requirements are the same as those above for other types of professionals. Please refer to the explanations of these shared requirements above for more detail.

Requirements for pharmacists, pharmacy interns, and pharmacy technicians authorized under column (B), (D), or (F)

- The vaccine must be authorized, approved, or licensed by the FDA;
- In the case of a COVID–19 vaccine, the vaccination must be ordered and administered according to ACIP’s COVID–19 vaccine recommendation(s);
- For COVID-19 vaccines administered by certified pharmacy technicians, the vaccination must be ordered by a supervising qualified pharmacist, and the supervising qualified pharmacist must be readily and immediately available to the certified pharmacy technicians;

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<sup>4</sup> The HHS Assistant Secretary for Health issued a separate PREP Act authorization for pharmacy technicians, which can be found at <https://www.hhs.gov/sites/default/files/prep-act-guidance.pdf>. The requirements are incorporated with those for pharmacists and pharmacy interns.

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
May 2021

- The licensed pharmacist must have completed the immunization training that the licensing State requires for pharmacists to order and administer vaccines. If the State does not specify training requirements for the licensed pharmacist to order and administer vaccines, the licensed pharmacist must complete a vaccination training program of at least 20 hours that is approved by the Accreditation Council for Pharmacy Education (ACPE) to order and administer vaccines. Such a training program must include hands on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines;
- The licensed or registered pharmacy intern and certified pharmacy technician must complete a practical training program that is approved by the ACPE. This training program must include hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines;
- The licensed pharmacist, licensed or registered pharmacy intern, and certified pharmacy technician must have a current certificate in basic cardiopulmonary resuscitation;
- The licensed pharmacist and certified pharmacy technician must complete a minimum of two hours of ACPE-approved, immunization-related continuing pharmacy education during each State licensing period;
- The licensed pharmacist must comply with recordkeeping and reporting requirements of the jurisdiction in which he or she administers vaccines, including informing the patient's primary-care provider when available, submitting the required immunization information to the State or local immunization information system (vaccine registry), complying with requirements with respect to reporting adverse events, and complying with requirements whereby the person administering a vaccine must review the vaccine registry or other vaccination records prior to administering a vaccine; and
- The licensed pharmacist and the licensed or registered pharmacy intern must comply with any applicable requirements (or conditions of use) as set forth in the Centers for Disease Control and Prevention (CDC) COVID-19 vaccination provider agreement and any other federal requirements that apply to the administration of COVID-19 vaccine(s).

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
May 2021

**Requirements for expired/inactive license holders authorized by the Secretary of Health's PREP Act authorization under column (E)**

The Washington State Secretary of Health issued a PREP Act authorization to allow certain individuals holding expired/inactive Washington licenses to administer COVID-19 vaccines.<sup>5</sup> The following requirements must be met to qualify under this authorization and column (E):

- The person held at any time since July 1998 a full active Washington State license to practice as a/an:
  - Advanced registered nurse practitioner, under chapter 18.79 RCW;
  - Registered nurse, under chapter 18.79 RCW;
  - Licensed practical nurse, under chapter 18.79 RCW;
  - Physician, under chapter 18.71 RCW;
  - Osteopathic physician and surgeon, under chapter 18.57 RCW;
  - Physician assistant (allopathic or osteopathic), under chapters 18.71A or 18.57A RCW;
  - Pharmacist, under chapter 18.64 RCW; or,
  - Naturopath, under chapter 18.36A RCW;
- No license ever held by the person in any United States jurisdiction has been subject to enforcement action, as determined by the Department of Health;
- The person has performed at least one of the following:
  - Administered a vaccine by intramuscular injection within the ten years preceding the date of this authorization;
  - Participated regularly in immunization services, including administration, over the course of their professional experience; and/or,
  - Completed a refresher immunization training within the six months preceding or at any time after the date of this authorization. The training may be given by a person holding a Washington State license in good standing in any profession listed in section 1 above, a health care facility, a person or entity currently authorized by the state to provide continuing education to any profession listed in section 1 above, a public health agency, or an accredited educational institution;
- The person administers COVID-19 vaccines in support of an enrollee or participant in the state or federal government's COVID-19 vaccination program;
- The person has registered in WAserv at [waserv.org](http://waserv.org), for which instructions can be found on the DOH [Healthcare Provider Resources and Recommendations page](#).
- The person has received confirmation from the Department of Health that (s)he is authorized hereunder; and
- The person has not been otherwise excluded from this authorization by the Department of Health.

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<sup>5</sup> The authorization can be accessed at <https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/PrepActAuthorizationRetiredProviders.pdf>.

**Washington State Department of Health**  
**List of Providers Authorized to Administer Vaccines**  
May 2021

More COVID-19 Information and Resources

Stay up-to-date on the [current COVID-19 situation in Washington](#), [Governor Inslee's proclamations](#), [symptoms](#), [how it spreads](#), and [how and when people should get tested](#). See our [Frequently Asked Questions](#) for more information.

A person's race/ethnicity or nationality does not, itself, put them at greater risk of COVID-19. However, data are revealing that communities of color are being disproportionately impacted by COVID-19. This is due to the effects of racism, and in particular, structural racism, that leaves some groups with fewer opportunities to protect themselves and their communities. [Stigma will not help to fight the illness](#). Share only accurate information to keep rumors and misinformation from spreading.

- [WA State Department of Health 2019 Novel Coronavirus Outbreak \(COVID-19\)](#)
- [WA State Coronavirus Response \(COVID-19\)](#)
- [Find Your Local Health Department or District](#)
- [CDC Coronavirus \(COVID-19\)](#)
- [Stigma Reduction Resources](#)

**Have more questions?** Call our COVID-19 Information hotline: **1-800-525-0127**

Monday – 6 a.m. to 10 p.m., Tuesday – Sunday and [observed state holidays](#), 6 a.m. to 6 p.m. For interpretative services, **press #** when they answer and **say your language**. For questions about your own health, COVID-19 testing, or testing results, please contact a health care provider.

To request this document in another format, call 1-800-525-0127. Deaf or hard of hearing customers, please call 711 ([Washington Relay](#)) or email [civil.rights@doh.wa.gov](mailto:civil.rights@doh.wa.gov).