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DEPARTMENT OF BUSINESS AND INDUSTRY  
OFFICE OF NEVADA BOARDS, COMMISSIONS AND COUNCILS STANDARDS  
STATE OF NEVADA BOARD OF PHARMACY

September 5, 2025

**Via Email**  
Address

**Re: Notice Regarding Use and Administration of the FDA Approved 2025-2026  
COVID-19 Vaccine.**

Dear [CONTACT]/To Whom It May Concern:

The Nevada State Board of Pharmacy (Board) has received several inquiries concerning the authority of a pharmacist under Nevada law to administer the 2025-2026 COVID-19 vaccine updated formulation (COVID-19 update). The Federal Food and Drug Administration (FDA) has approved the COVID-19 update vaccine. As always, a pharmacist may administer any FDA-approved vaccine, including the COVID-19 update, pursuant to a prescription. When presented with a prescription, a pharmacist must administer the vaccine in strict adherence to the practitioner's instructions and/or the manufacturer's directions for use.

Additionally, a pharmacist may administer any FDA-approved vaccine, including the COVID-19 update, pursuant to written guidelines and protocols developed pursuant to NRS 639.2629 or a collaborative practice agreement, as defined in NRS 639.0052. *See* NRS 454.213(1)(s). Many pharmacists are currently administering a variety of FDA-approved vaccines pursuant to such guidelines, protocols, and/or agreements. Pharmacies may need to update or amend these documents to include administration of the COVID-19 update.

Finally, a pharmacist may administer any FDA-approved vaccine, including the COVID-19 update, pursuant to the Board's regulations pertaining to immunizations. *See* NRS 454.213(1)(r); *see also* NAC 639.297 to 639.2978. According to NRS 454.213(1)(r)(3), any pharmacist who administers a vaccine pursuant to the Board's regulations must do so in compliance with the Standards for Immunization Practices recommended and approved by the Advisory Committee on Immunization Practices (ACIP) of the Centers for Disease Control and Prevention. The purpose of this provision is to ensure that the pharmacist is competent to administer any given

vaccine and knowledgeable about the risks that the vaccine poses to certain individuals or groups of individuals. *See also* NAC 639.2973(1)(e) (requiring that a pharmacist have a minimum of 20 hours of instruction and practical training concerning the ACIP). However, the Board does not construe NRS 454.213(1)(r)(3) as a prohibition against the administration of the COVID-19 update pending approval of product-specific recommendations issued by the ACIP. When, as here, the ACIP has previously issued recommendations concerning the general type of vaccine in question, the pharmacist may administer the vaccine if, in the professional judgment of the pharmacist, those previous recommendations provide adequate guidance and are not in conflict with the manufacturer's directions for use. Once the ACIP issues product-specific recommendations, a pharmacist may follow those recommendations.

Sincerely,  
Nevada State Board of Pharmacy