



COVID-19 Vaccination Administration and Prescription Standards

September 10, 2025

The Oregon Medical Board (OMB), Oregon State Board of Nursing (OSBN), and Oregon Board of Pharmacy (OBOP) recognize the ongoing concerns among healthcare providers regarding the absence of clear federal Advisory Committee on Immunization Practices (ACIP) guidelines for COVID-19 vaccine protocols for the 2025-2026 respiratory season.

The lack of comprehensive federal guidance has created uncertainty in clinical practice and challenges for healthcare providers seeking to deliver optimal care to their patients. Providers have experienced an uptick in inquiries from concerned patients in large part because of the severe interruptions to non-prescription pharmacy access caused by the delay in federal guidance. Lack of additional federal guidance does not, however, prohibit providers from providing vaccine prescriptions and administering the COVID-19 vaccine.

The OMB and OSBN recommend health care providers approach administration and prescribing of COVID-19 vaccines with the same professionalism and clinical judgment that has always been the hallmark of our trusted healthcare providers.

The information below is intended to reassure OMB and OSBN licensees regarding their authority to prescribe and administer vaccines within the scope of their license and to provide strategies to support in-office administration and prescribing for pharmacy administration.

In-Office Vaccine Administration Protocols

Healthcare providers with prescriptive authority are encouraged to establish standing protocols or collaborative drug therapy management (CDTM) agreements within their clinics and institutions for the administration of COVID-19 vaccines. These protocols and agreements provide authorization to administer vaccines to those patients within the FDA-approved population, specifically individuals aged 65 and above and those identified as high-risk. Providers should continue to exercise their professional clinical judgment to determine which patients qualify as high-risk based on individual clinical assessment, medical history, and current health status. There is no change to your authority to administer or prescribe the COVID-19 vaccine for FDA-approved populations or apply your professional clinical judgement for high-risk factors.

Healthcare providers should consult guidance from relevant professional medical societies, screen patients for contraindications and precautions, and proceed with COVID-19 vaccination based on the provider's clinical expertise and professional judgment of each patient's unique healthcare circumstances and risk factors.

Scope of Practice for Nurse Administration

The Oregon Nurse Practice Act (NPA) allows Licensed Practical Nurses (LPNs) and Registered Nurses (RNs) to provide nursing care within their defined scope of practice. Nurses at all levels may administer medications, including vaccines, pursuant to a valid prescription, healthcare provider order, or authorized standing protocol.



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Prescription Requirements for Pharmacist Administration

Prescriptions for COVID-19 vaccines administered by pharmacists must include the phrase “to administer at pharmacy.” If the patient is under the age of 65, it may be beneficial to indicate “medically necessary” or specify the patient’s underlying high-risk condition on the prescription with a diagnosis. List of high-risk conditions: <https://www.cdc.gov/covid/risk-factors/index.html>

State Support and License Protection

The state of Oregon fully supports healthcare providers in their professional practice and clinical decision-making regarding COVID-19 vaccination. Healthcare providers will not be subject to disciplinary actions against their professional licenses for using appropriate clinical decision making in administering or prescribing COVID-19 vaccines provided such decisions are made within their scope of practice and in the best interest of patient care.

Your dedication to patient care and public health, even in the face of federal regulatory uncertainty, exemplifies the highest standards of practice among Oregon’s physicians, physician associates, nurse practitioners, nurses, and pharmacists who have continued to serve their communities and prioritize patient safety and wellbeing.

We will update this document when new recommendations are available from the [Western States Alliance](#). For further support or inquiries, please contact the appropriate licensing board.



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