

**STATEWIDE MEDICAL STANDING ORDER FOR AUTHORIZED PHARMACISTS  
TO ADMINISTER TESTS FOR ACTIVE INFECTION OF THE NOVEL  
CORONAVIRUS SARS-COV-2 (COVID-19)**

**PURPOSE**

The purpose of this standing order is to increase access to COVID-19 testing by authorizing registered pharmacists to administer tests by collecting samples from patients for testing at a participating laboratory.

**AUTHORITY**

This standing order is being issued under the authority granted to Alaska's Chief Medical Officer in the Extending COVID 19 Emergency Declaration/Relief Act, sec. 4 ch. 10, SLA 2020. Expanded access to testing for COVID-19 is essential to ensuring the continued public health of Alaskans during the current pandemic, and participation from pharmacists is essential to increasing testing capacity statewide.

This standing order is effective until November 15, 2020, or until rescinded, whichever occurs first.

**ORDER TO ISSUE**

Pharmacists licensed in the State of Alaska or otherwise authorized to practice in the state may screen any person for COVID-19 who

- (1) presents a valid provider's order for testing from a Doctor of Osteopathy (DO), Medical Doctor (MD), Advanced Practice Registered Nurse (APRN), or Physician Assistant (PA); or
- (2) meets the State of Alaska Section of Epidemiology's most current testing criteria, available at <http://dhss.alaska.gov/dph/Epi/id/Pages/COVID-19/testing.aspx>.

Any tests used must be approved by the Food and Drug Administration (FDA).

Pharmacists may analyze samples independently or use an off-site laboratory. If the pharmacist utilizes an FDA-approved or authorized point-of-care testing platform and intends to analyze samples independently, the pharmacy shall possess a CLIA waiver and adhere to all manufacturer competencies prior to the pharmacist performing the test and interpreting the results.

Prior to beginning any testing, any pharmacy location shall notify the Division of Public Health at [dhsseoc@alaska.gov](mailto:dhsseoc@alaska.gov) so it may maintain a list of participating testing locations and issue further guidance or orders as needed.

**MEDICAL DIRECTIVE**

Any pharmacist ordering or administering an FDA-approved or authorized COVID-19 test shall:

**Assess** the client for signs of Acute Respiratory Distress (ARDS). If present, refer client to emergency care. *Call ahead for warm handoff prior to client transition.*

**Verify** provider's order for testing. If the order is from a DO, MD, APRN, or PA, proceed to **test**.

**Screen** client for testing criteria if no referral order.

- Screen client per most current State of Alaska Section of Epidemiology testing guidance: <http://dhss.alaska.gov/dph/Epi/id/Pages/COVID-19/healthcare.aspx>
- If client does not meet patient criteria for testing, proceed to **education**.
- If client meets patient criteria for testing, proceed to **test**.

**Test** clients:

- Provide instructions on procedure and answer questions.
- Obtain informed consent.
- Collect specimen and package per testing protocol.
- Proceed to **education**.

**Education:** Provide education based on client risk.

**Document** as per protocol.

#### **ADDITIONAL GUIDANCE**

This standing order authorizes any individual in the State of Alaska who meets the current testing criteria to obtain a COVID-19 screening test from a pharmacist.

The most current screening and testing information is available at:

<http://dhss.alaska.gov/dph/Epi/id/Pages/COVID-19/testing.aspx>

If the pharmacist utilizes an FDA-authorized point-of-care testing platform and intends to analyze samples independently, the pharmacy shall possess a CLIA-waiver and adhere to all manufacturer competencies prior to the pharmacist performing the test and interpreting the results.

Under federal law, a pharmacist who is “collecting or preparing specimens (or both) or only serving as a mailing service and not performing testing are not considered laboratories,” and does not need a CLIA waiver. 42 C.F.R. § 493.2.

#### **Extending COVID 19 Emergency Declaration/Relief Act, sec. 4 ch. 10, SLA 2020:**

**STANDING ORDERS.** (a) The chief medical officer in the Department of Health and Social Services, or, if the chief medical officer is incapacitated, the chief medical officer's designee, shall issue standing orders for public health agents and health care providers related to essential public health services and functions and in response to conditions of public health importance that are related to novel coronavirus disease (COVID-19). Standing orders shall be effective until retracted or for the duration of the public health disaster emergency declaration issued by the governor on March 11, 2020, as extended by sec. 2 of this Act.

(b) The chief medical officer in the Department of Health and Social Services is not liable for civil damages resulting from an act or omission in issuing a standing order authorized under this section if

(1) the standing order

(A) is issued to health care providers;

(B) is required to mitigate the COVID-19 public health disaster emergency; and  
(C) contains sufficient information in support of the need for a standing order;  
and

(2) the chief medical officer provides sufficient education or training required to properly implement the standing order, including training manuals, video recordings, and other reasonable means of implementing the standing order.

(c) Except as provided in (d) of this section, a public health agent or health care provider who takes action based on a standing order issued by the chief medical officer is not liable for civil damages resulting from an act or omission in implementing the standing order.

(d) Nothing in this section precludes liability for civil damages as a result of gross negligence, recklessness, or intentional misconduct.

(e) In this section, "essential public health services and functions," "health care provider," and "public health agent" have the meanings given in AS 18.15.395.

**Guidance for Licensed Pharmacists, COVID-19 Testing, and Immunity under the PREP Act, U.S. Department of Health and Human Services, 8 April 2020:** Licensed pharmacists that order and/or administer FDA-approved COVID-19 tests are considered “covered persons” under the PREP Act and “may receive immunity under the PREP Act with respect to all claims for loss caused by, arising out of, relating to, or resulting from, the administration or use of FDA-authorized COVID-19 tests.” <https://www.hhs.gov/sites/default/files/authorizing-licensed-pharmacists-to-order-and-administer-covid-19-tests.pdf>



\_\_\_\_\_  
*Anne Zink, MD, FACEP*  
*Alaska State Chief Medical Officer*

\_\_\_\_\_  
*Date*