



4 February 2021

Emma Scott
Senior Project Officer, COVID-19 Vaccination Preparedness Unit
Department of Health and Human Services
50 Lonsdale Street
Melbourne, Victoria 3000
Delivered via email: Emma.Scott@dhhs.vic.gov.au

Dear Ms Scott,

RE: Authorising participation in the SARS-CoV-2 (COVID-19) vaccine program in Victoria

The Society of Hospital Pharmacists of Australia is the national professional organisation for more than 5,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is committed to facilitating the safe and effective use of medicines, which is the core business of pharmacists, especially in hospitals. Victorian hospital pharmacists have been critical to the COVID-19 response in Victoria, providing safe, quality pharmacy care to Victorian patients during the COVID-19 pandemic in a COVIDsafe manner, and being an integral part of the multidisciplinary team providing care to COVID-19 positive patients admitted to hospital wards and intensive care units.

SHPA Victorian Branch welcomes the opportunity to respond to the Department of Health and Human Services' (Department) consultation paper on Authorising participation in the SARS-CoV-2 (COVID-19) vaccine program in Victoria. In preparation for the rollout of the COVID-19 vaccine program, hospitals and health services have undertaken their own modelling to estimate workforce capacity requirements. To achieve the national target of completing the Australia's COVID-19 vaccine national roll-out strategy by October 2021, a significant surge capacity in the medical, nursing, pharmacy and allied health workforce is required.

Thus, SHPA Victorian Branch's overarching position is that the Authorisations should go further than currently proposed, and that Pharmacists, Pharmacy Interns, Pharmacy Technicians, Pharmacy Students (regardless of year of study), should be able to prepare and administer the COVID-19 after completing the requisite COVID-19 training modules. In Victoria, we estimate there are just under 500 Pharmacy Interns, approximately 1,000 Pharmacy Students, and hundreds of Pharmacy Technicians. Given the scale and timeline of the COVID-19 vaccine program in Australia, these personnel are critical to its success.

SHPA Victorian Branch supports the proposed amendment to be made to the Secretary Approval: Pharmacist Immuniser, made under the Drugs, Poisons and Controlled Substances Regulations 2017 (DPCS Regs 2017), to authorise pharmacist immunisers who have completed the COVID-19 training modules to administer the COVID-19 vaccine in Victoria.

However, **SHPA Victorian Branch strongly recommends additional corresponding Short-term public health emergency orders (PHEO) under section 22D of the Drugs, Poisons and Controlled Substances Act 1981 (the Act) to enable administration of the COVID-19 vaccine by Pharmacy Interns, Pharmacy Technicians and Pharmacy Students (regardless of year of study) to be able to be Immunisers after successful completion of the COVID-19 training modules, under the supervision of Pharmacists.**

The content of current Pharmacist Immuniser training modules, as well as the time required to complete them, are appropriate for Pharmacy Interns, Pharmacy Technicians and Pharmacy Students. This would also bring



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consistency into the short-term PHEOs given medical, nursing and paramedicine students are proposed to be able to administer the vaccine. Internationally, various countries have safely expanded the scope of practice for Pharmacy Technicians to administer immunisations, including the United Kingdom, several states in the United States of America and Denmark.

SHPA Victorian Branch supports the proposed short-term PHEOs orders under section 22D of the Act to enable preparation and drawing-up of the COVID-19 vaccine by Pharmacists, Pharmacy Technicians and Pharmacy Students (final year). **However, to meet the objectives and timeline of the COVID-19 vaccine program, SHPA strongly recommends including Pharmacy Interns and Pharmacy Students (regardless of year of study) to be able to prepare and draw-up the COVID-19 vaccine under supervision by Pharmacists**, after successful completion of the requisite COVID-19 training modules.

SHPA Victorian Branch recommends that the supervision ratios and arrangements for administration, preparation and drawing up of the COVID-19 vaccine should be consistent across all the health disciplines. SHPA Victorian Branch would also appreciate clarification on the role of the Chief Pharmacist mentioned in Section 3.3.1 of the consultation paper, as we are only aware of the roles of Chief Allied Health Officer and Chief Officer, Medicines and Poisons Regulation in the Victorian Government.

Victorian hospital pharmacists, technicians and students embrace the challenges ahead to ensure all Victorians are immunised with the COVID-19 vaccine by the end of 2021 and are well positioned to assist with the vaccine rollout. If you have any queries or would like to discuss our concerns further, please do not hesitate to contact Johanna de Wever, General Manager, Advocacy and Leadership on jdeweever@shpa.org.au.

Yours sincerely,



Diana Sandulache
SHPA Victorian Branch Chair

