

UNA STATEMENT ON AHS HIGH VOLUME VACCINE CLINICS

On March 17, 2021, Alberta Health Services (AHS) informed United Nurses of Alberta (UNA) of plans to introduce temporary clinical processes at high volume COVID-19 vaccine clinics in order to minimize vaccine wastage and increase throughput because of expected increases in vaccine supply and demand for vaccination over the coming months.

UNA and AHS representatives met on March 19, 2021 to discuss these changes and AHS confirmed the following information:

- ▶ These changes are temporary until December 2021, will be re-evaluated every 120 days, and apply **only** to COVID-19 high-volume vaccine clinics.
- ▶ The temporary process changes relate to **vaccine preparation**. Specifically:
 - › Preparation of multiple doses of COVID-19 vaccines in advance by Pharmacists, Pharmacy Technicians and/or Nurses for administration by another health care professional.
 - › Immunizers to administer COVID-19 vaccines prepared by other health care professionals following procedures for vaccine preparation stations.
- ▶ This temporary change will involve an extensive 8-part safety process, which includes:
 - › sterile preparation of products for immediate administration;
 - › self-check and second-check processes;
 - › processes supported by Pharmacists, Pharmacy Technicians, and Nurses;
 - › vaccine traceability documentation processes;
 - › outlined PPE requirements;
 - › and required labelling of each dose.
 - › vaccine-specific directions;
- ▶ The anticipated benefits of these temporary process changes include:
 - › minimizing vaccine wastage,
 - › and allowing for more authorized regulated health care workers to assist with vaccination.
 - › increasing through-put, safeguarding vaccine preparation safety,
- ▶ The immunizer will continue to complete the fit to immunize and consent and administration of the vaccine. **The fit to immunize and vaccine administration processes have not been separated.**

Subsequent to this meeting, UNA also become aware that administrative assistants may be responsible for entering client and vaccine event information into *MediTech* but it is our expectation and understanding that this information **must** be reviewed and verified by the immunizer prior to saving this information in *MediTech*.

UNA recognizes that the preparation of multiple doses in advance of administration by someone different than the person administering the vaccine is a significant deviation from existing Immunization and Medication Administration standards and guidelines in Alberta. Therefore, UNA reached out to both to the College and Association of Registered Nurses of Alberta (CARNA) and the College of Registered Psychiatric Nurses of Alberta (CRPNA) for comment. Both nursing regulators directed UNA to a statement, they released in collaboration with the College of Licensed Practical Nurses of Alberta (CLPNA), which can be found on CARNA's website under [Messages from CARNA to Nurses](#) and on the CRPNA's website under [COVID-19 Messages and Resources](#).

Unfortunately, the regulators' statement neither endorses nor prohibits the temporary process changes introduced by AHS. UNA is concerned by this lack of clarity from the nursing regulators and has asked CARNA and CRPNA to provide more specific communication on whether these very specific and time-limited temporary practice changes are permitted under CARNA's Practice and Medication Management Standards. UNA requested CRPNA's Medication Management Standards to review and we were advised that they are not currently available on their public website as they are being revised to reflect new regulation changes. However, their website does provide reference to Alberta Health immunization policy and FAQ documents under its [Practice Resources](#), which UNA encourages its members to review.

After meeting with AHS representatives, reviewing both the *AHS Operational and Practice Guides for Vaccine Preparation Stations*, and reviewing *CARNA's Medication Management Standards and Guidelines for Medication and Vaccine Safety*, UNA is comfortable supporting these temporary process changes. As long as the requirements and procedures outlined by AHS are strictly adhered to, and there is no separation of the fit to immunize assessment from administration of the vaccine.

It is important to note that *CARNA's Medication Management Standards* permit administration of vaccines prepared by a pharmacist or (pharmacy technician) under *Standard 1.19*, which states "only administer medications prepared by themselves or a pharmacist (or pharmacy technician), except in urgent or emergent circumstances when the medication may be prepared by another health care professional as outlined in employer requirements".

Furthermore, *CARNA's Guidelines for Medication and Vaccine Injection Safety* appear to permit the temporary processes AHS has introduced. See *f. Sterile Preparations Prepared in the Practice Setting*, in this document, which states: "Unless immediately and completely administered by the person who prepared it, or immediate and complete administration is witnessed by the preparer, the preparation bears a label listing: patient identification information, names and amounts of all ingredients, name or initial of the preparer, and beyond-use time or date."

However, we encourage all of our members involved in high-volume vaccine clinics to review *CARNA's Medication Management Standards and Guidelines for Medication and Vaccine Injection Safety* and the *AHS Practice Guide Requirements, Procedures, & Considerations for Preparing COVID-19 Vaccine in Vaccine Preparation Stations* to better understand the strict requirements and expectations involved in this temporary process.

Furthermore, should you encounter any deviation from these requirements or have any other concerns related to these temporary processes we would encourage you to discuss these concerns with your immediate Supervisor/ Manager and, as necessary, contact your Local or UNA Provincial Office (Phone: 1-800-252-9394; Email: ProvincialOffice@una.ca) and ask to speak to an PRC Advisor for advice.