



Public Health Administration

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FDA and DCA Authorizes Pharmacists to Prescribe Paxlovid, with Certain Limitations

San Bernardino County COVID-19 Provider,

Last week, the [U.S. Food and Drug Administration \(FDA\)](#) revised the [Emergency Use Authorization \(EUA\)](#) for Paxlovid (nirmatrelvir and ritonavir), authorizing state-licensed pharmacists to prescribe Paxlovid to eligible patients. There are certain limitations in place to ensure appropriate patient assessment and prescribing of the treatment. Consistent with the revised EUA, the [Department of Consumer Affairs \(DCA\)](#) has waived restrictions on licensed pharmacists independently initiating and furnishing Paxlovid to patients while being subject to conditions listed below.

- The treatment is ordered and supplied in accordance with the revised FDA EUA including:
 - Sufficient information is available, such as access to patient health records less than 12 months old or consultation with the patient's healthcare provider to assess renal and hepatic function; and,
 - Sufficient information is available, such as access to health records, medical history, or consultation with the patient's healthcare provider to obtain a comprehensive list of medications, including over-the-counter medications the patient is taking to screen for potential drug interactions with Paxlovid;
- The pharmacist should refer the patient for a clinical evaluation with a physician, advanced practice registered nurse, or physician assistant licensed under state law to prescribe drugs if any of the following apply:
 - Sufficient information is not available to assess renal and hepatic function;
 - Sufficient information is not available to assess for potential drug interactions;
 - Modification of other medications is needed due to potential drug interaction;
 - Paxlovid is not an appropriate therapeutic option based on the authorized [Fact Sheet for Healthcare Providers](#) or due to potential drug interactions for which recommended monitoring would not be feasible;
- The pharmacist is certified in basic cardiopulmonary resuscitation;
- The pharmacist maintains documentation for each patient furnished Paxlovid sufficient to demonstrate compliance with the requirements of the EUA; and
- The pharmacist complies with all applicable federal and state recordkeeping and reporting requirements, including medication error and adverse event reporting requirements of the EUA.

Please note, patients should first consider pursuing care from their regular healthcare provider or finding a [Test to Treat](#) site in their area. We thank you for your continued partnership and dedication in protecting the San Bernardino County community against COVID-19.

Thank you,

A handwritten signature in black ink that reads "Michael A. Sequeira MD".

Michael A. Sequeira, M.D.
Health Officer
Department of Public Health

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