

Pharmacists' scope of practice has expanded to include testing and treatment

Michigan Senate Bill 219 was signed into law in July 2023 as Public Act 97 with an implementation date of March 12, 2026. It expands pharmacists' scope of practice to allow them to:

- Provide evaluation and management services for influenza, respiratory infections and COVID-19, including:
 - Independently ordering and administering diagnostic tests for influenza, respiratory infections and COVID-19
 - If the test is positive for COVID-19 or influenza, dispensing appropriate antiviral therapies to treat the individual
- Independently order and administer immunizations recommended by the Advisory Committee on Immunization Practices to individuals 3 years of age and older.

What pharmacies and pharmacists must do to provide expanded services

To provide the services allowed by this law:

- **Pharmacies** must obtain a Clinical Laboratory Improvement Amendments, or CLIA, Certificate of Waiver if administering diagnostic tests.
- **Pharmacists** must complete the required appropriate training, as identified by the Department of Licensing and Regulatory Affairs.

What pharmacies must do to bill for expanded services

To bill for expanded services, pharmacies must join the Blue Cross Vaccine Affiliation program. For additional information, see the following documents:

- [Blue Cross Vaccine Affiliation program overview](#)
- [Blue Cross Vaccine Affiliation program payable procedure codes and billing information](#) — Includes information about the claim filing indicators that are required when submitting electronic 837 professional claims for medical services

Key elements of the law

Under Michigan Public Act 97 of 2023, pharmacists:

- Must complete the appropriate training, as required by the Department of Licensing and Regulatory Affairs.
- Can order and administer immunizations recommended by the Advisory Committee on Immunization Practices to individuals 3 years of age and older, when the pharmacist has

completed the training program required by the Department of Licensing and Regulatory Affairs.

- Must report **all** immunizations they administer to the Michigan Care Improvement Registry.
- Can independently order and administer CLIA-waived tests for COVID-19, influenza or other respiratory illnesses, when they've completed the training program required by the Department of Licensing and Regulatory Affairs.
- May dispense COVID-19 or influenza antiviral therapies to an individual without a prescription from a health care provider. The therapies must be based on the results of a test and meet protocols established by the Centers for Disease Control and Prevention or public health guidelines established by the Department of Health and Human Services.
- Must advise the individual of the test results and refer the individual to a health care provider designated by the individual.

Important: Michigan Public Act 97 of 2023 doesn't affect a pharmacist's authority to order and administer CLIA-waived tests as otherwise authorized under federal law or pursuant to a collaborative practice agreement.

For complete information about Public Act 97, see the following pages on legislature.mi.gov:

- [Michigan Public Act 97 of 2023*](#)
- [MCL - Section 333.9204*](#)
- [MCL - Section 333.9206*](#)
- [MCL - Section 333.17724*](#)
- [MCL - Section 333.17724a*](#)

Additional information

See the provider alert titled [Pharmacists' scope of practice has expanded to include hormonal contraceptives](#).

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