

Practice Directive

Registered Nurses Assisting in Immunization Clinics

**College of Registered Nurses of Prince
Edward Island**

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Background

Over the past few years CRNPEI has received inquiries from Registered Nurses (RNs) about what they should know about giving vaccines **outside their regular workplace**. RNs were seeking guidance around maintaining their [Standards for Nursing Practice](#) while providing this service. Some of the scenarios asked about were: providing the vaccine to staff of an organization, office, or educational institution and were they able to provide vaccines to the office staff as well as the clients?

Before you start there are several things to consider.

CRNPEI's mandate is to protect the public and to ensure safe competent registered nursing practice. Registered Nurses are vital health care providers who administer vaccines in regular seasons as well as during outbreaks and pandemics. Whether an RN is immunizing in a setting such as a public health clinic, doctor's/NP's office, occupational health service, or private agency, the RN often provides the leadership in developing and maintaining a high-quality program. All registered nurses are accountable to apply the CRNPEI [Standards for Nursing Practice](#), ensuring they have the competencies and the authorization to administer the vaccine.

Competencies

Do you have the required competencies specific to giving vaccine?

CRNPEI standards for nursing practice must be adhered to at all times. For example, **Standard 1 - A Unique Body of Knowledge** states each nurse must possess and continually strive to improve upon the specialized body of knowledge based on nursing science relative to the area of nursing practice.

In this case you must determine if you have the necessary knowledge, skills and judgement to safely administer vaccine to the client/population you will be serving.

These competencies include *but are not limited to:*

- Safe administration of the vaccine
- Knowledge of the scientific basics of the vaccine
- Essential vaccine practices and contextual issues relevant to the specific vaccine

Note: It should be noted that some clinics/organizations may require additional certifications and or education about administering vaccine. Check with the employer/organization for any additional required competencies, policies or procedures.

Employment

What will your employment status be when you are giving the vaccine?

Will you be an employee of the health authority, pharmacy, pharmacist, private clinic, educational institution, private business or will you be considered an independent contractor?

Regardless of whether you are an employee or you are considered an independent contractor you must think about your responsibility, accountability and liability.

CRNPEI recommends you contact the [Canadian Nurses Protective Society](https://www.cnpns.ca/) (1-800-267-3390) to discuss issues related to professional liability, professional liability protection, and their contract review services.

CNPS professional liability protection is structured to protect individual eligible RNs from claims for professional liability arising from the provision of professional nursing services. RNs who are independent contractors may need additional liability protection, in addition to the professional liability protection that is offered by CNPS included in the registration with CRNPEI.

RNs who work as independent contractors may also incur general liability.

“General liability” refers to legal liability to a third party imposed by law for bodily injury and/or property damage arising from business operations. This might include, for example, claims for alleged damage RNs might inadvertently cause to the property or the premises used to provide their nursing services. RNs who are working as independent contractors in immunization clinics are encouraged to make inquiries with the owner/operator of the immunization clinic to confirm that they will be covered under the owner/operator’s general liability policy.

Vaccine Order

Do you have a Physician or Nurse Practitioner order to administer the vaccine?

Registered Nurses can only administer vaccines when there is an order written by an authorized prescriber (Physician/NP), or by using a medical directive approved by a medical advisory committee.

Individual orders are not required when a universal immunization program exists. For example, every person over the age of 6 months in PEI is entitled to receive Influenza vaccine. Even in the presence of a medical directive or universal program, it remains the responsibility of the RN implementing the directive to assess the client to determine whether the specific client conditions and situational circumstances identified in the directive/program guideline have been met. In all cases, the RN should possess the necessary knowledge, skill and judgment to implement the directive safely. In the event the RN does not carry out the order/directive appropriately and the patient is harmed, the RN may be found liable.

Informed Consent

What process is in place for you to obtain consent from the client?

According to the [PEI Consent To Treatment And Health Care Directives Act](#), and CRNPEI [Standards for Nursing Practice](#), nurses are accountable for obtaining consent for the interventions they provide. Consent for immunization requires the following elements for a valid consent:

- (a) must be informed;
- (b) must be given voluntarily;
- (c) must not have been obtained through misrepresentation or fraud.

Consent is informed if, before giving it, the client received the information that a reasonable person would require to understand the vaccine to be used and to make a decision about receiving the vaccine, including information about:

- (a) the disease prevented by the vaccine;
- (b) the components of the vaccine;
- (c) alternative treatments;
- (d) expected benefits of the vaccine;
- (e) likely effects and side effects of the vaccine including the outcome with no vaccine
- (f) the client/patient has an opportunity to ask questions.

Consent to treatment and refusal of consent *may be expressed orally or in writing or may be inferred by the client/patient's conduct*, referred to as implied consent. For example implied consent includes presenting at an immunization clinic and rolling up their sleeve to receive the vaccine. The health care practitioner proposing the treatment is responsible for taking reasonable steps to ensure that informed consent is obtained.

In some cases, the nurse obtaining the informed consent may not be the nurse administering the vaccine. This is acceptable as long as the administering nurse reasonably believes that informed consent has been obtained before he/she provides the vaccine.

If the client is incapable of giving consent, the substitute decision-maker must provide consent. Consent can be written or oral. Nurses should document that consent was obtained, either by using a consent form or by recording it in the health record.

Record keeping requirements

Documentation of any patient care or services is essential to safe and effective nursing practice in all settings. The CRNPEI Standards for Nursing Practice apply to the administration of vaccine. CRNPEI **Standard 2, Competent Application of Knowledge** states that the nurse documents in an accurate, timely and thorough manner.