



Date: September 16, 2025

BCD 2025-03 Replaces BCD 2025-01

To: Wisconsin Vaccinators

From: Ryan Westergaard, MD, Ph.D. Chief Medical Officer and State Epidemiologist for
Communicable Disease

STATEWIDE COVID-19 VACCINATION STANDING ORDER FOR THE 2025–26 RESPIRATORY VIRUS SEASON

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Background

COVID-19 remains a significant cause of serious illness, hospitalization, and death in Wisconsin and across the United States. Vaccination with updated seasonal formulations has been shown to reduce emergency visits, hospitalizations, and deaths, as well as to lower the risk of post-COVID conditions (“long COVID”). Multiple large-scale reviews and a recent synthesis by the Vaccine Integrity Project, confirm that vaccines are safe and effective across populations, including children, pregnant individuals, and people with underlying conditions. Major professional organizations—including the American Academy of Pediatrics (AAP), the American College of Obstetricians and Gynecologists (ACOG), and the American Academy of Family Physicians (AAFP)—recommend broad use of updated COVID-19 vaccines.

PURPOSE:

The purpose of this statewide standing order is to reduce morbidity and mortality from COVID-19 by authorizing qualified health care personnel to vaccinate eligible individuals without a patient-specific prescription. This order applies to all persons aged 6 months and older, including pregnant and lactating individuals, consistent with evidence-based recommendations from the American Academy of Pediatrics (AAP), the American College of Obstetricians and Gynecologists (ACOG), the American Academy of Family Physicians (AAFP) and the World Health Organization (WHO). The Food and Drug Administration has formally approved the 2025–2026 formulations for adults aged 65 and older and adults at higher risk of severe disease; however, this order is also intended to authorize vaccination for other groups for whom professional society guidance supports vaccination—such as children, adolescents, pregnant people, and healthy adults under 65—even though these uses are considered “off-label.”

STATEWIDE STANDING ORDER:

A standing order is defined in Wis. Stat. § 450.01(21p) as an order transmitted electronically or in writing by a practitioner for a drug or device for multiple patients or for one or more groups of patients.

AUTHORITY:

As the state lead agency for public health, this standing order is issued pursuant to Wis. Stat. § 250.04(1), which permits DHS to execute what is reasonable and necessary for the prevention and suppression of disease; and pursuant to Wis. Stat. § 250.03(1)(L)1. and 7., which states DHS' role at performing or facilitating the monitoring of health status of populations to identify and solve community health problems and facilitating links for individuals to needed personal health services.

EFFECTIVE DATE:

September 16, 2025 (supersedes all previous versions)

EXPIRATION OF STANDING ORDER:

This standing order shall remain in effect until withdrawn by DHS Medical Officer, DHS Secretary, or either's designee, or on September 11, 2026, whichever comes first. DHS retains the right to modify, rescind, or supplement this order as needed.

APPROVED FOR USE AS A STANDING ORDER BY:

Wisconsin Department of Health Services (DHS)

POLICY:

To be valid under this order, all COVID-19 vaccines must be administered by qualified personnel, as defined below, in accordance with product labeling when applicable and with evidence-based clinical recommendations from professional societies. Vaccination must be conducted in compliance with requirements related to staff qualifications and training, patient eligibility, and administration procedures, as described in detail below.

PROCEDURES:

1. Staffing requirements:

- a. A COVID-19 vaccine can be obtained, ordered, and administered under this order. Only appropriately trained and qualified health care personnel, working within their Wisconsin scope of practice, may administer COVID-19 vaccines under this order ("qualified personnel"). Qualified personnel include physicians, nurse practitioners, physician assistants, registered nurses, licensed practical nurses acting under appropriate supervision, pharmacists, and pharmacy interns and qualified pharmacy technicians acting under the supervision of a licensed pharmacist. All qualified personnel must hold an active Wisconsin license in good standing and meet the training requirements specified below.

2. Training Requirements:

- a. COVID-19 vaccines may be administered only by qualified personnel who have completed training consistent with their Wisconsin scope of practice. Training must include current CDC and DHS immunization best practices, with emphasis on proper storage and handling of vaccines, screening for contraindications and precautions, correct preparation and administration technique (including age-appropriate dosage and injection site), recognition and management of adverse events such as anaphylaxis, documentation of doses in the Wisconsin Immunization Registry (WIR), and reporting of adverse events

and administration errors to the Vaccine Adverse Event Reporting System (VAERS).

3. Vaccine Eligibility and Authorized Products

a. COVID-19 vaccines for the 2025–2026 respiratory virus season may be administered under this order as follows:

i. FDA-approved indications:

1. Pfizer-BioNTech COMIRNATY® (mRNA, 2025–26 formulation): Adults ≥ 65 years; individuals 5 to 64 years of age at increased risk for severe COVID-19.
2. Moderna SPIKEVAX® (mRNA, 2025–26 formulations): Adults ≥ 65 years; individuals 6 months to 64 years of age at increased risk for severe COVID-19.
3. Moderna MNEXSPIKE® (mRNA, 2025–26 formulations): Adults ≥ 65 years; individuals 12 to 64 years of age at increased risk for severe COVID-19.
4. Novavax NUVAXOVID® (protein subunit, 2025–26 formulation): Adults ≥ 65 years; individuals 12 to 64 years of age at increased risk for severe COVID-19.

ii. Additional indications based on professional society guidance and independent evidence reviews:

1. All children and adolescents aged 6 months through 17 years, consistent with AAP recommendations. <https://www.aap.org/ImmunizationSchedule>
2. Pregnant and lactating individuals, consistent with ACOG recommendations. <https://www.acog.org/clinical/clinical-guidance/practice-advisory/articles/2020/12/covid-19-vaccination-considerations-for-obstetric-gynecologic-care>
3. Adults under 65 without chronic health conditions, consistent with AAFP recommendations. <https://www.aafp.org/family-physician/patient-care/prevention-wellness/immunizations-vaccines/immunization-schedules/adult-immunization-schedule.html>
4. Immunocompromised persons of any age, where additional or repeat doses may be clinically indicated.

b. Vaccination may proceed for these groups when, in the judgment of the vaccinating clinician, the benefits outweigh the risks.

4. Procedures for Administration

a. Assess need for vaccination.

- i. All persons aged 6 months and older, including pregnant individuals, are eligible for seasonal COVID-19 vaccination. Offer vaccine regardless of prior infection history.

b. Screen for contraindications and precautions.

- i. Contraindications: Severe allergic reaction (e.g., anaphylaxis) after a previous COVID-19 vaccine dose or to a vaccine component.

- ii. Precautions: History of non-severe, immediate allergic reaction (<4 hours) after a COVID-19 vaccine dose. History of myocarditis or pericarditis within 3 weeks of a COVID-19 vaccine. History of multisystem inflammatory syndrome in children (MIS-C) or adults (MIS-A). Moderate to severe acute illness, with or without fever.
- c. Provide Vaccine Information Statements.
 - i. Give the current federal Vaccine Information Statement (VIS) for COVID-19 vaccine, in the patient's preferred language when available.
- d. Prepare to administer vaccine.
 - i. Verify product label indicates the 2025–2026 formula. Select appropriate product, dose, needle gauge/length, and injection site by age and weight.
- e. Administer the vaccine.
 - i. Use any FDA-approved or authorized COVID-19 vaccine appropriate by age and health status (e.g., COMIRNATY®, SPIKEVAX®, MNEXSPIKE®, NUVAXOVID®). Follow product-specific dosage instructions.
- f. Document the vaccination.
 - i. Record date, product, lot number, dose, site, route, and vaccinator in the patient's medical record and the Wisconsin Immunization Registry. Provide a record card to the patient.
- g. Be prepared to manage medical emergencies.
 - i. Ensure immediate availability of epinephrine and emergency response equipment. Observe vaccine recipients for at least 15 minutes post-vaccination (30 minutes for those with history of anaphylaxis).
- h. Report adverse events.
 - i. Submit clinically significant adverse events to VAERS at www.vaers.hhs.gov or by calling 800-822-7967.
 - ii. The administering qualified provider is responsible for responding to FDA requests for information about COVID-19 vaccine administration errors, adverse events, cases of MIS in children and adults and cases of COVID-19 that result in hospitalization or death following administration of COVID-19 vaccine to recipient patients.

SIGNATURE:

DATE: September 16, 2025



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By following this order, qualified personnel performing under this order attest they have read, understand, and shall follow this order.