

## **Opposition unless amended: HB76 Health Occupations - Pharmacists - Administration of Vaccines**

1/30/2024

Maryland House of Representatives  
Health and Government Operations Committee  
Room 241  
House Office Building  
Annapolis, Maryland 21401

Dear Honorable Chair, Vice-Chair and Members of the Committee:

On behalf of the pediatric nurse practitioners (PNPs) and fellow pediatric-focused advanced practice registered nurses (APRNs) of the National Association of Pediatric Nurse Practitioners (NAPNAP) Chesapeake Chapter, I am writing to express our opposition of **HB76 Health Occupations-Pharmacists - Administration of Vaccines unless amended.**

This legislation would allow pharmacists to be able to administer vaccines approved and licensed by the FDA and administered according to the schedule established by the CDC's Advisory Committee on Immunization Practices to children as young as 5 years old. We know that pharmacies have consistently increased annual influenza vaccination rates and most recently significantly supported the uptake of COVID-19 vaccines. We are grateful that the bill includes language that discusses the importance of well visits with patients and adult caregivers.

We understand the need for vaccinations to be available across many health care locations to increase access to care and vaccination rates. However we are concerned with the minimum age requirement and the required reporting documentation to IMMUNET. **We suggest amending the bill to reflect the following:**

- **Minimum age to 7 years.**
- **Requiring all vaccinations including influenza vaccination to be entered into IMMUNET in the same time frame that providers are required to document the administration of vaccines.**

We do not want to miss opportunities to see patients for vaccinations at their annual child visits under 7 years of age as significant developmental surveillance is completed. In addition to routine immunizations, providers routinely perform preventive screening, routine exam updates, counseling and anticipatory guidance. We also address vaccination questions and hesitancy. By shifting routine vaccination to pharmacies patients will miss out on these important components of health. Vaccinating a five year old can be very challenging and often requires vaccinations to be administered into the thigh muscles exposing the child.. It also usually requires more than one support staff to hold down the child to administer the vaccines. These make it challenging for privacy and safety iif vaccination occurs in a pharmacy without a specific location, exam table and support staff to make vaccination as quick as possible. In addition, the immunization schedule is very detailed and intervals are very specific and must be followed to be considered fully immunized. There are age specific doses for adults versus

children. Influenza vaccination requires two separate doses the first year a child is immunized to be considered fully vaccinated. Failure to upload these vaccinations to IMMUNET could leave a child not fully vaccinated. Additionally, requiring pharmacists to enter all vaccinations including influenza into ImmUNET will ensure seamless record keeping and prevent incorrect vaccine intervals, duplicate doses or missed opportunities for vaccinations in either the primary care office or the pharmacy setting.

Also of note currently pharmacies are not able to vaccinate children who receive vaccinations from the Vaccines for Children (VFC) supply. The Vaccines For Children (VFC) program is a federally funded program that provides vaccines at no cost to children who might not otherwise be vaccinated because of inability to pay. We understand that federal legislation is needed to allow pharmacies to become eligible to administer VFC vaccines, however this is a significant barrier to the uptake of vaccinations. Pharmacies must be able to administer VFC vaccines to promote health equity and not continue to widen social determinants of health.

For these reasons the Maryland Chesapeake Chapter of NAPNAP extends their opposition to **HB76 Health Occupations-Pharmacists - Administration of Vaccines unless the bill is amended to:**

- **Increase the minimum age to 7 years for all vaccinations**
- **Requiring all vaccinations including influenza vaccination to be entered into IMMUNET in the same time frame that providers are required to document the administration of vaccines.**

The pediatric advanced practice nurses of your state are grateful to you for your attention to these crucial issues. The members of Chesapeake Chapter of the National Association of Pediatric Nurse Practitioners memberships includes over 200 primary and acute care pediatric nurse practitioners who are committed to improving the health and advocating for Maryland's pediatric patients. If we can be of any further assistance, or if you have any questions, please do not hesitate to contact Lindsay J. Ward, the Chesapeake Chapter President at 410-507-3642 or [MDChesNAPNAPLeg@outlook.com](mailto:MDChesNAPNAPLeg@outlook.com).

Sincerely,



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