

January 30, 2024  
Denee Daly Street, MD

## **Oppose/UNFAV HB76: Health Occupations - Pharmacists - Administration of Vaccines**

To Madam Chair, HGO Committee and Committee Members:

I am writing to express my opposition to **House Bill 76** Health Occupations- Pharmacists- Administration of Vaccines that would allow pharmacists to vaccinate children age five and over without a doctor's prescription.

Children already have access to receive vaccines at doctor's offices, where an experienced, trained doctor can also assess the child's health. Pharmacists are not trained in that capacity. Further, Pharmacies are crowded, chaotic and pharmacists are busy and focused on filling and managing prescriptions. Pharmacists are overwhelmed already with adult vaccines. What happens when reluctant, screaming children are added to their workload?

When the ACIP (Advisory Committee on Immunization Practices) met in Sept 2022, pharmacists voiced concerns about administration of Covid bivalent boosters in pharmacies. Concerns included administration errors, the vaccination work being outside the normal pharmacy work flow. The ACIP meeting participants went further to say that the extra work was not conducive or practical in a busy pharmacy; this is why and how mistakes happen they said.

A reasonable conclusion is that even more mistakes will happen if pharmacists are burdened with giving pediatric vaccines, despite their best efforts. Compounding the concern is that pharmacists are not pediatricians. They are not trained in the assessment of vaccine appropriateness and readiness. We must not allow children to be endangered that way.

Shoulder injuries need to also be considered. Shoulder injuries related to vaccine administration are on the rise with the advent of pharmacies giving immunizations. There is a growing number of compensations by the federal government with more people getting their immunization outside of the doctor's office.

In addition, managing and giving childhood vaccines scatters the focus of the

pharmacist. It also hinders pharmacy customers from getting their pharmaceuticals if a pharmacist has to stop filling prescriptions every time a child walks up for a shot.

Pharmacists are not pediatricians and are not trained in the assessment of vaccine appropriateness and readiness. Pediatricians are specifically trained for this to reduce risk for serious harm or death. I think about the complicated schedule for childhood vaccines where they receive multiple shots at once and its not just the thought of a busy pharmacist without a pediatrician's training giving these shots, but also that the bill says the child can be vaccinated in the presence of a "caregiver". This should only be in the presence of a parent or legal guardian.

A child's best health outcomes happen when the parent and pediatrician work as a team, taking into consideration the health history, precautions, and any contraindications before making any medical decisions.

I respectfully request that you NOT pass **House Bill 76** Health Occupations- Pharmacists- Administration of Vaccines forward to a vote.

Thank you,

Denee Daly  
Street, Maryland resident