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March 2, 2021

To: The Honorable Paul G. Pinsky  
Chair, Education, Health, and Environmental Affairs Committee

From: The Office of the Attorney General, Health Education and Advocacy Unit

Re: Senate Bill 808 (Health Occupations- Licensed Dentists- Administration of Vaccinations): Letter of Concern

The Office of the Attorney General's Health Education and Advocacy Unit (HEAU) has concerns about Senate Bill 808 which would authorize dentists to administer vaccinations in much the same way that pharmacists are authorized by § 12-508 of the Health Occupations Article. Dentists would be allowed to administer (1) flu vaccines to children aged 9-18, (2) childhood vaccinations on the Centers for Disease Control and Prevention's (CDC) Recommended Immunization Schedule to children 11-18 years old, if prescribed by an authorized prescriber, and (3) to adults, vaccines listed in the CDC's Recommended Immunization Schedule or the CDC's Health Information for International Travel.

The HEAU acknowledges there may be value in increasing the availability of vaccinations to adults, and that pharmacists are allowed to administer vaccinations to children. But dentists provide services in a way that pharmacists do not, increasing the risk of misapprehension by some parents that childhood immunizations delivered by a child's dentist are acceptable substitutes for pediatrician visits, when they are not. We believe dentists and pharmacists should be required to expressly recommend parents take their children to the pediatrician for office visits, in keeping with recognized guidelines.

The HEAU has long advocated for accessible, affordable health care for families in Maryland, many of whom now have improved access to pediatricians, primary care providers and preventive care services like vaccinations, often without out-of-pocket costs

under improved insurance coverage. We are concerned that vaccination services that are covered when delivered by pediatricians and primary care providers may not be covered in the same way by private insurance because dentists are not usually on medical insurance provider panels. This places patients who would likely have no-cost coverage of the services at risk for surprise bills.

Based on similar concerns, this committee adopted an amendment to Senate Bill 84 (Pharmacists – Administration of Self-Administered Medications and Maintenance Injectable Medications) requiring a pre-service Medical Billing Disclosure. We believe a disclosure tailored to the delivery of vaccines by dentists as proposed in this bill would mitigate our concerns. The document could also include the recommendations about pediatric care for minor patients.

Thank you for considering our concerns.

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