



MID-ATLANTIC ASSOCIATION OF
COMMUNITY HEALTH CENTERS

TO: The Honorable Paul G. Pinsky, Chair
Members, Senate Education, Health, and Environmental Affairs Committee
The Honorable Chris West

FROM: Pamela Metz Kasemeyer
J. Steven Wise
Danna L. Kauffman

DATE: March 2, 2021

RE: **OPPOSE** – Senate Bill 808 – *Health Occupations – Licensed Dentists – Administration of Vaccines*

On behalf of the Maryland Chapter of the American Academy of Pediatrics and the Mid-Atlantic Association of Community Health Centers, we submit this letter of **opposition** for Senate Bill 808.

Senate Bill 808 authorizes a licensed dentist to administer influenza vaccines to a patient who is at least 9 years old without a prescription from an authorized provider and to a child ages 11-18 with a prescription. It also authorizes dentists to administer vaccines listed in the CDCs recommended immunization schedule as well as international travel vaccines to adults.

While there is not opposition to considering how dentists could be appropriately incorporated into the permanent framework of vaccine administration, there has been no deliberative discussion involving dentists and other health care providers engaged in vaccine administration to define an appropriate framework. Senate Bill 808 simply duplicates the existing statutory framework for pharmacist administration. There should be a more thorough discussion of the appropriate framework for authorization before legislation is enacted.

It should be noted that Senate Bill 808 recognizes the importance of requiring a prescription from a pediatric provider for the administration of a vaccine, other than influenza, for children ages 11-18 and that administration should be prohibited for children under the age of 11 (age 9 for influenza). As noted in discussions related to expanding vaccine administration authority for children to pharmacists, the unintended consequences of fragmenting care for children outweighs the perceived benefit of expanding access – especially given that Maryland has one of the highest vaccination rates in the country.

The above-named organizations look forward to having a dialogue with the dental community on how they may be engaged in expanding access to vaccines through an appropriately structured authorization framework but do not believe that legislation should be enacted prior to such a dialogue. An unfavorable report is requested.

For more information call:

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