

HB 1040 – Health Occupations – Pharmacists – Administration of Vaccinations – UNFAVORABLE

Dear Chair Pendergrass, Vice-Chair Peña-Melnyk, and Members of the House Health & Government Operations Committee,

I am writing to convey my strong opposition to HB 1040 – Health Occupations – Pharmacists – Administration of Vaccinations.

Why in the world would we give pharmacists (or anyone) license to administer all vaccines to any child age 3 and up **without** any doctor's prescription needed?

Previous similar bills which would have allowed pharmacists to vaccinate children age 9 and up **without** any doctor's prescription needed have wisely been given an UNFAVORABLE report by both House and Senate committees and this bill should quickly be given the same.

Pharmacists are not trained in assessment of children for appropriate vaccines and do not have the child's complete medical history, past vaccinations, allergies and contraindications, etc.

Many pharmacies are already troubled with excessive prescription errors and are too busy and chaotic to take on an additional responsibility this serious. Pharmacists should never have to stop their primary responsibility to vaccinate children at the drop of a hat.

There cannot possibly be sufficient time and focus in the middle of a busy pharmacy for the pharmacist to have the necessary conversations with a parent, review previous medical records, and do an assessment of a child for the appropriateness of each vaccine. There needs to be time for the discussion about risks and benefits of each vaccine so that true informed consent can be given and there also needs to be a relationship in place for follow-up should there be questions or adverse reactions post-vaccination. I actually just heard from an acquaintance that she has had to contact her family's pediatrician for follow-up visits regarding post-vaccination reactions her children experienced, and this is not something that a pharmacist is equipped to deal with, nor is it part of their job.

All vaccines given should be documented in the patient's medical record. A family may not have an accurate recollection of whether certain vaccines have or have not been given already and there is a strong risk of double-dosing if proper documentation is not kept.

Getting vaccines isn't supposed to be the only reason children see a health practitioner, particularly children as young as age 3! Going to the pharmacy for a vaccine, especially without a prescription or any prior assessment of appropriateness, is not a replacement for an established and ongoing relationship between patient, parent, and doctor. If the reason a family is going to a pharmacy to get vaccines without a prescription or assessment is that they do not have access to a doctor, this bill does nothing to remedy that and is entirely the wrong solution to the real problem.

Pharmacies and pharmacists are meeting quotas and getting bonuses based on the number of vaccines given, and pharmacies are offering bonuses for people to get vaccinations as well. This is not health care, these are strictly marketing and moneymaking schemes! These incentives and enticements added to the hectic environment of many pharmacies make it even more likely that a child may accidentally be given vaccines they have already received, simply to obtain a gift card. Pharmacists also have zero liability if a child is harmed in the process.

Another concern I have is that the incidence of SIRVA (Shoulder Injury Related to Vaccine Administration) has been known to go up when additional providers such as busy pharmacies get more involved in the business of administering vaccines. SIRVA has nothing to do with any risks related to the vaccine or its ingredients but is simply from improperly performing the vaccination procedure in a way that damages the patient's shoulder, often permanently. It is preventable and in some cases treatable if detected early, but failure to observe proper procedures can lead to life-long shoulder damage, pain, and disability. Not something I want for my children.

Certain vaccines require a post-administration observation period which cannot adequately be done in the middle of a busy pharmacy or when the pharmacy staff are returning to their primary duties.

All in all, this bill puts children at risk for increased medical errors and undermines the doctor-patient relationship, as well as causing more chaos in pharmacies which are already having difficulty performing their primary job. Our children deserve better. Please return an UNFAVORABLE report on HB 1040. Thank you.

Sincerely,

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