



DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

February 28, 2023

The Honorable Melony Griffith
Chair, Senate Finance Committee
3 East, Miller Senate Office Building
Annapolis, MD 21401-1991

RE: SB 372 - Health Occupations – Pharmacists – Administration of Vaccines – Letter of Support

Dear Chair Griffith and Committee Members:

The Maryland Department of Health (MDH) submits this letter of support for Senate Bill (SB) 372 - Health Occupations – Pharmacists – Administration of Vaccines. SB 372 extends the current state and federal authority of pharmacists who meet certain training and other requirements to administer vaccinations to children ages three years old and older.

Vaccinations are one of the most important public health interventions. Pharmacists have demonstrated that they can safely administer vaccinations to children as young as three years old.¹ While coverage rates for routine childhood vaccines are relatively high in Maryland compared to other states, gaps still exist.² One method to address gaps is ensuring access to vaccinations at convenient times and locations.³ Pharmacies are located throughout the state, including in areas with a lack of pediatricians or other health care providers. Pharmacies also often operate after the usual hours of some medical practices, making them convenient settings for vaccinations for working parents and adults.⁴

In other states, questions have been raised about communication between pharmacists providing vaccinations and physicians caring for patients. However, in Maryland, pharmacists administering vaccinations are required to report vaccinations to the state's immunization information system, ImmuNet, where providers and their patients can access immunization history. Based on data obtained from ImmuNet, 98% of vaccine doses reported by pharmacists are available within ImmuNet within seven days which suggest information is readily available to other health care providers.

¹ *The Prep Act and Covid-19, Part 2: The Prep Act Declaration ... - Congress.* <https://crsreports.congress.gov/product/pdf/LSB/LSB10730>.

² "ChildVaxView Interactive Child Vaccination Coverage." *Centers for Disease Control and Prevention*, Centers for Disease Control and Prevention, 28 Sept. 2020, <https://www.cdc.gov/vaccines/imz-managers/coverage/childvaxview/interactive-reports/index.html>.

³ Goad, Jeffery A., et al. "Vaccinations Administered during off-Clinic Hours at a National Community Pharmacy: Implications for Increasing Patient Access and Convenience." *Annals of Family Medicine*, The Annals of Family Medicine, 1 Sept. 2013, <https://www.annfammed.org/content/11/5/429.short>.

⁴ Kuehn, Michael, et al. "Assessing Barriers to Access and Equity for Covid-19 Vaccination in the US - BMC Public Health." *BioMed Central*, BioMed Central, 3 Dec. 2022, <https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-022-14636-1>.

MDH believes that pharmacists can safely expand access to a range of vaccines and are important in strengthening Maryland's immunization infrastructure by addressing vaccination gaps and inequities in our state.

If you would like to discuss this further, please contact Megan Peters, Acting Director of Governmental Affairs at megan.peters@maryland.gov or (410) 260-3190.

Sincerely,

A handwritten signature in blue ink, appearing to read "LH Scott".

Laura Herrera Scott, M.D., M.P.H.
Secretary