



**Date:** February 13, 2024

**To:** The Honorable Pamela Beidle, Chair

**From:** Aliyah N. Horton, FASAE, CAE, Executive Director, MPhA, 240-688-7808

**Cc:** Members, Senate Finance Committee

**Re:** **FAVORABLE SB 18** – Health Occupations - Pharmacists - Administration of Vaccines

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The Maryland Pharmacists Association (MPhA) urges a favorable report for **SB 18 – Health Occupations – Pharmacists – Administration of Vaccines**.

- SB 18 would essentially codify the authorization of pharmacists to order and administer pediatric vaccinations without a prescription and based on the Advisory Committee on Immunization Policies (ACIP) immunization schedule, as included in amendments to the federal PREP Act.
- The PREP Act amendments were made in recognition of pharmacy accessibility, history of safe administration of vaccinations in pharmacies and decreased vaccination rates among children during the COVID-19 pandemic, which continue.
- As introduced, the bill raises the minimum age from three-years old to five years-old. The age increase is a compromise from bills offered in previous years to address the concerns of the physician community.
- The bill is simply an opportunity to finalize what has been in practice for nearly four years.
- The study by the Maryland Department of Health (MDH) presented to the committee reported on the impact of pharmacists engaging in the practice; including responses to research points specifically requested by the physician community. MDH has not made recommendations to roll back the authorizations.
- Failure to pass SB 18 will result in a decrease in expectation of healthcare access for Marylanders.
- MPhA recognizes that it is crucial for children to be routinely evaluated by their physicians. The bill creates an entry point, not an end point.
- 11 Maryland counties are designated health professional shortage areas (HPSA); another 12 communities are designated as HPSA.
- More than 40% of children in Maryland are without a “medical home.” They do not have a consistent relationship with a healthcare provider for well child visits and checkups.
- SB 18 addresses broad public health concerns by providing more flexibility and opportunities for families to meet their medical needs and the requirement of pharmacists to counsel on the importance of well-child visits and the need for patients to follow-up with a health care provider.

- Pharmacists will provide a linkage to healthcare providers and the opportunity for creating new patient-physician relationships.
- Pharmacists/pharmacies have clear protocols in place for patient screenings to ensure vaccinations are appropriate. These protocols and training support:
  - identification and assessment of patients in need of service.
  - mitigation of medication side effects
  - avoidance of contraindications
  - administration of vaccinations; and
  - provision of emergency care, if required
- The provision of emergency care is no different in a pharmacy than in a physician's office (not located in a hospital system).
- Additional safeguards are in place. Maryland law requires practitioners to report all immunizations into the ImmuNet system, so all physicians and pharmacists have access to a patient's records.

## Pharmacy Workforce Concerns

Until the General Assembly fixes the Medicaid MCO payment model, lack of reimbursements will continue to put a strain on pharmacy services. Maryland pharmacists should be supported in practicing at the top of their education and on par with their colleagues around the country. They should not be penalized for seeking to provide services that support public health goals and may aid in the sustainability of their businesses.

All segments of the health care workforce are under stress including primary care and pediatricians, making it even more important that legislators work to:

- 1) reduce barriers to care for consumers;
- 2) support processes for efficiencies; and
- 3) make evidence-informed decisions so that pharmacists may provide care those in need and meet patients where they are.

A few laws and regulations, focused on pharmacy technicians, have been approved in the last year that address workforce and operational efficiencies in pharmacies. They are expected to have particular impact in the community chain pharmacy setting.

Pharmacists have been given authority to delegate additional technical tasks to technicians, which leave pharmacists more time to focus on patient counseling and other clinical activities. Please note all of these went into effect in within the last year.

- Technician remote entry of prescription data
- Technician administration of influenza, COVID-19, pneumonia vaccines to individuals at least 18 years old; and RSV or shingles vaccination to individuals at least 50 years-old
- Establishment of a new pharmacy technician category - *Validated Pharmacy Technician* . The regulation permits a validated pharmacy technician to perform final product verification of prescription and medication orders, as well as of medications selected for stocking into medication distribution systems. (eff. January 28, 2024)



**MARYLAND PHARMACISTS ASSOCIATION** - Founded in 1882, MPhA is the only state-wide professional society representing all practicing pharmacists, pharmacy technicians and student pharmacists in Maryland. Our mission is to strengthen the profession of pharmacy, advocate for all Maryland pharmacists and promote excellence in pharmacy practice.

A **FAVORABLE** report is also supported by the Maryland Pharmacy Coalition of which MPhA is a member.

**Full members:**

- Maryland Pharmacists Association
- American Society of Consultant Pharmacists - Maryland Chapter
- Maryland Pharmaceutical Society
- Maryland Society of Health System Pharmacists
- University of Maryland Baltimore School of Pharmacy Student Government Association
- University of Maryland Eastern Shore School of Pharmacy Student Government Association
- Notre Dame of Maryland University School of Pharmacy Student Government Association

**Affiliate members:**

- Maryland Association of Chain Drug Stores
- University of Maryland Baltimore School of Pharmacy
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