



## DEPARTMENT OF HEALTH

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Secretary

March 16, 2022

The Honorable Paul G. Pinsky, Chair  
Education, Health and Environmental Affairs  
Committee  
Miller Senate Office Building, 2 West  
Annapolis, MD 21401

The Honorable Shane E. Pendergrass,  
Chair, Health and Government  
Operations Committee  
House Office Building, Room 241  
Annapolis, MD 21401

**Re: SB 736/HB 1040 (Chapters 792 and 793 of the Acts of 2021) - Health Occupations - Pharmacists - Administration of Children's Vaccines - Study and Temporary Authority**

Dear Chairs Pinsky and Pendergrass:

Pursuant to Health Occupations - Pharmacists - Administration of Children's Vaccines - Study and Temporary Authority (HB 1040/SB 736) (2021), the Maryland Department of Health (MDH) is directed to produce a report, in consultation with the State Board of Pharmacy, to the Senate Education, Health, and Environmental Affairs Committee and the House Health and Government Operations Committee. In accordance with § 2-1257 of the State Government Article, MDH must include information it determines is important for setting policies for authorizing pharmacists to administer vaccinations to children, including: (1) the number of vaccines administered to children by pharmacists in accordance with the requirements of Section 1 of this Act; (2) the effectiveness and efficiency of ImmuNet; and (3) whether the option for children to be administered vaccines by pharmacists has led to changes in well-child visits with pediatric primary care providers.

Md. Ann. Code Health-General Article §18-109 requires an ImmuNet program. The current ImmuNet platform was implemented in 2010 as a database to capture and record an individual's vaccination records and provide a web-based tool for healthcare providers and schools to keep their patient and/or student vaccinations up-to-date. Health-General Article §§12-508 and 18-109, respectively, require pharmacists and local health departments to report all vaccinations to ImmuNet. In October 2019, HB 316 (2019) amended the law to require vaccinations administered by all providers in Maryland be reported to ImmuNet with the exception of those administered in nursing facilities, assisted living programs, continuing care retirement communities, or medical day care programs. Since its inception, ImmuNet has captured over 74 million vaccinations and has nearly 8,000 registered organizations throughout the state. Additionally, providers in the federal Vaccines for Children (VFC) program are required to order vaccinations for their VFC eligible population in ImmuNet. Since the capability to support this was developed, VFC providers have ordered over 16 million vaccinations. ImmuNet serves

as the primary source for COVID-19 vaccination data, and all doses of COVID-19 vaccinations are ordered through ImmuNet.

Table 1 provides the following data from all time as measurements of ImmuNet’s overall efficiency and effectiveness in surveilling vaccinations in the state: the total number of vaccinations administered by pharmacists to children, vaccinations recorded in ImmuNet, organizations registered with ImmuNet, vaccinations ordered in ImmuNet, and the percentage of providers reporting to ImmuNet. In accordance with Health-General Article §12–508, pharmacists are required to report all vaccinations administered to ImmuNet.

**Table 1: Total Vaccinations, Providers, and Organizations Reported to ImmuNet, Maryland, 2018-2020**

Indicator	CY 18	CY 19	CY 20
Vaccinations administered to children by pharmacists (<18 years of age)	33,519	33,507	70,016
Vaccinations recorded in ImmuNet	4,667,683	4,885,797	4,733,823
Organizations in ImmuNet	3,924	4,154	6,138
Vaccinations ordered in ImmuNet	1,072,708	1,168,669	1,172,299
Percent of providers reporting to ImmuNet	66%	69%	47%

MDH’s Prevention and Health Promotion Administration and Maryland Medicaid worked together to provide data on well-child visits with pediatric primary care providers prior to and after the enactment of this legislation. This data is presented in Table 2.

**Table 2: Medicaid Enrollees Well-Care Visits and Vaccinations, Maryland, 2018-2020**

Indicator	CY 18	CY 19	CY 20*
Total Enrollees	564,000	565,922	564,057
Enrollees with a Well-Care Visit	338,510	345,143	295,786
Enrollees with a Vaccination from a Non-Pharmacy Provider	231,551	230,044	206,086
Enrollees with a Well-Care Visit and a Vaccination from a Non-Pharmacy Provider	208,685	208,894	185,732
Enrollees with a Vaccination from a Pharmacy	5,701	5,108	10,913
Enrollees with a Well-Care Visit and a Vaccination from a Pharmacy	3,739	3,398	6,138
Enrollees with Any Vaccination	234,938	233,343	213,800
Enrollees with a Well-Care Visit and Any Vaccination	210,364	210,633	188,981

\*Service utilization in CY20 may be impacted by the COVID-19 pandemic

The results of an analysis of Medicaid data conducted by The Hilltop Institute show that enrollees receiving vaccinations from a pharmacy increased in number while those receiving vaccinations in other settings declined during the study period. However, it is important to note that providers may submit fee-for-service (FFS) claims for up to 12 months after the date of service. Therefore, an insufficient period has passed to gather all claims and encounters rendered

for the entire measurement period. Data for this period are considered preliminary at this time. Additionally, service utilization in calendar year 2020 may be impacted by the COVID-19 pandemic.

If you have questions about this report, please contact Heather Shek, Director, Office of Governmental Affairs, at 410-767-5282 or [heather.shek@maryland.gov](mailto:heather.shek@maryland.gov).

Sincerely,

A handwritten signature in cursive script, reading "Dennis R. Schrader".

Dennis R. Schrader  
Secretary

cc: Jinlene Chan, MD, MPH, FAAP, Deputy Secretary, Public Health Services  
Steven R. Schuh, MA, Deputy Director for Health Care Financing Administration and Medicaid Director  
Heather Shek, JD, MS, Director, Office of Governmental Affairs  
Donna Gugel, MHS, Director, Prevention and Health Promotion Administration  
Deena Speights-Napata, MA, Executive Director, Maryland Board of Pharmacy  
David Blythe, MD, MPH, Director, Infectious Disease Epidemiology and Outbreak Response Bureau  
Sarah Albert, Department of Legislative Services, 5 copies (MSAR # 13347)