

March 23, 2026

The Honorable Heather Bagnall, Chair  
House Health Committee  
Lowe House of Delegates Building  
Maryland General Assembly  
Annapolis, Maryland 21401

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**RE: SB 773 Health Occupations - Pharmacists - Vaccination Orders**

Chairman Bagnall and Members of the Committee:

On behalf of AstraZeneca, thank you for the opportunity to provide written testimony in support of SB 773. AstraZeneca is a global, science-led biopharmaceutical company that focuses on the discovery, development, and commercialization of prescription medicines in Oncology, Rare Diseases, and BioPharmaceuticals, including Cardiovascular, Renal & Metabolism, Respiratory & Immunology, and Vaccines and Immune Therapies. Maryland is home to our largest U.S. footprint, including advanced manufacturing and R&D operations. We employ over 5,500 Marylanders across sites in Gaithersburg, Frederick and Rockville.

AstraZeneca appreciates the opportunity to share its perspective in support of legislation intended to broaden access to vaccines by updating Maryland law to reflect modern, FDA-approved vaccine delivery approaches. Ensuring that residents can receive timely access to vaccines remains a shared public health priority, particularly as the delivery of care continues to evolve beyond traditional clinical settings.

We also note that the Maryland Department of Health and the Maryland Board of Pharmacy have offered support for SB 773 as introduced, underscoring that the bill aligns with existing public health objectives and contemporary pharmacy practice in the state. Their support reflects confidence that clarifying pharmacist authority for ordering, dispensing, and counseling on FDA-approved vaccines—including those approved for self-administration—can expand access while maintaining strong safeguards.

Vaccination access is strongest when patients are offered multiple, complementary pathways to care. Pharmacies have long served as trusted, community-based access points for preventive health services, and pharmacists play an increasingly important role in helping patients navigate vaccination options. As new forms of vaccines become available, including options approved for self-administration, it is important that state law clearly enables pharmacists to participate in those models in a way that is consistent with their training and professional responsibilities.

Current statutory language does not fully reflect this evolution. In particular, it does not clearly account for circumstances in which a vaccine is approved for home delivery and self-administration. Under these conditions, the pharmacist's role is focused on clinical review, prescribing, dispensing, and patient education rather than vaccine administration. Clarifying this authority removes an unintended barrier that can limit access for individuals who may otherwise benefit from additional vaccination access options.

Decreasing barriers and expanding access in this way supports public health goals without disrupting existing care models. Individuals will continue to have the option to receive vaccines through physicians' offices, clinics, and in-pharmacy administration. Providing an additional pathway simply increases flexibility for patients and caregivers who may face scheduling, transportation, or other access challenges.

Safety and oversight remain central to this approach. Vaccines that are FDA approved for self-administration are supported by established prescribing information, defined eligibility criteria, and standard adverse-event reporting requirements. Vaccines approved for use in the United States undergo rigorous FDA evaluation and are accompanied by clear prescribing information, defined eligibility criteria, and standard adverse-event reporting requirements. The vast majority of vaccine side effects are minimal and self-limited—such as transient injection-site pain, mild fatigue, headache, or low-grade fever—while serious adverse events are rare and are monitored through established surveillance systems. Pharmacists operate within well-regulated professional frameworks and are accustomed to managing prescription therapies that require careful screening, counseling, follow-up and Immunet reporting.

Maryland's Immunet immunization information system provides an additional layer of safety and oversight. Pharmacists are already required to report administered vaccines to Immunet, which helps prevent duplicative vaccinations, supports clinical decision-making, and enables rapid identification and follow-up of potential adverse events. Immunet incorporates safeguards for data accuracy, patient privacy, and secure data exchange, and it aligns with established consent and confidentiality standards in Maryland. Clarifying pharmacist authority under SB 773 operates within these existing protections and does not alter any Immunet reporting requirements.

In addition, SB 773 does not create new liability for pharmacists or other providers and does not impact existing pathways that support individuals in the rare event of a serious vaccine-related injury. Federal programs provide important backstops for vaccine-related injuries, namely: influenza vaccines are covered under the National Vaccine Injury Compensation Program (VICP), and COVID-19 vaccines are covered under the Countermeasures Injury Compensation Program (CICP) during the period in which they are designated as covered countermeasures under the PREP Act. These programs help ensure that, in addition to strong pre- and post-marketing safety systems, patients have access to compensation mechanisms when appropriate.

Across the country, states are increasingly updating their laws to ensure that vaccination policy keeps pace with federally approved innovations and contemporary pharmacy practice. These efforts reflect recognition that improving access does not require lowering standards, but rather ensures that statutory frameworks are sufficiently clear and adaptable.

AstraZeneca believes this legislation represents a pragmatic step toward strengthening public health prevention efforts in Maryland. By clarifying pharmacist authority in a limited and thoughtful manner, the state can support broader vaccine access, preserve patient choice, and reinforce the role of pharmacists as accessible health care providers within their communities. For these reasons, AstraZeneca respectfully supports a favorable report.

Thank you for your consideration and the opportunity to provide feedback on this important legislation. We urge a favorable report on SB 773.

Sincerely,



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