



Sept. 2, 2020

**Testimony of the Connecticut Pharmacists Association
Re: Authorization for Licensed Pharmacists to Order and Administer COVID-19 Vaccines**

Dear members of the Public Health, Human Services and Appropriations Committees:

As an organization representing pharmacists and pharmacies, we are proud of the crucial efforts that our members have undertaken to help our state respond to the COVID-19 pandemic by providing patients access to tests for the COVID-19 virus. The Department of Health and Human Services (“HHS”) helped expand the availability of COVID-19 tests on April 8, 2020, when HHS issued official guidance declaring that licensed pharmacists are authorized under the Public Readiness and Emergency Preparedness (“PREP”) Act to order and administer FDA-authorized COVID-19 tests.^{[1](#)} HHS further clarified the ability of pharmacists to respond to the current public health emergency on May 19, 2020, when the HHS Office of the General Counsel issued an Advisory Opinion explaining that the PREP Act preempts any state or local requirement that prohibits or effectively prohibits a pharmacist from ordering and administering FDA-authorized tests for COVID-19.^{[2](#)}

Connecticut pharmacists are currently authorized to administer all vaccines on the CDC’s Advisory Committee on Immunization Practices (“ACIP”) list to adult patients age 18 and over. But it is anticipated that the COVID-19 vaccine will be approved by Food and Drug Administration (FDA) many months before it is added to the ACIP list, so to further help Connecticut rapidly recover from the pandemic, we ask you to authorize pharmacists to order and administer all COVID-19 vaccines that the FDA authorize or approve to prevent the COVID-19 virus.

In Connecticut, hundreds of pharmacists have been trained and certified to administer vaccines and are integral members of the “immunization neighborhood.” To successfully achieve our state’s COVID-19 and routine vaccination goals, providing protection against vaccine preventable diseases will take collaboration, coordination, and communication among all stakeholders. As demonstrated during the 2009 H1N1 pandemic, and even more broadly over the last decade, removing barriers to pharmacy-based immunization meaningfully improves vaccine uptake.^{[3](#)} Therefore, we urge you to leverage the clinical expertise, knowledge, and accessibility of pharmacists by proactively removing barriers to patient access, across the lifespan, to COVID-19 vaccines. Given the success to date of pharmacists administering vaccines, serving as knowledgeable and accessible immunization providers within their communities and their collaboration with public health and other providers, a successful vaccination plan must actively involve pharmacists. An all-hands-on-deck approach will be needed. With the right resources, pharmacists will dramatically expand access to COVID-19 vaccinations and rapidly advance our state’s immunization program.

During this pandemic, pharmacists have been on the front lines every day serving our patients as healthcare professionals deemed critical to societal continuity. Pharmacists are the most accessible health care providers with close to 90% of the U.S. population living within 5 miles of a pharmacy,⁴ and patients do not usually require an appointment to see their pharmacist. In fact, for many underserved Americans, pharmacists are the only health professional they can readily access. Many pharmacists offer immediate care that is close and convenient to home and are a bridge between our communities and other providers, triaging medication and health needs, recommending needed vaccinations, and both administering those vaccines or referring patients for further follow-up. Additionally, with stay at home directives causing regular vaccinations to lapse during the height of the pandemic, pharmacists can and will play a key role in the catch-up effort.

On May 28, 2020 the Centers for Disease Control and Prevention (“CDC”) issued updated guidance stating “[a]s a vital part of the healthcare system, pharmacies play an important role in providing medicines, therapeutics, vaccines, and critical health services to the public.”⁵ Pharmacists administer influenza and other vaccines in accordance with the CDC’s Advisory Committee on Immunization Practices (“ACIP”) recommendations, as authorized by state laws and regulations.

And then on August 9, 2020 HHS issued further guidance under the PREP Act authorizing state-licensed pharmacists to order and administer vaccines to individuals ages three through 18 years.¹⁰ The announcement comes after a May 2020 CDC report revealed a startling decline in routine childhood immunizations as a result of families staying at home during the COVID-19 pandemic. Although families followed public health warnings about going out, an unfortunate result was many missed routine childhood vaccinations.

Widespread vaccination of the populace will be key to defeating the pandemic, so pharmacists should be authorized to vaccinate all age groups with vaccines approved or authorized by the FDA for COVID-19 consistent with the FDA labeling or other instructions for use for such vaccines. In addition, Connecticut is one several states that do not allow pharmacists to order a clinically appropriate vaccination, but instead require a prescription from another healthcare provider or other permissive authority by the state.¹¹ No diagnosis is needed for a vaccination, so this barrier to pharmacist vaccinations needlessly requires our patients to work with multiple healthcare providers to obtain clinically appropriate vaccinations. Pharmacists are trained and able to follow and implement CDC immunization guidelines, and associated activities including patient vaccine assessment, recommendation, administration, referral and documentation.

Pharmacists stand ready and able to help prevent the spread of COVID-19, but we need specific help from you to order and administer FDA authorized or approved COVID-19 vaccines.

Sincerely,



Nathan Tinker
CEO
Connecticut Pharmacists Association

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- 1 Office of the Assistant Secretary, "Guidance for Licensed Pharmacists, COVID-19 Testing, and Immunity under the PREP Act," (April 8, 2020), available at: <https://www.hhs.gov/sites/default/files/authorizing-licensed-pharmacists-to-order-and-administer-covid-19-tests.pdf>
 - 2 Advisory Opinion 20-02 on the Public Readiness and Emergency Preparedness Act and the Secretary's Declaration under the Act. May 19, 2020, available at: <https://www.hhs.gov/sites/default/files/advisory-opinion-20-02-hhs-ogc-prep-act.pdf>
 - 3 Drozd EM, Miller L, et al. Impact of Pharmacist Immunization Authority on Seasonal Influenza Immunization Rates across States. Aug 2017. Clinical Therapeutics. doi: 10.1016/j.clinthera.2017.07.004
 - Patel AR, et al. The impact of pharmacy-based immunization services on the likelihood of immunization in the United States. Journal of the American Pharmacists Association. 2018.
[https://www.japha.org/article/S1544-3191\(18\)30231-0/pdf](https://www.japha.org/article/S1544-3191(18)30231-0/pdf)
 - Goad JA, Taitel MS, Fensterheim LE, Cannon AE. Vaccinations administered during off-clinic hours at a national community pharmacy: implications for increasing patient access and convenience. Ann Fam Med. 2013;11(5):429-436. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3767711/>
 - Isenor JE, et al, "Impact of pharmacists as immunizers on vaccination rates: A systematic review and meta-analysis." Vaccine 34(47), 5708-5723 10/11/16, available at:
<https://doi.org/10.1016/j.vaccine.2016.08.085>
 - 4 NCPDP Pharmacy File, ArcGIS Census Tract File. NACDS Economics Department.
 - 5 CDC. Guidance for Pharmacies. Guidance for Pharmacists and Pharmacy Technicians in Community Pharmacies during the COVID-19 Response. May 28, 2020, available at:
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/pharmacies.html>
 - 6 Drozd EM, Miller L, Johnsrud M. Impact of Pharmacist Immunization Authority on Seasonal Influenza Immunization Rates Across States. Clin Ther. 2017 Aug 3. pii: S0149-2918(17)30771-3, available at:
<https://www.ncbi.nlm.nih.gov/pubmed/28781217>
 - 7 Schwerzmann J, Graitcer SB, Jester B, Kahl D, Jernigan D, Bridges CB, Miller J. Evaluating the Impact of Pharmacies on Pandemic Influenza Vaccine Administration. Disaster Med Public Health Prep. 2017 Oct;11(5):587- 593, available at: <https://www.ncbi.nlm.nih.gov/pubmed/28219461>
 - 8 Cason D., Schmit, JD, et al., Expanding State Laws and a Growing Role for Pharmacists in Vaccination Services, (published online Aug. 12, 2017), available at:
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5704925/>.
 - 9 The federal government agrees. For years, pharmacists have served as Medicare "mass immunizers," administering vaccines to millions of Medicare patients. See Medicare Learning Network, Roster Billing for Mass Immunizers (2019), available at: https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/Mass_Immunize_Roster_Bill_factsheet_ICN907275.pdf
 - 10 HHS Expands Access to Childhood Vaccines during COVID-19 Pandemic.
<https://www.hhs.gov/about/news/2020/08/19/hhs-expands-access-childhood-vaccines-during-covid-19-pandemic.html>
 - 11 Expanding State Laws and a Growing Role for Pharmacists in Vaccination Services, *available at* <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5704925/>.