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Connecticut State Medical Society Testimony in Opposition to
House Bill 5290 An Act Concerning the Administration of Vaccines by Licensed
Pharmacists

Presented to the Public Health Committee

March 1, 2010

Senator Harris, Representative Ritter and members of the Public Health Committee, my name is Ken Ferrucci and I am the Vice President of Public Policy and Government Affairs for the Connecticut State Medical Society (CSMS). On behalf of our more than 7,000 members, thank you for the opportunity to present this testimony to you today in opposition to House Bill 5290 An Act Concerning the Administration of Vaccines by Licensed Pharmacists. We understand the desire of this committee to increase access to and the availability of vaccines for adults. We also appreciate efforts to ensure patient safety through the requirement that the Commissioner of Consumer protection, in consultation with the Commissioner of Public Health and the Commission of Pharmacy to develop regulations. However, too many concerns exist to garner our support for this legislation.

Previous legislation allowed for the delivery of influenza vaccine to adults by licensed pharmacists provided they met certain requirements for education and training. CSMS did not oppose the legislation due to the fact that influenza vaccines are delivered by limited methods and the subsequent regulation of the process. However, expanding language beyond influenza vaccine to include all vaccines with no limitations on where and how the vaccine is anatomically introduced is not as easy as it sounds.

Different vaccines need to be given differently; some subdermally and some intramuscularly. Some cannot be given simultaneously or must be physically separated. All of this can be taught and is to primary care doctors throughout years of education and training. Medical acumen must extend beyond the delivery of the vaccine in order to ensure the complete safety of the patient. Pharmacists are highly trained professionals, however the complexity of the administration of adult vaccines is not part of their training.

CSMS submits that if the intent of this committee is to expand access to vaccines for adults in a cost effective but safe manner, we look to grant the ability of Medical Assistants to administer subcutaneous, intradermal and intramuscular medication under direct physician supervision.

Thank you for the opportunity to provide comments on House Bill 5290.