

**Statement Before  
The Committee on Public Health  
Friday March 16, 2012**

RE: SB 371: An Act Concerning The Administration of Injectable Vaccines to Adults in Pharmacies.

Good afternoon Senator Gerratana, Representative Ritter and members of the Committee on Public Health. My name is Marghie Giuliano. I am a pharmacist and the Executive Vice President of the Connecticut Pharmacists Association. The Connecticut Pharmacists Association (CPA) is a professional organization representing 1,000 pharmacists in the state of Connecticut.

I am here today to testify in support of SB 371: An Act Concerning the Administration of Injectable Vaccines to Adults in Pharmacies.

Vaccines are among the most cost-effective clinical preventative services available to our residents. Pharmacists are in a unique position to provide these services because we are so readily accessible to the public. SB 371 would allow pharmacists to administer any adult vaccine that is listed on the National Centers for Disease Control and Prevention's adult immunization schedule to persons 18 years of age and over.

Administering vaccinations is becoming increasingly important in certain populations. For example, diabetes is a major health problem in Connecticut. According to a report released by the Connecticut Department of Public Health last year, the prevalence of diabetes in Connecticut has increased significantly since the late 1990s. About 186,000 adults in Connecticut have diagnosed diabetes (6.9%) [2007-2009 data]. An additional 93,000 adults are estimated to have undiagnosed diabetes.

Recently the Advisory Committee on Immunization Practices (ACIP) for the National Centers for Disease Control and Prevention recommended that hepatitis B vaccine be administered to adults <60 years of age who have diabetes, as soon as possible after diabetes is diagnosed. As illustrated by the figures above, in order to satisfy this new recommendation pharmacists will need to be utilized to their full extent in order to reach this goal.

That being said, proper precautions need to be taken to ensure that pharmacists have the necessary support to take on a more extensive role in administering vaccinations.

As written now, Section (B) requires that when administering vaccines, more than one pharmacist must be working. This language is somewhat restrictive, especially considering this would not be cost effective at times when business is known to be slow; ie Saturday afternoons and evening or a Sunday.

We recommend amending the language to mirror other aspects of our practice act to allow a pharmacist to use "professional judgment" when determining whether or not current workflow conditions allow for the administering of vaccinations.

For example, in Sec. 20-616 concerning Prescriptions, Refills; transfers it states a pharmacist may exercise his **professional judgment** in refilling a prescription that is not for a controlled drug; another example can be found in Sec. Sec. 20-619 concerning the substitution of generic drugs where it states that a pharmacist may substitute a generic drug product with the same strength, quantity, dose and dosage form as the prescribed drug product which is, in the pharmacist's **professional opinion**, therapeutically equivalent.

Recommended language for vaccines could include:

*In a pharmacy, a pharmacist may use professional judgment when deciding whether or not the current workflow situation allows for the pharmacist to safely administer vaccinations to his patients.*

Such wording will not restrict pharmacists from providing vaccinations when only one pharmacist is available and the current workflow situation is quiet. However, a pharmacist, using professional judgment, can decide that his current workflow situation is too busy and not conducive to administer vaccinations safely at that time. The pharmacist can then recommend that the patient return at another time.

In conclusion, vaccination is a growing area where pharmacists can help to lower health care costs, increase patient access and meet primary intervention goals. We support that pharmacists should be able to **use professional judgment** in deciding when it is safe to administer any adult vaccine that is listed on the National Centers for Disease Control and Prevention's adult immunization schedule to persons 18 years of age and older.