

**Testimony of the Connecticut Association of Directors of Health**  
*Raised Senate Bill 371: An Act Concerning the  
Administration of Injectable Vaccines to Adults in Pharmacies*  
To the Distinguished Co-Chairs and Members of the Public Health Committee  
March 16, 2012

Good morning, distinguished Co-Chairs and Members of the Public Health Committee. My name is Patrick McCormack, and I am President of the Connecticut Association of Directors of Health (CADH) and the Director of the Uncas Health District, serving the towns of Bozrah, Griswold, Lisbon, Montville, Norwich, Sprague, and Voluntown.

CADH wishes to offer comments on Raised Senate Bill 371: *An Act Concerning the Administration of Injectable Vaccines to Adults in Pharmacies*. The Centers for Disease Control and Prevention's adult immunization schedule includes at least 12 vaccinations. CADH supports the laudable public health ideal of making these vaccines as widely available as possible; the greater the number of people who are vaccinated, the more easily further transmission of disease to others is prevented. But CADH also has three primary concerns with respect to this bill. First, Raised Senate Bill 371 will erode the ability of local health departments to adequately prepare for mass vaccination dispensation in an emergency. Second, it deprives adults of the opportunity to obtain other critical health services in conjunction with their vaccine visit. Finally, scope of practice issues should go through a review process, per Public Act 11-209.

Local health directors protect the public's health by, among other tasks, responding to states of emergency. Local health departments' commitment to emergency preparedness allowed them to organize and mobilize a safe and efficient response during recent emergencies, such as Hurricane Irene and October's historic snowstorm. Practicing skills at vaccination clinics is essential to maintaining local health departments' ability to provide mass vaccinations in the wake of an emergency. At least 10 local health departments offer vaccines against polio, hepatitis, and varicella. The availability of vaccines against flu, pneumococcal disease, and herpes zoster in pharmacies has already reduced participation in local health department vaccination clinics. The additional loss of adults seeking vaccinations would cripple local health departments' capacity to adequately prepare for mass vaccination dispensation when called upon.

Raised Senate Bill 371 also deprives individuals of the ability to obtain more comprehensive medical services at the time of vaccination. At the forefront of health reform is the creation and maintenance of a patient-centered medical home. The patient-centered medical home is a model to provide comprehensive and coordinated primary care. Local health directors are already at the forefront of this effort, supporting school-based health centers, educating families with respect to chronic disease management, and providing screenings for lead, sexually transmitted diseases, and other conditions. Accordingly, local health departments are best situated to administer vaccines and to provide comprehensive preventive health services to individuals in conjunction with the vaccine visit.

Finally, last year the Connecticut General Assembly passed Public Act 11-209 to establish a formalized process under the auspices of the Department of Public Health for resolving issues relating to a health care profession's scope of practice. That law proposes a balanced, evidence-based approach for assessing information relating to proposed scope of practice changes. This process is critical to determining when, or if, scope of practice advancements are recommended for legislative review. This is exactly the type of bill that ought to go through that process.

Thank you for your consideration of our comments on Raised Senate Bill 371. CADH is a nonprofit organization comprised of Connecticut's 77 local health departments and districts. Local health directors are the statutory agents of the Commissioner of Public Health and are critical providers of essential public health services at the local level in Connecticut.