

To Public Health Committee Members

Subject: **OPPOSITION** to SB 94 - AN ACT ALLOWING PHARMACISTS TO ADMINISTER THE INFLUENZA VACCINE TO CHILDREN TWELVE YEARS OF AGE AND OLDER

I'm writing to you today in **opposition** to SB 94. The stated purpose of this bill is "to reduce the cost of and expand access to the administration of the influenza vaccine to minors". First and foremost, this bill places our children at risk and second its ability to reduce costs and make vaccines more accessible is questionable when Pharmacists adhere to Connecticut regulatory guidelines.

- 1) The existing statute that you seek to amend with this bill is Section 20-633 of Connecticut General Statutes which clearly states that the vaccine can only be given by a pharmacist **pursuant to the order of a licensed health care provider** which in itself is undefined in the statute. However, if you go to the Regulation of Connecticut State Agencies it does spell this out as "**a licensed practitioner authorized to order or prescribe legend drugs**".

<https://eregulations.ct.gov/eRegsPortal/Browse/getDocument?guid=%7BCF27B94E-2355-49A3-9E01-D3A1D0CF7F90%7D>

This indicates to me that flu shots (vaccines) are not to be given by pharmacist in the absence of a prescription for the vaccination. Considering that, it seems that this really would not reduce the cost of administration or make it more accessible, as one would need to obtain a prescription for the vaccine from a licensed individual and follow that up with a trip to the pharmacy to get the actual vaccination.

- 2) This bill spells out no requirement for parental notification or consent and therefore would violate Section 300aa-26 of the 1986 National Childhood Vaccine Injury Act. <https://www.govinfo.gov/content/pkg/USCODE-2016-title42/html/USCODE-2016-title42-chap6A-subchapXIX-part2-subpartc-sec300aa-26.htm>
- 3) **Pharmacies are already in violation of the regulatory requirements for adult vaccinations** as they do not presently require their clients to provide a prescription for a vaccination.

<https://eregulations.ct.gov/eRegsPortal/Browse/getDocument?guid=%7BF27B94E-2355-49A3-9E01-D3A1D0CF7F90%7D> )

Given this, one would hardly expect them to comply with the informed consent requirements for minors. **This places our children at risk for duplicate treatments, improper administration, and/or vaccination where it is contraindicated.**

- 4) Vaccinations provided by a pharmacist do not go into someone's permanent medical record so subsequent adverse reactions to a vaccine can easily be missed or do not get documented to their file. This also has the potential to allow for duplicate vaccinations to be administered **further placing our children at risk.**
- 5) Flu shots have the highest number of adverse reactions reported in VAERS (Vaccine Adverse Events Reporting System). Pharmacists are not medically trained to respond to potential adverse reactions **further placing our children at risk.**
- 6) One of the most frequently compensated vaccine injuries is SIRVA which is a shoulder injury resulting from improper vaccine administration. This number has been on the rise since pharmacists were added to the expanded list of authorized vaccine administrators. Having nonmedical personnel administer vaccines **places our children at an elevated risk for this type of injury.**

For all of the listed reasons above I am opposed to SB 94 and request that you vote no on this bill.

Respectfully submitted,

Maria Smith, Canterbury