



COUNTY OF ERIE

MARK C. POLONCARZ

COUNTY EXECUTIVE

GALE R. BURSTEIN, MD, MPH
COMMISSIONER OF HEALTH

May 7, 2014

MEMORANDUM OF SUPPORT

A.9211 Paulin and S5688 Hannon

Pharmacist-Administered Immunizations

The Erie County Board of Health strongly supports A.9211 and S5688 which would reform and expand the law governing pharmacist-administered immunizations.

Specifically, this legislation would:

Expand immunization authority for pharmacists to administer Tdap (Combined Tetanus, Diphtheria and Pertussis Vaccines) to adults;

Allow for either a patient specific or non-patient specific order for all vaccines currently authorized in law including Tdap;

Removing requirement from law that shingles vaccine may only be given pursuant to a patient-specific order;

Eliminate the requirement that patient-specific order or non-patient specific order must be issued by a physician or certified nurse practitioner who has a practice site in the same county in which the immunization will be administered;

And, eliminate the various sunset dates in existing laws to make pharmacists' immunization authority permanent.

Immunizations are the best defense against morbidity and mortality for diseases for which vaccines are available and studies have shown that pharmacist-provided immunizations increase overall immunization rates. New York's law permits pharmacists to provide immunizations against influenza, pneumonia, shingles and most recently meningitis.

According to the State Board of Pharmacy, in New York there are approximately 10,000 pharmacists who are certified to immunize. No adverse reactions or complaints of any kind regarding immunizations by pharmacists have been reported to the State Board or Office of Professional Discipline.

Since the law allowing Pharmacists to vaccinate, New York's law was expanded several times by Executive Order to enable pharmacists to be on the frontline of defense during public health emergencies.

The first time was during the H1N1 epidemics. Pharmacists were asked to inoculate children as well as adults against this deadly virus. Following Hurricane Sandy pharmacists were given the authority to administer Tdap to those impacted by the Superstorm. More recently, the Governor extended pharmacists authority to give flu vaccine to children in response to the very high incidence of influenza in the State during the 2013 flu season given the fact that many had not been immunized. While pharmacists were essential to the state's effort to quickly and effectively inoculate vulnerable New Yorkers in these situations, they would have been able to more quickly respond and have an even greater impact if pharmacists were already recognized in law in this regard. In regards to Tdap we are not asking to expand the law to encompass the inoculation of children. Whooping cough is on the rise in the United States and adults can unknowingly pass the disease on to children. We are asking to now have the ability to inoculate adults against this deadly disease so as to better protect our children against this infection.

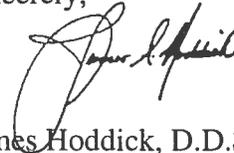
Moreover, CDC data for the 2009-2010 flu season indicate significant improvements in rates of immunization among groups that have traditionally not accessed vaccinations including an increase of 8% for African Americans, 8.6% for Hispanics and almost 13% for other ethnicities in New York. Overall, the State saw an increase in rate of immunizations by New York residents of 2.8% during that season.

It is evident from this data that New York's law is working well and has resulted in considerable increases in the number of people being vaccinated in this state. We believe that this is due to the trust and convenience that pharmacies provide to residents getting immunized. For these reasons, we strongly support this Bill to allow pharmacists to provide immunizations in New York permanently and to expand the vaccines that pharmacists may administer to adults to include Tdap.

In addition, the current provision in law that requires pharmacists to obtain a standing order from a physician or NP in the same county has been a significant barrier. This county restriction serves no clinical, insurance or public health purpose and is without precedent. By removing this provision, the bill provides greater flexibility for a New York State-based physician or NP to issue standing orders and expands the number of immunization-certified pharmacists available to meet public demand. Removing this barrier will increase the number of individuals who are immunized in New York thereby improving public health.

In closing, we greatly appreciate the State Legislature's support of pharmacists-administered vaccines and your leadership in passing laws to enable pharmacists to do so. We now ask for your continued support to do what is in the best interest of the health of all New Yorkers by reforming aspects of the current statute and giving certified pharmacists permanent authority to administer vaccines to adults as authorized by physicians and nurse practitioners.

Sincerely,

A handwritten signature in black ink, appearing to read "James Hoddick". The signature is fluid and cursive, with a large initial "J" and "H".

James Hoddick, D.D.S.
President,
Erie County Board of Health