August 21, 2020

The Honorable Sarah Copeland-Hanzas, Chairwoman
The Honorable John Gannon, Vice-Chairman
House Committee on Government Operations
115 State Street, Room 49
Montpelier, VT 05633

RE: NATIONAL COMMUNITY PHARMACISTS ASSOCIATION LETTER OF SUPPORT ON S 220

Dear Representative Copeland-Hanzas and Representative Gannon,

I am writing you today on behalf of the National Community Pharmacists Association (NCPA) in support of S 220, a bill that moves the needle in a major way to allow Vermont pharmacists to practice at the top of their license. NCPA represents the interest of America’s community pharmacists, including the owners of more than 21,000 independent community pharmacies across the United States and 46 independent community pharmacies in Vermont. These Vermont pharmacies filled over 2.5 million prescriptions last year, impacting the lives of thousands of patients in your state. NCPA applauds this forward thinking legislation and calls for your continued support on efforts to provide the highest standard of care for all Vermonters.

For S 220 to achieve long term positive health outcomes, amendments are needed to adjust the short-term provisions on vaccine access and CLIA waived testing.

The bill should be amended to authorize pharmacists to order and administer all FDA approved or authorized, or the Advisory Committee on Immunization Practices (ACIP) recommended vaccines to patients 3 years and older. Community pharmacies are often visited by patients to pick up prescriptions, ask for health counseling, and receive advice on avoiding a medication side effect. This established relationship is a main access point for vaccine administration, and it should be recognized as such to provide vaccine services to all citizens of Vermont. Since pharmacists are the most accessible healthcare providers in many communities, significant amounts of vaccinations occur when pharmacists are involved with vaccination strategies.

The bill should also be amended to authorize pharmacists to carry out any CLIA waived FDA approved test and require the Board of Pharmacy and Department of Public Health to develop testing and treatment protocols for minor ailments. Pharmacists are trained in providing services outside of dispensing medications like medication therapy management, managing chronic disease, and performing health and wellness testing. These point of care tests are CLIA-waived procedures that can be performed by pharmacists to initiate treatment of illnesses (i.e. influenza test and treat) or initiate prophylaxis for disease prevention or progression (i.e. test and treat HIV PrEP/PEP medication). Allowing pharmacists to perform these services allows them to minimize the long-term costs that can compound when a disease is not recognized and treated in time. As such, the authority to perform CLIA waived testing for SARS-CoV for asymptomatic persons should not sunset July 1, 2021. Instead, pharmacists should be authorized to run the point of care COVID-19 tests indefinitely. This is needed for long term tracking and maintenance efforts to counteract disease spread.

As the most accessible healthcare providers in many communities, pharmacists are well positioned to carry out all the provisions listed in S 220, including providing point of care testing services, and expanding vaccination capacity to Vermonters who see their pharmacist more often than any other provider. All community-based pharmacists and
pharmacies must be included early and always in all efforts to increase vaccine access. The value pharmacists across the profession have displayed in vaccination and COVID-19 testing efforts should not be ignored and we urge you to support this message and consider the amendments discussed above. Thank you for your time and consideration. If you have any questions, or if we can be of any assistance please do not hesitate to contact me at ademola.are@ncpa.org.

Sincerely,

Ademola Are  
Manager, State Government Affairs  
National Community Pharmacists Association

CC: The Honorable Nelson Brownell, Hal Colston, Marcia Gardner, Bob Hooper, Fritz Kitzmiller, Rob LaClair, Jim Harrison, John Palasik