

March 22, 2023

The Honorable Jason Small, Chairman
The Honorable Mark Noland, Vice-Chairman
Senate Committee on Business, Labor, and Economic Affairs
Montana State Capitol
PO Box 201706
Helena, MT 59620-1706

RE: HOUSE BILL 710 – REVISE PHARMACIST LAWS RELATING TO IMMUNIZATION

Dear Chairman Small, Vice Chair Noland and committee members:

We thank you for the opportunity to submit testimony on **HOUSE BILL 710**, a bill that authorizes licensed pharmacists to independently order and administer vaccines to individuals 7 years and older. We **support** this bill as it ensures pharmacists will be able to continue administering vaccines after their temporary federal authority to administer expires.

NCPA represents the interest of America’s community pharmacists, including owners of more than 19,400 independent community pharmacies across the United States and 93 independent pharmacies in Montana. These Montana pharmacies filled over 5 million prescriptions last year, impacting the lives of thousands of patients in your state. Over 90% of Americans live within five miles of a community pharmacy,¹ and more than any other segment of the pharmacy industry, independent community pharmacies are often located in underserved rural and urban areas. These pharmacies are frequently the most accessible healthcare providers in many Montana communities and are vital in the provision of immunizations, testing, and other services. This bill will not only allow pharmacies to expand their vaccination capacity but could also be an opportunity for patients without a medical home or primary care provider to be plugged in to the healthcare system and to access other services they might not otherwise receive.

With over 1,210 pharmacists practicing within Montana, approval of this legislation will allow pharmacists, pharmacy personnel, and pharmacies to meet the demand for health care services and continue to be a gateway for patients to access quality care. Montana pharmacists have been administering vaccines since October 2020, when the U.S. Department of Health and Human Services (HHS) issued guidance related to the HHS Declaration Under the Public Readiness and Emergency Preparedness (PREP) Act for Medical Countermeasures Against COVID-19.

This federal guidance also authorized qualified pharmacy technicians, acting under the supervision of a qualified pharmacist, to administer Food and Drug Administration (FDA)-authorized or FDA-licensed COVID-19 vaccines to persons ages three or older and to administer FDA-authorized or FDA-licensed ACIP-recommended vaccines to persons ages three through 18 according to Advisory Committee on Immunization Practice’s (ACIP’s) standard

¹ NCPDP Pharmacy File, ArcGIS Census Tract File, NACDS Economics Department.

immunization schedule.² In August 2021, this temporary federal authority was expanded to authorize qualified pharmacy technicians to administer seasonal influenza vaccines, under the supervision of a qualified pharmacist, to persons ages 19 and older consistent with ACIP recommendations.³

As beneficial as this temporary federal authority has been in expanding access to care and relieving some of the burden on an overstressed healthcare system, it is set to expire in 2024. Approval of this bill will make this temporary federal authority permanent under state scope of practice, and it expands the authority to cover adult immunizations beyond influenza and COVID-19 as well.

NCPA strongly supports the Montana Pharmacy Association in their advocacy to make the federal PREP ACT authorities permanent for Montana pharmacists to independently order and administer vaccinations. We appreciate the bill's sponsor, Representative Knudsen, for his attention to this important issue and we urge approval from this committee.

Sincerely,



Belawoe Akwakoku
State Government Affairs Manager
National Community Pharmacists Association

² Guidance for PREP Act Coverage for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns for Childhood Vaccines, COVID-19 Vaccines, and COVID-19 Testing (October 20, 2020), <https://www.hhs.gov/sites/default/files/prep-act-guidance.pdf>

³ Eighth Amendment to Declaration Under the PREP Act for Medical Countermeasures Against COVID-19 (August 4, 2021), <https://www.govinfo.gov/content/pkg/FR-2021-08-04/pdf/2021-16681.pdf>