

February 2, 2024

The Honorable Mark Smith, Chair
House Medical and Health Affairs Subcommittee
South Carolina House of Representatives
Blatt Building, Room 425
P.O. Box 11867
Columbia, SC 29211

RE: H 3988 PHARMACISTS AND PHARMACY TECHNICANS – PHARMACY PRACTICE ACT DEFINITIONS

Chair Smith and Members of the Medical and Health Affairs subcommittee:

We thank you for the opportunity to submit testimony on **H 3988**, a bill that authorizes licensed pharmacists to order and administer vaccines to individuals 12 years and older, and to initiate federal Clinical Laboratory Improvement Amendments (CLIA) waived tests under the pharmacy practice act. We **support** this bill as it ensures pharmacists will be able to continue administering vaccines and testing services after their temporary federal authority to administer expires in **December 2024**.

NCPA represents the interest of America's community pharmacists, including owners of more than 19,400 independent community pharmacies across the United States and 295 independent pharmacies in South Carolina. These South Carolina pharmacies filled over 19 million prescriptions last year, impacting the lives of thousands of patients in your state.

Within the next 10 years, the U.S. could see a shortage of over 55,000 primary care physicians.¹ In South Carolina there are 106 areas that are designated as health professional shortage areas.² There are thousands of pharmacists in South Carolina who are ready to provide valuable healthcare services to these communities that have limited access to care.³

With over 5,340 pharmacists practicing within South Carolina, approval of this review 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. South Carolina pharmacists and pharmacy technicians have been administering vaccines under the supervision of pharmacists 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 authorized qualified pharmacy technicians, acting under the supervision of a qualified pharmacist, to administer

¹ Association of American Medical Colleges. 2019 UPDATE The Complexities of Physician Supply and Demand Projections From 2017 To 2032. Available at: https://aamcblack.global.ssl.fastly.net/production/media/filer_public/31/13/3113ee5c-a038-4c16-89af-294a69826650/2019_update_-_the_complexities_of_physician_supply_and_demand_-_projections_from_2017-2032.pdf

² Kaiser Family Foundation. Primary Care Health Professional Shortage Areas (HPSAs). Timeframe: as of September 30, 2019. Available at: <https://www.kff.org/other/stateindicator/primary-care-health-professional-shortage-areas/hpsas/?currentTimeframe=0&sortModel=%7B%22colld%22:%22Location%22,%22sort%22:%22asc%22%7D>.

³ Bureau of Labor Statistics. Occupational Employment Statistics Query System. Available at: <https://data.bls.gov/oes/#/home>.

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 immunization schedule.⁴ 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.⁵

Over 90% of Americans live within five miles of a community pharmacy,⁶ 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 South Carolina communities and are vital in the provision of immunizations, testing, and other services. This bill will not only allow pharmacies to expand their vaccination and testing 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.

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 **December 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 and testing beyond influenza and COVID-19 as well.

NCPA strongly supports the South Carolina Pharmacy Association in their advocacy to make the federal PREP ACT authorities permanent for South Carolina pharmacists to administer vaccinations and CLIA-waived tests. We appreciate the bill's sponsor, Representative Davis, for her attention to this critical issue and we urge approval from this committee.

Sincerely,



Belawoe Akwakoku
Associate Director, State Government Affairs
National Community Pharmacists Association

⁴ 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>

⁵ 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>

⁶ NCPDP Pharmacy File, ArcGIS Census Tract File, NACDS Economics Department.