

Dear Sen. Murphy:

I am writing in support of HF1197/SF1176 for the 2024 legislature.

As a concerned primary care physician for Minnesota's pediatric patients, I believe that pharmacists in Minnesota should be able to continue to vaccinate Minnesota's youth from the age of 3 years and older, as they have been doing since 2020. Childhood vaccinations are crucial for preventing many life-threatening diseases and can potentially save the lives of many children. However, access to these vital services can be challenging. Some families live in underserved areas or may have to travel a distance to find a clinic. Community pharmacies are often the closest and most convenient way to access vaccines. By allowing pharmacies in Minnesota to vaccinate children, we can increase accessibility and ensure more children receive essential life-saving vaccinations. At the same time, pharmacists can actively help us connect families to a primary pediatric care by stressing the importance of well child visits with families as they come in for vaccines.

Making sure that Minnesota law provides pharmacists with the same authorities they have been practicing under since July of 2020 must be a priority this year. If the Legislature does not act this year, these authorities will go away Dec. 31st, 2024 and the public health of Minnesota will suffer.

Therefore, I call upon our legislators in the Minnesota State Legislature and relevant healthcare authorities to empower pharmacists, trained pharmacy technicians, and pharmacy interns across our state with the ability to administer childhood vaccinations and encourage child wellness visits to pediatric primary care providers.

Kind regards,  
Andrew Lyman-Buttler, MD, M.Ed

# Maintain pharmacy administered vaccine & testing authorities

*Nearly 40% of millions of COVID-19 vaccine doses have been administered by Minnesota pharmacists, pharmacy technicians, or pharmacy interns*



## Minnesotans are about to lose access to services they trust

We must maintain public health by maintaining the immunization and testing authorities granted under the Federal Public Readiness and Emergency Preparedness (PREP) Act. Without this legislation, pharmacists will lose the authority to order vaccinations and Point of Care tests, pharmacies will lose the authority to vaccinate children down to the age of three and technicians will lose the authority to provide any type of vaccination. **The final extension of the PREP Act expires December 31.**

Under an emergency declaration in 2020 of the PREP Act, the Secretary of Health and Human Services provided pharmacists across America with the authority to, among other things:

- Using ACIP schedules, order and administer vaccinations to patients ages 3 years and above with any FDA approved or approved for emergency use vaccine;
- Allow properly trained pharmacy technicians to administer vaccinations;
- Order and administer FDA approved or approved for emergency use - CLIA waived tests (non-laboratory testing)

## Allow pharmacies to continue services | HF 1979/SF 1176

**The pharmacy profession stepped up!** Nearly 40% of millions of COVID-19 vaccine doses have been administered by Minnesota pharmacists, pharmacy technicians, or pharmacy interns (Minnesota Department of Health, COVID-19 Vaccine Data). Minnesotans have recognized the significant impact that pharmacists have on public health. According to a recent survey by NACDS, “81% of adults in Minnesota believe it’s important for their state to update its policies to ensure that patients permanently have the same access to pharmacy vaccination, testing, and treatment services that were available during the COVID-19 pandemic.”

**Continue expanded patient access to care - Vaccinations:** Enhancing pharmacists' reach to offer vaccinations to all individuals six years and older, and influenza and COVID-19 vaccine to those 3 years and older improves vaccination rates and public health. A pharmacist's clinical decision making, access to resources such as the Minnesota Immunization Information Connection (MIIC), expertise regarding vaccinations, and frequent referrals to primary care providers all contribute to improved health outcomes.

**Efficient teamwork in the profession:** All health professionals must practice at the top of their licenses and training to provide the best care. Under the PREP Act declaration in 2020, trained MN pharmacy technicians were allowed to administer vaccines under the supervision of a qualified pharmacist. Allowing qualified pharmacy technicians to administer vaccines, after completion of authorized training & under the direct supervision of a licensed pharmacist, increases efficiency, allowing pharmacists to focus on clinical tasks, such as assessment, recommendations, & planning for optimal medication outcomes for their patients.

**Expanding patient access to care - POC Testing:** POC testing involves performing a diagnostic test outside of a laboratory that produces a rapid and reliable result, aiding in identifying acute illness and screening for and managing chronic diseases. This can help identify earlier diagnoses and earlier access to treatment - which can be lifesaving!



Angela Franey, Executive Director  
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*We Care for You*



February 14, 2024

Dear Representative Bahner and Senator Hoffman;

The Minnesota Advanced Practice Registered Nurses (APRN) Coalition and the Minnesota Nurse Practitioners (MNNP) organization heartily endorse **HF 1197/SF 1176**, which will allow licensed pharmacist to continue to vaccinate Minnesota's youth patients from the age of 3 years and older, as they have been doing since 2020. According to the Centers for Diseases Control and Prevention (CDC), vaccines have reduced or eliminated many infectious diseases that once routinely killed or harmed infants, children, and adults. However, access to these vital services can be challenging in certain circumstances.

In Minnesota specifically, there are unique challenges to immunization access. Some families live in underserved areas or may have to travel a distance to find a clinic. Community pharmacies are often the closets and more convenient way to access healthcare and vaccines. Community pharmacies provide improved access and convenience that meet patients' needs. By allowing pharmacies in Minnesota to vaccinate children we can increase accessibility and ensure more children receive essential, life-saving vaccinations. At the same time, pharmacists can actively help to connect families to a primary care pediatric provider.

Making sure that Minnesota law provides pharmacists with the same authority they have been practicing under since July of 2020 must be a priority this year. If the Legislature does not act this year, these authorities will go away December 31<sup>st</sup>, 2024, and the public health of Minnesota will suffer. Providing Minnesota pharmacists with the authority to continue the vaccination and testing services that over 5 million Minnesotans since the Pandemic have already received is crucial to protecting our public health into the future. The change will not only improve individual health but also contribute significantly to community health by ensuring that enough people will be immunized to prevent the spread of disease within a community.

We appreciate both of your leadership in this important public health effort.

Sincerely,

Sara McCumber, DNP, APRN, CNP, CNS  
President  
Minnesota Nurse Practitioners

Julie Sabo PhD, RN, APRN, CNS, FCNS  
President  
Minnesota APRN Coalition

March 13, 2024

The Honorable Tina Liebling, Chair  
The Honorable Robert Bierman, Vice Chair  
House Committee on Health Finance and Policy  
State Office Building – Room 10  
100 Martin Luther King Jr. Boulevard  
Minneapolis, MN 55155

**RE: SUPPORT FOR HF 1197 – PHARMACISTS IMMUNIZATION AND TESTING AUTHORITIRES**

Chairperson Liebling, Vice Chair Brown, and members of the committee:

We thank you for the opportunity to submit testimony on **HF 1197**, a bill that expands pharmacy scope of practice within immunizations & testing, and mandates coverage of these services under the state Medicaid plan. We **SUPPORT** this bill as it ensures pharmacists will be able to continue administering vaccines and testing 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 160 independent pharmacies in Minnesota. These Minnesota pharmacies filled over 10 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,<sup>1</sup> 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 Minnesota 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.

Within the next 10 years, the U.S. could see a shortage of over 55,000 primary care physicians. In Minnesota there are 216 areas that are designated as health professional shortage areas. There are thousands of pharmacists in Minnesota who are ready to provide valuable healthcare services to these communities that have limited access to care.

With over 6,520 pharmacists practicing within Minnesota, 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. Minnesota 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.

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<sup>1</sup> NCPDP Pharmacy File, ArcGIS Census Tract File, NACDS Economics Department.

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 immunization schedule.<sup>2</sup> 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.<sup>3</sup>

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 beyond influenza and COVID-19 as well.

Over the years, the pharmacy profession has evolved from a dispensing and product reimbursement industry to a profession with training and patient relationships to provide outcomes-based services and participate in care coordination efforts. Pharmacists' care has increasingly involved patient counseling and we have learned how their presence in underserved communities has seen improved health outcomes and reduced healthcare costs. The lack of adequate payment for these services prevents pharmacies from being compensated for their services and reduces the access to care for many patients in the state. We applaud the mandatory coverage language in HF 1197. Mandatory coverage provisions for pharmacists providing preventative health care services are paramount to the success of HF 1197.

NCPA strongly supports the Minnesota Pharmacists Association in their advocacy to make the federal PREP ACT authorities permanent for pharmacists to order and administer immunizations and testing services. We appreciate the committee's attention to this important public health, and we urge approval from its members.

Sincerely,

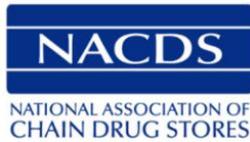


Belawoe Akwakoku  
Associate Director, State Government Affairs  
National Community Pharmacists Association

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<sup>2</sup> 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>

<sup>3</sup> 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>



## Support HF 1197/SF 1176 to Continue Trusted Patient Immunization & Testing Access at Minnesota Pharmacies

Minnesota's pharmacists and pharmacy technicians have been on the frontline of immunization and testing since the start of the COVID pandemic. **Unfortunately, patient access to immunization and testing services will revert to pre-pandemic status after Dec. 31 when the federal Public Health Emergency (PHE) Declarations under the PREP Act expire.** Please support [HF 1197/SF 1176](#) to permanently allow patients access to their current immunization and testing service options at Minnesota's pharmacies.

The COVID-19 pandemic exposed the challenges within the traditional healthcare system, and **also proved pharmacies can provide Minnesotans with convenient, safe, and affordable patient-driven access to care.** To meet public health needs during the pandemic, pharmacies quickly pivoted and stood up the infrastructure needed across Minnesota to meet that immunization needs of families, including a full range of childhood vaccines.

Since January 2021, Minnesota's families have received millions of vaccines at their community pharmacies. In order to meet patient needs, pharmacies invested in their pharmacy technician workforce, including providing technicians the opportunity to obtain accredited immunization training. Without pharmacy technicians' efforts, it would have been extremely difficult for Minnesota to meet the demand for care, especially in underserved areas of Minnesota. Continuing technicians' ability to utilize their training and skills is essential to patient care and vital to the state's healthcare workforce going forward.

[HF 1197/SF 1176](#) aligns with the trust Minnesotans have in services at pharmacies. In a survey commissioned by the National Association of Chain Drug Stores and conducted by Morning Consult December 7-12, 2022, **87% of Minnesotans said pharmacies are very easy or somewhat easy to access and 84% of Minnesotans support pharmacists administering routine vaccinations.**

Please support [HF 1197/SF 1176](#) to continue your constituents' continued access to immunizations and testing services at their local pharmacy, while maintaining expanded healthcare access and equity across Minnesota.

Dear Legislator:

I am writing in support of HF1197/SF1176 for the 2024 legislature.

As a concerned primary care provider for Minnesota's pediatric patients, I deeply believe that the health of our children is paramount. The more children with access to vaccines, the better it is for their individual and overall health. This belief stems from my personal conviction and understanding of the importance of both childhood vaccination and wellness visits.

This is why I believe that pharmacists in Minnesota should be able to continue to vaccinate Minnesota's youth patients from the age of 3 years and older, as they have been doing since 2020. Childhood vaccinations are crucial for preventing many life-threatening diseases and can potentially save the lives of many children. According to the Centers for Disease Control and Prevention (CDC), vaccines have reduced or eliminated many infectious diseases that once routinely killed or harmed infants, children, and adults. However, access to these vital services can be challenging in certain circumstances.

In Minnesota specifically, we face unique immunizations access challenges. Some families live in underserved areas or may have to travel a distance to find a clinic. Community pharmacies are often the closest and most convenient way to access healthcare and vaccines in particular. Community pharmacies provide improved access and convenience that meet patients needs. By allowing pharmacies in Minnesota to vaccinate children, we can increase accessibility and ensure more children receive essential - life saving - vaccinations. At the same time, pharmacists can actively help us connect families to a primary care pediatric provider by stressing the importance of well child visits with families as they come in for vaccines.

Making sure that Minnesota law provides pharmacists with the same authorities they have been practicing under since July of 2020 must be a priority this year. If the Legislature does not act this year, these authorities will go away Dec. 31st, 2024 and the public health of Minnesota will greatly suffer. Providing Minnesota pharmacists with the authority to continue the vaccination and testing services that over 5 million Minnesotans since the Pandemic have already received is crucial to protecting our public health into the future. The change will not only improve individual health but also contribute significantly to community health. As a result, enough people will be immunized to prevent the spread of a disease within a community.

Therefore, I call upon our legislators in the Minnesota State Legislature and relevant healthcare authorities to empower pharmacists, trained pharmacy technicians, and pharmacy interns across our state with the ability to administer childhood vaccinations and encourage child wellness visits to pediatric primary care providers.

Handwritten signature of Zach Merten MD in black ink.

**Zach Merten MD** (he/him/his)

Associate Program Director | University of Minnesota Methodist Hospital Family  
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