



## MEMORANDUM IN SUPPORT *S2507/A3007 Executive Budget*

The National Association of Chain Drug Stores (NACDS) supports S2507/A3007 to broaden access to essential immunization services for residents of New York.

Since 2008, when pharmacists were first authorized to immunize adults against flu and pneumococcal disease, the response from pharmacists, the medical community, public health officials, insurers and consumers has been overwhelmingly positive. Immunization rates have improved as access to vaccines has expanded. Furthermore, community pharmacies and the public health community also have more than a decade of planning and engaging in pandemic response together and have built upon the early successes of pharmacies as pandemic vaccinators during the 2009 H1N1 pandemic, including studies that show the importance of pharmacies and pharmacists in the deployment of vaccines. This was recognized federally as the Department of Health and Human Services (HHS) authorized pharmacists to initiate, order, and administer COVID-19 and childhood vaccines to improve the uptake of vaccination services and protect Americans.

State law currently authorizes pharmacists and pharmacy interns under the direct supervision of an immunizing pharmacist, to immunize children against influenza and adults against influenza, pneumococcal disease, shingles, meningitis, tetanus, diphtheria and pertussis. This bill expands access to vaccines by leveraging pharmacists to provide all vaccines recommended by the Centers for Disease Control and Prevention (CDC) such as Hepatitis A and B, varicella, and more.

The bill aligns New York with laws enacted the majority of states where pharmacists administer CDC-recommended vaccines. Some states go even further, meaning that the current state law is unduly restrictive given positive results and current health policy trends.

Removing the county restriction from the current law is also an important reform. Physicians and nurse practitioners who issue standing orders as a way to improve access to vaccines should have the flexibility to determine the areas to be served and should not be limited by the county lines where they practice. This provision in the law creates a barrier to access and serves no clinical or insurance-related purpose; thus, it should be eliminated for reasons of public health and safety.

Making the law permanent is easily justified. In consecutive legislative sessions vaccines have been added and sunset dates have been moved. During public health emergencies (e.g. current COVID-19 pandemic, Superstorm Sandy, the virulent 2018 flu season) the Governor issued Executive Orders expanding the law's provisions. It has become abundantly clear that having vaccines available to the public via accessible community healthcare destinations in the evenings, on weekends, or whenever convenient has proven effective. With widespread insurance coverage, broad public acceptance and demonstrated value, expanded pharmacist immunization authority should have a permanent place in the Laws of New York.