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March 22, 2012

Commonwealth of Pennsylvania
House of Representatives
Professional Licensure Committee
The Honorable Julie Harhart, Chair
PO Box 202183
313 Main Capitol
Harrisburg, PA 17120

Dear Committee Members,

As a practicing pharmacist having the Authorization to Administer Injectables (RPI000202), I would like to offer some insight into why I support House Bill 817. House Bill 817 would remove the age limit on patients to whom a pharmacist may administer injectable medications, biological and immunizations; require parental consent for pharmacist's administration of injectables to patients under 18 years of age; and allow trained pharmacy interns to administer injectables under the direct supervision of a pharmacist who is licensed to administer injectables.

A little bit about my pharmacy practice; Bechtel's Pharmacy is a family business with locations in Slatington, Lehigh County, and Lehigh Township, Northampton County. Providing immunizations is a small, but important, part of our practice. Over the past three years, we have administered over 600 vaccinations. We have standing orders in place with a local physician for influenza, pneumococcal and zoster vaccines. About half of the vaccines we have administered have been influenza, essentially all under the standing order we have in place. More than 45% have been for zoster (shingles); and, although we have a standing order for this vaccine, most patients present a prescription from their physician when receiving this vaccine. The remaining vaccines we have administered include pneumococcal, Tdap (Tetanus, diphtheria and pertussis), and HPV.

I have found the 18 year age limit on patients receiving injectables from a pharmacist to be an impediment to providing care to the community I serve. Each year I have had at least one mother come to me with an adolescent child seeking the flu vaccine and have had to turn them away. I suspect that these young people did not get the flu vaccine that year. I also had a physician who wanted me to administer the HPV series to one of his patients. I was unable to accommodate this patient and her physician because she was not yet 18 years old.

It's not that I have never administered a vaccine to a patient under 18. In December 2009, during the height of the effort to immunize people against the H1N1 influenza virus, we administered an intranasal formulation of the H1N1 influenza vaccine. Since the age limit applies only to injectables, we were able to administer this form of the vaccine to patients under the age of 18, and in fact did so. The intranasal flu vaccine has its limits though. It is a live vaccine and is only approved for use in healthy individuals between the ages of 2 and 49 years. The patient population at highest risk of complications from influenza is precluded from receiving this form of the vaccine. The injectable influenza vaccine, an inactivated virus, is safer than the alternative intranasal vaccine.

Allowing Pharmacy Interns who have completed the same training which pharmacists are required to complete to administer injectables under the supervision of a licensed pharmacist is just common sense. Pharmacists in all 50 states have the privilege of administering injectables in some manner. Pharmacy schools are training their students to assume these responsibilities. At some schools this training is an elective; at some schools, a required part of the curriculum. Initially, the Pennsylvania Board of Pharmacy accepted only the APhA Pharmacy-based Immunization Delivery Certificate Program as meeting the training requirements of our regulations. The Board has since found several curricular based programs, some of which are more rigorous than the APhA training, to be acceptable. In my opinion, it borders on irresponsible to allow a future health care professional to develop a skill set only to allow those skills to deteriorate through lack of use.

The goal of all of us in the health care professions should be to immunize as many people as we can against vaccine preventable diseases. Removing barriers from patients who seek vaccines is an important step toward that goal. Limiting the ability of pharmacists to administer injectables based on the patient age is a barrier that can and should be removed.

Thank you for allowing me to share my thoughts.

Respectfully,

Edward J. Bechtel, R.Ph.