



TO: Members, Assembly Committee on Health  
FROM: Danielle Womack, MPH  
Vice President, Public Affairs  
Pharmacy Society of Wisconsin  
DATE: January 20, 2021  
SUBJECT: Support of AB 4

Chairman Sanfelippo and members of the Assembly Committee on Health, thank you for the opportunity to provide testimony today on Assembly Bill 4. This legislation will expand access to pharmacy-provided immunizations both during and after the current pandemic.

Pharmacy professionals serve as a crucial asset and partner in the fight against COVID-19 and the administration of the COVID-19 vaccine. Under current law, pharmacy students may only administer vaccines if a licensed pharmacist supervises them. Many public health departments, health systems, and academic institutions are hosting vaccination clinics with physicians, nurse practitioners, physician assistants, or registered nurses – not pharmacists – on site.

AB 4 would allow healthcare personnel whose scope of practice includes vaccination to supervise pharmacy student immunizers, rather than only pharmacist supervisors as required by current law.

The skillset of immunizing is a technical one not unique to one's healthcare profession; thus, it could be overseen by another healthcare professional authorized to immunize. Providing more flexibility to student pharmacists by allowing supervision by other healthcare providers when providing vaccinations is an effective way to disseminate the vaccine. While many student pharmacists are already playing an active role in vaccine administration, enlisting all of our willing, ready, and able pharmacy students to collaborate with other healthcare providers will exponentially increase vaccination opportunities. There are more than 700 pharmacy student immunizers in Wisconsin – allowing them to serve their community by administering COVID-19 vaccines in more settings can increase our immunization administration in Wisconsin significantly.

Unfortunately, due to busy pharmacies' staffing levels, it can be challenging for pharmacists to administer vaccines. Multiple states, including Idaho, Utah, and Rhode Island, allow pharmacy technicians to administer immunizations as an additionally trained immunizer under a licensed pharmacist's delegation and supervision. As part of the pandemic public health emergency declaration and PREP Act, the U.S. Department of Health and Human Services allows pharmacy technicians to immunize patients aged 3-18. Under a pandemic variance, the Wisconsin Pharmacy Examining Board enables technicians to immunize patients 18 and older.

AB 4 would allow trained, certified, and supervised technicians to permanently administer vaccines to patients six and older, the same age minimum allowed for pharmacy students. Allowing pharmacy technicians to administer immunizations, when trained and under the supervision of a pharmacist, will increase pharmacies' abilities and capacities to provide

immunizations to patients, thereby assisting with the public health need to achieve the necessary vaccine catch-up.

Upon review of AB 4, we have two suggested amendments:

**1. Allow any trained pharmacy student to immunize patients**

- a. Current law and AB 4 only allow students to immunize once the student has completed year two of pharmacy school
- b. Once a student has completed immunization training, their year in school is relatively insignificant – the required training course includes all educational elements needed.
- c. The allowance for any trained student to immunize was included in AB 1 as passed by both the Assembly and the Senate substitute amendment
- d. We request that these students be able to be supervised by any healthcare provider whose scope includes immunization, as allowed by this bill for students who have completed their second year of pharmacy school

**2. Allow pharmacists, pharmacy students, and pharmacy technicians trained in immunization administration to administer injectable epinephrine and diphenhydramine in the case of an adverse reaction to a vaccine.**

- a. The administration of emergency injectable medication is allowed under current HHS temporary allowances but is not permanent under Wisconsin law
- b. We want to ensure that pharmacy professionals can administer these life-saving drugs in the case of an anaphylactic reaction

Pharmacies are uniquely positioned to serve as an additional access point for patients – many pharmacies are open late (or 24 hours) and do not require immunization appointments. Additionally, 90% of Americans live within 5 miles of a pharmacy, making pharmacies a convenient option for many individuals, especially those with limited transportation access. Empowering all trained pharmacy professionals to immunize patients will increase our ability to vaccinate the population during and after the pandemic.

Thank you very much for your consideration of this Assembly Bill 4. I am happy to answer any questions at this time or after the hearing at [dwomack@pswi.org](mailto:dwomack@pswi.org) or 608-827-9200.