



PENNSYLVANIA ACADEMY
OF FAMILY PHYSICIANS

September 20, 2021

**House Professional Licensure Committee
Public hearing on COVID-19 pharmacy waivers**

Good morning, Chairman Hickernell, Chairman Wheatley and honorable members of the House Professional Licensure Committee. Thank you for the opportunity to speak to you today about the various pharmacy waivers that were issued during the COVID-19 emergency declaration.

My name is Dr. Tiffany Leonard, and I am a family physician and the owner and operator of a direct primary care practice in Montgomery County. I also serve as the President of the Pennsylvania Academy of Family Physicians, which represents more than 6,000 physician, resident, and student members across the Commonwealth.

Family physicians have been on the front lines of the COVID-19 pandemic, but we understand that we haven't been there alone. We value and appreciate the efforts of our health care provider colleagues, including pharmacists, that have worked together to reduce the spread of the virus and vaccinate as many Pennsylvanians as possible over the past year and a half.

We recognize the important responsibility that pharmacists play in our health care system, and we value and respect that role. The COVID-19 emergency necessitated an "all hands-on deck" approach from providers across the health care spectrum. And while we are not out of the woods yet, we believe the need for many of the waivers has expired.

The various waivers that were issued during the governor's emergency declaration were necessary at the time to ensure access to Covid-19 testing and widespread distribution of Covid-19 and flu vaccines across the Commonwealth. However, the PAFP does not support making these changes permanent. We believe some of the waivers that were issued expand the scope of practice for pharmacists and pharmacy interns at the risk of patient safety, particularly that of the children we care for.

The PAFP has serious concerns about allowing pharmacists to administer vaccines to customers under the age of 18 years. When a child patient visits their family physician's or pediatrician's office for childhood vaccinations, it is an important opportunity for the physician to examine

the child's physical, mental, and behavioral development, and identify potential issues including abuse. The value of these visits cannot be overstated; they are critically important to ensure a child's well-being.

The PAFP supported passage of Act 8 of 2015, which allows pharmacists to administer the flu vaccination to patients 9 years of age and older. We continue to support that policy but believe expanding it to include patients 3 years of age and older is unnecessary and disrupts continuity of care, as many childhood vaccinations are administered, and developmental and other health concerns identified, between the ages of 3 and 9.

The current CDC vaccine schedule calls for a two-dose series of flu vaccine for some children under the age of 9, specifically if they have not had two or more doses previously. A child's family physician or pediatrician will have their complete medical history readily available, whereas the pharmacist may not. This could lead to the patient receiving too few or too many doses of flu vaccine.

It is also important to note that physicians are trained to quickly recognize and effectively manage severe reactions to vaccines, most notably anaphylaxis—a severe, potentially life-threatening allergic reaction. Medication dosing for young children is not the same as for adults. Without appropriate management anaphylaxis can become fatal very quickly.

Finally, physicians are a trusted source of information for vaccinations, including the COVID-19 vaccine. With Pennsylvania already facing vaccine hesitancy, parents are likely to turn to their child's physician, with whom they already have an established relationship, for guidance on getting their child vaccinated against the virus.

While we understand the need for the pharmacy waivers under the recent emergency declaration, the PAFP believes a return to pre-COVID policies is appropriate and timely.

On behalf of myself and the PAFP, thank you again for the opportunity to testify before you today. I look forward to answering any questions.