

June 1, 2020

Representative Scott Wiggam
Committee Chair
rep1@ohio.house.gov

Re: Strong Support of Ohio House Bill 673

Dear Representative Wiggam:

The National Association of Chain Drug Stores (NACDS) greatly appreciates the opportunity to provide strong support for Ohio House Bill 673 to protect and care for residents during the COVID-19 public health emergency. This bill would expand access to community pharmacy-led care for Ohioans, including **immunizations for COVID-19 to individuals 7 and older** and **administration of COVID-19 tests**.

NACDS members have over 6,700 pharmacists at 1,600 pharmacies in Ohio trained, ready, and willing to address threats to the health and wellbeing of your residents, including providing the necessary COVID-19 testing, including antibody testing, and forthcoming vaccine. Pharmacists are key partners during a crisis given their accessibility and integration in communities across the state, doctorate-level clinical training, and their ability to help ensure patients have access to the supportive care measures they need.

We urge you to act now to ensure Ohioans have access to COVID-19 testing and vaccine, when available. Advancing HB 673 is central to such preparations, as pharmacies and pharmacists can support safely and effectively ramping up such efforts.

Expanding Ohioan Access to COVID-19 Testing

By expanding pharmacists' authority to include the ability to administer COVID-19 tests, people throughout Ohio will benefit from increased access to care. To date, 39 states allow pharmacists to provide COVID-19 tests for patients, and we urge Ohio to join these other states. Community pharmacy sites should be utilized to their full potential to meet public health needs and better track outbreaks of the virus within the state. These testing sites have the benefit of being embedded in the communities they serve as well as providing hours outside of typical office hours, making it easier for those without easy access to transportation or flexibility with their work schedule to still receive testing if needed. To ensure outbreaks of COVID-19 within Ohio are contained and prevented, it will be imperative to promote utilization of local neighborhood pharmacy testing sites.

On May 19th, the Department of Health and Human Services issued landmark guidance asserting that previous federal guidance authorizing pharmacists to order and administer COVID-19 testing preempts any restrictions on the state or local level that would prohibit a pharmacist from being involved in COVID-19 testing.¹ Ohio should utilize their pharmacists to their full potential by allowing them to be involved in COVID-19 testing, both through the provision of FDA-authorized COVID-19 tests as well as the collection of specimens for non-CLIA-waived tests.

Preparing to Scale COVID-19 Vaccination Distribution and Administration

Making vaccine readily available to the public will prevent additional infections and future outbreaks. Pharmacies have proven they can safely and quickly scale up their immunization efforts during a pandemic by using their distribution networks and local presence in neighborhoods throughout the country. For example, through the CDC 2009 H1N1 Vaccine Pharmacy Initiative, the Centers for Disease Control and Prevention (CDC) distributed about 5.5 million doses of

¹ HHS. Advisory Opinion 20-02 on the Public Readiness and Emergency Preparedness Act and the Secretary's Declaration Under the Act. May 19, 2020. <https://www.hhs.gov/sites/default/files/advisory-opinion-20-02-hhs-ogc-prep-act.pdf>

the pandemic vaccine to 10 large pharmacy organizations over a 3-month period, which was in turn distributed to over 10,700 retail stores. Overall, this accounted for 23% of all vaccines distributed during the same time period when delivering such care was relatively new to pharmacies.² Therefore, given that pharmacies have significantly expanded their immunization programs since the H1N1 pandemic and given their accessibility in communities throughout Ohio, pharmacies are needed to quickly and safely distribute and administer COVID-19 vaccinations.

To further support the importance of integrating pharmacies in COVID-19 vaccination efforts, one pivotal study indicated that community pharmacies can mitigate against 23.7 million pandemic symptomatic cases, yielding a cost savings of nearly \$100 billion.³ Additionally, the model illustrated that by extending pharmacy hours, the nation could make an even greater impact. Another study led by the federal government demonstrated that weekly national vaccine administration capacity increased to 25 million doses per week when retail pharmacist vaccination capacity was included in the model. Importantly, the study also established that ***time to achieve 80% vaccination coverage nationally was reduced by seven weeks when community pharmacies were included*** in vaccination distribution and administration, assuming high public demand for vaccination.⁴ To further support these efforts, many community pharmacies can also deploy mobile vaccine programs that can be tailored to those in underserved, rural, or vulnerable communities.

Advancing HB 673 is vitally important to Ohio's efforts to reopen its economy and care for its citizens. NACDS appreciates the opportunity to provide strong support and we urge quick adoption of HB 673, to ensure pharmacies are best able to care for Ohioans throughout the pandemic response. If you have questions, please contact Jill McCormack at JMcCormack@nacds.org or 717.525.8962.

Sincerely,



Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores

CC:

Representative Bill Roemer
rep38@ohio.house.gov

Attachment: *Pharmacies: A Vital Partner in Reopening America*

² Koonin LM, et al. CDC's 2009 H1N1 vaccine pharmacy initiative in the United States: implications for future public health and pharmacy collaborations for emergency response. *Disaster Med Public Health Prep.* 2011 Dec;5(4):253-5. <https://www.ncbi.nlm.nih.gov/pubmed/22146661>

³ Bartsch SM et al. Epidemiologic and economic impact of pharmacies as vaccination locations during an influenza epidemic. *Vaccine.* November 2018. <https://www.ncbi.nlm.nih.gov/pubmed/30340884>

⁴ Schwerzmann J, Graitcer SB, Jester B, Krahl D, Jernigan D, Bridges CB, Miller J. Evaluating the Impact of Pharmacies on Pandemic Influenza Vaccine Administration. *Disaster Med Public Health Prep.* 2017 Oct;11(5):587-593. <https://www.ncbi.nlm.nih.gov/pubmed/28219461>

About NACDS:

NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate nearly 40,000 pharmacies, and NACDS' 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit nacds.org.