



## **The Ohio Society of Health-System Pharmacy**

To: The Ohio House of Representatives Health Provider Services Committee

SB144: Proponent Testimony

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### **To: The Health Provider Services Committee**

Dear Chairman Cutrona, Vice Chair Gross, Ranking Member Somani, and esteemed members of the Health Provider Services Committee., on behalf of the Ohio Society of Health-System Pharmacy (OSHP) we would like to thank you for the opportunity to provide proponent testimony on Senate Bill 144, a bill with the potential to increase the accessibility of vaccinations for all Ohioans, especially for residents of medically underserved urban and rural communities. We would additionally like to extend our gratitude to Senator Romanchuk specifically for sponsoring this important piece of legislation.

The Ohio Society of Health-System Pharmacy represents hundreds of Ohio's pharmacists, students, technicians, and other healthcare associates with a specific focus on health-system pharmacy practice. OSHP strongly supports the proposed amendments to section 4729.41 of the Ohio Revised Code that are contained within the currently proposed version of SB144. We additionally encourage lawmakers and other applicable agencies to consider adjusting the verbiage of section A(3) of Rule 5160-9-05 within the Ohio Administrative Code to help ensure that pharmacies are able to meet these additional demands by ensuring reimbursement for these services.

### **Senate Bill 144 Background:**

In its current form, SB144 aligns with language previously adopted in the Senate as an integral component of our effort to combat the morbidity and mortality of the Covid-19 pandemic. This bill will reinstate provisions that were vitally important to the healthcare landscape throughout the Public Health Emergency (PHE) which ended on May 11, 2023. The bill, echoing the federal PREP Act, presents an opportunity to empower Ohio families with the choice to access a full range of childhood vaccines at local pharmacies. Ensuring that all Ohio families have access to the full range of childhood vaccines is crucial for preserving and enhancing public health efforts in our state, especially in historically underserved urban and rural areas.

When evaluating the impact of these provisions during the Covid-19 pandemic, the numbers speak volumes about the efficacy of this approach at improving vaccine access, with pharmacists, interns and technicians delivering over 14 million vaccines to Ohioans, including

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756,000 to children, in a span of just 2.5 years. The compelling data presented above underscores the need for more accessible vaccine providers, especially considering the healthcare access gaps prevalent in Ohio. Currently, 182 areas within Ohio are designated as primary care shortage areas, in addition, as Senator Romanchuk has pointed out, 48.8% of Ohio's children (approximately 1.25 million kids) lacked a medical home in 2021, this is an unacceptable statistic that demands our collective attention and action.

Additionally, the Ohio Department of Health's immunization rate data demonstrates large gaps in care related to childhood vaccination rates - with most childhood vaccinations averaging around 85% coverage. Ohio's childhood vaccination rates have been declining. This presents Ohio with an opportunity to address this important public issue and aid in the prevention of potential public health emergencies that could be caused by declining vaccination coverage.

Senate Bill 144 presents an opportunity to bridge these access gaps and improve patient outcomes, all the while reducing healthcare costs for Ohio families and the Ohio taxpayer. Below, we have some key points that we would like you to consider; these points exemplify why The Ohio Society of Health-System Pharmacy believes that Senate Bill 144 will have such a positive impact.

### **Key Considerations For SB144:**

#### **1. Pharmacies offer a more accessible and convenient place to receive healthcare services such as immunizations.**

There is a pharmacy located within 5 miles of every American household, many of which are open during evenings and weekends, making them more accessible for all patients. By expanding the authority to administer immunizations to certified pharmacy technicians and registered pharmacy technicians, the bill ensures that the places frequently visited by patients can be fully utilized to expand access to immunization services. Allowing for patients to receive vaccines without needing to make appointments with pediatricians has potential benefits of saving time and money for both patients and payers such as medicare and medicaid. The reduced cost and increased ease of access for pediatric patients will further increase adherence to recommended vaccines and positively impact the health of Ohio's general population.

Pharmacies provide more accessible locations for Ohioans to receive immunizations and do so at a lower cost. For example, the average cost of receiving a shingles vaccination at a physicians office is \$208.72, much higher than the \$168.50 average cost for that same vaccination at a pharmacy. More immunizations at pharmacies will help reduce costs for patients and this legislation will help expand pharmacies capabilities to meet those increased demands. We should however ensure that pharmacies receive reimbursement for these services whether they are provided by a pharmacist, or a technician under the pharmacists supervision.

Currently, Rule 5160-9-05 of the Ohio Administrative Code Section discusses reimbursement for services provided at a pharmacy, with vaccine administration receiving reimbursement based upon an "Administration fee," which Section A(3) of this rule defines as follows:

*("Administration fee" means the maximum amount payable to a provider to administer a vaccine or injectable drug that is payable under this chapter and authorized to be administered by a pharmacist or pharmacy intern in accordance with section 4729.45 of the Revised Code and the rules promulgated thereunder.)*

*We would encourage lawmakers and applicable agencies to update this verbiage as follows:*

*"The "Administration fee" means the maximum amount payable to a provider to administer a vaccine or injectable drug that is payable under this chapter and authorized to be administered by a pharmacist, pharmacy intern, certified pharmacy technician or registered pharmacy technician in accordance with sections 4729.41 and 4729.45 of the Revised Code and the rules promulgated thereunder."*

Ensuring reimbursement will help ensure that pharmacies are able to better address staffing concerns that otherwise may limit their ability to handle increases in immunization demand.

**2. This bill adds options to expand care/access to immunizations. This increased access to care supports (but doesn't supplant) the importance of having a primary care physician, family medicine physician, and/or a pediatrician.**

Moreover, we commend the inclusion of a provision in the bill that addresses the shortage of primary care providers for Ohioans. Under the previous PREP act, pharmacists must report all immunizations administered to the patient's primary care provider if they have one. Additionally, when individuals do not have a primary care provider (again 182 areas in Ohio are designated as primary care shortage areas), pharmacists will counsel those patients (and their families) about the importance of well-child visits and can refer the patient to a primary care provider if appropriate. In this way, patients who currently lack access to a primary care provider could gain access to the vaccines that are indicated for them at a time that is convenient for them while also gaining information about how to establish a longitudinal connection to a primary care provider.

**3. Expanding the number of providers who can administer vaccinations will help alleviate staffing concerns seen across various healthcare settings.**

Adding additional, qualified individuals to the immunization team helps alleviate the burden that increased immunization demand has on pharmacists, by allowing them to delegate the administration of the vaccine to a qualified member of their pharmacy team under that pharmacists supervision.

In addition to alleviating the burden on pharmacy technicians and interns, it is important to note that Ohio health systems have critical shortages of nursing staff, who are often tasked with patient vaccination assessment and vaccine administration. The Ohio Nurses Association declared a "Code Red" Campaign, which aimed to highlight the staffing issues and identify strategies to improve staffing levels and working conditions among nurses. Similarly with providers, nurses are tasked to do more with less, including immunization. Seven out of ten nurses in direct patient care consider exiting their current role due to working conditions. With the multitude of tasks assigned to nurses, immunizations may not be fully assessed during

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routine visits. Adding additional, qualified individuals to the immunization team can facilitate reduced burnout on strained nursing staff. Secondly, expanding the number of patients that qualify for immunization by pharmacy staff (pediatrics) can alleviate burden and improve patient care.

**4. This is widely considered a helpful strategy to continue addressing important public health issues. Other states have paved the way and set precedent for this practice to be established.**

Ohio is not the only state that has recognized the need to reinstate the important provisions outlined in this bill; the current bill aligns with measures already adopted by other states, such as Kentucky, Michigan, Virginia, and West Virginia. This consistency across states not only strengthens the case for Senate Bill 144 but also reflects a national trend toward recognizing the pivotal role of pharmacists, pharmacy interns, and pharmacy technicians in improving public health.

**5. Certified pharmacy technicians and registered pharmacy technicians are skilled members of the pharmacy care team.**

Pharmacies and health systems across Ohio already rely on the technical skills of certified pharmacy technicians and registered pharmacy technicians to support the effective operations of our pharmacies. Pharmacy technicians are relied upon across Ohio to perform sterile, and non-sterile compounding, stock automated drug dispensing units, accept new prescriptions and complete various other tasks involved in the preparation of prescription medications. Like licensed pharmacy interns, certified pharmacy technicians are well qualified to safely administer vaccinations under the direct supervision of a pharmacist and have clearly demonstrated this throughout the COVID-19 pandemic.

**Conclusion:**

In closing, The Ohio Society of Health-System Pharmacy urges the Committee to consider the invaluable contributions made by pharmacy technicians here in Ohio and recognize the positive impact that Senate Bill 144 can make within our communities. We encourage you to bring this bill forward to the rest of the Ohio House of Representatives. We appreciate your thoughtful consideration of this important legislation and stand ready to address any questions or concerns you may have.

Thank you for your commitment to the well-being of your constituents, our patients, and the advancement of public health.

Sincerely,



Daniel Arendt Pharm.D., BCPS

Legislative Affairs Director: The Ohio Society of Health-System Pharmacy