



March 7, 2022

Members of the Health Finance and Policy Committee,

On behalf of the 11,000 members of the Minnesota Medical Association (MMA), I am writing to share concerns with HF 4009.

HF 4009 lowers the age that pharmacists can administer vaccinations to from 13 to three, except for COVID-19 or SARS-CoV-2 vaccinations, which pharmacists can currently administer to individuals over the age of six. This would likely lead to fewer well child visits for Minnesota's families, since many families schedule well child visits in order to update their child's vaccinations.

Fewer annual well child visits would likely lead to higher rates of undiagnosed childhood illness, chronic disease, and developmental conditions. It may also lead to more unreported cases of child abuse and neglect, which are frequently reported by physicians. There are also rare adverse reactions to vaccinations that pharmacists are less capable to address than physicians.

HF 4009 removes requirement that pharmacists can only administer vaccinations by written protocol with a licensed physician, a physician assistant, or an advanced practice registered nurse. Pharmacists are critical to the administration of some vaccinations, mainly influenza and COVID-19, but they do not have the same training as physicians for other childhood vaccinations. A physician receives training through medical school and residency that includes much more extensive training on vaccinations than a pharmacist.

Though the MMA appreciates efforts that may lead to higher vaccination rates, the unintended consequences in HF 4009 are too serious for the MMA to support. The MMA hopes the bill can be amended to address the concerns outlined in this letter.

Sincerely,

Randy Rice, MD

President, Minnesota Medical Association