



To: House Health and Human Services Committee

From: Rachelle Colombo
Director of Government Affairs, Kansas Medical Society

Date: March 8, 2016

Re: HB 2646; allowing pharmacists and certain other individuals to administer any vaccine to any person six years of age or older.

The Kansas Medical Society appreciates the opportunity to submit comments today in opposition to HB 2646, allowing pharmacists to administer vaccinations. While we support efforts to ensure that more Kansans are immunized, such efforts should not further fragment care or expose patients to sub-optimal care or outcomes. Though the bill seems like an obvious solution, it over simplifies the problem and does not address the importance of receiving the right vaccination at the right time and recording all treatments in the patient's comprehensive medical record.

The bill preserves the requirement for vaccination protocols and reporting back to the primary care physician of the patient, but there are many other concerns left unaddressed. There is more than one vaccination for each virus, some more preferable for particular patients than others. Depending on other presenting factors in a patient, there is an optimal time and type of vaccination that should be administered. Additionally, once a pharmacist administers a vaccination, that information does not automatically populate into the electronic medical record – creating an informational vacuum that could lead to a patient being *over*-immunized when seeing a physician who does not have up to date information reflected on the patient's medical record. Such a scenario is what happens when care is further fragmented rather than coordinated.

Kansas physicians are sensitive to the changing culture in which we live; certainly patients desire more convenience and we would like to see more patients immunized. But rather than taking a simplistic or overly broad approach to encouraging immunization, it is imperative that patient convenience does not outweigh care concerns. An approach that better encourages continuity of care and ensures optimal immunization administration would be preferable. We would like the opportunity to work with the proponents to address these meaningfully address these concerns as we all work together for Kansas patients. Until such time, the Kansas Medical Society opposes HB 2646. Thank you for the opportunity to offer these comments.