

WEST VIRGINIA  
SECRETARY OF STATE  
BETTY IRELAND  
ADMINISTRATIVE LAW DIVISION

Form #3

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2008 AUG 29 PM 5:34

OFFICE WEST VIRGINIA  
SECRETARY OF STATE

NOTICE OF AGENCY APPROVAL OF A PROPOSED RULE  
AND  
FILING WITH THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

AGENCY: WEST VIRGINIA BOARD OF PHARMACY TITLE NUMBER: 15

CITE AUTHORITY: West Virginia Code Section 30-5-30 (HB 3056, 2008 Regular Session)

AMENDMENT TO AN EXISTING RULE: YES  NO

IF YES, SERIES NUMBER OF RULE BEING AMENDED: \_\_\_\_\_

TITLE OF RULE BEING AMENDED: \_\_\_\_\_

IF NO, SERIES NUMBER OF RULE BEING PROPOSED: 15-12-1, et seq.

TITLE OF RULE BEING PROPOSED: Pharmacist Administration of Immunizations

THE ABOVE PROPOSED LEGISLATIVE RULE HAVING GONE TO A PUBLIC HEARING OR A PUBLIC COMMENT PERIOD IS HEREBY APPROVED BY THE PROMULGATING AGENCY FOR FILING WITH THE SECRETARY OF STATE AND THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE FOR THEIR REVIEW.

  
Authorized Signature



## Board of Pharmacy

Phone (304) 558-0558

Fax (304) 558-0572

Office  
232 Capitol Street  
Charleston, West Virginia 25301

### APPROVAL OF FILING OF REGULATIONS


**BE IT HEREBY KNOWN** that the West Virginia Board of Pharmacy approves the filing of the following proposed regulations with the Secretary of State and the Legislative Rulemaking and Review Committee:

- (1) Electronic Prescribing (per SB 1001, 2007 1<sup>st</sup> Special Session);
- (2) Pharmacist Administration of Immunizations (per HB 3056, 2008 Regular Session); and
- (3) Regulation of Charitable Clinic Pharmacies (per SB 722, 2008 Regular Session).

This approval was granted by the Board at its regular meeting on July 14, 2008, wherein the Board reviewed drafts of the proposed regulations, and authorized our Executive Director and General Counsel, David E. Potters, to respond to any public comments properly received. In authorizing Mr. Potters to respond to the public comments, the Board further authorized him to make modifications or amendments to the proposed regulations as were appropriate in accordance with the goals and direction given by the Board in drafting these rules.

Signed this 29th day of August, 2008,

BY:

  
\_\_\_\_\_  
George Karos, President

QUESTIONNAIRE

*(Please, return a copy of this form with each filing of your rule - unless a Public Hearing or Comment Period is Proposed Rule, and if needed, Emergency and Modified Rule.)*

DATE: August 29, 2008

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

FROM: (Agency Name, Address & Phone No.) WEST VIRGINIA BOARD OF PHARMACY  
232 CAPITOL STREET  
CHARLESTON, WEST VIRGINIA 25301  
304-558-0558

LEGISLATIVE RULE TITLE: PHARMACIST ADMINISTRATION OF IMMUNIZATIONS  
(PART OF TITLE 15)

1. Authorizing statute(s) citation WV CODE SECTION 30-5-30 (HB 3056, 2008 REGULAR SESSION)

2. a. Date filed in State Register with Notice of Hearing or Public Comment Period:  
July 30, 2008--Public Comment Period

b. What other notice, including advertising, did you give of the hearing?  
N/A

c. Date of Public Hearing(s) *or* Public Comment Period ended:  
August 29, 2008

d. Attach list of persons who appeared at hearing, comments received, amendments, reasons for amendments.

Attached     X     No comments received

- e. Date you filed in State Register the agency approved/proposed Legislative Rule following public hearing: (be exact)

August 29, 2008

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- f. **Name, title, address and phone/fax/e-mail numbers** of agency person(s) to receive all *written correspondence* regarding this rule: (Please type)

David E. Potters

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Executive Director and General Counsel  
232 Capitol Street

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Charleston, West Virginia 25301

---

304-558-0558

304-558-0572 (fax)

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- g. **IF DIFFERENT FROM ITEM 'f'**, please give **Name, title, address and phone number(s)** of agency person(s) who wrote and/or has responsibility for the contents of this rule: (Please type)

N/A

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3. If the statute under which you promulgated the submitted rules requires certain findings and determinations to be made as a condition precedent to their promulgation:

- a. Give the date upon which you filed in the State Register a notice of the time and place of a hearing for the taking of evidence and a general description of the issues to be decided.

N/A

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b. Date of hearing or comment period:

N/A

c. On what date did you file in the State Register the findings and determinations required together with the reasons therefor?

N/A

d. Attach findings and determinations and reasons:

Attached N/A

BRIEF SUMMARY OF AND STATEMENT OF CIRCUMSTANCES WHICH REQUIRE  
THE PROPOSED LEGISLATIVE RULE

Pharmacist Administration of Immunizations

15 CSR 12

**Summary and Statement of Circumstances:** HB 3056, passed during the Regular Session, 2008, and duly enacted into law, permits pharmacists to administer immunizations to patients in this State. HB3056 directs the West Virginia Board of Pharmacy as set forth in West Virginia Code Section 30-5-30 to promulgate rules, with the advice of the Board of Medicine and Board of Osteopathy, to implement and enforce the provisions of this section. Pharmacists are already administering immunizations in most other states in the United States pursuant to the laws in the various jurisdictions. These proposed regulations set forth the conditions under which a pharmacist in West Virginia may do so, including the training and certifications that must be obtained, continuing education, and standards of practice which must be followed.

**For Further Information:** Copies of the proposed rule may be obtained from the website of the West Virginia Secretary of State at [www.wvsos.com](http://www.wvsos.com), or interested parties may call the Administrative Law Division of the Office of the Secretary of State at (304) 558-6000.

Further information may be obtained by contacting the West Virginia Board of Pharmacy, David E. Potters, Executive Director and General Counsel, 232 Capitol Street, Charleston, West Virginia, 25301, telephone (304) 558-0558.

**Note:** This is a proposed new series, such that there are no strike-throughs in the proposed rule..

FISCAL NOTE FOR PROPOSED RULES

Rule Title: 15-12-1. et seq: Pharmacist Administration of Immunizations

Type of Rule:  Legislative  Interpretive  Procedural

Agency: West Virginia Board of Pharmacy

Address: 232 Capitol Street, Charleston, West Virginia 25301

Phone Number: (304) 558-0558 Email: dpotters@wvbop.com

**Fiscal Note Summary**

Summarize in a clear and concise manner what impact this measure will have on costs and revenues of state government.

The Board of Pharmacy will have to process and issue certifications for pharmacists to administer immunizations, including future renewals. The proposed regulation allows for a \$10.00 fee for application for such a certification which will cover the administrative costs. Thus, while the Board of Pharmacy will realize costs, it will also realized increased revenues through fees received. As such, there should be no net financial impact to the Board. There will be no effect to the State's general revenue.

**Fiscal Note Detail**

Show over-all effect in Item 1 and 2 and, in Item 3, give an explanation of Breakdown by fiscal year, including long-range effect.

FISCAL YEAR			
Effect of Proposal	Current Increase/Decrease (use "-")	Next Increase/Decrease (use "-")	Fiscal Year (Upon Full Implementation)
1. Estimated Total Cost	5,000.00	15,000.00	15,000.00
Personal Services			
Current Expenses			
Repairs & Alterations			
Assets			
Other			
2. Estimated Total Revenues	5,000.00	15,000.00	15,000.00

Rule Title: \_\_\_\_\_

3. **Explanation of above estimates (including long-range effect):**  
Please include any increase or decrease in fees in your estimated total revenues.

The Board has approximately 3,000 pharmacists currently actively licensed in the State. The above estimates assume that approximately 1/2 of the licensees will desire to obtain certification to administer immunizations, with approximately 500 applying in the 2008-2009 fiscal year, and approximately 1,500 applying for certification or renewal each fiscal year thereafter. The Board of Pharmacy will have to process and issue certifications for pharmacists to administer immunizations, including future renewals. This includes costs of providing applications (in other than electronic format), time for Board employees to process applications, costs of producing and mailing certificates, and costs of producing and mailing notices for renewals. The proposed regulation allows for a \$10.00 fee per application for such a certification, which will cover the administrative costs. Thus, while the Board of Pharmacy will realize costs, it will also realize increased revenues through fees received. As such, there should be no net financial impact to the Board. There will be no effect to the State's general revenue.

**MEMORANDUM**

Please identify any areas of vagueness, technical defects, reasons the proposed rule **would not** have a fiscal impact, and/or any special issues **not** captured elsewhere on this form.

[Empty box for memorandum content]

Date: July 31, 2008

Signature of Agency Head or Authorized Representative

David S. Peters

TITLE 15  
LEGISLATIVE RULE  
WEST VIRGINIA BOARD OF PHARMACY

FILED

2008 AUG 29 PM 5: 34

SERIES 12  
BOARD OF PHARMACY RULES REGARDING IMMUNIZATIONS  
ADMINISTERED BY PHARMACISTS

OFFICE WEST VIRGINIA  
SECRETARY OF STATE

§15-12-1. General.

1.1. Scope. -- To establish rules for pharmacists licensed in West Virginia to administer immunizations to patients in this State.

1.2. Authority. -- W. Va. Code §30-5-30 (HB 3056, 2008 Regular Session), with advice from the Board of Medicine and Board of Osteopathy.

1.3. Filing Date. -- \_\_\_\_\_.

1.4. Effective Date. -- \_\_\_\_\_.

§15-12-2. Definitions.

2.1. "Immunizations" means, for the purpose of this title, the vaccines specifically listed in this subsection which a pharmacist may administer to any person eighteen years of age or older, including:

- (a) Influenza; and
- (b) Pneumonia.

§15-12-3. Qualifications.

3.1. A pharmacist licensed by the Board may administer immunizations to any person eighteen years of age or older provided the pharmacist has met all of the following requirements:

- (a) registered with the board to administer immunizations;
- (b) successfully completed the American Pharmacists Association's (APhA) immunization training program, or such other immunization training course as may be approved by the Board, which courses must be based on the standards established for immunization training by the Centers for Disease Control and Prevention in the public health service of the United States Department of Health and Human Services;
- (c) maintains current certification in basic life-support training, including basic cardiopulmonary resuscitation (CPR), offered by the American Heart Association or the American Red Cross; and
- (d) completed a minimum of two (2) hours annually of continuing education related to immunizations. The continuing education must be by a provider approved by the Accreditation Council for Pharmacy Education (A.C.P.E.).

3.2. It is unprofessional conduct for a pharmacist to administer an immunization, who is not in compliance with this Title.

#### §15-12-4. Registration.

4.1. Prior to administering immunizations a pharmacist shall submit an application supplied by the Board for review and approval of the Board, providing that all of the requirements of Section 3(a) have been met. The application must be submitted along with a required fee of \$10.00. Provided all requirements of Section 3(a) have been met and the required fee is received, the Board shall issue a registration to administer immunizations. Registrations shall expire bi-annually on June 30 of year in which the pharmacist's license to practice pharmacy expires.

4.2. A pharmacist may not administer an immunization unless currently registered with the Board to do so under this Title. Further, such registration must be posted conspicuously at any location at which the registered pharmacist is doing any administration.

#### §15-12-5. Immunizations.

5.1. Immunizations authorized by this Title shall be administered:

(a) in accordance with definitive treatment guidelines for immunizations promulgated by the latest notice from the U.S. Department of Health and Human Services, Centers for Disease Control and Prevention (CDC), including, but not limited to, CDC's "Recommended Adult Immunization Schedule, by Vaccine and Age Group" and "Recommended Adult Immunization Schedule, by Vaccine and Medical and Other Indications", including the footnotes provided for each schedule; or

(b) in accordance with a proper order from a properly authorized practitioner.

5.2. Administration must be done in accordance with the training required by Section 3.1(b) of this Series, including, but not limited to indications, contraindications, route of administration, sanitary environment for administration, specifics regarding administration, and storage requirements for each specific immunization authorized by this title;

5.3. Administration must include implementation of the CDC's recommended appropriate observation for an adverse reaction of an individual following an immunization.

5.4. Under no circumstances may a pharmacist delegate his or her authority to administer immunizations to any other person, including but not limited to, any pharmacy technician.

5.5. A current Vaccine Information Statement, as provided by CDC, shall be provided to each person receiving an immunization for each immunization administered.

#### §15-12-6. Record-keeping and reporting.

6.1. An immunization questionnaire and consent form shall be completed for each person receiving an immunization. A record of the immunization administration shall be forwarded to the primary care physician or other licensed health care provider as identified by the person receiving the immunization, within not more than 30 days of the

date of the administration. In the event that the patient affirmatively indicates in writing that he or she does not have a primary care physician or other health care provider to whom to forward the report, the pharmacist must document such in the immunization record, and provide a record of the immunization administration to the patient.

6.2. In addition, the pharmacist must report the administration of the patient immunization to the West Virginia Statewide Immunization Information (WVSII) database in the format and containing such information as may be required by the WVSII within not more than 30 days of the date of the administration.

6.3. The immunization questionnaire and consent form and record of the immunization administration shall be filed in the pharmacy in a manner that will allow timely retrieval, and shall be kept on file for a time period not less than five (5) years from the date of the immunization. All such records shall be maintained in the pharmacy where the immunization is administered. In the event it is administered off-site, then the records shall be maintained in the pharmacy where the pharmacist who administered the immunization is employed at the time the immunization is given.

#### §15-12-7. Emergencies.

7.1. A pharmacist authorized to administer immunizations under this title may administer epinephrine and diphenhydramine in the management of an acute allergic reaction to an immunization following guidelines issued by CDC for such situations.

7.2. A pharmacist shall have a readily retrievable emergency response plan as outlined in by the CDC and maintain a readily retrievable emergency kit to manage an acute allergic reaction to an immunization administered.

#### §15-12-8. Immunization Training Programs

8.1. The Board must approve a course or program in immunization administration for that course to be used to meet the qualification requirement of section 3.1(b). In order to be approved by the Board, the course or program, at a minimum, must include practical training and instruction on the following:

- (a) basic immunology, including the human immune response;
- (b) adverse reactions, contraindications, warnings and precautions;
- (c) response to emergency situations, including administration of epinephrine and diphenhydramine;
- (d) storage and handling requirements;
- (e) recordkeeping and reporting requirements, including screening and informed consent documentation;
- (f) proper environment for administration and observation;
- (g) legal and regulatory issues, including, but not limited to, state law and regulations, OSHA compliance, biohazard control, and such other relevant and applicable standards; and
- (h) policies and procedures for establishing and implementing appropriate immunization treatment guidelines.

8.2. Any course approved by the Board must include a minimum of 15 hours of didactic and practical based components of instruction and training, including self study and live instruction. The live instruction must be a minimum of six (6) hours, and shall

include documented and supervised instruction on physical administration of vaccinations.



# Board of Pharmacy

Phone (304) 558-0558

Fax (304) 558-0572

Office  
232 Capitol Street  
Charleston, West Virginia 25301

## RESPONSES TO COMMENTS RECEIVED

(Including explanation of amendments made to the proposed rule as a result of comments)

### PROPOSED REGULATIONS PHARMACIST ADMINISTRATION OF IMMUNIZATIONS WV CSR 15-12-1, et seq.

The Board of Pharmacy received written public comments to the proposed rules filed with the Secretary of State on July 30, 2008. Following are the Board's responses to those comments.

1. The Board received a written comment from Board of Medicine stating its support for the proposed rule. The Board received numerous other positive comments from pharmacists, pharmacy professors, students, and members of the public voicing support without suggesting any changes.
2. The Board received an oral comment from counsel for the Board of Medicine asking the Board whether the proposed regulations provided for a sanitary environment in which the immunizations would take place. This oral comment was also echoed by a written comment from Jennie L. Cummings. A sanitary environment is among the training required by Section 3.1(b) of Series 12; nonetheless, the point made in these comments shows that clarification is in order. Based thereon, the Board amended proposed Section 15-12-5, to highlight this requirement. Specifically, the Board added the following underlined language to subsection 5.2:

5.2 Administration must be done in accordance with the training required by Section 3.1(b) of this Series, including, but not limited to, indications, contraindications, route of administration, sanitary environment for administration, specifics regarding administration, and storage requirements for each specific immunization authorized by this title;

Clearly, a sanitary environment must be observed whether in a clinical setting as well as any non-traditional setting (such as a church, school, or other immunization "clinic" setting).

3. Two comments received indicate support for the proposed rule, but question why they limit immunizations to individuals 18 years of age or older. They advocate for allowing immunization of all age groups. However, HB 3056 limits pharmacist immunizations as a matter of State Code to individuals 18 years of age or older, which limitation the Board's proposed rules cannot exceed. Thus, the rule complies with the statutory mandate. As such, the Board will not make any modifications or amendments on this point at this time.
4. One comment received questions why the rules were proposed "under the advice of the Board of Medicine and the Board of Osteopathy," stating, "I feel that this requirement still negates the pharmacist's role as a health care provider." However, HB 3056 requires that these rules be proposed by the Board of Pharmacy with the advice of the Boards of Medicine and Osteopathy. As such, the Board and a work-group met with counsel for the Boards of Medicine and Osteopathy to discuss the proposed parameters for the rules, training requirements, and other issues to fulfill the requirement. The Board then e-mailed the proposed rules to counsel for the two other Boards for their review and comment. The Board appreciates very much the advice of these two Boards in preparing these regulations. We are all united in the same goal, which is to protect the health, safety, and welfare of the public. As such, the Board will not make any modifications or amendments on this point at this time.
5. Three comments were received asking that the Board add what has become known nationally as "conscientious objector clauses" or "conscience clauses". These clauses are more prominently linked in the national and state legislative conversations with "morning-after" pills or other medications associated with preventing implantation of a fetus, contraceptives, and other such medications or devices. In the 2008 Regular Session, bills were introduced in both the House and Senate on each side of the debate. Clearly, this topic is more appropriately addressed by statutory legislation rather than legislative rule. Further, it is beyond the scope of these rules on immunizations. As such, the Board will not make any modifications or amendments on this point at this time.
6. One comment suggests that immunizations be done only in rural retail settings, and not be done in community pharmacies in more heavily populated areas. This comment is based upon the idea that long lines for immunizations may interrupt dispensing of other medications. However, the goals of increasing the immunization rates in West Virginia will be better accomplished by a uniform rule regardless of the location of the particular pharmacist immunizer. Further, the Board trusts that the pharmacies and pharmacists who decide to offer this service will do so with adequate staffing to serve their customers' needs, and will respond to the demands of the market place as their experiences require. As such, the Board will not make any modifications or amendments on this point at this time.
7. Comments were received indicating that pharmacists should be permitted to administer more than just the flu and pneumonia vaccines authorized by the proposed rules. However, HB 3056 requires joint-rulemaking between the Boards of Medicine,

Osteopathy, and Pharmacy for any further vaccinations to be added to this list. Given that pharmacist immunization is a new practice in this State, the Boards of Medicine and Osteopathy prefer to take this measured approach to allow the pharmacists an opportunity to develop this practice with these two vaccines before opening up this area of practice further. Thus, given the requirements of HB 3056 for joint-rulemaking, the Board will not make any modifications or amendments on this point at this time.

8. Several comments ask that the proposed rules be expanded to allow pharmacy interns (pharmacy students who are licensed as such) to do immunizations so that they can receive more full training on this area of practice while in pharmacy school. However, HB 3056 states clearly that only a pharmacist may administer these immunizations. Thus, unless the Legislature deems it appropriate to amend the statute to allow pharmacist interns to also immunize while working in pharmacies, the Board is unable to expand its rule in derogation of the statute. As such, the Board will not make any modifications or amendments on this point at this time.
9. Several related comments were received from current pharmacy students regarding Continuing Education (CE) requirements and training required for registration. One suggests that any pharmacists who did not administer any immunizations during his or her registration period should be required to go through a new, albeit abbreviated, re-certification process. Another suggested that two (2) CE hours per year may not be sufficient. A third suggested that the registrations expire annually (asking for annual certification based upon 2 CE hours per year). Finally, another comment generally suggested that the Board increase the training required to become registered.

In short, the work-group that studied and drafted these proposed rules reviewed requirements of many other states and other training courses before establishing the requirements enumerated in the proposed rules. Four (4) CE hours per two-year reporting period was at the high-end of the average found in other states. Further, the fifteen (15) hours minimum of training required before becoming registered was equal to or higher than what is required in most other states. Finally, the only course currently approved by the Board, the 20-hour APHA course referenced in Section 15-2-3 is the most stringent course available on this topic to the knowledge of the Board, and is the only one to have received a written letter from the Centers for Disease Control as covering their immunization topics. Thus, the Board feels that the training and CE requirements are in line with, or more stringent than, other states allowing this practice. Lastly, all pharmacist licenses are issued biannually. To require pharmacists to re-register annually would increase the burdens on the pharmacists and the Board unnecessarily, and require the pharmacists to pay the certification fee every year rather than biannually. The Board believes that the stringent training and CE requirements and biannual registration are sufficient to protect the public without requiring annual re-certification. As such, the Board will not make any modifications or amendments on this point at this time.

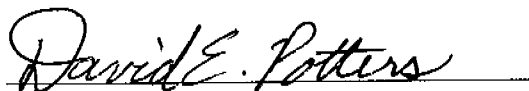
10. One comment suggests that pharmacists certified to immunize be required to post the registration so that the patients know whether a pharmacist is or is not properly

credentialed to administer vaccinations. Pharmacists are already required to post their licenses in the pharmacy. Thus, requiring posting of the immunization registrations should not be any significant additional burden to assure the public that the pharmacist is appropriately trained. As such, Section 15-12-4.2 has been amended as follows:

"4.2. A pharmacist may not administer an immunization unless currently registered with the Board to do so under this Title. Further, such registration must be posted conspicuously at any location at which the registered pharmacist is doing any administration."

11. Finally, one comment states that the Fiscal Note does not provide any statistical analysis or support for its approximation that about ½ of all licensed pharmacists in the State will desire to obtain registration to administer immunizations. The commenter is correct that the Board arrived at this estimation in a somewhat "arbitrary" manner. However, members of several pharmacy and pharmacist associations participated in the work-group drafting these rules, and the consensus seemed to be that many of the already established pharmacists in the State would choose not to take on the burden of immunizing in their practices, while most of the newly-trained pharmacists coming out of school will. In between, some chains will require all pharmacists to be certified, while some will not. Given that the low registration fee of \$10.00 is largely to cover the costs of processing, whether the actual number is significantly higher or lower than 50% of all pharmacists will not have any real significant impact to the Board's fiscal statement. As such, the Board stands by this admittedly "rough" approximation.

Prepared by:



David E. Potters  
Executive Director and General Counsel



**West Virginia Pharmacists Association**

2016 1/2 Kanawha Boulevard, East, Charleston, West Virginia 25311

Telephone (304) 344-5302 • FAX (304) 344-5316 • Email WVRDS@AOL.COM

August 29, 2008

West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301

Hand Delivered

Dear Board Members:

Representing the profession of pharmacy in our State since the late 1890's, the West Virginia Pharmacists Association expresses its support of your proposed rule permitting appropriately trained pharmacists to administer certain immunizations as called for in House Bill 3056, which passed the 2008 Legislature.

Pharmacists are the most accessible health care professional and with many pharmacies being open seven days a week, our State's citizens greater opportunities to secure these needed immunizations.

Studies reveal more individuals are immunized against influenza in states where pharmacists can administer immunizations compared to those states not allowing pharmacists to immunize patients.

WVPA suggests you delete reference to any specific provider of education programs training pharmacists to administer immunizations, thus leaving your rule to require approved programs to be equivalent to standards set by the CDC as called for in House Bill 3056. This is recommended because your Board may find other approved providers requesting they be listed in your rule, which will require your Board to undertake further amendments to your rule in the future. This is also recommended to avoid confusion among pharmacists that they should take a particular program rather than others that are equivalent.

Your Board is respectfully requested to consider the above request, then give approval to your rule as presented.

Very truly yours,

A handwritten signature in cursive script that reads "Richard D. Stevens".

Richard D. Stevens  
Executive Director

**RECEIVED****AUG 29 2008****WV BOARD OF PHARMACY**

August 28, 2008

Via Overnight Mail  
David E. Potters, Esq.  
Executive Director & General Counsel  
West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301

RE: Proposed Rules for Pharmacist Administration of Immunizations

Dear Mr. Potters:

The National Association of Chain Drug Stores is a national trade association that represents 13 chain pharmacy companies that operate approximately 300 pharmacies in the State of West Virginia (State). On behalf of our members operating in West Virginia, NACDS applauds the Board of Pharmacy (Board) for these proposed rules that will allow pharmacists to administer influenza and pneumonia immunizations to persons over 18 years of age pursuant to House Bill 3056 enacted in 2008.

413 North Lee Street  
P.O. Box 1417-D49  
Alexandria, Virginia  
22313-1480

The accessibility of community pharmacies makes them optimal health care settings for patients to receive immunizations from pharmacists. Research has shown that in states where pharmacists are permitted to provide influenza immunizations that significantly more individuals are immunized against influenza compared with states that do not allow pharmacists to immunize patients.<sup>1</sup>

In reviewing the rule, we ask the Board for consideration of the following comments. First, we ask that pharmacists be permitted options of providing the immunization record to the primary care physician or other licensed health care provider and to the West Virginia Statewide Immunization Information database such as faxing or other electronic means. This makes sense in view of the movement at the federal and state levels for electronic health records. Second, for similar reasons and because pharmacies are computerized, we ask that pharmacies have the option of maintaining the immunization records in an electronic form such as scanning or other computerized means as pharmacies maintain their prescription records electronically.

In addition, in view of the positive benefits from pharmacists' administration of immunizations and the other costs that pharmacists will incur, we ask for

(703) 549-3001

Fax (703) 836-4869

www.nacds.org

<sup>1</sup> Steyer et al, The Role of pharmacists in the delivery of influenza vaccinations. Vaccine 22:8, pages 1001-1006 (February 2004)

David E. Potters, Esq.  
Executive Director & General Counsel  
West Virginia Board of Pharmacy  
August 28, 2008  
Page 2 of 2

consideration of not charging a fee. Pharmacists will incur ongoing fees for the requirements for the immunization training program, CPR certification, and continuing education.

We thank the Board of Pharmacy for consideration of our comments.

Sincerely,

*Diane L. Darvey*

Diane L. Darvey, Pharm.D., JD  
Director Legislative and Regulatory Affairs

cc: Nicole Valentine, Regional Director, NACDS



## **RITE AID Corporation**

**MICHAEL A. PODGURSKI, R.Ph.**  
Vice President  
Pharmacy Services

- **MAILING ADDRESS**

P.O. Box 3165  
Harrisburg, PA 17105

- **GENERAL OFFICE**

30 Hunter Lane  
Camp Hill, PA 17011

- **(717) 975-5888**

- **(717) 975-3760 Fax**

- **e-mail: [mpodgurski@riteaid.com](mailto:mpodgurski@riteaid.com)**

August 28, 2008

West Virginia Board of Pharmacy  
Attn: David E. Potters  
232 Capitol Street  
Charleston, West Virginia 25301

Re: Proposed Legislative Rule 15-12-1, et seq.  
Pharmacist Administration of Immunizations

Dear Mr. Potters,

Rite Aid commends the West Virginia Board of Pharmacy in its promptness and thoroughness in preparing the proposed rule for pharmacist administration of influenza and pneumonia immunizations.

Thank you also for the Board's recognition that some chain pharmacies have spent considerable time, money and personnel resources to develop in-house training programs. Rite Aid utilizes the APhA training programs but our in-house classes are presented by our own APhA trained pharmacists which is more cost effective. Rite Aid appreciates your consideration of this factor by giving pharmacies the opportunity to submit an immunization training program to the Board for review.

West Virginia is fortunate in having two excellent Schools of Pharmacy. Rite Aid has maximized any opportunity to partner with the schools, provide internships to students and try to keep as many graduating pharmacists as possible within West Virginia. Rite Aid views the internships as mutually beneficial by providing Rite Aid pharmacists time to interact with the interns and also providing the interns with real-life, on-the-scene training opportunities. West Virginia is already starting to experience a shortage of pharmacists so we all benefit from providing exciting and meaningful opportunities to integrate pharmacy interns into in-state pharmacy practice.

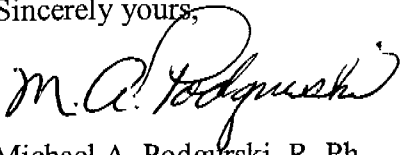
In this regard, Rite Aid requests that Section 15-12-5.4 be expanded to include an appropriately trained student-intern being able to administer influenza and pneumonia immunizations under the supervision of a pharmacist who is currently licensed by and also currently registered with the West Virginia Board of Pharmacy to administer immunizations.

Rite Aid submits the following amendment of subsection 5.4 for your consideration:

Under no circumstances may a pharmacist delegate his or her authority to administer immunizations to any person, including but not limited to, any pharmacy technician except a student who is participating in an internship program with a pharmacy that is currently licensed by the State of West Virginia. Before the beginning of the internship, the student shall submit proof of successful completion of the School of Pharmacy's course of study for administration of immunizations to the Board. Upon approval of the student's submission by the Board, any immunization administered by the intern shall only be done under the supervision of a pharmacist who is both currently licensed by and registered with the West Virginia Board of Pharmacy.

Thank you for your consideration of Rite Aid's request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "M. A. Podgurski". The signature is written in a cursive style with a large, looping initial "M".

Michael A. Podgurski, R. Ph.



R. Curtis Arnold, DPM  
South Charleston

Michael L. Ferree, MD  
Morgantown

Angelo N. Georges, MD  
Wheeling

Doris M. Griffin, MBA  
Martinsburg

M. Khalid Hasan, MD  
Beckley

Beth Hays, MA  
Bluefield

Carlos C. Jimenez, MD  
Glen Dale

Vettivelu Maheswaran, MD  
Charles Town

Bill May, DPM  
Huntington

Joe E. Miller, LtCol USMC (Ret), MA  
Hurricane

Badshah J. Wazir, MD  
South Charleston

Kenneth Dean Wright, PA-C  
Huntington

**State of West Virginia**  
**West Virginia Board of Medicine**  
101 Dee Drive, Suite 103  
Charleston, WV 25311  
Telephone 304.558.2921  
Fax 304.558.2084

August 11, 2008

David E. Potters  
Executive Director and General Counsel  
West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301

Re: 15 CSR 12, Proposed Rule, Pharmacist Administration of Immunizations

Dear Mr. Potters:

The West Virginia Board of Medicine files this comment in support of the above proposed rule. We have appreciated the opportunity to work with you in its development. This should be beneficial for the citizens of West Virginia, and we are hopeful that it will be enacted as it has been filed.

Best wishes to you.

On Behalf of the Board,

Robert C. Knittle

**RECEIVED**

lab

AUG 12 2008

WV BOARD OF PHARMACY

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**DISCIPLINARY COUNSEL**  
John K. McHugh  
Charleston

Jennie L. Cummings  
1637 Upland Road  
Huntington, WV 25701

August 25, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

To whom it may concern,

I am writing in regards to the proposed legislative rule, WV Code Section 30-5-30 (HB 3056), concerned with "Pharmacists Administration of Immunizations." The rules proposed are precisely articulated and agreeable as I believe it is most important to keep the overall public protected as is standard in all medical environments.

The only issue that grabs my attention in this legal document is under 15-12-8 Immunization Training Programs, letter f, "Proper environment for administration and observation." I show concern because from my experience, the majority of pharmacies do not have a private, clean, safe designated area for immunizations to be given. Immunizations might be quick and require little preparation as far as the proper environment, however; it is important that the public feel secure when coming into a pharmacy for flu and pneumonia immunizations and hopefully any future additions along with potential epinephrine management. Due to the lack of appointed areas that exist in pharmacies currently, it should be a priority to require and inspect any pharmacy that has been certified to administer prior to doing so. I am sure that most pharmacies and the Board of Pharmacy will see to it that all persons that step into the pharmacies for this treatment will be protected.

Thank you for your time and most importantly let me say that this is a huge advantage for West Virginia residents and I firmly believe that this will be greatly beneficial to our beloved state.

Sincerely yours,

A handwritten signature in cursive script that reads "Jennie L. Cummings". The signature is written in black ink and is positioned above the typed name.

Jennie L. Cummings  
West Virginia Native

David Potters,

I feel that allowing licensed pharmacists to administer immunizations is a move in the right direction. Coming from a patient's view point, my physician has limited the administration of vaccinations to one or two days a week due to over flow of patients and not enough time. I cannot recall a time with in the last 5 years or more where my physician himself gave me a vaccination. Only has a nurse given me a vaccination, therefore I don't see why allowing pharmacists to give vaccinations would be a negative movement.

Kevin Pataky



# UNIVERSITY OF CHARLESTON

2300 MacCorkle Ave. S.E., Charleston, WV 25304 · Phone (304) 357-4800 · FAX (304) 357-4915 · www.ucwv.edu

West Virginia Board of Pharmacy  
Attn: Mr. David Potters  
232 Capitol Street  
Charleston, WV 25301

Re: Proposed Rules 15-12

Dear Mr. Potters:

I would like to offer my support of the proposed rules regarding pharmacists as immunizers in the state of West Virginia. I feel the rules are complete and appropriate with regards to training and record keeping. The only addition I would like to see is the rules expanded to include tetanus, hepatitis B and Zostravax. I understand this is dependent upon working with the boards of medicine and osteopathy but I feel it is important we move forward on this as soon as possible.

Sincerely

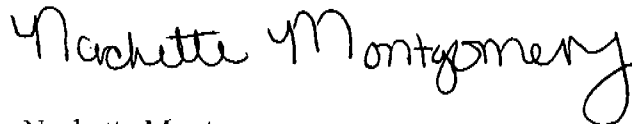
A handwritten signature in cursive script, appearing to read 'David G. Bowyer'.

David G. Bowyer  
Director of Experiential Education

August 25, 2008

To Whom It May Concern:

I was delighted to learn that the legislature in the state of West Virginia had passed a bill allowing pharmacist to immunize. As a resident of West Virginia I have realized that we are behind in some of our healthcare practices and this is a huge step for pharmacist as well a healthcare in this state. I believe that pharmacists are an important part of the healthcare team and by allowing us to immunize we are a step closer to bridging the gap between West Virginia and the rest of the country.

A handwritten signature in black ink that reads "Nchette Montgomery". The signature is written in a cursive, flowing style.

Nchette Montgomery  
University of Charleston School of Pharmacy  
Class of 2012

Seyi Ayodele

2300 MacCorkle Ave. S.E

Charleston, WV 25304

TO WHOM IT MAY CONCERN

Dear sir/ma

My name is Seyi Ayodele, a proud first year student of university of Charleston School of Pharmacy. I am writing this letter to show my support for the passage of the law that allows Pharmacist to give immunization to patients.

I strongly think this is a great law that will benefit not only the people in the community but also the government. Immunization is given to prevent diseases, so the problem is not the immunization, but the number of patients that are expose to this form of preventive care, considering the fact that West Virginia is a growing economy with a lot of rural areas without doctors of nurses that use to provide this type of care.

So on a final note, I think the legislative body, WV board of pharmacy, student representative and the activists responsible for the law did a great job that will benefit the whole community.

Yours sincerely

Seyi Ayodele

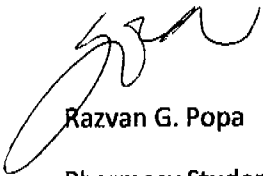
Razvan Gabriel Popa  
2300 MacCorkle Ave  
518 Middle Hall  
Charleston, WV 25304  
08-26-2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

Dear Mr. Potters

As a future Pharmacist, I cannot agree more with this new avenue our profession has taken. I believe it was long overdue for Pharmacists to receive more responsibility and show that we are fully capable of performing immunizations. I hope the future holds even more great news for our profession, and I would like to see us be able to give more than 2 types of immunizations. I hope, as a future Pharmacist, to be able to make a difference.

Sincerely,

A handwritten signature in black ink, appearing to read 'Razvan G. Popa', with a large, stylized flourish at the end.

Razvan G. Popa  
Pharmacy Student (P1)

Ajay Jariwala  
University of Charleston  
School of Pharmacy  
317 Middle Hall  
2300 MacCorkle Avenue S.E.  
Charleston, WV 25304

August 27, 2008

To Whom It May Concern:

The letter is regarding to HB 3056, which was passed during the Regular Session, 2008. I am currently a pharmacy student at the University of Charleston and after reading the summary of the rules, I completely agree with pharmacist being eligible to administer immunizations in West Virginia. However, I am from North Carolina, and I know that pharmacists already can administer immunizations if they want to. If West Virginia wants to catch up with the rest of the United States, I feel that the government needs to implement such improvements, not only for pharmacists, but for all professions with other ordeals that have been brought to their attention. All in all, HB 3056 is good for the whole economy as well, including those that cannot drive a certain distance to their healthcare provider to receive a small thing like a flu shot. Therefore, this is going to be good for the state as a whole. Thank you for your time.

Sincerely,

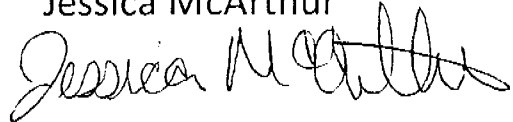
A handwritten signature in black ink, appearing to read 'Ajay Jariwala', with a stylized flourish at the end.

Ajay Jariwala

The rules for the pharmacy immunizations legislation are very reasonable and I agree with them. As a future pharmacist I believe that a pharmacist should have the right to do immunizations and these rules are very good and can easily be followed.

Sincerely,

Jessica McArthur

A handwritten signature in black ink that reads "Jessica McArthur". The signature is written in a cursive style with a large, stylized initial "J" and "M".

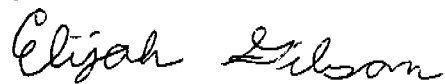


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Dear members of the West Virginia Board of Pharmacy,

I am writing to comment on the rules for pharmacists giving immunizations. I think the rules are well written, and I cannot see any places that need changed. I am a student at the University of Charleston School of Pharmacy, and I am glad that I will be able to immunize when I graduate.

Sincerely,



Elijah Thomas Gibson

---

University of Charleston  
School of Pharmacy  
2300 MacCorkle Ave SE  
Charleston, WV 25304

304-549-2728  
ashleybailey@ucwv.edu

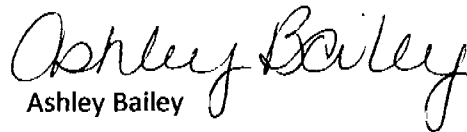
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8/21/2008

Ashley Bailey  
1209 East Village Dr.  
South Charleston, WV 25309

To whom it may concern:

My name is Ashley Bailey and I am currently a P1 student at the University of Charleston School of Pharmacy. As a West Virginia native and future pharmacist, I wholeheartedly support this legislation. I feel the Pharmacist Administration of Immunizations rule is a vital component to the future of pharmacists in West Virginia. In a state where many patients have to travel hours to their family doctor, but only minutes to their local pharmacy, you are granting them the privilege of saving time and money by allowing them to drive the short trip to the local pharmacy to receive their yearly flu shot, rather than them have to drive the hours to their doctor just for a simple shot. By allowing pharmacists the ability to administer immunizations you are, in my opinion, allowing for better, more convenient care for patients.

  
Ashley Bailey

*P1 Student*  
*University of Charleston School of Pharmacy*

West Virginia Board of Pharmacy

Attn: David Potters

I am writing in regard to pharmacists giving immunization shots in the state of West Virginia. I strongly support this legislation. Pharmacists play a vital role in the health care system. With the passing of this legislation, it will allow pharmacists to expand their role in the health care field. Pharmacists will be able to use their training and expertise to immunize their patients. Patients will benefit from having options regarding their immunization shots. Some of these benefits include cost, distance, and travel time. The state of West Virginia will be able to hold on to their pharmacists or possibly even attract pharmacists from out of state. I for example, would refuse to practice pharmacy in a state ignorant of my expertise and knowledge. I would hope to see this legislation pass. I look at this as a progressive step towards the evolution of pharmacy practice in the state of West Virginia. Thank you for your time on this matter.

X Chance Kuchinskas

Chance Kuchinskas  
Pharmacy Student

8/27/2008

Khyati Patel  
University of Charleston School of Pharmacy  
2300 MacCorkle Ave  
Charleston, WV 25304

Mr. David Potters  
232 Capitol Street  
Charleston, WV 25301

**Dear Mr. David Potters,**

As a first year pharmacy student at University of Charleston School of Pharmacy, I believe it is very important for pharmacists to administer immunizations to patients. The legislative rule proposed by West Virginia Board of Pharmacy titled Pharmacists Administration of Immunizations addresses all concerns by setting forth proper rules and regulations. This will allow only those pharmacists who undergo specific training to administer immunizations. As a future pharmacist who will be allowed to administer immunizations, this will increase our scope of practice and allow pharmacists to serve the community to the best of their abilities.

I thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Khyati Patel', written in a cursive style.

Khyati Patel  
First Year Student  
University of Charleston School of Pharmacy

August 21, 2008

West Virginia Board of Pharmacy

ATTN: David Potters

232 Capitol Street


Charleston, WV 25301

The purpose of this letter is to comment in support of the proposed legislative rule for pharmacist administration of immunizations. These rules include qualifications and training which is exceptionally thorough and will provide pharmacists in West Virginia all the necessary information they will need to safely and effectively administer vaccines to the public, even in the unfortunate event of an allergic reaction emergency. The registration process is reasonable and straight-forward, especially since the renewal date coincides with the pharmacist's license to practice pharmacy.

Record-keeping requirements are sufficient, although it is not clear to me through my interpretation of the rules whether record-keeping includes records of emergency situations. My only concern is that if an emergency were to occur in a pharmacy during a vaccination, a record or "incident report" of it should be kept along with general vaccination records.

As a pharmacy student, it is my pleasure to support this rule and I look forward to the rights given by the law to expand my scope of practice and improve public health in the state of West Virginia.

Sincerely,

A handwritten signature in cursive script that reads "Jessica B. Horsley". The signature is written in black ink and is positioned above the printed name.

Jessica B. Horsley

University of Charleston School of Pharmacy

Class of 2012

August 27, 2008

To whom it may concern:

I am currently a student at the University Of Charleston School Of Pharmacy and I support the immunization laws because it now allows pharmacists in the state of West Virginia to help patients in a different manner. The field of pharmacy is growing exponentially, and with this expansion the capacity of what pharmacists should growing in parallel. There is no limit on the capacity of what a pharmacist is capable of doing, so by allowing the pharmacist to be more involved in patient care can only improve the way that health care is delivered in the entirety.

One addition that I hope to see in the near future however, is the addition of more immunizations that pharmacists can administer, as well as a broader spectrum of different populations that the pharmacist can serve when immunizations are in question. Pharmacy is a field that is emerging with the growing need of the population, with this change the capacities of what pharmacists are allowed to do should also escalate.

Best Regards,

A handwritten signature in cursive script that reads "Puja Ajmani". The signature is written in black ink and includes a long, sweeping horizontal stroke at the end.

Puja Ajmani

Pharmacy Student Class of 2012

Brandon Benson  
307 71<sup>st</sup> Street S.E. Apt. D  
Charleston, WV 25304

August 26, 2008

West Virginia Board of Pharmacy  
Attention David Potters:  
232 Capitol Street  
Charleston, WV 25301

Dear Sir or Madam:

As an out of state student I was glad to see that this law is in the process of being implemented for pharmacists here in West Virginia. I believe the law can be a key factor in retaining out of state students, as well as keeping in state students, when we graduate. I agree with the proposed rules as outlined. The training program seems like it will be sufficient so that the pharmacists are properly trained to handle the immunizations and everything associated with them. The required continued education will also ensure they stay current with their training after the initial learning is done.

Sincerely,

A handwritten signature in black ink, appearing to read "Brandon Benson", written in a cursive style.

Mr. Brandon Benson  
University of Charleston Pharmacy Student

Brianna Husted  
335 Portland Place  
Lititz, PA 17543

West Virginia Board of Pharmacy  
Attn: Mr. David Potters  
232 Capitol Street  
Charleston, WV 25301

08/27/2008

Dear Mr. David Potters,

After familiarizing myself with the new legislature passed regarding pharmacists administering immunizations, I would like to commend the Board of Pharmacy for this achievement. This is a great leap for the profession of pharmacy and all of the groups involved in pushing for this bill should be praised. The requirements of pharmacists to give immunizations are more than adequate to ensure patients receive the care they deserve. Pharmacists are required to complete training that includes a minimum of 21 hours of training and to continue their immunization education annually by completing 2 or more hours of CE credits approved by the Accreditation Council for Pharmacy Education (ACPE). The record keeping and recording that the bill calls for keeps the physician informed of their patient's status and brings the connection between physicians and pharmacists closer together. In the coming years the gap between pharmacists and physicians will decrease as they work together to improve overall patient care.

Although pharmacists have only been approved to administer the Influenza and Pneumonia vaccines, it is just one baby step toward giving pharmacists more privileges. I believe that the vaccine for Shingles (Herpes Zoster) should be added to the bill in the future. The Advisory Committee on Immunization Practices (ACIP) has recommended that persons 60 years of age or older receive the vaccine to reduce the risk of Shingles and its associated pain. By allowing pharmacists to give the vaccine, the older community would benefit by having more access to care.

Thank you for your time and I hope that my classmates and I can provide more insight for the future of the pharmacy profession.

Sincerely,



Brianna Husted  
University of Charleston  
School of Pharmacy  
Class of 2012

402 Grandview Pointe

Dunbar WV 25064

August 22, 2008

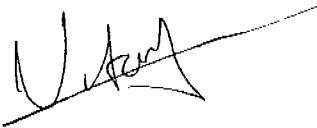
David Potters

232 Capitol Street

Charleston, WV 25301

I agreed with the proposal which allowing pharmacists give immunization. The criteria for the administration had been clearly determined. The certification criteria, continuing educations, application process, fees, type of vaccinations or immunizations, Basic Life Support training, immunization training programs , and also emergencies procedure had been determined in the proposal. I believe this will help the West Virginian to receive a better health services from health care professional.

Sincerely

A handwritten signature in black ink, appearing to read 'Vittelian Forbes', with a long horizontal line extending to the right.

Vittelian Forbes

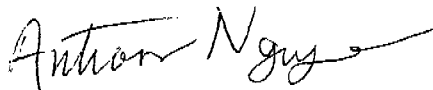
University of Charleston

School of Pharmacy class 2012

Tuesday August 26, 2008

Dear David E. Potters,

Hello, my name is Anthony Nguyen; I am a first year pharmacy student at the University Of Charleston School Of Pharmacy and I am writing to thank you for passing the immunization bill that allows license pharmacist to immunize with proper training. I full-hearted believe this amendment to the bill will benefit the patients and the overall health of the community. This amendment to the bill will allow West Virginia to keep pace with others state in the United State. Thank you for your time and please respond back.

A handwritten signature in cursive script that reads "Anthony H. Nguyen". The signature is written in black ink and includes a long, sweeping horizontal line at the end.

Anthony H. Nguyen

University of Charleston School of Pharmacy, Class of 2012

318 Roxalana Hills Drive, Dunbar, WV 25064

William Bradley  
1204 Village Drive  
South Charleston, WV 25309  
August 26, 2008

West Virginia Board of Pharmacy  
ATTN: David Potters  
232 Capitol Street  
Charleston, WV 25301

Mr. Potters:

I am writing in regard to the proposed rules for Pharmacist Administration of Immunizations.

Currently, I am a first year student at the University of Charleston, School of Pharmacy. As a future pharmacist in West Virginia, I am excited to see the direction we are heading. I look forward to further developments in these and other issues that serve to undermine the image of healthcare in West Virginia.

Thank you for your pursuit in keeping pharmacists in West Virginia through legislation and rules that move toward allowing the same scope of practice as other states. You have my support .

Sincerely,

A handwritten signature in cursive script, appearing to read "William Bradley", with a long horizontal flourish extending to the right.

William Bradley

Jason Weaver  
2300 MacCorkle Ave SE  
Charleston, WV 25304  
August 21, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25304

To Whom It May Concern:

I am a first year pharmacy school student and I would like to voice my support for the bill - HB 3056 or Pharmacist Administration of Immunizations Bill. I know that during pharmacy school, students such as me will learn how to give immunizations and it seems that this knowledge should be put to use. It should lessen the burden on some physicians and most importantly on the patients. It seems unnecessary for patients to have to worry about making it to a busy physician who may be farther away than a competent pharmacist. I also understand that not all pharmacists will get certified right away which should be expected. West Virginia should catch up with the rest of the country (47 states) who have already adopted such a provision for pharmacists. Pharmacists should be able to help patients with immunizations just as physicians and nurses.

Sincerely,  
Jason Weaver

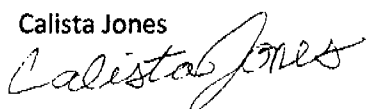
Calista Jones  
Mailbox #18, 108 Middle Hall  
2300 MacCorkle Ave, SE  
Charleston, WV 25304  
8/27/08

West Virginia Board of Pharmacy, Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

Dear Mr. David Potter,

This letter was written in regard to the legislation passed for Pharmacist Administration of Immunizations. I am a first year pharmacy student from the University of Charleston, WV. I believe that pharmacists will be able to successfully administer influenza and pneumonia vaccines and it will benefit a lot of people. I think that in addition to influenza and pneumonia, pharmacists should be able to administer hepatitis B, tetanus, Zostavax and Gardacil vaccinations. Most people have to purchase the Gardacil vaccine from the pharmacy, so it would be even more convenient for them to get the vaccine that day versus having to make a doctor's appointment. Pharmacists will make immunizations easily accessible and increase public awareness of what vaccinations are available and when they need to get it. Even if a patient may prefer to go to their doctor for the immunization, the pharmacy will remind patients to ask their doctor to get vaccinated and pharmacists will be able to educate them about the newest vaccines. New vaccines are generally more expensive, so most doctor's offices won't carry them, but if the public can choose to purchase and receive that vaccine, it will help protect those people that are not vaccinated. In coordination with the patient's physician, the pharmacist and physician can work together to make sure the population's immunizations are up-to-date. This will help establish the goal in Healthy People 2010 by decreasing the number of deaths from vaccine-preventable diseases. As the baby boomers age, easy access to the Zostavax vaccine will increase their quality of life. This will take some of the pressure off of doctors and nurses who are swamped with managing the combined health problems that aged individual often have. The bottom line is if we want to increase the health of the population, we have to improve their access to medical care. The easiest way to increase the health of people is early prevention, i.e. immunizations. I believe under the APhA's Pharmacy-Based Immunization Delivery program, pharmacists will be provided with enough education (and continuing education) to be able to administer vaccinations safely and professionally. It was estimated that only half of the licensed pharmacists in West Virginia would desire to obtain certification to administer vaccinations, so this will help contribute to the health of a number of people and we should support these pharmacists. Doctor's should understand that pharmacists will not be intruding on their practice but rather committing to helping doctor's improve and sustain the health of their patients.

Sincerely Yours,

Calista Jones  


To whom it may concern,

My name is Brad Mullins I am currently a student at the University Of Charleston School Of Pharmacy. I believe the recent bill to allow pharmacists to immunize is a great step forward not only for my chosen profession, but also for the state of West Virginia. I believe that all those in support of the bill and some of those who now oppose it will see in the coming future how important and beneficial it will be to the patients we serve. Since there are such a large number of rural towns where the closest health care provider may be located an hour away this will hopefully increase the number of residents of the state that receive the flu and pneumonia vaccines. I also believe this will improve the pharmacist-patient relationship to help better educate the public in proper immunization routines. This bill has nothing but my full support and I am very happy that members of our legislature were able to see the importance of allowing pharmacists to immunize even if it is in a limited capacity.

A handwritten signature in black ink, appearing to read 'Brad A. Mullins', with a long horizontal flourish extending to the right.

Brad A. Mullins

Belinda Ashby  
University of Charleston School of Pharmacy  
2300 MacCorkle Avenue SE  
Charleston, WV 25304

August 25, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

**Public Comment on Proposed Rules for Pharmacist Administration of Immunizations-  
WV Code Section 30-5-30 (HB 3056)**

Dear Mr. Potters:

I want to take this opportunity to comment on the proposed rules developed by the Board of Pharmacy that will govern pharmacist administration of immunizations. I believe the rules are very thorough, and they will enforce the provisions of HB 3056. I want to see the rules accepted.

Sincerely yours,

A handwritten signature in cursive script that reads "Belinda C. Ashby".

Belinda Ashby  
First-year Pharmacy Student  
University of Charleston School of Pharmacy

Tiffany Dotson  
107 N. Arthur Drive  
Charleston, WV 25312  
[tiffanydotson@ucwv.edu](mailto:tiffanydotson@ucwv.edu)

August 26, 2008

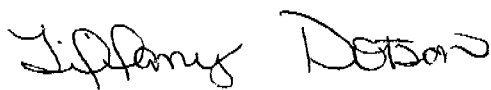
West Virginia Board of Pharmacy  
David Potters  
Executive Director and General Counselor  
232 Capitol Street  
Charleston, WV 25301

Dear Mr. Potters:

My name is Tiffany Dotson; I am a first year student at the University of Charleston School of Pharmacy. This is a very exciting time for pharmacists in West Virginia! Being able to provide certain immunizations to the individuals in our community is very important! Now individuals who previously did not have access to a primary care physician can receive these important vaccinations.

I support the immunization laws, because they give pharmacists guidelines on how to best provide this service to patients. I agree with the fifteen hours of training required by law! I believe it is very important that the pharmacist administering the immunizations have the same training as other healthcare providers. Will pharmacist be allowed to administer any other vaccines besides influenza and pneumonia in the future?

Sincerely,

A handwritten signature in black ink that reads "Tiffany Dotson". The signature is written in a cursive style with a large initial "T".

Tiffany Dotson

To the Honorable Members of the West Virginia Legislature

My name is Martha Elaine Bass, and I am currently enrolled in my first year of pharmacy school. I support the immunization bill because it effects how health care is given in West Virginia. This bill helps allow people in all areas of the state to receive the immunizations which they need. Normally in the smaller cities there is a pharmacy and not a doctor. This bill will help people have access to immunizations without going to the doctor office.

Martha Elaine Bass

August 26, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

Re: Pharmacist Administration of Immunizations  
15 CSR 12

Dear Mr. Potters,

I am writing this letter in support of the proposed legislation allowing pharmacists to administer immunizations within the state of West Virginia. As a student currently enrolled in a professional pharmacy program, I see the passage of this legislation as a "win-win" situation for the citizens of West Virginia and the health care professionals who serve them, be they physicians or pharmacists. It is ludicrous to think that there would be opposition to such a bill when the ultimate outcome is the improved access to necessary and potentially life-saving immunizations.

As health care professionals it is our obligation to our patients and the community to make health care as assessable and affordable as feasibly possible. Allowing trained pharmacist to administer immunizations is one small step towards such a goal.

Sincerely,  
Linda A. Musick  
University of Charleston  
School of Pharmacy  
Class of 2012

The rules regarding immunizations seem to be clear and complete. A set of continuing education requirements are important and should be included because public health service standards are constantly changing. Also, reporting immunization records to the primary care physician identified by the patient would aid in a collaborative working relationship between pharmacists and physicians.

  
Julie Baumgartner

August 26, 2008

Brittany Richter  
2800 Hart St. Apt. 10  
Charleston, WV 25304

David E. Potters  
WVBOP  
232 Capitol St.  
Charleston, WV 25301

Re: Pharmacist Administration of Immunizations

Dear WVBOP,

I fully support the legislation passed for licensed pharmacists in the state of West Virginia to administer immunizations. At the time the rules only allow pharmacists to administer vaccines for Influenza and Pneumonia. The original bill also included the ability to give Hepatitis B, Tetanus, and Zostavax vaccines as well. Hopefully in the future we can work to expand the legislation to include these vaccines also.

The qualifications for a pharmacist to administer vaccines; including the proper training and registration are devised well in the rules of this bill. This is an exciting advancement for the profession of Pharmacy in West Virginia and compliance with these rules will help to ensure the safety of our patients as well as promote the expansion of our profession.

Sincerely,



Brittany Richter  
UCSOP Student  
Class of 2012

Rachel M. Deliere  
2800 Hart Street Apt. 10  
Charleston, WV 25304  
August 26, 2008

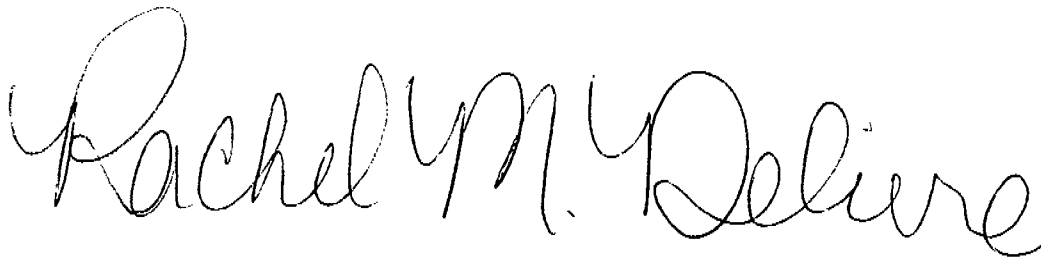
David E. Potters  
West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301

Re: Pharmacist Administration of Immunizations Rules

Dear Mr. David E. Potters:

First of all, I would like to thank you for supporting the pharmacists of West Virginia in getting the immunization bill approved. As for the rules pertaining to the administration of the immunizations, I wholly support the fact that pharmacists will be the only trained professional allowed to perform the acts of administration in the pharmacy setting. I also appreciate that proper training will be required for pharmacists to go through and an upkeep of continuing education exercises. This will allow pharmacists to bear in mind the seriousness of administering immunizations to the patients of the state of West Virginia.

Sincerely,

A handwritten signature in black ink that reads "Rachel M. Deliere". The signature is written in a cursive style with a large, looping initial "R".

Rachel M. Deliere  
Student, UCSOP Class of 2012

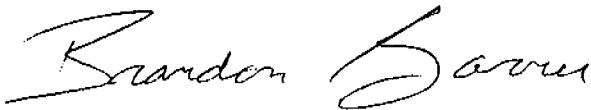
1542 Smith Rd.  
Charleston, WV 25314  
Aug. 25, 2008

David Potters  
West Virginia Board of Pharmacy  
232 Capitol St.  
Charleston, WV 25301

Dear Mr. Potters,

I am writing this letter in response to the immunization law recently passed in West Virginia. As a first year pharmacy student at the University of Charleston, I feel that it is my responsibility to address the issues that might affect pharmacists both locally and nationwide. Immunization as we all know is a key element in the prevention of infectious diseases. Allowing pharmacists to administer in the immunization process is not only a convenience to certain individuals, but it also helps the population as a whole. The fewer number of people who develop a specific disease, the less likely it can be spread form one individual to another. I am in complete favor of pharmacists being able to give immunizations. I believe the public will also be in favor of this when they actually see how convenient it can really be.

Sincerely,

A handwritten signature in cursive script that reads "Brandon Garner". The signature is written in black ink and is positioned above the printed name.

Brandon Garner

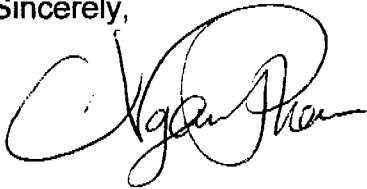
August 27<sup>th</sup>, 2008

To whom it may concern,

I am writing this letter to agree to the proposal of allowing pharmacist to immunize patients of 18 years of age or older. I believe that pharmacists are healthcare providers and healthcare providers should be able to provide health services to the public. That service should include immunizing patients for influenza and pneumonia. It would also be beneficial to the patients that local pharmacies that fill their prescriptions are also providing immunization. Patients no longer will have to wait in long lines to get vaccinated during the influenza season.

With all that has been said, I truly hope the proposal to allow pharmacist to immunize patients of 18 years of age or older will be implemented in the coming year. As a pre-professional and a pharmacy student, I support the proposal of allowing pharmacist to immunize patients.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ngan Pham', written in a cursive style.

Ngan Pham

Pharmacy student

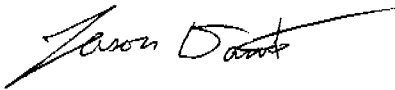
Class of 2012

Jason Daniels  
106 White Street apt G  
Charleston, WV. 25302

Mr. Potters,

I am a 1<sup>st</sup> year pharmacy student from the University of Charleston. I am writing this letter regarding the immunization law recently passed in West Virginia. I am very excited about the passing of this law, and the results should be very gratifying. Any expansion of medical care making it more accessible is extremely beneficial. I agree with the rules. They are adequate and very clear.

Thank you.  
Jason Daniels

A handwritten signature in black ink that reads "Jason Daniels". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

Joshua Castle  
101 29<sup>th</sup> St S.E.  
Apt 20  
Charleston WV 25304

WV Board of Pharmacy  
Attn: David Potters  
232 Capitol St.  
Charleston WV 25301

To Whom It May Concern:

I am a first-year Pharmacy student at the University of Charleston School of Pharmacy, and I am in favor of Pharmacist Administration of Immunizations. I believe the rules proposed are favorable, and I believe whole-heartedly that allowing Pharmacists to give immunizations only better the overall health care of the State of West Virginia.

Being a first-year Pharmacy student, this allows us the opportunity to truly understand the benefits of these rules, and allows us to incorporate this into our education. As we complete our education and head into the workforce we can truly make a difference amongst the general public by having a greater education of administering immunizations.

In 15-12-8, it speaks of Immunization Training Programs and lists compliance orders that must be obtained before allowing Pharmacists to be licenses by the State Board to administer Immunizations. These rules required at minimum 15 hours, with a minimum of 6 hours being live instruction. These requirements are stringent enough to allow every Pharmacist wanting to participate in the program to be trained in the proper way.

I support these rules and believe that passage of these proposed rules will benefit the State of West Virginia, as well as, the health care of the whole state. Many rural areas are limited with Doctors and Nurses, and by allowing yet another Professional to administer these Immunizations can only better the health of all the individuals, and start a trend of better health care.

Sincerely,



Joshua Castle

West Virginia Board of Pharmacy

Attn: David Potters

232 Capitol Street

Charleston, WV 25301

Dear Sir,

I wanted to take this opportunity to voice my opinion in support of the set of rules regarding Pharmacist Administration of Immunizations as set forth by the West Virginia Board of Pharmacy. I believe the rules are thorough and well-stated as to cover any complications or issues that could potentially arise in the issuing of immunizations by a pharmacist or any other health care professional. The required training is also very detailed and appropriate. Implementation of these rules would be a great benefit to the citizens of West Virginia. I myself drive approximately twenty miles to see my primary care physician, but there are three pharmacies within a two mile radius of my house. Making immunizations for the two potentially deadly illnesses stated in the rules available through local pharmacists will allow a greater percentage of the population to be reached, in particular those high risk patients that may have the greatest difficulty making the trip to the doctor's office. Again, the rules are fair and thorough, and I believe they should be implemented "as is" with no changes.

Sincerely,

Heather Moles

Student Pharmacist

University of Charleston

Charleston, WV

Maren McNaughton  
2300 MacCorkle Ave S.E.  
523 Middle Hall  
Charleston, WV 25304  
27 August 2008

West Virginia Board of Pharmacy

Attn: David Potters

232 Capitol Street  
Charleston, WV 25301

Dear Mr. Potters,


I am writing to inform you how strongly I feel that the state of West Virginia should allow all pharmacists to perform immunizations. I feel pharmacists are a big part of the health care system. Not only are pharmacists one of the most accessible health care providers, but they are dedicated to helping the well-being of their rural communities here in West Virginia.

After eight years of schooling, pharmacists enter the field well-educated with countless hours of hands-on experience pertaining to, but not limited to, immunizations. Receiving a doctorate of pharmacy degree should allow all practicing pharmacists the ability to provide persons with any immunization vaccine upon request of the recipient.

Pharmacists are committed to a long-life journey of learning, in which they will always be on top of their profession. As the profession changes with the times, so do the responsibilities of the pharmacist. Please allow West Virginia pharmacists to not only dispense medications and counsel patients, but to immunize the citizens of West Virginia against diseases that are becoming more prevalent in the upcoming years. I agree with the rules and regulations written about this issue and I believe prevention is necessary to a healthy state and that pharmacists are the trustworthy and educated people the state needs to get the job done.

Thank you for your time and consideration.

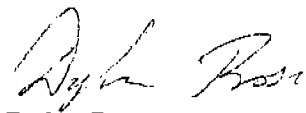
Sincerely,



Maren McNaughton  
Pharmacy Student (P1)

My name is Dylan Rose and I am a first year pharmacy student at the University of Charleston. I believe section §30-5-30 provides not only a great service to the community by allowing pharmacist to immunize patients where they may have little access to alternative health care, but also allows the state of West Virginia to ascend to the level of health care given by pharmacist in the rest of the nation.

I agree with the section regarding training. I believe that the administrator of the vaccine must be a licensed pharmacist, and that they must have completed the American Pharmacists Association's training program. I also feel that this program is sufficient for the level of immunizations that pharmacist will perform.

A handwritten signature in cursive script that reads "Dylan Rose". The signature is written in black ink and is positioned above the printed name.

Dylan Rose  
UCSP 2012

To whom it may concern:

I have read over the rules for the bill that would allow pharmacists to immunize. I agree with them and feel that this is a very important thing for the state. I am a native West Virginian and I know that often time's pharmacists are more readily available than doctors in some rural communities. It may also help to get more people in the state to receive immunizations. This alone will help to increase the overall health of the whole state.

Sincerely,

A handwritten signature in cursive script that reads "Daniel Parker".

Daniel Parker, UCSOP student

August 23, 2008

To the West Virginia Board of Pharmacy:

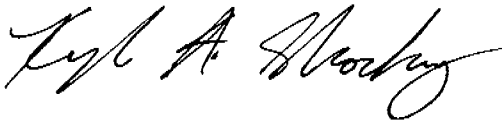
I, Kyle Shockey, am in full support for the proposed rules for *Pharmacist Administration of Immunizations*. I am a P1 student at the University of Charleston School of Pharmacy, and in developing my education, I see much importance in pharmacists being able to immunize.

The amount of people able to be immunized per year could significantly be increased through pharmacy-based influenza vaccine clinics. Also, it would increase the general health of the West Virginia population and forward the development of preventative medicine. I believe the proposed rules will allow pharmacists to receive the necessary training and access to the rights needed to perform this medical service.

As a pharmacy student, I strongly believe that this step in advancement of the profession is essential to West Virginia healthcare, as well as getting pharmacists recognized as healthcare professionals.

Thank you for your time,

Kyle A. Shockey

A handwritten signature in cursive script that reads "Kyle A. Shockey". The signature is written in black ink and is positioned to the left of the typed name.

University of Charleston  
School of Pharmacy  
Class of 2012

Krystal Kalt  
5409 ½ Venable Ave. SE  
Charleston, WV 25304  
August 25, 2008

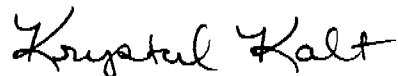
**David Potters**  
**Executive Director and General Counsel**  
**West Virginia Board of Pharmacy**  
**232 Capitol Street**  
**Charleston, West Virginia 25301**

Dear David Potters:

I am a first year student of the University of Charleston School of Pharmacy, and I have recently reviewed the current law and rules of authorizing pharmacists to administer immunizations in West Virginia. I am pleased to say, I strongly agree with the terms of the associated bill. I also believe that a \$10.00 application fee for certification is fair. The established rules are an important advancement in pharmacist duties and are necessary for improving healthcare in the State of West Virginia.

Thank you for your concern and your support of the Pharmacist Administration of Immunizations proposal.

Sincerely,

A handwritten signature in cursive script that reads "Krystal Kalt".

Krystal Kalt  
UC School of Pharmacy Student

Jessica Belcher  
724 Roxalana Hills Drive  
Dunbar, WV 25064  
August 26, 2008

Attn: David Potters  
WV Board of Pharmacy  
232 Capitol St  
Charleston, WV 25301

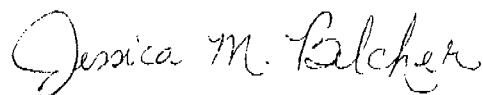
Dear Mr. Potters:

I am currently a student at the University Of Charleston School Of Pharmacy, and I would like to comment on the proposed immunization rules. As a future pharmacist, I am very excited about the decision to allow pharmacists to immunize. I believe that with today's growing need for healthcare, and with the shortage of health care professionals, quality of care for patients should still be optimized as much as possible. West Virginia consists of many small communities that have limited access to healthcare needs. Granting pharmacists the ability to immunize will ultimately save these communities money and time during the flu season. I truly believe by making this possible you are benefiting thousands of West Virginians. I have personally seen how difficult it can be for these people to get out of their homes, especially throughout the winter months.

As for the rules that have been proposed regarding the immunizations, I feel that they are very fair and feasible. They addressed any concern that I would have had regarding the issue. I would like to thank you again for making this possible for pharmacists throughout the state!

Thank you for your support.

Sincerely,

A handwritten signature in cursive script that reads "Jessica M. Belcher". The signature is written in dark ink and is positioned below the word "Sincerely,".

Jessica Belcher

David E. Potters

West Virginia Board of Pharmacy

School of Pharmacy

University of Charleston

Charleston WV.

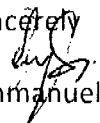
Dear Sir/Madam

Comments on rules and regulations concerning Pharmacists and Immunizations

As population increase especially the elderly population, the healthcare crises will increase.

Immunization will play a major role in curbing some of these problems. The pharmacist's role in immunizations should be given a second look. More healthcare practitioners will be needed. By expanding the pharmacists' role in immunizations other than what is currently, the contribution of pharmacists will be appreciated.

Sincerely

  
Emmanuel Sarpong

August 26, 2008

Mr. David Potters  
Executive Director & General Counsel  
West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301

Dear Mr. Potters:

My name is Ciera Powers and I am a first year pharmacy student at the University of Charleston. I am writing you in regards to the immunization rules that are proposed to benefit pharmacists and their practice. I want to commend you for working so diligently to get the immunization rights for pharmacists to where they are now.

The citizens of West Virginia desperately need pharmacists within the state to be able to administer immunizations. If pharmacists are granted the right to administer the influenza and pneumonia vaccines then the citizens of West Virginia will benefit in numerous ways.

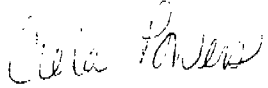
First, in small towns where there are no physicians or where only one may be available then the citizens will have the opportunity to seek their local pharmacist for the vaccine they would normally have to drive several miles to receive or have to wait a considerable amount of time for an appointment for the only physician in their town. Time is of the essence when concerning vaccines such as these and people do not have time to waste when it comes to their health.

Secondly, with pharmacists being allowed to immunize it could save a considerable amount of money for the citizens of West Virginia, especially those in the rural areas. If a person goes to a physician's office to receive a vaccine then they would have to pay the office fees then pay for the vaccine; whereas if they were able to go to their local pharmacist then they would not have to pay office fees, but possibly only have to pay for the vaccine itself. But it is a possibility that some pharmacies may sponsor free vaccine clinics to help people in their local community so they do not have to fret with the costs of the vaccines.

I believe whole-heartedly in what the West Virginia Board of Pharmacy, local pharmacists, and pharmacy students are trying to accomplish with allowing trained and practicing pharmacists to administer immunizations. I know that supporting pharmacists are well-qualified and trained in being able to immunize and trust them fully in their practice.

I am proud to support pharmacists being able to immunize and hope to be a practicing pharmacist in the near future who can take full advantage of this right so that I too can help serve the people within my community and make their lives a little easier.

Yours sincerely,

A handwritten signature in cursive script that reads "Ciera Powers". The signature is written in black ink and is positioned below the typed name.

Ciera Powers

August 26, 2008

Dear Members of the West Virginia Board of Pharmacy,

This letter is intended to show my support for the rules proposed by Mr. Potters concerning the pharmacists of this state and their now legal allowance to immunize. They seem to be comprehensive in all of the requirements necessary for a pharmacist in the state to be properly trained in a way that the patients will feel just as confident with the procedure as they would in other immunization sites. I feel this in an important step in the advancement of healthcare in the state of West Virginia. I worked for a pharmacy in North Carolina which hosted a very successful flu clinic. It made me realize of not only the importance, but the logic for pharmacists to be given this right to immunize. This being said, as a future pharmacist, I look forward to utilizing this right in a few years and am in full support of the rules set forth.

Sincerely,



Shawn Taylor

UCSOP Class of 2012

Ms. Dung Thai  
84 Presidio Pointe  
Cross Lanes, WV 25313

August 26, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301  
RE: Comments to proposed rules

Dear Mr. Potters,

I believe that allowing pharmacists the ability to give immunizations is a useful public health service. As long as the qualifications listed in the rules 3.1-3.2 have been met, pharmacists giving vaccinations is a benefit to patients and the society as a whole.

By making more immunizers available, I believe that more people would choose to get vaccinated because of the convenience of being able to get this shot administered by their pharmacist instead of waiting a long time for their physician.

47 states have already been able to offer this practice and WV residents should be able to get the same opportunity just as long as the proper training stated in the rules have been met.

Sincerely,

A handwritten signature in black ink, appearing to be 'Dung Thai', with a long horizontal flourish extending to the right.

Dung Thai

To whom it may concern,

I am writing this letter to voice my approval of the recent decision to allow pharmacist to administer vaccinations. I feel that this bill is a step in the right direction for the health care profession in the state of West Virginia. I do feel that the pharmacist of this sate should be prepared for this recent step by adequately passing the vaccination certification test and having the proper facilities to administer these vaccinations. I am very pleased with your recent steps towards a brighter health care environment.

Professionally,

Neil Hudson

Todd Cooper  
120 Oak Drive, Apt. 118F  
Dunbar, WV 25064

To Whom It May Concern:

As a first year pharmacy student at the University of Charleston, I am writing this response to the immunization legislation and its regulations for pharmacists. I hope that whatever steps necessary to allow pharmacists that same opportunity to practice that exists in other states will be permitted in West Virginia. Geographically the states surrounding West Virginia do not have the current immunization restrictions that are present in West Virginia. Please allow me the opportunity to practice pharmacy in West Virginia without the current restrictions and make West Virginia a state for equal practice opportunities for pharmacists.

Thank you,

Todd Cooper

Pharmacy Student  
University of Charleston  
Class of 2012

Joseph P. Savilla  
124 Brentwood Rd.  
Nitro, WV 25143

West Virginia Board of Pharmacy  
Attn. David Potters  
232 Capitol St.  
Charleston, WV 25301

Mr. Potters,

I am a first year pharmacy student at the University Of Charleston School Of Pharmacy and I am writing this comment to you regarding the proposal of the rule: Pharmacist Administration of Immunizations. As a future West Virginia pharmacist, I believe equal opportunities for pharmacists nationwide which is not the case for a small number of states as of this time. Many states do not have restrictions for pharmacists administering immunizations and I feel that West Virginia should have the same opportunity.

Thank you,

A handwritten signature in black ink, appearing to read 'Joseph P. Savilla', written in a cursive style.

Joseph P. Savilla

4627 Leno Creek Road  
Hernshaw, WV 25107-8589

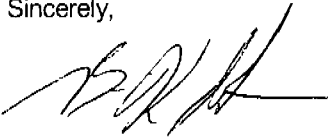
August 25, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, West Virginia 25301

Dear Mr. Potters:

This letter is a comment in regards to rules put forth for West Virginia Code Section 30-5-30, which permits pharmacists to administer immunizations to patients within the state of West Virginia. As a first year pharmacy student at the University of Charleston, I recommend that the rules be accepted with no changes. The rules set forth are reasonable. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Workman', with a long horizontal stroke extending to the right.

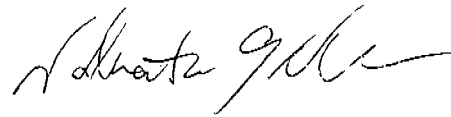
Brian Workman

August 21, 2008

Dear David E. Potters,

I was just looking through the laws enlisted on the website, and noticed that pharmacists are just able to administer shots for pneumonia and influenza. Is there any chance that the new vaccine, Zostavax, will be given by pharmacists in the near future? I come from Florida and we stock it in our freezer, but the nurse at our in-store clinic has to administer it. So I was just wondering if this law will be passed to make it more accessible to the elderly. Thank you for your time.

Regards,  
Salvatore J. Sirico

A handwritten signature in black ink, appearing to read "Salvatore J. Sirico", written in a cursive style.

Please send response to:

Salvatore J. Sirico  
318 Roxalana Hills Drive  
Dunbar, WV 25064

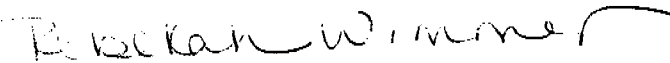
Rebekah Wimmer  
744 Roxalana Hills Dr.  
Dunbar, WV 25064  
August, 26 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

Dear Mr. Potters,

I am a first year pharmacy student at the University of Charleston School of Pharmacy and am writing to encourage you in your stance for pharmacists and their abilities to immunize. I fully agree with all the rules as stated and want to be another voice heard in this plight. Thank you for what you have accomplished for our profession thus far and what I know you will continue to do.

Sincerely,

A handwritten signature in cursive script that reads "Rebekah Wimmer". The signature is written in black ink and is positioned above the printed name.

Rebekah Wimmer

August 24, 2008

To Ms. Betty Ireland,

My name is Kimleng Vay. I am currently a student at the University of Charleston School of Pharmacy. I am writing you this letter concerning the proposed rule for immunization by a pharmacist from the West Virginia Board of Pharmacy. I would like to let you know that I support the regulations proposed by the West Virginia Board of Pharmacy. I agree with them that a pharmacist should be able to immunize and those regulations seem to cover the necessary details to ensure patient safety and privacy. I hope that you will consider my thoughts as you review the proposed regulations.

Thank you,



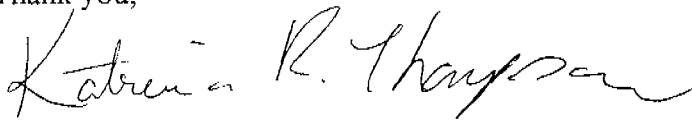
Kimleng Vay

August 24, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol St.  
Charleston, WV 25301

As a current pharmacy student at the University Of Charleston School Of Pharmacy who wishes to practice pharmacy in the state of West Virginia, let me begin by saying that I am thrilled that I will now be able to immunize in the community that I love so much. Upon review of the proposed rules, I would also like to state that I would be very satisfied with these regulations, especially in that I believe pharmacists, in fact ALL healthcare providers, delivering immunizations should not only have current and adequate training to do so, but that they be required to maintain that qualification through continuing education.

Thank you,

A handwritten signature in cursive script that reads "Katrina R. Thompson". The signature is written in black ink and is positioned above the printed name.

Katrina R. Thompson

8/27/2008

Dear West Virginia Board of Pharmacy,

I am greatly excited by the passage of the law to allow Pharmacists to Administer Immunizations! As a first year pharmacy student at the University of Charleston, I am hopeful to stay in the state of West Virginia to practice as a Pharmacist. I feel that the fee is suitable to cover the administrative costs for this law. I am a little dumbfounded why anyone would be opposed to this law. I would like to see in the future the ability for pharmacists to administer vaccines for Hepatitis B boosters and also the vaccine for Chickenpox. I understand these will need to be added to the law, but I am hopeful with the help of pharmacy students we will be able to get that passed. Thanks again for my considerations.

Professionally,

A handwritten signature in cursive script that reads "Luke Kubacki".

**Luke Kubacki**

University of Charleston

School of Pharmacy

Class of 2012

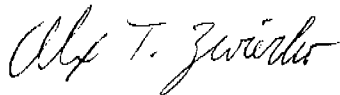
[lukekubacki@ucwv.edu](mailto:lukekubacki@ucwv.edu)

724-350-9721

Dear Mr. Potters and Fellow Board Members,

My name is Alex Zwierko and I am in my first professional year of pharmacy school at the University of Charleston. I am writing you with regards to the rules for the pharmacist's administration of immunizations. I would first like to say that I feel that this is a great step forward for the state and the profession. As for the cost I believe that a 10 dollar processing fee is minimal and seems fair to those that would like to receive their license. After reading the rules I believe that the board has done sound job of addressing the important issues. I do agree that those licensed to give immunizations should do continuing education to keep up with changes and new information in the field. Also, I believe that the point about the records being required to be passed on the physician is very important and glad to see that it was clearly stated in the rules. I believe that these rules are fair and will do a great job of guiding Pharmacists as they begin to administer immunizations in the state of West Virginia. I would like to thank the board for their hard work and am glad to see this wonderful change come one step closer to implementation. Good work and thank you for taking the time to read this.

Sincerely,

A handwritten signature in cursive script that reads "Alex T. Zwierko". The signature is written in black ink and is positioned below the word "Sincerely,".

Alex T. Zwierko

Rob Browning  
PO Box 534  
Verdunville, WV 25649  
August 21, 2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, WV 25301

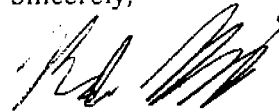
To Whom It May Concern:

I am a first-year pharmacy student at the University of Charleston and I support this law because I was born and raised in West Virginia and love this state. I fully welcome any measures that will make it easier for me to stay here after graduation, and this immunization law will take away an incentive for me to "border-hop" by working in Ohio or Kentucky, diverting much of my tax money to those states.

The proposed rules under which the law will be enforced are largely favorable. The training requirements for pharmacists to be certified to give immunizations are more than adequate, and might be a bit more strict than necessary; other health-care professionals do not require that much training to give immunizations. The \$10 fee is also fair. I believe that the majority of pharmacists will be satisfied that the rules proposed will improve patient care while maintaining patient safety.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Browning', written in a cursive style.

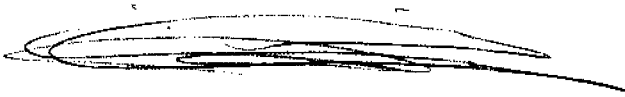
Rob Browning

Ali Quraishi  
518 Middle Hall  
2300 MacCorkle Ave. S.E.  
Charleston, WV 25304

To Whom It May Concern,

This letter is being sent to you regarding **§30-5-30**, where it talks about immunizations for pharmacists. I am very happy that pharmacists have been granted permission by the law to administer immunizations in the state of WV, but am still unhappy that they have limitations set upon them. Pharmacists are health care providers just like doctors, so they should be treated as such.

Thank you for your time,

A handwritten signature in black ink, appearing to read 'Ali Quraishi', with a long horizontal flourish extending to the right.

Ali Quraishi

Pharmacy Student

August 26,2008

West Virginia Board of Pharmacy

Attn: Mr. David Potters

232 Capitol Street

Charleston, WV 25301

Dear Mr. Potters:

I am a first year student at the University Of Charleston School Of Pharmacy and am writing this letter in regards to the Pharmacist Administration of Immunizations laws and rules which are currently being considered by legislation. Following my evaluation of the aforementioned laws and rules, a concern that I have includes the fact that Pharmacists are only being permitted to administer immunizations to individuals over the age of 18. The average 18 and older individual have more standard business hours available for normal doctor's visits as they are working in an occupation that allows for lunch breaks and personal days or are students with possible opening in their class schedule. On the contrary, those under 18 whom are in school approximately seven hours a day, five days a week and are unable to leave campus. I feel one of the main targeted audiences are those under the age of 18 so that they have more opportunities to get the flu and pneumonia vaccines that are stated in the laws and regulations.

I understand that if this were considered, more continuing education and training are also mandatory. Although I am only in my first few weeks of Pharmacy school, I have an appreciation for the knowledge, responsibility, and the requirement for continuing education which are all keys to the success and maximum quality of healthcare. Thank you for taking the time to listen to my concern and thank you for allowing pharmacist to stay active in the health profession.

Sincerely,

A handwritten signature in cursive script that reads "Amanda Marie Ortiz". The signature is written in black ink and is positioned above the printed name.

Amanda Marie Ortiz

Luke Cunningham  
August 22, 2008  
UC School of Pharmacy Student

After reviewing the rule "Pharmacist Administration of Immunizations," I feel that permitting pharmacists across our state to immunize patients is a very practical and logical advancement in our health-care. I believe that this practice will bring about a very positive response from the general public. The only question I have concerning this rule is why are the pharmacists limited to only immunizing persons 18 years of age and over? I feel that if they were allowed to immunize all possible patients, they would dramatically increase the convenience for the patrons. Overall, I am very excited about the new regulations being put into place for practicing pharmacists, and as a future pharmacist I am looking forward to the new scope of practice.

August 26, 2008

West Virginia Board of Pharmacy,

I am writing in response to the proposed rules for the new law allowing pharmacists in West Virginia to administer vaccinations. I agree with everything in the rules, but I am a little uncomfortable that we must still be under the advice of the Board of Medicine and the Board of Osteopathy. I feel that this requirement still negates the pharmacist's role as a health care provider. The role of the pharmacist has changed over the years; many people now come to their local pharmacy for health care advice before going to their doctor. By placing limitations on the ability of a pharmacist to adequately fulfill the role of a health care provider, we are limiting the quality of care available to patients.

Sincerely,

A handwritten signature in black ink that reads "Veronica L. Butts". The signature is written in a cursive style with a large, sweeping flourish at the end.

Veronica L. Butts

UCSOP, class of 2012

West Virginia Board of Pharmacy

232 Capitol Street

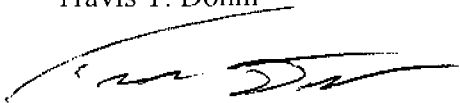
Charleston, WV 25301

To whom it may concern,

I feel a conscience clause should be included for Pharmacists who choose not to fill certain drugs. Protecting our rights is part of our constitution and those who chose to not fill a medication should be protected under these rights. Thank you very much for your time.

Professionally,

Travis T. Dohm

A handwritten signature in black ink, appearing to read "Travis T. Dohm", written over a horizontal line.

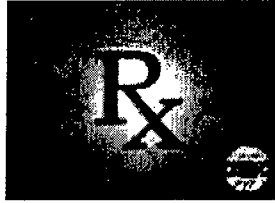
Pharmacy Student 2012

Justin Travis Lutsy

245 Casey Fork Rd

Ashford, WV

25009



West Virginia Board of Pharmacy

Attn: David Potters

232 Capitol Street

Charleston, WV 25301

Dear To Whom It May Concern,

I am currently a University of Charleston School of Pharmacy student, and have recently been introduced to the Pharmacist Administration of Immunizations bill that had passed earlier this year. As a future pharmacist I believe that this bill is an excellent chance for Pharmacists in many settings to further enhance their practice as a health professional. However, I do believe that the administration of these immunizations should be left up to the Pharmacist who is working that particular day. In addition, I also believe that the immunizations should be left out of the community pharmacies in heavily populated areas due to the likely situation of having extremely long waits as is for patients waiting on medication. On the other hand, community pharmacies that are in the rural areas that lack other healthcare facilities should allow the administration of these immunizations, because it would assist the small towns that are without up to date facilities.

Thank you for your time

Sincerely,

Justin Lutsy

University of Charleston School of Pharmacy

Whitney D. Hendrickson  
1626 Virginia Street Apt. #1  
Charleston, West Virginia 25311  
whitneyhendrickson@ucwv.edu

August 26, 2008

West Virginia Board of Pharmacy  
Mr. David Potter  
232 Capitol Street  
Charleston, West Virginia 25301  
dpotters@wvbop.com

Dear Mr. Potters:

As a first year pharmacy student here in Charleston West Virginia, I am writing with a few concerns based on the laws and rules that are being considered by legislation. The first, concern that I have is with the law pertaining to the Pharmacist Administration of Immunizations. After reviewing the laws, rules, and regulations pertaining to immunizations I have learned that there are only two vaccines that Pharmacists are allowed to administer (Influenza, and Pneumonia). I also understand that West Virginia is an underserved area that only has approximately three thousand licensed pharmacists practicing in the state. With that being said, why would I choose to remain here in West Virginia where I can only administer those two vaccines? All of the surrounding and or nearby states are allowed to administer up to five vaccinations.

The second concern that I have is with the conscience clause. The conscience clause is a statutory provision that permits individuals or institutions to refuse to provide or to pay for medical procedures on the basis of religious or moral beliefs. As a future Pharmacists I feel that I should have the right to refuse service to a patient that I cannot in good conscience fill a prescription for. Also, forty-seven states have this law in place. Why not West Virginia? The number forty-seven is an alarming number. If the conscience clause was not a big issue then why would that many states have that law in place? As mentioned before it would be quiet easy to move to another state where I can be protected by this law.

In conclusion I feel that legislators should take a second look at the laws and rules that they have in place. To be competitive with the surrounding states I feel that it would be in West Virginia's best interest to keep up to par with the other forty-nine states. Thank you very much for taking the time to listen to my concerns and I hope to hear from you soon.

Sincerely,

A handwritten signature in black ink that reads "Whitney Hendrickson". The signature is written in a cursive style with a long horizontal flourish at the end.

Whitney Hendrickson

West Virginia Board of Pharmacy

Attn: Mr. David Potters

232 Capitol Street

Charleston, WV 25301

Dear Mr. Potters:

I am a first year student at the University Of Charleston School Of Pharmacy and am writing this letter concerning the Pharmacist Administration of Immunizations laws and rules which are currently being considered by legislation. After reading and reviewing the rules and laws regarding immunizations I noticed that only influenza and pneumonia are allowed to be administered by a Pharmacist in the state of West Virginia. I know that five were proposed however our political leaders only felt it necessary to allow two of the five to be passed. Other states allow their pharmacists to administer all five, so there is nothing stopping people who live in towns bordering other states to get their immunizations done elsewhere. Also, West Virginia is in need of more Pharmacists, and I, as an out-of-state pharmacy student, am wondering why I should stay in this state when in another state I could get licensed and be allowed to administer more immunizations.

Thank you for taking the time to listen to my concern.

Sincerely,



Carly Trentini

1506 Virginia St. E. #101

Charleston, WV 25311

Keli A. Robinson  
1216 East Village Dr.  
Apartment 8C  
South Charleston, WV 25309

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capitol Street  
Charleston, West Virginia 25301

Dear Mr. David Potters,

I am currently a first year Pharmacy student at the University of Charleston, School of Pharmacy. I am extremely proud of our state for passing HB 3056, designed for authorization for pharmacists to administer Immunizations. The bill includes limitations to type of immunization allowed to be administered and the age of the recipient. Also, training and annual reporting involved have been established. I am proud to be beginning my journey to become a pharmacist, and am very proud to be a part of this wonderful community of Pharmacists in West Virginia.

Although, I do agree with most of the rules and regulations involved in HB 3056, I do have a couple suggestions that could help within this bill. I believe that there should be more access to a greater amount of immunizations which pharmacists are authorized to administer. For example, I would suggest that pharmacists should be authorized to administer Zostavax. As well, I do not believe that there should be any type of age limit for patients receiving these immunizations.

Overall, I do thoroughly support HB 3056 authorizing pharmacists to administer immunizations to the public, and especially to those in underserved areas, such as our Appalachian region.

Keli A. Robinson

A handwritten signature in cursive script that reads "Keli A. Robinson". The signature is written in black ink and is positioned below the typed name.

Pharmacy Student

Peter Truong  
19 Pope Way  
S. Charleston, WV 25309

David E. Potters  
Executive Director & General Counsel  
West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301  
(304) 558-0558

August 27, 2008

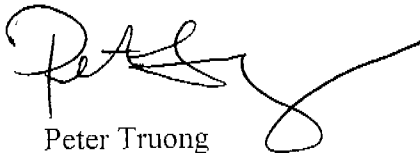
Dear Mr. Potters:

The passage of this new law enabling pharmacists to administer immunizations is an enormous advancement to the pharmacy profession as a whole. Not only does it benefit the pharmacist, it also allows patients who cannot afford healthcare to have an outlet for immunizations. Although I am from California, which allows for pharmacists to immunize, I have not seen many pharmacists administering immunizations. Hopefully with time, more pharmacies will take advantage of this right.

Under the rules, the extent of training and registration is adequate for the pharmacist to be immunization certified. However, the spectrum of immunizations should be extended to include: the Hepatitis B series, MMR and DPT. These are common vaccinations required of most to all employment and educational affiliations, and should be added along with the influenza and pneumonia vaccines. Other than that, I do not see any issues with the rules that should be addressed.

Thank you for all your work and support for the pharmacy profession. As a first year pharmacy student and future pharmacist, I look forward to the positive progression in the years to come.

Sincerely,



Peter Truong

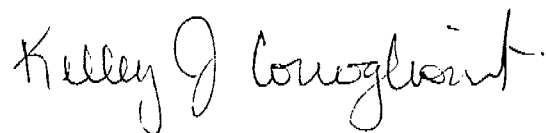
Kelley Corcoglioniti  
3303 Chesterfield Ave  
Charleston, WV 25304  
kelleycorcoglioniti@ucwv.edu

To whom it may concern,

My name is Kelley Corcoglioniti and I am currently a first year pharmacy student at the University of Charleston. I am writing to you today as a response of carefully reviewing the rules applied to pharmacists administering immunizations. I would first like to express how excited I am that when I graduate I will be able to administer immunizations as outlined by this set of rules. I fully agree with the training required and also with the registration process. As a patient, I know that seeing my pharmacist's license and/or registration would offer some comfort during this new transition.

As a student of pharmacy, the one concern I have after reading these rules is that we will only be able to administer two types of vaccinations. I believe that any immunization not requiring special treatment before or after administering (i.e. hepatitis series, HPV vaccinations, etc...) should be allowed with proper training. Should patients require one of these immunizations, we as pharmacists should be able to learn the appropriate procedures concerned with each one and then administer them. By restricting us to only two vaccines, I feel we will not be able to fully serve our patients and fulfill their needs. Please take this into careful consideration.

Sincerely,

A handwritten signature in black ink that reads "Kelley J. Corcoglioniti". The signature is written in a cursive, flowing style.

Kelley Corcoglioniti

Hayley DeMay  
2300 MacCorkle Ave SE  
515 Middle Hall  
Charleston, WV 25304  
08-26-2008

West Virginia Board of Pharmacy  
Attn: David Potters  
232 Capital Street  
Charleston, WV 25301

Mr. Potters,

After reviewing the new law giving pharmacists the right to contribute to the immunization process of our state, I can say that I am pleased with the write-up. I agree to the amount of training needed for pharmacists to administer these vaccinations and I really believe that the ability for pharmacists to give these will promote the vaccines and hopefully aid in the better health and well being for the great state of West Virginia.

The only thing that worries me is the lack of types of immunizations allows for pharmacists to administer. For example, just this summer I waited three hours in a clinic, wasting a half of a day's work, just to receive the first of my three Hep B series. I know of many people who cannot afford to waste any hours of work at all. Since most pharmacies are open until nine o'clock at night and some are open twenty four hours, those people could go before or after their work without losing a half or whole day's pay. I just ask you to consider the possibility of pharmacists administering more than just a couple vaccines.

Thank you for your time,

Hayley DeMay

To-Whom-It –May-Concern,

After reviewing the House Bill 3056 in its entirety I have noted one area in which I would like to make a comment for improvement. The area that I find lacking in HB 3056 is that there are no provisions for pharmacy students or interns. This bill is a great step for bettering West Virginia health care, especially health care services as provided by the pharmacist. However, it would be remissible to omit students from this bill entirely. Perhaps it is one aspect that may have to come with time, as I understand legislation is a process of compromise. Reality aside, ideologically an intern should be able to partake in nearly all the activities of a pharmacist under the direct supervision of the pharmacist. This should also include immunizations. Traditionally, in the past, nurses have primarily been the health care provider to administer immunizations. Nurses learn how to immunize in the early portion of their education. A pharmacy student should be no different. With proper training and guidance from pharmacy preceptors, students would matriculate pharmacy school with more confidence and proficiency when it comes to the administering of immunizations. This would not only benefit the pharmacy student but the population which he or she would serve, that is why it is important to include pharmacy students and interns in this bill. It is not about the providers or students, but about the people which we serve.

Sincerely,

Brian M. Holmes

UCSOP Class of 2012

August 27, 2008

West Virginia Board of Pharmacy:

I believe that the new law, which allows the pharmacist to administer immunizations, is beneficial to all members of the West Virginia health community. The new law will allow more people access to proper healthcare since many people live in communities where the pharmacist is the sole healthcare provider. While the passing of this law is a huge achievement, I believe it should be further expanded to allow pharmacy interns to have the opportunity to give immunizations under the supervision of a pharmacist. The best way for an intern to learn is through practice and this will ensure that interns will be familiar with the process and thus ready to give immunizations on their own once they become a licensed pharmacist.

Sincerely,

A handwritten signature in black ink, appearing to read "Valerie Wells". The signature is fluid and cursive, with a long horizontal stroke at the end.

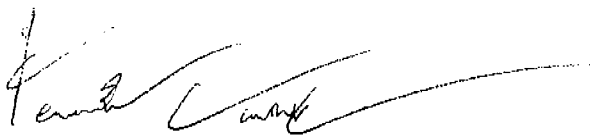
Valerie Wells

UCSOP Class of 2012

To whom it may concern,

My name is Kenneth Canipe and I am a first year pharmacy student at the University of Charleston. I am writing this letter in response to the rules that are currently under review by the West Virginia Board of Pharmacy for pharmacists to be able to give immunization shots. As a student that is currently training to practice the art of pharmacy I feel that the required minimum of fifteen hours of didactic and practical training as well as the minimum of six hours of instruction should be sufficient in providing pharmacists with a strong foundation in which to build their practice of providing the community in which they serve. The only potential flaw I see in this proposal is that it does not mention students. As a pharmacy student I feel that it is important that we should be able to practice immunization of patients under the strict guidance of a pharmacist is registered with the board in administering immunizations in-order to better serve our future patients. I do realize though that we have to crawl before we can walk, I therefore I fully support the proposed rules and regulations and hope that they will make it through your review process so that as pharmacists we can add to the ever expanding healthcare system and provide vital services to improve the quality of lives of individuals in the great state of West Virginia. Having said that, I hope that someday in the near future that we will be able to incorporate pharmacy students into step for improving healthcare by allowing them to practice giving immunizations under the guidance of a trained professional.

Thank you for your time

A handwritten signature in black ink, appearing to read 'Kenneth Canipe', with a long, sweeping horizontal line extending to the right.

Kenneth Canipe

Dear West Virginia Board of Pharmacy:

My name is Andrew Wellman and I am currently a first-year pharmacy student at the University of Charleston SOP. In regards to the current rules for pharmacists to immunize, I believe that as long as the rules are at least as stringent as what any other healthcare provider who administers immunizations must abide by, then the rules are adequate. I would like to see some policy for renewal of certification for those pharmacists who did not administer any immunizations while certified that they must complete all or part of the initial certification process. This will ensure the patients have the highest quality care and are not being immunized by a pharmacist who has not administered one in two years.

Thank you for your time,

A handwritten signature in black ink, appearing to read "Andrew Wellman", with a long horizontal flourish extending to the right.

Andrew Wellman

Dear David Potter and Fellow Board Members,

I am a P1 student at the University of Charleston School of Pharmacy. I am writing this letter to support the rules set forth governing how pharmacist immunize the public. The only concern I see is the registration expiring bi-annually. I feel that this should be changed to an annual registration to match the other yearly requirements of 2 hours of CE related to immunization.

Sincerely,

A handwritten signature in black ink, appearing to read "Corey R Scott". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Corey R Scott

Allison Porter  
1518 Huron Terrace  
Charleston, WV 25311

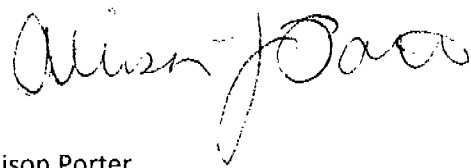
Attn: David Potters  
West Virginia Board of Pharmacy  
232 Capitol Street  
Charleston, WV 25301

August 27, 2008

Dear Sir,

I am writing to you today regarding the rules set forth by the Board of Pharmacy in accordance to the law passed allowing pharmacists to immunize. Although I believe as a future pharmacist, myself, the fee set forth, I feel is appropriate. However, I do not believe that only 2 hours of continuing education annually is sufficient. Is this contact hours or literary hours? Thank you for considering my comments and questions.

Sincerely,

A handwritten signature in cursive script that reads "Allison Porter". The signature is written in black ink and is positioned above the printed name.

Allison Porter

Student Pharmacist

University of Charleston, Class of 2012

Ashley Pham  
108 Middle Hall  
2300 MacCorkle Ave, SE  
Charleston, WV 25304

West Virginia Board of Pharmacy  
David E. Potters  
Executive Director and General Counsel  
232 Capitol Street  
Charleston, WV 25301

To the Attention of David E. Potters:

I am a first year Pharmacy Student at the University Of Charleston School Of Pharmacy. I strongly believe in this House Bill 3046 for this proposed rule regarding the permission of Pharmacists to administer immunizations to patients in this State of West Virginia. As stated in the summary, "Pharmacists are already administering immunizations in most other states in the United States pursuant to the laws in the various jurisdictions". I was born and raised in Maryland, where immunizations by pharmacists are administered regularly. Specifically, Influenza vaccines are administered throughout Maryland provided by pharmacists, making it more convenient to receive vaccines. Upon coming to West Virginia for Pharmacy School, I was surprised to hear that this was one of three states which did not allow pharmacists to administer immunizations. As a "pharmacist in training", I am hoping that this proposal gets passed as soon as possible so I would have the privilege of vaccinating when I become a Pharmacist in West Virginia.

One suggestion, however, is to increase the training for pharmacists in order for them to be able to administer immunizations. Training is a vital part of any practice. Since this is a new privilege to pharmacists in West Virginia, I think that there should be more initial training involved with immunization administration. I hope that you take all this into consideration.

Sincerely Yours,

Ashley Pham

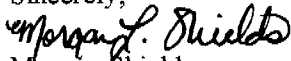
UCSOP Class of 2012

August 22, 2008

Dear to whom it may concern at the West Virginia Board of Pharmacy:

My name is Morgan Shields. I am a first year pharmacy student at the University of Charleston School of Pharmacy. The legislation regarding the immunization for licensed West Virginia pharmacists was exciting to read. The training and continuing education for pharmacists to be qualified to administer these immunizations was very clear and thorough to ensure patient safety. My only suggestion would be to require the posting of the pharmacist's immunization license in a place visible to the patient. This requirement will allow for patient trust and ensure the credibility of the pharmacist. I am very excited to be working toward this doctor of pharmacy degree, and even more excited to see the profession extending to provide more opportunities for patient care through such things as immunizations.

Sincerely,

  
Morgan Shields

Mr. Shawn D. Osolin  
Univ. of Charleston  
2300 MacCorkle Ave SE  
524 Middle Hall, Box 152  
Charleston, WV 25304

West Virginia Board of Pharmacy

Attn: David Potters

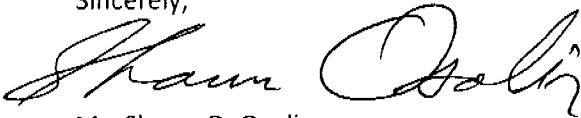
232 Capitol Street

Charleston, WV 25301

Dear Mr. Potters:

Hello. I am a pharmacy student at the University of Charleston School of Pharmacy. I am writing with a question on the rules of immunization (HB 3056) pertaining to pharmacist administration of immunizations. My comment pertains to Section #3 of Appendix B (Fiscal Note For Proposed Rules) titled "Explanation of Above Estimates." I am curious as to how you arrived at the estimate that "approximately 1/2 of licensees will desire to obtain certification to administer immunizations." That statement seems to be arbitrary and lacking in statistical analysis and sampling methods. Since this area of the rules deal with state funds, this is a very important area to have conclusive evidence supporting your claim. Please explain and possibly rectify this potential problem. You may reply to the above address or via email at [shawnosolin@ucwv.edu](mailto:shawnosolin@ucwv.edu). Thank you for your time and consideration.

Sincerely,



Mr. Shawn D. Osolin