

**WEST VIRGINIA
SECRETARY OF STATE
NATALIE E. TENNANT
ADMINISTRATIVE LAW DIVISION**

Form #3

Do Not Mark In This Box

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2011 DEC -8 AM 11:38

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.

AMENDMENT TO AN EXISTING RULE: YES NO

IF YES, SERIES NUMBER OF RULE BEING AMENDED: 12

TITLE OF RULE BEING AMENDED: Board of Pharmacy Rules Regarding
Immunizations Administered By Pharmacists

IF NO, SERIES NUMBER OF RULE BEING PROPOSED: _____

TITLE OF RULE BEING PROPOSED: _____

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.

David E. Potters
Authorized Signature



Board Members
George Karos, Pres.
Lydia Main, Vice Pres.
Charles Woolcock, Sec.
Martin Castleberry
Rebekah E. Hott
Carl K. Hedrick, Jr.
Sam Kapourales

David E. Potters,
Executive Director &
General Counsel

Betty Jo Payne,
Asst. Exec. Director

Office

232 Capitol Street

Charleston, West Virginia 25301

Phone (304) 558-0558

Fax (304) 558-0572

Board of Pharmacy


APPROVAL OF FILING OF RULES

BE IT HEREBY KNOWN that the West Virginia Board of Pharmacy has reviewed public comments and approves the filing of the following modified rules with the Secretary of State and the Legislative Rulemaking and Review Committee, which were considered and approved for filing by the Board at its regular meetings held on October 25, 2011. The public comments were also reviewed by the Board of Medicine and Board of Osteopathy, and the rule is approved by them as well as indicated in the attached correspondence from them:

Title 15, Series 12, "BOARD OF PHARMACY RULES REGARDING IMMUNIZATIONS ADMINISTERED BY PHARMACISTS", expanding the vaccines permitted to be administered by pharmacists (per West Virginia Code § 30-5-30 requiring joint rulemaking between the Boards of Medicine, Osteopathy, and Pharmacy for expanding the list of immunizations permitted).

Signed this 7th day of December, 2011,

BY:


George Karos, President



State of West Virginia *Board of Medicine*

REV. O. RICHARD BOWYER
PRESIDENT

MARIAN SWINKER, MD, MPH
SECRETARY

101 Dee Drive, Suite 103
Charleston, WV 25311
Telephone 304.558.2921
Fax 304.558.2084
www.wvbom.wv.gov

MICHAEL L. FERREBEE, MD
VICE PRESIDENT

ROBERT C. KNITTLE
EXECUTIVE DIRECTOR

December 5, 2011

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

Re: 15 CSR 12, Board of Pharmacy rules Regarding Immunizations Administered by Pharmacists

Dear Mr. Potters:

The Board of Medicine remains in favor of the amendments originally proposed in the above joint rules which have been filed. We understand and agree with the fact that the joint rules proposed now are the same as those originally proposed and that all parties endorse this. It has been a pleasure working with the Board of Pharmacy in this matter.

Sincerely,

A handwritten signature in black ink that reads "Robert C. Knittle".

Robert C. Knittle



STATE OF WEST VIRGINIA
BOARD OF OSTEOPATHY
405 Capitol Street, Suite 402
Charleston, WV 25301

Phone: 304-558-6095
Fax: 304-558-6096

November 18, 2011

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

RE: Title 15, Series 12 Pharmacy Rule Change

Dear David:

The West Virginia Board of Osteopathy met on Friday, November 11, 2011 and reviewed the public comments presented regarding Title 15, Series 12 Legislative Rule on the administration of immunizations by pharmacists.

As the West Virginia Board of Pharmacy intends to file the rule in final form with the Secretary of State and Legislative Rule Making Review Committee without any revisions to the Rule as approved by the West Virginia Board of Osteopathy at their meeting on July 25, 2011, our Board is in full support of the legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "Diana Shepard", with a long, sweeping flourish extending upwards and to the right.

Diana Shepard
Executive Director

QUESTIONNAIRE

(Please include a copy of this form with each filing of your rule: Notice of Public Hearing or Comment Period; Proposed Rule, and if needed, Emergency and Modified Rule.)

DATE: December 7, 2011

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: Title 15, Series 12
Board of Pharmacy Rules Regarding
Immunizations Administered By Pharmacists

1. Authorizing statute(s) citation WV Code Section 30-5-30

2. a. Date filed in State Register with Notice of Hearing or Public Comment Period:
Filed September 14, 2011.

b. What other notice, including advertising, did you give of the hearing?
None.
No hearing held. Only public comment period.
Rules were subject of several prior Board
Meeting Agenda.

c. Date of Public Hearing(s) or Public Comment Period ended:
Comment Period until October 20, 2011, at 4:00 p.m.

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)

No public hearing held. Public Comment Period only. December 8, 2011.

- 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
Executive Director & General Counsel
232 Capitol Street
Charleston, West Virginia 25301
304-558-0558
david.e.potters@wv.gov
304-558-0572 (fax)

- 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

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

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. West Virginia Code Section 30-5-30 directed the West Virginia Board of Pharmacy to promulgate rules, with the advice of the Board of Medicine and Board of Osteopathy, to implement and enforce the provisions of this section for pharmacist administration of flu and pneumonia vaccines, but required joint rulemaking by the three Boards for any further expansion of the types of immunizations a pharmacist may administer. The Board of Pharmacy prepared and the Legislature approved of the Board of Pharmacy's rules for pharmacists to administer flu and pneumonia vaccines in Title 15, Series 12. Now, after reviewing that process, the West Virginia Board of Pharmacy, Board of Medicine, and Board of Osteopathy have worked together to amend those rules in Series 12 to provide for additional immunizations through joint rulemaking by the three boards. The modification of Series 12, if approved, would add all of the vaccines specifically listed in the statute: Influenza, Pneumonia, Hepatitis A, Hepatitis B, Herpes Zoster, and Tetanus. With regard to tetanus, the rule would follow CDC recommendations and market realities to allow for tetanus-diphtheria (commonly referred to as "Td"), or tetanus-diphtheria-and-pertussis (commonly referred to as "Tdap") as combination vaccines which are preferred by the CDC over tetanus alone. Finally, it would require pharmacists to report any adverse events with administration to the Vaccine Adverse Events Reporting System (VAERS), and provide a copy of all reports to the Board. VAERS is a national vaccine safety surveillance program co-sponsored by the Centers for Disease Control and Prevention (CDC) and the Food and Drug Administration (FDA), and is available at <http://vaers.hhs.gov/index>.

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, 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 modification of the Series, such that changes are reflected by strike-throughs and underlining in the proposed rule.

FISCAL NOTE FOR PROPOSED RULES

Title 15, Series 12

Rule Title: _____

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: david.e.potters@wv.gov

Fiscal Note Summary

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

None. This just provides for pharmacists' authority within their scope of practice.

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	0.00	0.00	0.00
Personal Services	0.00	0.00	0.00
Current Expenses	0.00	0.00	0.00
Repairs & Alterations	0.00	0.00	0.00
Assets	0.00	0.00	0.00
Other	0.00	0.00	0.00
2. Estimated Total Revenues	0.00	0.00	0.00

Title 15, Series 12

Rule Title: _____

Rule Title: _____

3. Explanation of above estimates (including long-range effect):

Please include any increase or decrease in fees in your estimated total revenues.

None. This just provides for pharmacists' authority within their scope of practice.

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.

This just provides for pharmacists' authority within their scope of practice.

Date: 12/8/11

Signature of Agency Head or Authorized Representative

David E. Potters

TITLE -15
LEGISLATIVE RULE
WEST VIRGINIA BOARD OF PHARMACY

FILED

2011 DEC -8 AM 11:38

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/amend the rules for pharmacists licensed in West Virginia to administer immunizations to patients in this State, providing for additional immunizations through joint rulemaking by the West Virginia Board of Pharmacy, Board of Medicine, and Board of Osteopathy.

1.2. Authority. -- W. Va. Code §30-5-30.

1.3. Filing Date. -- June 9, 2009 _____.

1.4. Effective Date. -- July 1, 1009 _____.

§15-12-2. Definitions.

2.1. "Board", unless otherwise specifically indicated, means the West Virginia Board of Pharmacy.

2.2. "Immunizations" means, for the purpose of this rule, 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;

(c) Hepatitis A;

(d) Hepatitis B;

(e) Herpes Zoster; and

(f) Tetanus, tetanus-diphtheria (commonly referred to as "Td"), or tetanus-diphtheria-and-pertussis (commonly referred to as "Tdap").

§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 rule.

§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 rule. 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 rule 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 (available at www.cdc.gov/vaccines/recs/schedules/adult-schedule.htm);

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 rule;

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.

6.4. Pharmacists shall report all adverse events to the Vaccine Adverse Events Reporting System (VAERS), and promptly provide a copy of all reports to the Board. VAERS is a national vaccine safety surveillance program co-sponsored by the Centers for Disease Control and Prevention (CDC) and the Food and Drug Administration (FDA), and is available at <http://vaers.hhs.gov/index>.

§15-12-7. Emergencies.

7.1. A pharmacist authorized to administer immunizations under this rule 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 Members
George Karos, Pres.
Lydia Main, Vice Pres.
Charles Woolcock, Sec.
Martin Castleberry
Rebekah E. Hott
Carl K. Hedrick, Jr.
Sam Kapourales

Office
232 Capitol Street
Charleston, WV 25301



David E. Potters,
Executive Director &
General Counsel

Betty Jo Payne,
Asst. Exec. Director

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www.wvbop.com

RESPONSES TO PUBLIC COMMENTS RECEIVED
TO PROPOSED RULES

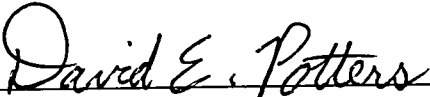
(Including explanation of any amendments made to the proposed rule as a result of comments)

TITLE 15, SERIES 12 (WV CSR 15-12-1, et seq.)
“Pharmacist Administration of Immunizations”

The Board of Pharmacy met on October 25, 2011, to receive written public comments to the proposed rules filed with the Secretary of State on September 14, 2011, making amendments to Title 15, Series 5. The Public Comment Period closed on October 20, 2011. Two timely-filed public comments were received by the Board, and both are fully in support of the proposed changes to the Rules. The first comment is from the West Virginia Pharmacist Association dated October 7, 2011. The second comment is from the National Association of Chain Drug Stores dated October 12, 2011. Neither comment makes any suggestions for changes. The Board noted that it received two other comments on October 24, 2011, after the public comment period had closed, so they were not permitted to be considered. However, the Board noted that they are both supportive of the rule and echo the two comments that were considered. They were from the West Virginia Immunization Network and The Center for Rural Health Development, Inc.

Therefore, the Board approved the rules for filing as filed for public comment, without any further modifications. Likewise, the Boards of Medicine and Osteopathy were provided all four comments for review, and have provided written approval for final filing without any further changes as well.

Prepared by:


David E. Potters
Executive Director and General Counsel



Board Members

*George Karos, Pres.
Lydia Main, Vice Pres.
Charles Woolcock, Sec.
Martin Castleberry
Rebekah E. Hott
Carl K. Hedrick, Jr.
Sam Kapourales*

Board of Pharmacy

*David E. Potters,
Executive Director &
General Counsel*

*Betty Jo Payne,
Asst. Exec. Director*

Office

232 Capitol Street

Charleston, West Virginia 25301

Phone (304) 558-0558

Fax (304) 558-0572

October 25, 2011

Robert C. Knittle, M.S.
Executive Director
West Virginia Board of Medicine
101 Dee Dr., Suite 103
Charleston, WV 25311

Diana Shepard
Executive Director
West Virginia Board of Osteopathy
405 Capitol Street, Suite 402
Charleston, WV 25301

Re: Public Comment to Title 15, Series 12, Board of Pharmacy Rules Regarding
Immunization Administrated by Pharmacist

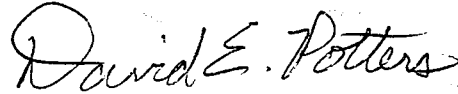
Dear Mr. Knittle and Ms. Shepard:

Enclosed are copies of the public comments received by the Board of Pharmacy regarding the proposed rules changes to Title 15, Series 12, Board of Pharmacy rules regarding immunization administrated by Pharmacist. We received only two comments, both of which were in favor of the rules. The first comment is from the West Virginia Pharmacist Association dated October 7, 2011. The second comment is from the National Association of Chain Drug Stores dated October 12, 2011. Neither comment makes any suggestions for changes. The Board received two more comments, enclosed, on October 24, 2011. The comment period ended October 20, 2011, so they were not considered. However they are both supportive as well, and echo the others that were considered.

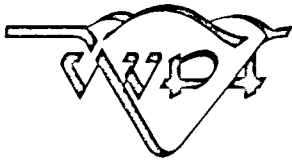
The Board of Pharmacy meet on October 25, 2011, and received the public comments. It voted to file the rules with the secretary of state and legislative rule making review committee in final form without any changes based upon the public comments. Therefore, I am forward to your Boards for their review as well, as part of the joint rule making process.

Thank you for your attention to this matter. Should you have any questions or concerns please feel free to contact me:

Sincerely,

A handwritten signature in black ink that reads "David E. Potters". The signature is written in a cursive style with a large, prominent initial "D".

David E. Potters
Executive Director & General Counsel



West Virginia Pharmacists Association

2016¹/₂ Kanawha Boulevard, East, Charleston, West Virginia 25311

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

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OCT 11 2011

WV BOARD OF PHARMACY

October 7, 2011

West Virginia Board of Pharmacy
c/o Immunization Comments
232 Capitol Street
Charleston, WV 25301

Dear Board Members:

On behalf of the more than 1,800 licensed pharmacists in West Virginia, this Association expresses its support of your proposed rule, Title 15, Series 12, regarding immunizations administered by pharmacists.

Your rule expands the types of immunizations that can be administered by pharmacists who have completed appropriate training. This will improve access to these effective vaccines to more adults throughout our State.

Pharmacists will provide these immunizations in a cost effective manner, affording more adults the opportunity to obtain the vaccines.

Your Board is to be commended for its collaboration with the Board of Medicine and Board of Osteopathy in promulgating this rule, as called for in House Bill 3056 passed by the Legislature in 2008.

Very truly yours,

A handwritten signature in black ink that reads "Richard D. Stevens".

Richard D. Stevens
Executive Director
WEST VIRGINIA PHARMACISTS ASSOCIATION

xc: WVPA Board of Directors
WVPA Members



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

October 12, 2011

West Virginia Board of Pharmacy
c/o Immunization Comments
232 Capitol Street
Charleston, WV 25301

RE: Board of Pharmacy Rules Regarding Immunizations Administered by
Pharmacists

Dear Executive Director and General Counsel Potters:

On behalf of our members operating pharmacies in the state of West Virginia, the National Association of Chain Drug Stores is writing to commend the Board of Pharmacy for these proposed rules that expand the immunizations that pharmacists are permitted to administer by adding hepatitis A, hepatitis B, herpes zoster, tetanus, tetanus-diphtheria, and tetanus-diphtheria-and-pertussis.

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

We applaud the Board Pharmacy along with the Board of Medicine and Board of Medicine and the Board of Osteopathy for joining together to issue these proposed rules that recognize the value of pharmacists in providing immunization services to the residents of the State of West Virginia along with the other members of the health care team.

Despite the availability of effective immunizations, many Americans remain unvaccinated and susceptible to vaccine-preventable diseases. Community pharmacies and pharmacists play a key role in providing patients with accessible immunization services to help reduce the number of inadequately vaccinated Americans.

Again, we wholeheartedly support the Board of Pharmacy for these proposed rules and for working with the Board of Medicine and the Board of Osteopathy to reach this laudable goal.

Sincerely,

A handwritten signature in black ink that reads "Jill K. McCormack". The signature is written in a cursive, flowing style.

Jill McCormack, Director
State Government Affairs
jmccormack@nacds.org

(703) 549-3001

Fax (703) 836-4869

www.nacds.org

RECEIVED

OCT 24



**West Virginia
Immunization
Network**

WV Board of Pharmacy
c/o Immunization Comments
232 Capitol St.
Charleston, WV 25301

October 19, 2011

Re: Expansion of Pharmacists as Immunizers

To: WV Board of Pharmacy

On behalf of the West Virginia Immunization Network (WIN), I would like to take this opportunity to state our support for the expansion of pharmacists' scope of practice to be able them to provide more immunizations to adults in West Virginia. WIN is a statewide coalition of more than 200 representatives from both the public and private sectors who work to create an environment in West Virginia where every resident is appropriately immunized. Since 1996, WIN's goal has been to educate the public regarding the seriousness of vaccine-preventable diseases and the importance of immunizations across the lifespan.

Historically, West Virginia's adult immunization rates have been low and vaccine-preventable diseases have persisted. West Virginia currently has the highest incidence rate of Hepatitis B and has recently had outbreaks of Hepatitis A. Additionally, there was a four-fold increase in pertussis cases between 2009 and 2010. Yet many adults are unaware that they can and should be immunized against these diseases. Others find it difficult to visit a primary care provider during the work day or find that their primary care provider does not carry immunizations. These barriers to adult immunization can be overcome by increasing access to immunization by enabling them to pharmacists to provide more adult immunizations.

WIN feels that pharmacists have played a key role in increasing adult access to influenza and pneumococcal immunizations. By expanding pharmacists' scope of practice to include Hepatitis A; Hepatitis B; Herpes Zoster; and tetanus-diphtheria or tetanus-diphtheria and-pertussis for those 18 years of age and older, adults in West Virginia will have even greater access to immunizations, which will result in greater protection from vaccine-preventable diseases.

Thank you for your work to improve adult immunization rates in West Virginia. We look forward to working with you in the future toward this goal.

Sincerely,

Elaine Darling
Program Manager, West Virginia Immunization Network



RECEIVED
OCT 24 2011
WV BOARD OF PHARMACY

WV Board of Pharmacy
c/o Immunization Comments
232 Capitol St.
Charleston, WV 25301

October 19, 2011

Re: Expansion of Pharmacists as Immunizers

Dear Members of the WV Board of Pharmacy:

On behalf of the Center for Rural Health Development (Center), I would like to take this opportunity to express our support for the expansion of pharmacists' scope of practice in West Virginia that would enable pharmacists to fully immunize adults ages 18 years and older. The Center's mission is to create a healthy future for West Virginia by improving the health of our residents and the strength of West Virginia's health care delivery system, especially in rural and underserved communities. Thus, our state's ability to fully utilize the skills and knowledge of all of our health care providers in meeting the health needs of our state's residents is integral to the achievement of the Center's mission.

We feel that by expanding pharmacists' scope of practice to enable them to provide Hepatitis A; Hepatitis B; Herpes Zoster; and tetanus-diphtheria or tetanus-diphtheria and-pertussis, that adults throughout West Virginia, particularly those in rural areas, will have greater access to immunizations. With pharmacies located in almost every ZIP code in West Virginia, pharmacists are the most accessible health care providers in our state. We feel that this expansion in scope of practice will result in improved adult immunization rates in West Virginia and will support our businesses by subsequently reducing work absenteeism and the health care costs associated with vaccine-preventable diseases.

Thank you for the opportunity to express our opinion on this important health issue and your work to improve the health of all West Virginians.

Sincerely,

Sharon L. Lansdale,
President/CEO