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**West Virginia Board of Pharmacy Response to Comments on 15 CSR 12**

The Board appreciates the support for 15 CSR 12 voiced by the West Virginia Retailers Association and the National Association of Chain Drug Stores.

Ryan L. Hatfield

General Counsel

A handwritten signature in black ink, appearing to read "Ryan L. Hatfield", is written over the typed name and title.



*West Virginia Retailers Association*

August 21, 2020

Mr. Ryan L. Hatfield  
General Counsel  
West Virginia Board of Pharmacy  
2310 Kanawha Blvd., East  
Charleston, WV 25311

via email: [Ryan.L.Hatfield@wv.gov](mailto:Ryan.L.Hatfield@wv.gov)

**RE: West Virginia Board of Pharmacy Rule 15-12**

Dear Mr. Hatfield:

Members of West Virginia Retailers Association operate nearly 400 chain and independent pharmacies and employ over 16,000 individuals within the state of West Virginia.

The WV Board of Pharmacy's rule 15-12 regulating immunization provided by pharmacists and pharmacy interns is a step forward for our citizens. This vital rule provides a clarification of immunizations administered by WV pharmacists and pharmacy interns and goes even further in protecting the public health in our rural state.

West Virginia residents will have more protection closer to home than ever before and our state will benefit from the overall health outcomes it affords our residents. Everyone should have easy access to the lifesaving immunizations and vaccines available in this country today and we applaud the WV BOP and the WV Legislature for recognizing this important fact.

The current pandemic has shown just how vital pharmacies are in their service to local communities.

Best regards,

Bridget Lambert, President  
WV Retailers Association

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**Hatfield, Ryan L**

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**From:** Jill McCormack <JMcCormack@NACDS.org>  
**Sent:** Tuesday, August 18, 2020 1:01 PM  
**To:** Hatfield, Ryan L  
**Cc:** Capehart, Krista D; Bridget Lambert - WV Retailers Association (blambert@wvretailers.com)  
**Subject:** [External] NACDS support for Proposed Rules

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Dear Mr. Hatfield:

NACDS is writing to note our support for proposed rules 15 WVCSR 1 that defines "electronic supervision" and 15 WVCSR 12 regarding immunizations. We applaud the Board for taking these steps to modernize patient care, especially during the current pandemic.

As you are well aware, business efficiencies like electronic supervision have allowed pharmacists to streamline workflow in and out of the pharmacy, ultimately resulting in the ability to serve more patients in a timely manner. Streamlining workflow also frees up pharmacists to offer critical services such as immunizations that are -- and will continue to be -- much needed as this health crisis continues. We also noted the addition of the State of Emergency language adding "FDA authorized or approved" vaccine to immunization rule. This is a critical provision that we strongly support. Thus, these rules dovetail nicely together and will help us serve the healthcare needs of West Virginia's patients as we move towards a flu season that will no doubt be complicated by the ongoing COVID-19 crisis.

Thank you for the opportunity to comment and please don't hesitate to contact me if you need more information or assistance.

Sincerely,  
Jill

**Jill McCormack | Regional Director, State Government Affairs**  
**National Association of Chain Drug Stores**  
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