



July 14, 2020

Chris Woodul, RPh  
Board Chairman  
New Mexico Board of Pharmacy  
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**Support the Entire Pharmacy Team to Expand Critical Vaccine Access Amid COVID-19 Pandemic and Upcoming Influenza Season**

Dear Mr. Woodul,

NACDS greatly appreciates the Board's directive to explore the potential for pharmacy technicians to administer vaccines. Amid the COVID-19 pandemic and upcoming flu season, vaccine access is paramount to supporting health in communities across the country. Moreover, the ability for pharmacies to help close gaps in vaccine access and provide catch-up immunizations for children and adolescents is vital to prevent outbreaks of other dangerous diseases, which would severely exacerbate the current emergency circumstances. Leveraging the skills of the entire pharmacy team will meaningfully expand access to vaccines for the public and residents across the state.

NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate nearly 40,000 pharmacies, including more than 200 in New Mexico, and NACDS' 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists, and employ about 19,000 people in New Mexico. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit [nacds.org](http://nacds.org).

While pharmacy-based vaccination has meaningfully improved vaccine uptake for over two decades, emphasis has been placed primarily on pharmacists as vaccinators. However, in recent years, pharmacy technicians have demonstrated success in the technical task of vaccine administration, and in such models, pharmacists maintain responsibility for all aspects requiring clinical or professional judgement. Technician immunization models and pilots have proven safe and effective, showing that restrictions preventing technicians from immunizing are arbitrary and unfounded. Such restrictions seriously impede and hamper patient access to more effective care delivery and reduce vaccine administration capacity.

Proactively authorizing pharmacy technicians to provide vaccines in advance of influenza season will allow pharmacies to plan and adapt care delivery models to provide increased vaccine capacity and optimally serve patients this fall. In fact, pharmacies typically begin offering influenza vaccine in mid to late August – only a few short weeks away. Now more than ever, undue restrictions on pharmacy staff should be lifted for the greater good, to help meet public health goals for vaccination during this critical and unprecedented time.

NACDS strongly urges the Board to authorize pharmacy technicians to perform the technical task of administering immunizations. Such action will better support pharmacies to meet the growing need for widespread vaccine access

especially this fall given impending demand for influenza vaccine, pneumonia vaccine, and the forthcoming COVID-19 vaccine, in addition to others. Now more than ever, it is critical to leverage the expertise and skills of all pharmacy staff, without undue restrictions, to optimize the capacity of pharmacies to provide much needed vaccinations and other care services across the state. These unprecedented times require new models of care and innovative practices that leverage all healthcare resources and deploy all skills to best support and care for the public. Thank you for considering and please do not hesitate to contact NACDS' Mary Staples at [mstaples@nacds.org](mailto:mstaples@nacds.org) or 817-442-1155 to discuss further.

Sincerely,



Steven C. Anderson, FASAE, CAE, IOM  
President and Chief Executive Officer