

LEGISLATORS: ACT NOW TO CONTINUE CRITICAL ACCESS TO AFFORDABLE CARE AT MICHIGAN PHARMACIES

Federal PREP Act allowances will expire on May 11¹ and unless Michigan policymakers act now, patient access to healthcare services at their local pharmacy is in jeopardy.

The pharmacy community has played a vital role in expanding patient access to care and helping communities reopen and return to normal over the last two years by getting shots in arms and providing important testing services. Under the federal Public Readiness and Emergency Preparedness Act (PREP Act), pharmacy providers across the country were approved to provide a broad array of immunizations and “test to treat” services during the public health emergency, utilizing the full pharmacy team (including pharmacy technicians) to provide critical access to affordable services in many underserved communities.

Michigan pharmacies administered 10,069,807 vaccinations between 2019-2022.

Legislators: It's time to advance HB 4316 and SB 219 to help Michigan patients stay healthy.

FEDERAL PREP ACT ALLOWANCES FOR PHARMACY PERSONNEL	
Vaccination services authorized by the PREP Act. <ul style="list-style-type: none"> • Pharmacists: order & administer COVID (3 yrs +); ACIP (3- 18 yrs) • Interns: administer COVID (3 yrs +); ACIP (3- 18 yrs) • Pharmacy Technicians: administer COVID (3 yrs +); ACIP (3- 18 yrs); flu (adults) 	“Testing to treat” services authorized by the PREP Act. <ul style="list-style-type: none"> • Pharmacists: order and administer COVID tests; COVID therapeutics • Interns: administer COVID tests • Pharmacy Technicians: administer COVID tests

Why codify PREP Act allowances in Michigan?

- Pharmacies have effectively connected millions of patients – including those who do not otherwise have a primary care provider – to important healthcare services. Without continuing this practice there will be critical gaps in care resulting in patient confusion and frustration.
- Research shows immunization rates improve when pharmacists and pharmacy technicians are authorized to vaccinate adults and children.
- **64% of Michigan adults believe “learning the lessons of the pandemic means keeping in place policies that make it easier for patients to access services from pharmacists and other pharmacy team members.”²**
- Since 2021, 18 states have broadened vaccination authority, and 16 have granted permanent vaccine authority to pharmacy technicians.³

The fix is simple: make it easier, not harder, for people to continue getting vaccinated at pharmacies.

Michigan law should be modernized to continue the full range of testing and the initiation of treatment services to be provided to citizens, beyond the pandemic, at their neighborhood pharmacies by codifying permanent, independent authority for pharmacists to continue to provide essential testing:

- Recognize pharmacists' independent ability to order, administer, bill, and be reimbursed for any FDA-authorized CLIA-waived test;
- Recognize pharmacists' independent ability to initiate the appropriate treatment pursuant to the result of the CLIA-waived test; and
- Recognize pharmacists' authority to delegate administration of such tests to trained pharmacy interns and technicians.

Michigan residents trust community pharmacies

- Michigan pharmacies administered 10,069,807 vaccinations between 2019-2022.
 - 50% of pharmacy COVID-19 vaccination sites were in areas with high social vulnerability.⁴
 - Over 40% of those vaccinated at pharmacies were from racial/ethnic minority groups.⁵
- There was a 30-40% increase in pharmacy flu vaccines between 2018/19 and 2020.
- More than 40 million flu vaccinations have been administered at pharmacies during the 2022-23 season, compared to 26 million at physician medical offices.

The value of continuing "test to treat" services

- Pharmacies use the same testing technology and follow the same steps as other healthcare providers to conduct testing services.
- Within the federally implemented COVID-19 testing programs:
 - Pharmacies offered 20,000 COVID-19 testing sites nationwide.
 - Pharmacies provided more than 45 million COVID-19 tests.⁶
 - 70% of pharmacy testing sites are in areas with moderate to severe social vulnerability.⁷
- Through this federal pharmacy flexibility, **there are currently 66 Michigan pharmacies that offer "test-and-treat" services for COVID-19.**⁸
 - These 66 additional community healthcare destinations have allowed patients the convenience to receive care in one place.
- 8 states, including Idaho, Kentucky, New Mexico, and Florida, have authorized pharmacists to conduct CLIA-waived testing and the initiation of treatment.
- Pharmacists complete a rigorous Doctor of Pharmacy curriculum, including direct patient care components: patient assessments & point-of-care testing skills, per pharmacy accrediting body.

Pharmacies provide the greatest access to cost-efficient services.

- More than 90 percent of people in the United States live within 5 miles of a community pharmacy.
- Pharmacies have more locations and significantly more operating hours for vaccination than physician practices in low-income communities.⁹
- 87% of Michiganders say it is very or somewhat easy to access pharmacies, ranking their accessibility the highest among healthcare destinations tested.

¹ President Biden announced the federal government will end the COVID-19 Public Health Emergency on May 11. The PREP Act is contingent on the Public Health Emergency and many services and allowances under it will expire once the emergency expires.

² A poll commissioned by NACDS and conducted by Morning Consult December 7-12, 2022.

³ Detail: 18 states broadened vaccination authority: AR, FL, GA, ID, IL, IN, IA, ME, MD, NH, ND, OH, OK, PA, VA, VT, and WY, 16 states have granted permanent vaccine authority to pharmacy technicians: AR, CO, IA, ID, IL, IN, KY, MO, NC, NH, NV, RI, UT, VA, WA, and WI

⁴ GAO, Federal Efforts to Provide Vaccines to Racial and Ethnic Groups, available at <https://www.gao.gov/assets/gao-22-105079.pdf>.

⁵ GAO, Federal Efforts to Provide Vaccines to Racial and Ethnic Groups, available at <https://www.gao.gov/assets/gao-22-105079.pdf>.

⁶ https://content.govdelivery.com/attachments/USDHSEFEMA/2021/03/09/file_attachments/1717220/By%20the%20Numbers.COVID.FINAL.Mar.%208.2021.pdf <https://www.cdc.gov/icatt/index.html>

⁷ White House, FACT SHEET: Biden Administration Announces Historic \$10 Billion Investment to Expand Access to COVID-19 Vaccines and Build Vaccine Confidence in Hardest-Hit and Highest-Risk Communities, available at <https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/25/fact-sheet-biden-administration-announces-historic-10-billion-investment-to-expand-access-to-covid-19-vaccines-and-build-vaccine-confidence-in-hardest-hit-and-highest-risk-communities/>

⁸ <https://www.bridgemi.com/michigan-health-watch/got-covid-michigan-has-66-one-stop-shops-both-test-and-treat>

⁹ GHLF study commissioned by the American Disease Prevention Coalition, available at [https://www.japha.org/article/S1544-3191\(22\)00094-2/fulltext](https://www.japha.org/article/S1544-3191(22)00094-2/fulltext)