

New Hampshire & National Association of Chain Drug Stores (NACDS)

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State Profile

1. Number of NACDS Members operating in NH:	11
2. Number of NACDS Stores in NH:	224
3. Number of NACDS Pharmacists working in NH:	638
4. Number of NACDS Employees in NH:	16,815

COVID-19 Testing

Additional testing capacity is necessary: to ensure the health of the community and the health of the state's economy

Pharmacies are ready and able to expand COVID-19 testing for communities across New Hampshire.

Outdoor and mobile testing hosted by pharmacy companies should be leveraged for testing.

- FDA has authorized COVID-19 testing for use at the point-of-care that are appropriate for performance in settings like outdoor, mobile, and drive-through pharmacy platforms.
- Pharmacists are no strangers to providing point-of-care (POC) tests as **40 states already allow pharmacists to provide the necessary screenings and POC tests for conditions such as the flu.**
- Pharmacies in New Hampshire already administer tests through collaborative practice agreements and COVID-19 tests are no different.
- Given the current strain on the healthcare system, it is necessary to authorize New Hampshire-licensed pharmacists to **independently** order and administer these tests in order to meet public health needs. Urgent action is needed to remove barriers and eliminate any potential restrictions in New Hampshire that undermine public health efforts for pharmacies to provide testing access to the public.

Any requirement for protocols or physician authorization, outside of a statewide protocol, is excessive and creates undue burden and limits access to care.

Earlier this month, HHS Secretary Azar authorized pharmacists to order and administer COVID-19 tests, including serology tests, to rapidly expand access across America. (See <https://www.hhs.gov/sites/default/files/authorizing-licensed-pharmacists-to-order-and-administer-covid-19-tests.pdf>) In a parallel action, as of April 28th, 27 states now provide for pharmacy-led COVID-19 testing. While some advocate that this guidance preempts states, we ask the Governor to issue:

1. An executive order that waives any impeding rules and restrictions to effectively support pharmacies to roll out end-to-end testing broadly across all communities they serve.
or
2. A Statewide Standing Order that permits New Hampshire pharmacists to order and administer COVID-19 tests, without the need for additional protocols or other physician authorization.

NACDS Polling Data of Voters in NH

- **88%** say it is easy to access pharmacies
- **74% Agree:** COVID-19 has shown that public health partners like pharmacies are important, and we need to remove barriers like some government regulations that prevent pharmacies from being utilized to the extent possible.
- **78%** say pharmacists should be allowed to **provide tests** for COVID-19.

Pharmacists can and should “order” tests independently in New Hampshire, without physician authorizations that can cause delays in access to care for many pharmacies.

Vaccines

Preparedness is vital to the public health of the state.

- Distributing and administering the COVID-19 vaccine, when available, will be a monumental step toward overcoming the COVID-19 pandemic.
- When available, it will be imperative to vaccinate people throughout New Hampshire as quickly as possible in order to prevent additional infections and outbreaks.

Pharmacy immunizations can be scaled quickly and safely in pandemics.

- Pharmacies use their distribution networks and local presence to scale up vaccination quickly and safely.
- In 2009, 10 large pharmacies participated in the CDC 2009 H1N1 Vaccine Pharmacy Initiative. Over 3 months, CDC distributed ~ 5.5 million doses to these pharmacies, and they distributed it to 10,700+ retail stores.
 - ***The CDC 2009 H1N1 Vaccine Pharmacy Initiative accounted for 23% of all vaccine distributed at that same time period.***^[1]
- Pharmacists are accessible and convenient sites to provide COVID-19 immunizations when available. Patients also benefit from expanded hours at pharmacies that extend beyond when traditional providers are open.
- A newly published *Forbes* article outlines the vital role that pharmacists will have in helping to promote access to the forthcoming COVID-19 vaccine,^[2] and urges states to eliminate barriers to pharmacist-provided vaccines.

Pharmacies serve as an additional healthcare destination for New Hampshire residents to receive accessible quality care, improve vaccination rates, and enhance public health throughout the state.

New Hampshire pharmacists can currently administer the flu vaccine to people of all ages and other specific vaccines to individuals 18 years of age or older. However, they are only authorized to administer these vaccines under a collaborative practice agreement (CPA), standing order, or prescription.

- Pharmacists are qualified and capable, via completion of extensive education and training, of administering all FDA-approved vaccines without additional requirements.
- Given the severity of this global pandemic, physicians’ offices are experiencing an increased demand for care, and may not have capacity to also handle the administrative requirements for pharmacists to administer vaccines. New Hampshire’s Department of Health & Human Services

^[1] <https://www.ncbi.nlm.nih.gov/pubmed/22146661>

^[2] Winegarden, Wayne. March 31, 2020. “Expand Pharmacists’ Authority To Promote Access To Forthcoming COVID-19 Vaccine.” *Forbes* <https://www.forbes.com/sites/waynewinegarden/2020/03/31/expand-pharmacists-authority-to-promote-covid-19-vaccine-access/>

can establish appropriate protocols that can ease these capacity issues during this critical period to ensure patients have increased access to convenient and quality care.

Pharmacists should have the ability to *independently order and administer* the forthcoming COVID-19 vaccine, as soon as it is authorized by the FDA, for patients *of all ages* to ensure swift uptake of the vaccine, which will prevent further infections and outbreaks in the state.

With our robust network of stores throughout the State of New Hampshire, our members want to partner with the Department of Public Health in NH to offer our citizens the most safe, efficient and cost-effective manner of being protected from COVID-19.

Thank you.