TO: Members, Wisconsin State Legislature

FROM: Danielle Womack, MPH
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DATE: November 20, 2020

SUBJECT: COVID-19

Pharmacists provide essential healthcare in their communities and in Wisconsin’s health-systems. As frontline healthcare providers, pharmacists are working side-by-side with interprofessional teams to respond to the pandemic with evidence-based care, creativity, and inspiring heroics.

In addition to filling life-saving prescriptions, community-based pharmacists serve as a local point of healthcare to provide medication management. Local pharmacists routinely partner with physicians to optimize patients’ medications for affordability and desired outcomes, efforts that are more critical now than ever. Local pharmacists also provide immunizations, including the forthcoming COVID vaccines, health screenings, point of care testing (including COVID testing), and chronic disease monitoring.

Pharmacists in ambulatory care settings are collaboratively managing treatment for chronic diseases, complex specialty conditions, and working to improve medication adherence via telehealth. Infectious disease expert pharmacists are quickly reviewing thousands of pieces of literature and research, serving as medication experts for their overworked hospital-based teams. They are implementing critical care guidelines, addressing medication shortages, and developing allocation plans for scarce resources.

During this COVID-19 pandemic, pharmacists and pharmacy professionals have remained essential and accessible to patients, ensuring that patient care is not disrupted.

We have identified a series of policy solutions to issues relating to patient access to testing and vaccines and healthcare staffing shortages. We look forward to collaborating with policymakers to address health disparities, work with local public health, and bring solutions to the table as health care teams are stressed to the max and “all hands on deck” are needed to care for our fellow Wisconsinites.

Please do not hesitate to reach out to me at 608-827-9200 or dwomack@pswi.org to discuss advancing these policy priorities.
The Pharmacy Society of Wisconsin has identified the following policy changes as ways in which Wisconsin can combat the COVID-19 pandemic.

Allow all trained pharmacy students to administer vaccines.
Currently, only pharmacy students who have completed their second year of pharmacy school may administer vaccines under the supervision of a pharmacist, despite many pharmacy students receiving immunization administration training earlier in their academic career.

**Solution:** Modify Wis. Stat. 450.03(1)(f) to read “A person who is enrolled at an accredited school of pharmacy and has successfully completed his or her second year in, and whose practice of pharmacy is limited to performing duties under the direct supervision of a person licensed as a pharmacist by the board.”

Allow pharmacy technicians to administer vaccines.
The United States Department of Health & Human Services recently issued an amendment to the Public Readiness and Emergency Preparedness Act (PREP Act) that would allow pharmacy technicians to administer vaccines; however, the training requirement in the HHS amendment for pharmacists supervising pharmacy technicians is greater than Wisconsin state law for pharmacist immunizers. Additionally, the HHS amendment only allows technicians to assist in immunizing children and with the COVID vaccine, thereby limiting the ability for technicians to assist with adult influenza vaccine efforts. Therefore, we have significant concerns about the ability to expand access to immunizations via the HHS guidance.

**Solution:** Allow pharmacists in Wisconsin to supervise a pharmacy technician if they comply with state law regarding immunization training for patients aged 3 and older when following ACIP recommendations.

Ensure pharmacists are reimbursed for administering COVID-19 tests & vaccines.
Despite being authorized to administer COVID-19 tests and vaccines, pharmacists are often not included as providers in payer contracts, including through Wisconsin Medicaid, which only reimburses pharmacists for administering influenza and Hepatitis A vaccines to adults.

**Solution:** Require that payers, including Medicaid, reimburse pharmacists for administering COVID-19 tests and vaccines as they would any other healthcare provider.

Pass AB 788 to ensure adequate prescription access in case of staffing shortages
Remote dispensing sites allow for staffing flexibility in pharmacies and allow patients to access prescriptions where access may be otherwise limited due to staffing.

**Solution:** Pass AB 788, which previously passed the State Assembly and Senate Committee on Health & Human Services, which would allow remote dispensing sites more flexibility in their operations.

Permanently Removing Workforce Licensing Barriers
Out-of-state pharmacists and other healthcare providers are currently able to be receive license reciprocity in Wisconsin to fill workforce shortages created by COVID-19, but this authorization will expire in early 2021.

**Solution:** Make DSPS waivers for out-of-state licensure permanent.