



February 11, 2025

**Re: Joint Legislative Budget Hearing Expressing Strong Support for New York Budget Provisions Providing Continued Access to Vaccination**

*Sent via email: [wamchair@nyassembly.gov](mailto:wamchair@nyassembly.gov) / [financechair@nysenate.gov](mailto:financechair@nysenate.gov)*

The American Disease Prevention Coalition writes to express strong support for **provisions included in the 2025 budget bill** that will update current pharmacy practice in New York for continued access to vaccinations and sustain efficient pharmacy workflow by continuing to allow pharmacy technicians to administer vaccines. Specifically, we support provisions to include “registered pharmacy technicians” as immunizers (Subpart C pg. 163). We also request your consideration to further extend this language to allow nationally certified pharmacy technicians to practice in community pharmacies.

Vaccination is an essential part of maintaining health and well-being by reducing the risk of illness, disability, and death due to vaccine-preventable diseases. Vaccines help prevent serious diseases, including, influenza (flu), pneumonia, tetanus, pertussis (whooping cough), herpes zoster (shingles), meningitis, COVID-19, and hepatitis A and B.

Pharmacists and pharmacy technicians throughout New York played an instrumental role in vaccination during the pandemic and are uniquely positioned to continue serving as active participants in the vaccination effort by having local and accessible locations. The U.S. Department of Health and Human Services (HHS) recognized pharmacies’ ability to provide access by extending authority for pharmacists and pharmacy technicians. In December 2024, the PREP Act declaration’s covered countermeasures for COVID-19 and seasonal influenza vaccines was extended through December 31, 2029, for pharmacists to order and administer and pharmacy interns and pharmacy technicians to administer COVID-19 and seasonal influenza vaccines (to children ages three and older).<sup>1</sup> If this authority were to go away, pharmacy technicians in New York would be limited in their vaccination authority, impacting pharmacy workflow and increasing workload on pharmacists.

Pharmacists and pharmacy technicians play an important role in preventing and treating disease, especially given pharmacists rigorous professional education and training around medications and vaccines, vaccine practice management, adverse reactions to vaccines, vaccine guidance and

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<sup>1</sup> <https://www.pharmacist.com/APhA-Press-Releases/hhs-extends-federal-authority-consistent-with-apha-request-for-pharmacy-personnel-to-independently-administer-vaccines-and-test-to-treat-services-through-2029#:~:text=PREP%20Act%20immunity%20from%20liability,%2C%20and%20COVID%2D19%20tests.>

recommendations, as well as possessing a skill set at administering vaccines and medication. In 2021, 80% of people in New York got their vaccines at a pharmacy, up from 46% in 2018<sup>2</sup>.

While progress has been made, New York is yet to reach pre-pandemic vaccination levels. A gaps analysis shows New York is 1% below where they were in 2019<sup>3</sup>. Pharmacies also play an important role within communities by enhancing awareness of vaccines, assessing a patient's immunization status, recommending vaccines, administering vaccines, and reporting vaccinations to the state registry and primary care providers, if applicable, to maintain coordination with all providers— all in alignment with current practice guidelines and recommendations. Studies have also shown that pharmacies have more locations and longer operating hours than physician practices in low-income communities, highlighting the critical function pharmacies play in expanding vaccination services.<sup>4</sup> Now more than ever, vaccination authority expansion should be made permanent to ensure continuity of access to care.

Successful inclusion of this provision as part of the Budget will help ensure New Yorkers have adequate access to vaccination health care destinations within their communities, are protected from vaccine-preventable diseases and are as healthy as possible. However, current NY statute only requires that technicians working in a hospital setting to be registered with the Board of Pharmacy. Moving forward, it is essential to allow pharmacy technicians to practice in community settings, and mirror the Federal PREP Act language which allows nationally certified technicians who have completed the required immunization training to administer vaccines in our local pharmacies by broadening pharmacy access from the hospital to the community setting and ensure pharmacies are best able to care for our citizens through immunization.

Again, thank you.

Sincerely,

American Disease Prevention Coalition

<https://vaccinesshouldntwait.org/>

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<sup>2</sup> Percentage of vaccine administration at pharmacy (vs. non-pharmacy medical setting) (18 years and older), All Vaccines in-Scope IQVIA LRx and Dx, August 2022 (as per data in IQVIA Institute, "Trends in Vaccine Administration in the United States")

<sup>3</sup> <https://www.vaccinetrack.com/Trend?tab=gap&state=40#>

<sup>4</sup> Journal of the American Pharmacist Association, [https://www.japha.org/article/S1544-3191\(22\)00094-2/fulltext](https://www.japha.org/article/S1544-3191(22)00094-2/fulltext)