

# Pennsylvania Chapter

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN®



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The Pennsylvania Chapter, American Academy of Pediatrics is incorporated in the state of Pennsylvania.

July 13, 2020

Honorable Tom Wolf  
Governor, Commonwealth of PA  
508 Main Capitol Building  
Harrisburg, PA 17120  
Via Fax: 717-772-8284

Dear Governor Wolf:

The PA Chapter of the American Academy of Pediatrics (PA AAP) is responding to your recent declaration to waive the requirement under current Pennsylvania law that pharmacists are not authorized to administer flu vaccines to children under 9 years of age. We do understand that the intent of the waiver revolves around the concern and urgency to ensure every child and adult are appropriately vaccinated against influenza in light of a potential COVID resurgence. We do appreciate that the waiver only covers influenza vaccinations and does not apply to any potential COVID-19 vaccines or other childhood vaccinations.

However, the PA AAP, as the largest organization of pediatric health care providers in the state, has serious reservations due to the potential consequences of such an order. Children have unique medical and developmental needs. For example, pediatric patients often require specific positioning for injections necessitating an additional set of hands to safely position the child to receive a vaccine. Community pharmacists are sometimes the sole healthcare professional at a location, limiting the availability of qualified personnel to assist with this positioning during vaccinations.

The present law limiting pharmacists to influenza vaccination administration to 9 years and up was put in place to ensure that adverse reactions to vaccines are appropriately managed and that a child's primary care medical record is accurately maintained. The waiver has the serious potential to disrupt continuity of care, because pharmacists who administer flu vaccines are not required to report it to the child's primary care physician or to be available 24 hours a day in the event of an adverse reaction. This may lead to unintended consequences, as outlined below.

Our offices provide care to the whole child (addressing the physical, psycho-social and emotional aspects of care) and function as the medical home for the ongoing care of children whether well or developmentally delayed or medically complex. We are available to our patients 24/7. We are worried that parents whose children receive influenza vaccines in isolation of their medical home will then see no need to follow-up with their provider, leading to missed well-child check-ups. This will lead to delays in: receipt of other vaccinations, EPSDT screenings, lead testing, vision and hearing screening and referral to early intervention services and specialty care and missed opportunities to identify child abuse or neglect.

In addition, it is not clear what mechanisms would allow sharing of vaccine data? Electronic medical records are difficult to access outside of a health system. For any child under age 9 years receiving their first influenza vaccination, the ACIP and CDC recommend two immunizations be given 1 month apart. Who will track this information so that the child returns for the second “booster” and is then protected against influenza disease?

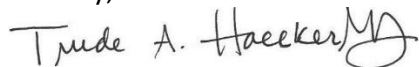
Along with our colleagues at the PA Medical Society, we are discouraged that the health care community was not consulted in making this change given that the request came from the state’s licensing authority.

How do we ensure that access to the influenza vaccine in these young children will be limited only during the COVID-19 pandemic?

There is no evidence that expanding pharmacy administration of vaccines increases the overall rate of immunization. Indeed, a 2016 study published in *Vaccine\** found no increase in adult influenza immunization rates but rather became a convenience factor for where the vaccine was given. It is our contention that this convenience factor may cause unexpected adverse consequences for our patients.

We respectfully ask that there be serious consideration given to rescinding this waiver for children.

Sincerely,



President

PA Chapter, American Academy of Pediatrics

CC: PA AAP Board of Directors  
PA AAP Advocacy Committee Co-Chairs  
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\* See <http://www.sciencedirect.com/science/article/pii/S0264410X16302419>