



To: House Health and Human Services

From: Rachelle Colombo
Director of Government Affairs, Kansas Medical Society

Date: February 6, 2019

Re: HB 2082; allowing pharmacists to administer injections

The Kansas Medical Society appreciates the opportunity to provide comments in opposition to HB 2082, allowing pharmacists to administer injections unless a physician expressly prohibits them from doing so on the prescription. The bill does not impose any other limitation on the administration of injections by pharmacists and requires physicians to opt out of this expanded scope, rather than opt-in. Not only is this a broad expansion of pharmacists' scope into the practice of medicine, it serves to fragment care for patients.

There was extensive discussion in the 2017 session about expanding pharmacists' scope to allow the administration of vaccinations. Physicians and pharmacists talked at length about some of the risks involved with improper injections; deterring patients from their primary care physician and increasing the risk that due to fragmented care, quality of care is diminished. Because clinicians agreed that encouraging immunizations is in the best interest of public health, a number of specifics were agreed upon to allow for passage of the bill.

The same cannot be said for HB 2082. In fact, despite having the same issue discussed in Senate Public Health and Welfare a year ago and our comments that we ought to proceed collaboratively among clinicians before enacting legislation, the pharmacists have not been willing to meet with physicians to discuss appropriate practice. Clinicians have not discussed the need or basis for this bill or how it ought to be limited or applied to ensure that care is not fragmented or compromised.

Before the legislature changes the laws affecting public health, providers ought to discuss clinical aspects and implications and ensure standard of care is protected by those with the appropriate training and education to practice medicine. KMS respectfully requests your opposition to the passage of HB 2082.