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November 17, 2015

The Honorable Jason Lewis  
Senate Chair, Joint Committee on Public Health  
State House, Room 511B  
Boston, MA 02133

The Honorable Kate Hogan  
House Chair, Joint Committee on Public Health  
State House, Room 130  
Boston, MA 02133

**Re: H. 2051 and S1128, *An Act Increasing Access to Immunizations***

Dear Senator Lewis and Representative Hogan:

On behalf of Atrius Health I am writing to express our strong support for **H. 2051 and S1128, *An Act Increasing Access to Immunizations***.

Atrius Health is the Northeast's largest nonprofit independent multi-specialty medical group. The Atrius Health practices—including Dedham Medical Associates, Granite Medical Group, and Harvard Vanguard Medical Associates—together with VNA Care Network & Hospice serve 675,000 patients across eastern Massachusetts. A national leader in delivering high-quality, patient-centered coordinated care, the Atrius Health medical groups and home health agency and hospice work together, in collaboration with hospital partners, community specialists and skilled nursing facilities, to develop innovative, effective and efficient ways of delivering care in the most appropriate setting, making it easier for patients to be healthy. Atrius Health is also a Medicare Pioneer ACO.

Atrius Health has joined with a number of other organizations across the state including the Massachusetts League of Community Health Centers, the Massachusetts Medical Society, Conference of Boston Teaching Hospitals as well as a number of large physician groups including Reliant Medical Group, Acton Medical Group and Mount Auburn Cambridge Independent Practice Association (MACIPA) to advocate in support of this needed update to MGL Chapter 94C.

The proposed legislation would amend current state law to allow certified medical assistants to administer immunizations under the direct supervision of a primary care provider. Atrius Health employs hundreds of certified medical assistants at our various practice locations who play a vital role as part of our patient care team. We are confident that our medical assistants, with the supervision and oversight of physicians and

other providers, possess the necessary training and skill sets to administer immunizations to our patients without compromising patient safety. Like many providers in the state, Atrius Health works to ensure that all of our patients are current on recommended vaccines where indicated; however the increasing need to provide influenza, pneumococcal, shingles and other routine vaccinations to our patients places additional burden on our clinicians.

Existing state law (MGL Chapter 94C) does not authorize certified medical assistants to administer medications, including vaccinations, and only permits certain licensed professionals (e.g. nurses, licensed practical nurses, physicians, etc.) to administer medications. We believe this restriction adds unnecessary costs to healthcare by requiring such licensed professionals to perform a function that can be safely performed in a more cost effective manner by certified medical assistants. The legislation as proposed would ensure that certified medical assistants would only be permitted to administer an immunization under the supervision of a primary care provider, which helps to ensure patient safety in the extremely rare occurrence of an adverse event caused by an immunization.

Massachusetts would join a growing list of states that expressly permit medical assistants/certified medical assistants to administer immunizations to patients. I have attached a resource document compiled by the American Medical Association that may be helpful to you and your staff. This document lists the various state citations surrounding scope of practice for medical assistants including immunization authority.

We strongly believe the proposed legislation makes an important update to state law to support healthcare providers transforming the delivery of care.

In closing, we respectfully recommend the committee amend the current draft language to include all providers authorized under Massachusetts law to prescribe medications as qualified to provide "Direct Supervision" rather than limiting supervision solely to primary care providers, i.e. specialty physicians, specialty advanced practice nurses and specialty physician assistants should also be eligible to provide direct supervision. There are many settings where it may be clinically appropriate for patients to receive immunizations when they are under the care of a specialty clinician, and thus we feel the language should be broad enough to ensure all settings are able to utilize certified medical assistants to immunize their patients.

We look forward to working with members of the committee and your staff on this important piece of legislation and urge your support of H2051 and S1128. Thank you again for your consideration. Should you have additional comments please feel free to contact me at (617) 559-8281 or Kathy Keough, Director of Government Relations at (617) 559-8561.

Sincerely,

A handwritten signature in black ink that reads "Richard Lopez MD". The signature is written in a cursive, flowing style.

Richard Lopez, MD  
Chief Medical Officer, Atrius Health