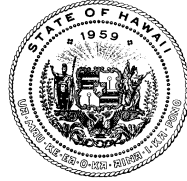


JOSH GREEN, M.D.  
GOVERNOR OF HAWAII  
KE KIA'AINA O KA MOKU'AINA 'O HAWAII



KENNETH S. FINK, M.D., M.G.A., M.P.H.  
DIRECTOR OF HEALTH  
KA LUNA HO'OKELE

STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P. O. Box 3378  
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doh.testimony@doh.hawaii.gov

**Testimony COMMENTING on SB602 SD2  
RELATING TO HEALTH.**

REP. MARK NAKASHIMA, CHAIR  
HOUSE COMMITTEE ON CONSUMER PROTECTION & COMMERCE

Hearing Date: March 16, 2023

Room Number: 329

1 **Fiscal Implications:** N/A.

2 **Department Testimony:** The Department of Health (DOH) is actively engaged in a  
3 constructive discussion with stakeholders of this measure, and shares observations and  
4 opportunities to improve this measure.

5 The jurisdiction of DOH regarding this measure derives from the department's authority to issue  
6 licenses to diagnostic laboratories and as the reference laboratory for the State of Hawaii. This  
7 responsibility and expertise inform the following perspective on appropriate utilization of  
8 laboratory resources.

9 Minors vs Adults

10 DOH recommends caution when new or expanding models of clinical care delivery practice are  
11 considered. As such, the department recommends excluding minors from the scope of all CLIA-  
12 waived tests until the continuity of healthcare inferred by this measure can be more fully  
13 evaluated. On the [CDC's website for CLIA-waived tests](#), the federal agency warns that "Some  
14 waived tests have potential for serious health impacts if performed incorrectly." A local  
15 discussion between pharmacists, pediatricians/family physicians, and laboratorians may be  
16 prudent to identify risks, and potentially recommend pre-requisite training or other checks and  
17 balances.

18

1 Diagnostic vs. Screening Tests

2 The [list of CLIA-waived tests](#) is 26 pages long. Certain diagnostic tests, such as those for  
3 COVID-19 or influenza, are generally supported by clinical guidelines for which follow-up by a  
4 retail pharmacy is considered safe and effective, while other diagnostic tests on the list require  
5 significantly more training. For example, making a successful differential diagnosis between  
6 streptococcal pharyngitis A or streptococcal pharyngitis B is greatly enhanced from training  
7 consistent with a physician or advanced practical registered nurse to distinguish between true  
8 positive, false positive, false negative, and true negative.

9 Diagnosis begets treatment. More information is needed to assure that a retail pharmacy can  
10 develop a treatment plan and/or deliver immediate, appropriate, and safe care for any test listed  
11 on the 26-page CLIA-waived test document. There will be tests and medical conditions for  
12 which treatment is likely beyond the resources available at a retail pharmacy. As such, reducing  
13 the scope of CLIA-waived tests to screening and monitoring is recommended. Specific  
14 diagnostic tests may be enumerated with concurrence from the Hawaii Board of Medical  
15 Examiners or other representation of community standards of practice.

16 Despite concerns and unanswered questions, DOH sees merit in this discussion. For example,  
17 the awareness of a diabetic patient of their HbA1C level may higher given the proximity and  
18 ease of access to retail pharmacies compared to a clinical laboratory. The immediacy of the  
19 testing pharmacy to conduct a disease management intervention for this patient has great value.

20 CLIA-waived tests span a broad range of complexity and risk, and it is unclear if all of them are  
21 within a pharmacy's capacity to safely and effectively manage, e.g., referral mechanisms,  
22 medical records systems, consultations, etc. DOH looks forward to continued discussions and a  
23 measure that balances safety and efficacy with innovation and practicality.

24 Thank you for the opportunity to testify.

## **Testimony of the Board of Pharmacy**

**Before the  
House Committee on Consumer Protection and Commerce  
Thursday, March 16, 2023  
2:30 p.m.  
Conference Room 229 and Videoconference**

**On the following measure:  
S. B. 602, S.D. 2, RELATING TO HEALTH**

Chair Nakashima and Members of the Committee:

My name is James Skizewski, and I am the Executive Officer of the Board of Pharmacy (Board). The Board supports this bill.

The purposes of this bill are to: (1) establish permitting and education requirements for pharmacists performing certain diagnostic tests or tests waived pursuant to the Clinical Laboratory Improvement Amendments of 1988 (CLIA); and (2) expand the definition of "practice of pharmacy" to include the ordering of certain tests and collecting specimens for certain diagnostic or CLIA-waived tests.

This bill amends the definition of "practice of pharmacy" to authorize pharmacists to order, collect specimens, or perform diagnostic and CLIA-waived tests provided it is in accordance with permitting and education requirements.

Pharmacies are geographically dispersed throughout the community with extended hours of operation, making access to health care provided through pharmacies convenient for patients in each locality. Patients have established relationships of trust with and recognize pharmacists as healthcare professionals. As a result, the pharmacist scope of practice has expanded over time. Pharmacists possess the skills and knowledge necessary to perform diagnostic and CLIA-waived tests, which are non-technical and have a low risk for erroneous results. For example, in response to the COVID-19 pandemic, pharmacists order and administer COVID-19 tests in pharmacies across the State, safely expanding patient access to care.

Other States that allow pharmacists to administer CLIA-waived tests include, but are not limited to, Alabama, Arkansas, Georgia, Indiana, Kentucky, Massachusetts, Minnesota, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, Texas, Virginia, West Virginia, and Wyoming.

Testimony of the Board of Pharmacy  
S.B. 602, S.D. 2  
Page 2 of 2

Thank you for the opportunity to testify on this bill.



**SanHi**

GOVERNMENT STRATEGIES

A LIMITED LIABILITY LAW PARTNERSHIP

DATE: March 15, 2023

TO: Representative Mark Nakashima  
Chair, House Committee on Consumer Protection and Commerce

FROM: Mihoko Ito / Tiffany Yajima

RE: **S.B. 602, S.D.2 – Relating to Health**  
**Hearing Date: March 16, 2023 at 2:30 p.m.**  
**Conference Room: 329**

---

Dear Chair Nakashima, Vice Chair Sayama, and Members of the Committee on Consumer Protection and Commerce:

We submit this testimony on behalf of Walgreen Co. (“Walgreens”). Walgreens operates stores at more than 9,000 locations in all 50 states, the District of Columbia, and Puerto Rico. In Hawaii, Walgreens has 17 stores on the islands of Oahu and Maui.

Walgreens is in **strong support** of this measure which amends the practice of pharmacy statute under Chapter 461 to allow pharmacists to order and perform certain diagnostic related laboratory tests and CLIA-waived tests as part of the practice of pharmacy.

As a result of the COVID-19 pandemic, the federal Public Readiness and Emergency Preparedness (PREP) Act granted pharmacists the independent authority to order and collect CLIA-waived tests and certain diagnostic related tests such as PCR tests for COVID-19 testing. Pharmacists have been performing these tests pursuant to the PREP Act, and as a result they have the skill, experience and training to perform these tests. The purpose of this measure is to clarify their independent authority to do so.

Clinical Laboratory Improvement Amendments (“CLIA”) waived tests are simple, easy to use tests that are non-technical in nature and are meant to be performed by lay persons in a non-clinical setting. Examples of CLIA-waived tests include blood glucose tests, cholesterol monitoring tests, and most recently, COVID-19 tests. In fact, throughout the pandemic, pharmacies have served as crucial points of access for COVID-19 testing. There is little to no risk to patients experiencing adverse health effects from these tests and they can easily be performed at home or in a pharmacy setting. When done in the pharmacy, the pharmacy itself oversees, implements and manages compliance with CLIA-waiver protocol, and has oversight over all procedures within the pharmacy.

We note that the companion bill in the House, H.B. 659, was heard and passed with amendments in the H.D.1. Walgreens prefers the H.D.1 version of House companion, H.B. 659, and also respectfully requests amendments based on discussions with stakeholders. Accordingly, Walgreens supports amendments to:

- Adopt the contents of the House companion bill - HB 659 HD1
- Remove the ability for pharmacists to perform certain diagnostic lab tests

- Narrow the focus to only certain CLIA waived tests including: strep, A1C, flu, RSV, blood glucose, HIV, Hepatitis C, and Covid, and any other CLIA waived tests determined by the Board of Pharmacy.

Thank you for the opportunity to submit this testimony in strong support of this measure.

Honorable Mark Nakashima, Chair  
Honorable Jackson Sayama, Vice Chair  
House Consumer Protection & Commerce Committee

Thursday, March 16, 2023; 2:00 P.M.  
Conference Room 329 & Videoconference

**RE: SB 602 SD2 RELATING TO HEALTH - SUPPORT**

Aloha Chair Nakashima, Vice Chair Sayama, and Members of the Committee,

CVS Health is writing to share with you our support regarding SB 602 SD2, Relating to Health. The amendments within are a positive step in providing increased and equitable access to diagnostic testing by enabling a pharmacist to order CLIA-waived testing and conduct specimen collection. Providing increased access to diagnostic testing will support the patients of Hawaii with early detection of chronic conditions, management of their current disease states, and aid in determining if an acute malady requires further medical intervention.

Throughout the COVID-19 pandemic, pharmacies have played a key role in federal and state responses. The nation's pharmacies have supported thousands of COVID-19 testing sites, with CVS Health's family of pharmacies administering more than 58 million COVID-19 diagnostic tests while currently maintaining 4,700 testing sites across the nation. Over half of these testing sites have supported underserved communities, as measured by the CDC Social Vulnerability Index as of December 9, 2021.

Pharmacists have demonstrated their clinical ability to safely order and administer testing during the COVID-19 Public Health Emergency. The amendments within SB 602 SD2 will codify this competency in State law and serve to sustain patient access to diagnostic testing when pandemic related emergency allowances conclude.

On behalf of CVS Health, I thank you for allowing us to provide our comments of support for your consideration.

Respectfully,

Carla Saporta Cheng  
Senior Director of State Government Affairs  
CVS Health



Testimony Presented Before the  
House Consumer Protection Committee  
March 16, 2023

Corrie L. Sanders, PharmD. on behalf of  
The Hawai'i Pharmacists Association (HPhA)

**Support for SB602 SD2, Relating to Health**

Honorable Chair Nakashima, Vice Chair Sayama and members of the committee,

The Hawai'i Pharmacists Organization (HPhA) stands in support of SB 602 that would allow pharmacists to sign and authorize performance of Clinical Laboratory Improvement Amendment (CLIA) waived tests.

Per the CLIA law, waived tests are tests determined by CDC or FDA to be so simple that there is little risk of harm or error when utilized by the general population. Some testing methods for glucose and cholesterol are waived along with pregnancy tests, fecal occult blood tests, some urine tests, select infectious disease tests, etc. CLIA waived tests can provide time-sensitive, life saving information that has the potential to impact population health.

Community pharmacies in Hawai'i provide the most accessible point of care, specifically during evening, holiday, overnight and weekend hours. All pharmacists are fully capable of ordering and administering CLIA waived tests and should be granted permission to utilize professional judgement, as they would for any other function. Awaiting for additional parties to sign off on a CLIA waived test continues to serve as a barrier to care, specifically on our neighbor islands where access to care faces additional obstacles and logistical challenges.

Pharmacists play an integral role in patient care amid a growing shortage of primary care providers in Hawai'i. Our value has become exceedingly evident throughout the COVID-19 pandemic where pharmacists served as cornerstones of care and were integral in the successful distribution of COVID-19 testing and vaccinations. As the most accessible health care providers, allowing pharmacists to authorize CLIA tests would streamline the patient care process, expedite treatment regimens, prevent unnecessary exposures to infectious diseases and decrease the burden on an already overwhelmed healthcare system.

We strongly feel the inclusion of additional third parties in administering CLIA waived tests that are intended for general population use serves as an administrative barrier that prevents expedited patient care. Regardless of additional registration processes, the patient safety and training responsibilities still fully fall on the pharmacist.



The argument will be made that interpretation of these tests can cause death. We would like to remind the committee that CLIA waived tests are intended to be utilized by the general population without a prescription due to the low risk of error and harm. The alternative perspective worth considering is that by not allowing pharmacists to provide these tests to the public, we will be removing the most accessible health providers from caring for patients that may also result in death. For example, a patient with low blood sugar could present to a pharmacy open 24/7 for immediate testing as opposed to not seeking testing at all, or seeking higher level care for a simple test within an already overwhelmed hospital system or clinic.

We strongly feel the inclusion of all CLIA waived tests falls within the training of a medical profession with a doctorate level education that is renowned for our accessibility and trusting relationships with patients. Enacting SB 602 will align the responsibility of Hawai'i pharmacists with the education we receive to perform CLIA waived tests and decrease time sensitive care barriers across all Hawaiian islands. Please consider allowing us to leverage our training and accessibility to benefit the health and safety of our community at large.

Oh behalf of The Hawai'i Pharmacists Association, mahalo for this opportunity to testify.

Very Respectfully,

A handwritten signature in black ink that reads "Corrie Sanders". The signature is written in a cursive, flowing style.

Corrie L. Sanders, PharmD., BCACP, CPGx  
President, Hawai'i Pharmacists Association



# UNIVERSITY OF HAWAII SYSTEM

## ‘ŌNAEHANA KULANUI O HAWAII

### Legislative Testimony

#### Hō'ike Mana'o I Mua O Ka 'Aha'ōlelo

Testimony Presented Before the  
House Committee on Consumer Protection and Commerce  
Thursday, March 16, 2023 at 2:00 p.m.

By

Bonnie Irwin, Chancellor

and

Miriam Mobley Smith, Interim Dean

Daniel K. Inouye College of Pharmacy

University of Hawai'i at Hilo

### SB 602 SD2 – RELATING TO HEALTH

Chair Nakashima, Vice Chair Sayama, and Members of the Committee:

Thank you for the opportunity to submit testimony on SB 602 SD2. The University of Hawai'i at Hilo (UH Hilo) supports SB 602 SD2, which establishes permitting and education requirements for pharmacists performing certain diagnostic tests or tests waived pursuant to the Clinical Laboratory Improvement Amendments of 1988 (CLIA). This bill expands the definition of “practice of pharmacy” to include the performance of certain diagnostic or CLIA-waived tests.

Pharmacists in the State of Hawai'i are currently permitted to perform certain drug therapy-related tests under the definition of “practice of Pharmacy” in section 461-1, Hawai'i Revised Statutes. CLIA-waived tests are simple and non-technical. They are FDA-approved, apply methods that are accurate and intuitive, the likelihood of error is negligible and, if performed incorrectly poses no reasonable risk of patient harm. New developments in point of care testing technology have significantly broadened the number of available CLIA-waived tests. Subsequently, expanding pharmacists' performance of any aspect of CLIA-waived tests can contribute to improving patient care outcomes.

Offering CLIA-waived testing for multiple services including medication management, health wellness and disease prevention, infectious disease screening, chronic illness screening, chronic care management can increase access to health care and improve public health. Based on test findings, pharmacists can help patients avoid adverse drug interactions, refer patients to their primary care providers or health care centers, educate patients about chronic disease risk factors and preventive health measures, and assist patients to undertake risk reduction strategies.

As the only College of Pharmacy in the State of Hawai'i, our mission is to educate pharmacy practitioners and leaders who will improve health in Hawai'i and throughout the Pacific through education, research and service. We prepare our student pharmacists to serve patients in pharmacies and as members of inter-professional health care teams. As

their role has evolved to encompass a greater focus on the provision of services, pharmacists should be permitted to perform CLIA-waived tests that enhance their contribution to patient care.

Thank you for the opportunity to testify in support of SB 602 SD2.



**HAWAII MEDICAL ASSOCIATION**

1360 S. Beretania Street, Suite 200, Honolulu, Hawaii 96814

Phone (808) 536-7702 Fax (808) 528-2376

www.hawaiimedicalassociation.org

HOUSE COMMITTEE ON CONSUMER PROTECTION AND COMMERCE

Representative Mark Nakashima, Chair

Representative Jackson Sayama, Vice Chair

Date: March 16, 2023

From: Hawaii Medical Association

Bernard Robinson, MD, HMA Public Policy Committee

**Re: SB 602 SD2 Relating to the Health - Diagnostic Testing; CLIA-Waived Tests; Pharmacists; Education Requirements**

**Position: Oppose**

The purpose of this measure is to establish permitting and education requirements for pharmacists performing certain diagnostic tests or tests waived pursuant to the Clinical Laboratory Improvement Amendments of 1988 (CLIA).

Pharmacists are medication experts, and they have an important role in the healthcare team. They are well-trained to dispense medications, educate and counsel patients on safe and appropriate use of prescriptions, evaluate for drug-drug interactions, and advise healthcare practitioners on medication therapies.

While pharmacists offer pharmaceutical expertise, they are not trained to diagnose and assess medical illness, provide independent medical care, or prescribe medication therapy. Pharmacists do not perform physical exams, develop differential diagnoses, or prioritize diagnoses for the timely delivery of treatment. HMA is concerned that the expansion of Hawaii pharmacist practice to include ordering and/or performing all CLIA-waived tests poses a potential risk to patient safety. Ordering these tests without an appropriate medical assessment can lead to significant delays in healthcare delivery for patients, as well as the unintended consequences of unnecessary increased costs, overwhelming administrative tasks, on an overly burdened healthcare system. This intended expansion of pharmacy scope increases the risks of misdiagnosis, missed underlying medical conditions, delayed care coordination, and poor health outcomes.

Collaborative practice agreements (CPAs) are a viable and safe alternative to this proposed pharmacy expansion. In Hawaii, there are several pharmacies that have formal CPA arrangements that allow physicians and pharmacists to work together to provide patient care. HMA strongly supports all similar means to improve access to care for our patients while maintaining the highest standards of quality and safety.

Thank you for allowing the Hawaii Medical Association to testify in support of this measure.

**HMA OFFICERS**

President – Angela Pratt, MD President-Elect – Elizabeth Ann Ignacio, MD  
Immediate Past President – Michael Champion, MD Treasurer – Nadine Tenn Salle, MD  
Secretary – Thomas Kosasa, MD Executive Director – Marc Alexander



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continued

References and Quick Links:

American Medical Association. Issue Brief: Considerations for Lawmakers Before Expanding Pharmacists Scope of Practice 2023.

Center for Disease Control and Prevention. Waived Testing. Accessed 3/14/23  
<https://www.cdc.gov/labquality/waived-tests.html>

Guadamuz, et al. Fewer Pharmacies in Black and Hispanic/Latino Neighborhoods Compared with White or Diverse Neighborhoods, 2007-15. Health Affairs. May 2021. <https://doi.org/10.1377/hlthaff.2020.01699>

**HMA OFFICERS**

President – Angela Pratt, MD President-Elect – Elizabeth Ann Ignacio, MD  
Immediate Past President – Michael Champion, MD Treasurer – Nadine Tenn Salle, MD  
Secretary – Thomas Kosasa, MD Executive Director – Marc Alexander

Clinical Laboratories of Hawaii  
99-193 Aiea Heights Dr  
Aiea, HI 96701

COMMITTEE ON CONSUMER PROTECTION & COMMERCE

Thursday, March 16, 2023, 2:30 PM

Hawaii State Capitol  
415 South Beretania Street  
Honolulu HI, 96814

Aloha Chair Nakashima, Vice-Chair Sayama, and members of the committee,

Clinical Laboratories of Hawaii respectfully submits testimony in **opposition to SB602**. This measure will unnecessarily expand a pharmacist's power to order and perform waived tests.

Waived testing is approved through certification; current practice necessitates that oversight be done by a clinical laboratory director and the use of a laboratory consultant to ensure quality control and quality assurance. Expanding waived testing powers will require the use of State assets to fund the newly necessitated enforcement by CLIA, including in-person and more frequent visits to waived testing sites. While we respect the work of all health care professionals, pharmacists do not have the education and/or training to serve as clinical laboratory directors and should not be the final authority on a waived laboratory.

The primary concern regarding this measure is that it will allow pharmacists to "order and perform" all available waived tests.

Currently, HRA 11-110.1-2 an "authorized person" who can order test includes "a pharmacist licensed pursuant to HRS Chapter 461 in collaboration with a licensed physician...pursuant to HRS Chapter 442 and can only "order, receive and interpret laboratory test results within the scope of their practice." The "scope of their practice" for pharmacists only includes "routine drug therapy" per HRS Chapter 461, and only in accordance with a physician order or a protocol developed collaboratively with a physician and under which a pharmacist must receive appropriate training. Bill HB659 wants pharmacists to be able to order ALL waived tests (currently around 120), most if not almost all, outside the "scope of their practice."

To expand from a narrative perspective, a physician will examine the patient, take vital statistics, and explore family history to evaluate a patient's well-being to parse out the lab tests needed to refine a diagnosis. A physician can determine the gravity of the results and then refine a treatment plan for the patient, which may include prescriptions. A pharmacist does not have the education or experience to do any of those things. Moreover, under the law, pharmacists can't prescribe drugs to a customer without a physician order – since while they understand drugs, they do not have the medical background to diagnose and treat.

This measure gives pharmacists unwarranted authority in the field of medicine by allowing them to order tests without the appropriate education, certification, training, or experience. It is for this

and the other aforementioned reasons that we request you to vote against SB602.

If you have any questions, please contact me at your convenience. Mahalo for your time and consideration.

Respectfully,

Ally Park

President, Clinical Laboratories of Hawaii

*Clinical Labs of Hawaii is proud to celebrate 52 years of caring for Hawai'i. Clinical Labs of Hawaii (CLH) and Pan Pacific Pathologists were founded in 1971, by Dr. Moon S. Park. Upon completion of his pathology training at the Mayo Clinic, Dr. Park brought his vision of providing quality laboratory testing to the healthcare providers and patients of Hawai'i to reality by opening his first laboratory in Hilo. Today, Clinical Labs of Hawaii has more than 850 employees and 50+ locations throughout the Hawaiian Islands. The focus and vision have remained the same, quality patient care with best-in-class technology and service.*

**SB-602-SD-2**

Submitted on: 3/11/2023 9:27:49 AM

Testimony for CPC on 3/16/2023 2:30:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Ronald Taniguchi, Pharm.D.	Individual	Support	Written Testimony Only

Comments:

I strongly support expanding the access to the ordering of and the collection of specimens for certain diagnostic or CLIA-waived tests by qualified pharmacists. Mahalo



**SB-602-SD-2**

Submitted on: 3/11/2023 8:40:13 PM

Testimony for CPC on 3/16/2023 2:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Thaddeus Pham	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Nakashima, Vice Chari Sayama, and CPC Committee Members,

As a public health professional, I write in strong support of SB602 SD2, which would establish permitting and education requirements for pharmacists performing certain diagnostic tests or tests waived pursuant to the Clinical Laboratory Improvement Amendments of 1988 (CLIA). SB602 would also expand the definition of "practice of pharmacy" to include the performance of certain diagnostic or CLIA-waived tests.

As we have all learned (and likely experienced directly) during the early COVID-19 pandemic, pharmacists are essential components of a robust and responsive healthcare system. Not only do they dispense medications, but they also act as educators, screeners, and immunizers for people who otherwise might not engage with the healthcare system. As such, this bill would leverage this important workforce to provide approved rapid tests to help us respond to existing and future public health issues.

To better serve public health, I also recommend that language in section (5) (A) be amended to read (**addition in bold**):

*"Diagnostic-related laboratory tests used to detect or screen for severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) and respiratory illnesses including influenza infection, streptococcal pharyngitis, or liver function issues or infections (**such as viral hepatitis**)"*

Please pass this bill to ensure that Hawai'i can respond in a timely and nimble way for public and economic health.

In gratitude,

Thaddeus Pham (he/him)

**SB-602-SD-2**

Submitted on: 3/13/2023 3:45:12 PM

Testimony for CPC on 3/16/2023 2:30:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Aaron Ruddick	Individual	Support	Written Testimony Only

Comments:

I SUPPORT SB602 SD2 and agree that pharmacies are vital part of our healthcare system – especially because of the ease of access in the community.

I support this measure in order to allow CLIA-waived point of care tests such as those used to diagnose HIV and hepatitis C as there is evidence that supporting these and other types of tests at the pharmacy level increase access to care and address some of the barriers to care.

Thank you for the opportunity to testify.

**SB-602-SD-2**

Submitted on: 3/14/2023 9:51:25 AM

Testimony for CPC on 3/16/2023 2:30:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kerri Okamura	Individual	Support	Written Testimony Only

Comments:

To Chair Nakashima, Vice Chair Sayam and members of the Committee on Consumer Protection and Commerce:

Pharmacists are the most accessible healthcare professional in our communities. Allowing pharmacists to order and perform CLIA waived testing would improve access to care and health outcomes.

Please support SB602.

March 12, 2023

Aloha Chair Nakashima, Vice Chair Sayama, and the Committee on Consumer Protection & Commerce,

I appreciate the time to allow me to testify in strong support of SB602. This may be redundant testimony, but I think it is important for people unfamiliar with pharmacists and pharmacy practice to understand some key points.

- Pharmacists are the most accessible health care professionals and have the most frequent encounters with patients. Pharmacists have the skill and knowledge to perform these tests.
- Pharmacies are geographically dispersed throughout the community with extended hours of operation, so access for patients is convenient.
- These tests are quick and easy tests that by definition are “simple laboratory examinations and procedures that have an insignificant risk of an erroneous result.” Some examples of other common CLIA waived tests are urine pregnancy and ovulation tests, fecal occult blood tests, blood glucose home monitoring, various dipstick urine tests for drug use or bacterial infection, and influenza or covid nasal swabs.
- Pharmacists have been essential to ordering and administering Covid-19 antigen tests in pharmacies across the state and nation through the pandemic, and this bill is needed to clarify their authority to continue as the PREP act expires in 2024 by adding specific language to Chapter 461, Practice of pharmacy.

We need to proactively clarify Chapter 461 before the expiration of the PREP act so the services that were expanded can continue to fill gaps in healthcare, especially in underserved populations. As a pharmacist, I feel these tests will arm me with more information to make better recommendations and referrals for care when self-care is not appropriate. Pharmacists are the first line or stop when people want to self-treat ailments or contemplate seeing a doctor.

Thank you for the opportunity to testify in strong support of SB602.

Sincerely,

Alanna Isobe, Rph

**SB-602-SD-2**

Submitted on: 3/14/2023 10:48:39 AM

Testimony for CPC on 3/16/2023 2:30:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Rensely Alik	Individual	Support	Written Testimony Only

Comments:

I SUPPORT SB602 SD2 and agree that pharmacies are vital part of our healthcare system – especially because of the ease of access in the community.

I support this measure in order to allow CLIA-waived point of care tests such as those used to diagnose HIV and hepatitis C as there is evidence that supporting these and other types of tests at the pharmacy level increase access to care and address some of the barriers to care.

Thank you for the opportunity to testify.

Rensely Alik

**SB-602-SD-2**

Submitted on: 3/14/2023 9:11:49 PM

Testimony for CPC on 3/16/2023 2:30:00 PM

Submitted By	Organization	Testifier Position	Testify
SueAnn Yasuoka	Individual	Support	Written Testimony Only

Comments:

March 14, 2023

Committee on Consumer Protection and Commerce

Rep. Mark Nakashima, Chair, Rep. Jackson Sayama, Vice Chair, and Committee Members

As a licensed Pharmacist, practicing in a pharmacy chain here in Hawaii I would like to submit my **support of SB602 SD2** :Establishes permitting and education requirements for pharmacists ordering or collecting specimens for certain diagnostic tests or tests waived pursuant to the Clinical Laboratory Improvement Amendments of 1988 (CLIA). Expands the definition of "practice of pharmacy" to include the ordering of certain tests and collecting specimens for certain diagnostic or CLIA-waived tests.

Although with an effective date of 12/31/2050, many more advances in technology and testing will possibly be available and the passage of this bill will be irrelevant. I would like the committee to consider a date that is much more reasonable for the Pharmacists, as Health Professionals, to be educated and able to perform these duties with cooperation and collaboration to establish the rules and guidelines with the College of Pharmacy, Board of Pharmacy, and National Professional Association.

Thank you for the opportunity to testify my Support for SB602. SD2.

SueAnn Yasuoka, RPh