



A VOICE FOR CHOICE
ADVOCACY

LETTER OF AMENDMENT REQUEST TO AB443 (Salas)

Optometry: scope of practice

June 1, 2017

Dear Assembly Member Salas,

A Voice for Choice Advocacy has reviewed AB443 is currently opposing this bill unless amended. While we do not object to most of the changes this bill makes to the Optometry Practice Act, we do have considerable concern regarding the bill granting optometrists the ability to administer vaccines for influenza, herpes zoster virus, and pneumococcus to adults. Administering vaccines is outside the scope of optometrist practices. Vaccines have known side effects and should be administered by someone who has knowledge of the patients' full medical history, other medications being taken and their long term health. Even with the basic training outlined in the bill, optometrists would not have adequate experience in dealing with adverse reactions and if a patient has a reaction the optometrist would unlikely be able to give follow up, short and long term care.

Due to the 1986 Childhood Vaccine Injury Act, manufacturers and administrators of childhood vaccines have no liability for vaccine injury, because the Vaccine Injury Court adjudicates vaccine injury cases (and has paid out over \$3.5 billion in doing so). However, this federal law only covers vaccines given to children. This means that for those vaccines given only to adults, optometrists become liable for vaccine reactions and injury, which is evident by the increase in recent lawsuits due to vaccine injury resulting from the Herpes Zoster vaccine.

If this bill passes with the vaccination wording included, it will not only put patient's lives at risk, but will also put optometrists at risk for costly lawsuits. Therefore **we ask that you amend AB443 to remove SEC. 2.**

Section 3041 (f) of the Business and Professions Code:

~~(f) (1) An optometrist certified pursuant to Section 3014.3 shall be certified for the administration of immunizations after the optometrist meets all of the following requirements:~~
~~(A) Completes an immunization training program endorsed by the federal Centers for Disease Control and Prevention (CDC) that, at a minimum, includes hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines, and maintains that training.~~
~~(B) Is certified in basic life support.~~
~~(C) Complies with all state and federal recordkeeping and reporting requirements, including providing documentation to the patient's primary care provider and entering information in the appropriate immunization registry designated by the immunization branch of the State Department of Public Health.~~
~~(2) For the purposes of this section, "immunization" means the administration of immunizations for influenza, herpes zoster virus, and pneumococcus in compliance with individual Advisory Committee on Immunization Practices (ACIP) vaccine recommendations published by the CDC for persons 18 years of age or older.~~

Thank you for your time and consideration. I will be in Sacramento next Monday (6/6) and again in the weeks following and would be happy to meet with you or your staff to discuss this further. I look forward to hearing from you.

Sincerely,

Christina Hildebrand

Christina Hildebrand
President, A Voice for Choice Advocacy, Inc.
christina@avoiceforchoiceadvocacy.org

Giving issues a voice, A Voice for Choice Advocacy advocates for people's rights to be fully informed about the composition, quality, and short- and long-term health effects of all products that go into people's bodies, such as food, water, air, pharmaceuticals and cosmetics.