



From: Senator Kathy Bernier
To: Committee on Health
Re: Testimony on Senate Bill 13
Relating to: dentists administering certain vaccines.
Date: February 8, 2021

Thank you Chairman Testin and committee members for holding a public hearing on this important piece of legislation.

As the vaccine rollout for COVID-19 continues, it's becoming clear that Wisconsin needs more qualified vaccinators to administer vaccines quickly and to every corner of the state. This bill would significantly grow Wisconsin's vaccinator pool by allowing Wisconsin licensed dentists to administer COVID-19 and flu vaccines.

Licensed dentists routinely administer local and general anesthesia, write prescriptions, and perform various types of injections, which is why other states, such as Minnesota and Illinois already allow dentists to administer flu vaccines.

Under this bill, a dentist would need to complete 12 hours of training on vaccine storage, protocols, administration technique, emergency procedures, and record keeping and must have liability insurance that meets certain requirements. In addition, Wisconsin DHS has a rigorous vaccinator enrollment process that includes checks on basic competencies and capacity for vaccine storage that dentists would be required to complete.

Adopting this "all hands on deck" strategy will add 3,500 more vaccinators across Wisconsin to assist our statewide effort to quickly and safely administer the COVID-19 Vaccine.

I ask you to please consider a swift passage of Senate Bill 13. Thank you for allowing me to testify, I would be happy to take any questions you may have.

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Chairman Testin, Vice Chairman Kooyenga, ranking member Erpenbach, and members of the Senate Committee on Health, thank you for providing the Wisconsin Dental Association the ability to submit testimony on Senate Bill 13. I appreciate the ability to testify virtually today.

My name is Paula Crum, and I am a Periodontist who practices in Green Bay and the current President of the Wisconsin Dental Association. The WDA wants to thank Senator Bernier for authoring this bill.

Like all frontline health care professionals, we are proud of how dental offices have responded during these unprecedented times. Dentists voluntarily limited treatment to emergent care to help stop the spread of COVID-19 and keep patients out of hospital emergency rooms.

The WDA donated Personal Protective Equipment (PPE) to the Wisconsin Emergency Management System to help fellow healthcare professionals and first responders. That donation, which does not count the thousands of pieces of PPE donated by individual dental practices to hospitals, first responders, clinics and other providers in their communities statewide, consisted of 20,000 surgical masks, 25,000 pairs of gloves and 1,700 surgical gowns.

This legislation is another positive contribution that the dental profession can make towards effectively combating the COVID-19 pandemic in Wisconsin. If signed into law, Wisconsin's 3,500 licensed community dentists will be able to immediately have an impact on the massive vaccination efforts our state is now undertaking.

Dentists are an integral part of delivering primary health care services to Wisconsinites. As Wisconsin moves to a more integrated health care delivery system, utilizing dentists to screen for basic health conditions and provide preventive services such as vaccines makes increasingly more sense. Wisconsin dentists are Doctors of Dental Medicine or Doctors of Dental Surgery, have prescribing authority, and are well-educated to administer a broad range of vaccines. Dentists are already trained to provide injections in objectively more complex areas of the mouth that commonly have gag reflexes, major blood vessels, nerves, and a moving tongue.

Dentists are already able to provide vaccines in a number of other states, including Illinois and Minnesota. These states both allow licensed dentists to administer the flu vaccine and have successfully increased access and improved convenience for patients seeking flu shots. Recently in Oregon, a bill was signed into law that affords dentists the ability to prescribe and administer vaccines.

In lieu of the COVID-19 pandemic, around 20 states have expanded the role of various health care providers to allow them to assist with the COVID-19 vaccination efforts. For

example, New York is now allowing dentistry students to administer COVID vaccines. Wisconsin should issue a call to arms to assist in vaccination efforts.

To administer COVID-19 and flu vaccines under the bill, a dentist must complete 12 hours of training on vaccine storage, protocols, administration technique, emergency procedures, and record-keeping. The Wisconsin Dental Association and its members recognize and appreciate the importance of proper education and training. However, we do feel that this level of training could be prohibitive to a professional that is already well trained in injections and prevent dentists from completing the training.

The committee just heard testimony on a bill to allow Pharmacy Technicians the ability to administer vaccines with just two hours of training. We respectfully ask that the training requirement in this bill be reduced to an amount that could be accomplished in a day or less. In Illinois, the training is a maximum of four hours. In the future, this training and education could occur during dental school.

We are aware that there are questions surrounding reimbursement and billing. Dentists are rarely involved with Medical insurance. At this time, we envision dentists being able to assist in mass vaccination clinics within their local communities like the one that was just announced in Rock County yesterday. There are opportunities like this for both COVID and influenza. Nothing in the legislation mandates that insurance cover vaccinations by dentists.

Wisconsin leads the way in our approach to health care. It's time to take that creativity and ensure that oral health is better integrated with physical and behavioral health. In fact, many Wisconsinites see their dentists more often than other medical providers; it makes increasingly more sense to view dentists as a primary care provider. This bill takes an important step towards those integration efforts. Wisconsin dentists are ready and willing to serve their communities in this additional way to continue to further the health of our whole state and combat the COVID-19 pandemic.

Thank you for the opportunity to testify before you today and consideration of this legislation. I want to specifically thank Senator Testin and his staff for assisting with virtual testimony today.

Wisconsin Association of Health Plans

The Voice of Wisconsin's Community-Based Health Plans

Testimony Presented to the Senate Committee on Health

Senate Bill 13

February 9, 2021

Chairman Testin, Ranking Member Erpenbach, thank you for the opportunity to testify today on Senate Bill 13. My name is Tim Lundquist and I am the Director of Government and Public Affairs at the Wisconsin Association of Health Plans. The Association is the voice of 12 community-based health plans that collectively do business in every county in Wisconsin. Member health plans provide health insurance coverage to individuals, employers, and government programs.

Over the past year, these health plans have demonstrated a deep commitment to addressing the pandemic and continuing to provide stable, high-quality health insurance coverage. In their communities, health plans acted quickly to ensure individuals have timely access to diagnostic testing and treatment. Working with state policymakers, health plans have provided comment on government program and legislative proposals, to help individuals in Wisconsin continue to access the care they need, when they need it, and at a price they can afford.

Crafting public policy in an uncertain time requires careful consideration of both potential benefits and potential risks. Others have made the case for the potential benefits of Senate Bill 13. I am here today to outline potential risks.

First, Senate Bill 13 creates payment issues. As health plans do not generally contract with dentists to provide medical services, there are significant technical challenges to standing up new payment mechanisms for providers that are nearly all out-of-network and unaccustomed to billing for medical services.

Second, Senate Bill 13 could lead to consumer confusion. Are dentists intending to seek certification under Medicaid or Medicare to provide vaccination services, or will dentists only offer these services to commercially insured and private pay patients? Additionally, some dental providers in Wisconsin have "opted-out" of Medicare. Under current federal rules, health plans are prohibited from making payments to providers that have "opted out" of Medicare. This means that Senate Bill 13 could lead some elderly consumers in Wisconsin to get stuck with a bill for vaccine services they would not otherwise have to pay for.

Third, Senate Bill 13 proposes a permanent change in dentists' scope of practice. As drafted, this legislation is not narrowly tailored to respond to the COVID-19 pandemic. Instead, it provides dentists permanent authority to administer influenza vaccines. Health plans support efforts to increase the number of vaccinators when it leads to higher vaccination rates, but there is limited evidence to suggest this policy change will do so. Minnesota and Illinois provided this authority in 2014 and 2015, and over the next few influenza seasons saw their vaccination rate decrease. Oregon made this change in 2020, and it is too soon to evaluate any impact.

Finally, we encourage members of the Committee to consider how Senate Bill 13 fits into a broader vaccination strategy. If Wisconsin is still facing a shortage of vaccine supply, what is the benefit of creating an unknown number of new, small vaccination sites? Is there a shortage of vaccinators, and if so, are efforts better focused on increasing the number of vaccinators in traditional clinical, pharmacy, or community vaccination settings, as opposed to authorizing a new group that will operate outside of these common sites? We believe these are important questions to answer and ask the Committee give careful consideration to the potential harms described above.

Thank you again for the opportunity to testify. I am happy to try and answer any questions you may have.