



ROBERT BROOKS

STATE REPRESENTATIVE • 60th ASSEMBLY DISTRICT

Assembly Committee on Health
Tuesday, March 9, 2021

Thank you for holding a hearing on Assembly Bill 124 and allowing me to testify in support.

As the COVID-19 vaccine supply becomes steadier, Wisconsin would benefit from an increase in vaccinators to assist in getting doses into residents' arms.

Assembly Bill 124 permits dentists to administer COVID-19 and flu vaccines. This bill would add another 3,500 additional vaccinators throughout the state.

Dentists are highly qualified health care professionals that already administer local and general anesthesia on a daily basis. It is important to note that Minnesota and Illinois already permit dentists to administer flu vaccines. Wisconsin would be a leader in the COVID-19 vaccination response with the implementation of this policy.

Under the bill, dentists would need eight hours of training on vaccine storage, protocol, administration technique, emergency procedure, and record keeping to qualify as flu and COVID-19 vaccinators. The bill also requires dentists to have liability insurance.

The Department of Health Services also maintains a vaccinator enrollment process, which verifies competencies and vaccine storage capacity. This is another mechanism to ensure that dentists are properly trained to administer these vaccines.

This legislation safeguards consumers' health, while allowing for the creation of a larger vaccinator pool. This policy is a win-win for Wisconsinites who wish to be vaccinated.

Thank you for your time and attention and I ask that you support Assembly Bill 124. I would be happy to answer any questions.



From: Senator Kathy Bernier
To: Assembly Committee on Health
Re: Testimony on Assembly Bill 124
Relating to: dentists administering certain vaccines.
Date: March 9, 2021

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

As the vaccine rollout for COVID-19 continues, it is critical that we have qualified vaccinators in every corner of the state to quickly and safely administer vaccines. Assembly Bill 124 would significantly grow Wisconsin's vaccinator pool by allowing Wisconsin licensed dentists to administer COVID-19 and flu vaccines. It's important to note that this bill language already passed the Assembly as part of 2021 Assembly Bill 1.

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 extensive 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 Assembly Bill 124. Thank you for allowing me to testify, I would be happy to take any questions you may have.

Wisconsin Association of Health Plans

The Voice of Wisconsin's Community-Based Health Plans

Testimony Presented to the Assembly Committee on Health

Assembly Bill 124

March 9, 2021

Chairman Sanfelippo, Ranking Member Subeck, thank you for the opportunity to testify today on Assembly Bill 124. 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 provide health insurance coverage to individuals, employers, and government programs in every county in Wisconsin.

Over the past year, Association members have demonstrated a deep commitment to addressing the COVID-19 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 today for the potential benefits of Assembly Bill 124. I am here today to outline potential risks.

First, Assembly Bill 124 creates payment issues. Under the bill, dentists who meet certain requirements are authorized to provide vaccines for COVID-19 or influenza. Presumably, dentists that offer these services to patients will seek reimbursement. Today, the federal government is generally paying for COVID-19 vaccine doses, but providers in most settings are billing for the administration of the vaccine. In many cases, this means billing commercial health insurance. Since health plans do not generally contract with dentists to provide medical services, Assembly Bill 124 could lead to significant technical challenges in standing up new payment mechanisms for providers that are nearly all out-of-network and unaccustomed to billing for medical services.

Second, Assembly Bill 124 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 Assembly Bill 124 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, Assembly Bill 124 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.

Finally, we encourage members of the Committee to consider how Assembly Bill 124 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 these potential harms.

One potential solution to these issues is to narrow the scope of Assembly Bill 124 to grant dentists the necessary authority to administer COVID-19 vaccines at mass-vaccination sites. This change would minimize the potential harms I've outlined today, while ensuring Wisconsin's dentists are able to contribute to the "all hands on deck" vaccination strategy that many have called for.

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

Executive Office
6737 W. Washington Street
Suite 2360
West Allis, Wisconsin 53214
414.276.4520
414.276.8431 FAX



Legislative Office
122 W. Washington Avenue
Suite 600
Madison, Wisconsin 53703
608.250.3442
608.282.7716 FAX

Chairman Sanfelippo, Vice Chairman Summerfield, ranking member Subeck, and members of the Assembly Committee on Health, thank you for providing the Wisconsin Dental Association the ability to provide testimony on Assembly Bill 124.

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 Representative Brooks and Senator Bernier for authoring this bill.

This bill is nearly identical to the language included in Assembly Bill 1 which was ultimately vetoed by Governor Evers. The Wisconsin Dental Association has already testified on this topic once before in this committee, but we greatly appreciate the opportunity to do so again.

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. Increasingly since the last time we testified on this provision, dentists have been asking when and how they can assist in vaccination efforts. If signed into law, Wisconsin's 3,500 licensed community dentists will be able to have an impact on the massive

vaccination efforts our state is now undertaking. For reference, this committee represents over 400 WDA member dentists.

Wisconsin dentists have either a Doctor of Dental Medicine or Doctor of Dental Surgery degree. They have prescribing authority and are well-educated to administer a broad range of vaccines. Dentists are already trained to provide injections in objectively a more complex area of the body – the mouth, where we deal with 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 dental 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 8 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.

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 ones being announced around the state. There are opportunities like this for both COVID and influenza. Nothing in the legislation mandates that insurance cover vaccinations by dentists.

Thanks to you, 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.



March 9, 2021

Representative Sanfelippo and Members of the Committee:

My name is Dr. Virginia (Ginny) Scott, and I am President of the Wisconsin Academy of General Dentistry (AGD). On behalf of over 700 members that embody our organization, the WIAGD, I am speaking in favor AB 124.

The WIAGD is a component of the Academy of General Dentistry (AGD), the second largest dental association and the largest organization solely representing general dentists. As the primary oral health care provider for patients of all ages, general dentists take responsibility for the diagnosis, treatment, and coordination of services to meet patients' oral health needs. Approximately 82% of Wisconsin's licensed dentists are general dentists.

We are without a doubt in support of dentists being able to administer COVID-19 and seasonal vaccines, such as influenza vaccines. Dentists are more than qualified to administer such vaccines considering our extensive experience working with needles in sensitive areas of the oral cavity.

Additionally, we appreciate and support the amendment presented by Representative Brooks which reduces the additional training requirement from 12 to 8 hours for dentists to become administrators of the vaccine.

As vaccine supply is made more widely available over the coming months, we want to contribute to the need to expand the pool of available COVID-19 vaccinators in order to respond effectively to the pandemic.

The WIAGD thanks Representative Brooks and Senator Bernier for introducing this legislation and including dentists in the effort to get Wisconsinites vaccinated. Thank you again Chair Sanfelippo and members of the Committee for allowing me to speak on this today, and I am happy to take any follow up questions.

Virginia (Ginny) Scott, DDS, MAGD
President, WIAGD
ginnydds@gmail.com