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Testimony Presented Before the
House Committee on Higher Education and Technology
Friday, February 10, 2023 at 2:30 p.m.
By
Bonnie Irwin, Chancellor
and
Miriam Mobley Smith, Interim Dean
Daniel K. Inouye College of Pharmacy
University of Hawai'i at Hilo

HB 659 HD1 - RELATING TO HEALTH

Chair Perruso, Vice Chair Kapela, and Members of the Committee:

Thank you for the opportunity to submit testimony on HB 659 HD1. The University of Hawai'i at Hilo (UH Hilo) supports HB 659 HD1, 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 HB 659 HD1.

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

Before the
House Committee on Health and Homelessness
Friday, February 10, 2023
2:30 p.m.
Conference Room 329 and Videoconference

# On the following measure: H. B. 659 HD1, RELATING TO HEALTH

Chair Perruso 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 performance of certain diagnostic or CLIA-waived tests.

This bill amends the definition of "practice of pharmacy" to authorize pharmacists to order or perform diagnostic and CLIA-waived tests provided it is in accordance with permit 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 H.B. 659 HD1 Page 2 of 2

Thank you for the opportunity to testify on this bill.



3375 Koapaka St., Suite F251 Honolulu, Hawaii 96819

www.pharmacarehawaii.com

Testimony Presented Before the
House Committee on Higher Education and Technology
Friday, February 10, 2023, at 2:30 p.m.
Conference Room 309
By
Byron Yoshino, PharmD
CEO
Pharmacare Hawaii

#### HB 659 – RELATING TO HEALTH

Chair Perruso, Vice Chair Kapela, and members of the committee: Thank you for the opportunity to submit testimony on HB 659. Pharmacare Hawaii supports HB 659 that establishes permitting and education requirements for pharmacists performing certain diagnostic tests or tests waived pursuant to the Clinical Laboratory Improvement Amendments (CLIA) and expands the definition of "practice of pharmacy" to include the ordering of and the collection of specimens for certain diagnostic or CLIA-waived tests.

Pharmacare Hawaii has a 95+ year legacy (Yoshino Drugs and Value Drugs) in the islands and has been an integral part of the Hawaii community, developing strong relationships between our patients, pharmacists, and nurses. It is through this lens of community and patient commitment that we strongly support HB 659.

Passage of this bill will allow pharmacists to use their training and licensing to better serve our community. During the unprecedented COVID pandemic, pharmacists have been critical to providing testing and vaccinations that undoubtedly saved lives in Hawaii. This bill will continue these, and other critical services, by including these much-needed services in the definition of "practice of pharmacy."

As a locally owned pharmacy, we are honored to be part of the Hawaii health care system. Passage of HB 659 will strengthen health care by increasing patient access to these services in a way that simplifies the health care system for patients, meets them where they are, and doesn't impinge on physician services or relationships.

Thank you for allowing us to testify in support of HB 659.



Kamehameha Shopping Center 1620 North School Street Honolulu, HI 96817 Phone: (808) 832-8262

Fax: (808) 832-8268

## Testimony in Support of HB659

Aloha Chair Perruso, Vice Chair Kapela, and Members of the Committee,

Times Pharmacy strongly supports HB659 which would help clarify the law to allow pharmacists to order and perform certain common diagnostic-related tests as well as CLIA-waived tests. By law, CLIA-waived tests are those tests that are determined by the CDC and FDA to be so simple that there is little risk of error. Additionally, the Accreditation Council for Pharmacy Education (ACPE) has approved various Point-of-Care Testing certification programs that require pharmacists to complete a total of 20 hours of didactic and live training.

Pharmacies and pharmacists play an integral role in our healthcare system and are considered one of the most accessible healthcare providers in the nation. By allowing pharmacists to order and perform CLIA-waived tests, it would help expand services to many rural and underserved communities.

The PREP Act allowed pharmacists to order and administer COVID tests which aided in the increased identification of COVID positive cases and resulted in preventative measures to reduce further transmission. CLIA-waived tests exist for Hemoglobin A1c, Cholesterol, Influenza, Hepatitis C, and HIV just to name a few. Early detection of unbeknownst disease state markers could drastically change the course of disease progression and improve therapeutic outcomes. Proactive and preventative care is needed to decrease overall healthcare spend and improve quality of life.

Thank you for the opportunity to testify,

Patrick Uyemoto, Pharm.D. Director of Pharmacy Times Pharmacy



February 9, 2023

Dear Chair Belatti, Vice Chair Takenouchi, and members of the House Health and Homelessness Committee:

Molokai Drugs, Inc. supports HB 659 which would allow our pharmacists to sign and authorize Clinical Laboratory Improvement Amendment (CLIA) waived tests.

On the island of Molokai, we have a widening shortage of primary care providers (PCPs). In the past six months, we have lost six medical doctors and/or nurse practitioners. These medical professionals have moved away, retired, or passed away.

Our community pharmacists are here to assist our patients when they are not able to see their PCPs for tests. Our pharmacists are accessible for testing six days per week without an appointment. On any given day, we normally have 1-2 pharmacists on staff.

In conclusion, we would appreciate greater access to services such as CLIA-waived tests (COVID-19 and vaccinations) that our Molokai-based pharmacists can provide for our patients under the practice of pharmacy in Hawaii.

Thank you for allowing us to submit testimony in favor of HB 659.

Sincerely,

Kimberly Mikami Svetin

President

Molokai Drugs, Inc.

My Snet

P.O. Box 558

Kaunakakai, HI 96748

Work 808-553-5790

Fax 808-553-5308

#### LATE \*Testimony submitted late may not be considered by the Committee for decision making purposes



1275 Pennsylvania Avenue, NW Suite 700 Washington, DC 20004

February 9, 2023

Honorable Amy Perruso, Chair Honorable Jeanne Kapela, Vice Chair House Higher Education & Technology Committee 415 South Beretania Street Honolulu, Hawaii 96813

RE: HB 659 HD1 RELATING TO HEALTH. - SUPPORT

Hearing date: February 10, 2023

Aloha Chair Perruso, Vice Chair Kapela, and Members of the Committee:

CVS Health is writing to share with you our support regarding HB 659 HD1, 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 HB 659 HD1 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-Chang Senior Director of State Government Affairs CVS Health





DATE: February 9, 2023

TO: Representative Amy Perruso

Chair, House Committee on Higher Education and Technology

FROM: Mihoko Ito / Tiffany Yajima

RE: H.B. 659, H.D. 1 – Relating to Health

Hearing Date: Friday, February 10, 2023 at 2:30 p.m.

**Conference Room: 309** 

Dear Chair Perruso, Vice Chair Kapela, and members of the Committee on Higher Education and Technology:

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 perform 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. This bill also clarifies that pharmacists may order and perform diagnostic-related laboratory tests used to detect or screen for COVID-19, influenza, streptococcal pharyngitis, or liver function issues or infections.

We are continuing to work with stakeholders on this bill and would respectfully ask the committee to pass this measure to allow discussions to continue. Thank you for the opportunity to submit this testimony in strong support of H.B. 659, H.D. 1.

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

# COMMITTEE ON HIGHER EDUCATION & TECHNOLOGY Friday, February 10, 2023, 2:30 PM Conference Room 309

Hawaii State Capitol 415 South Beretania Street Honolulu HI, 96814

Aloha Chair Perruso, Vice-Chair Kapela, and members of the committee,

Clinical Laboratories of Hawaii respectfully submits testimony in opposition to HB659. 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 HB659.

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.



# HAWAI'I PHARMACISTS ASSOCIATION

Legislative Testimony

Testimony Presented Before the Higher Education and Technology Committee Friday February 10, 2023

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

# Support for HB 659, Relating to Health

To the Honorable Chair Perruso, Vice Chair Kapela and members of the Committee,

The Hawai'i Pharmacists Organization (HPhA) stands in support of HB 659 that would allow pharmacists to sign and authorize performance of Clinical Laboratory Improvement Amendment (CLIA) waived tests. HB 659 adds an additional responsibility to pharmacist scope of practice to include the ability to order and perform CLIA waived tests and requires pharmacy registration as a collection facility.

Per the CLIA law, waived tests are tests determined by CDC or FDA to be so simple that there is little risk of 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, live 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 waived tests would streamline the patient care process, expedite treatment regimens, prevent unnecessary exposures to infectious diseases and decrease the burden on an 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, by definition, 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 care professionals from helping to care 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 care for a simple test from an already overwhelmed hospital system or care provider.

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 HB 165 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,

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

Submitted on: 2/9/2023 12:13:08 PM

Testimony for HET on 2/10/2023 2:30:00 PM

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

#### Comments:

TESTIMONY RE: HB 659 RELATING TO HEALTH

To Chair Amy Perruso, Vice Chair Jeanne Kapela, and members of the committee:

My name is Kerri Okamura, R.Ph., and I appreciate the opportunity to submit testimony in SUPPORT of House Bill 659.

Pharmacies are convenient, accessible and trusted healthcare destinations. Allowing pharmacists to order and perform certain tests would reduce barriers to care, especially in rural communities. Allowing pharmacists to order and perform these tests will improve quality of care and outcomes by providing for earlier identification of acute infection and chronic diseases which can be lifesaving in some cases.

Point of care testing training for pharmacists consists of 16 hours of home study, 4 hours of live training and skills assessment.

Pharmacists have played an important role over the past couple of years providing COVID testing to thousands of patients in our communities. In addition to providing tests, pharmacists also provided education to patients and families on mitigating further spread of COVID and provided information on treatment options. This same model would be extremely valuable to increasing access to routine care (drug therapy management and chronic disease management) in our neighbor island and rural communities.

I respectfully and strongly urge the Committee to pass HB 659. Thank you for the opportunity to testify.

Sincerely,

Kerri Okamura, R.Ph.

#### February 9, 2023

Aloha Chair Perruso and Respected Members of the Committee on Higher Education and Technology:

I appreciate the time to allow me to testify in strong support of HB659. 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.
- Pharmacists complete 20 hours of continuing education in order to perform these tests. The
  education requirement is at home study as well as hands on certification, similar to the
  requirements we have in place to prescribe birth control or give vaccinations. We do not take
  this added responsibilities lightly and have national certification programs that ensure the
  pharmacists are trained in the technical aspects of these tests as well as the ailments or diseases
  they are used to detect.
- Other states including California, Colorado, Idaho, Louisiana, Minnesota, Oregon and Wyoming (to name a few) allow pharmacists to order and perform CLIA-waived tests.

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 HB 659.

Sincerely,

Alanna Isobe, Rph

Submitted on: 2/9/2023 2:47:00 PM

Testimony for HET on 2/10/2023 2:30:00 PM

Submitted By	Organization	<b>Testifier Position</b>	Testify
Keri Oyadomari	Individual	Support	Written Testimony Only

## Comments:

## Support for SB659, Relating to Health

To the Honorable Chair Perruso, Vice Chair Kapela, and members of the Committee,

I am writing in support of HB 659 that would allow pharmacists to order and perform certain diagnostic related laboratory tests and CLIA- waived tests as part of the practice of pharmacy.

Pharmacies and Pharmacists play an integral role in patient care amid a growing shortage of primary care providers in Hawai'i and are one of the most accessible healthcare providers. This became evident during the COVID pandemic as community pharmacists became the most accessible means to obtain a COVID test. The intent of the PREP Act was to increase access to care and expedite treatment for patients in the community. When there were limited resources and access to obtaining a COVID test, it was the network of community pharmacies that mobilized and made themselves available for testing statewide, including pop up testing events at Aloha Stadium.

Passing HB 659 would allow for pharmacists to better support other healthcare providers in increasing access and providing these simple point of care tests to promote immediate treatment. Like the COVID testing, pharmacists could greatly increase access to other tests such as HIV, Hepatitis C, and promote patients to seek treatment without delay.

Thank you for the opportunity to testify.

Submitted on: 2/9/2023 2:48:32 PM

Testimony for HET on 2/10/2023 2:30:00 PM

Submitted By	Organization	<b>Testifier Position</b>	Testify
Derek Tengan	Individual	Support	Written Testimony Only

## Comments:

## Support for SB659, Relating to Health

To the Honorable Chair Perruso, Vice Chair Kapela, and members of the Committee,

I am writing in support of HB 659 that would allow pharmacists to order and perform certain diagnostic related laboratory tests and CLIA- waived tests as part of the practice of pharmacy.

Pharmacies and Pharmacists play an integral role in patient care amid a growing shortage of primary care providers in Hawai'i and are one of the most accessible healthcare providers. This became evident during the COVID pandemic as community pharmacists became the most accessible means to obtain a COVID test. The intent of the PREP Act was to increase access to care and expedite treatment for patients in the community. When there were limited resources and access to obtaining a COVID test, it was the network of community pharmacies that mobilized and made themselves available for testing statewide, including pop up testing events at Aloha Stadium.

Passing HB 659 would allow for pharmacists to better support other healthcare providers in increasing access and providing these simple point of care tests to promote immediate treatment. Like the COVID testing, pharmacists could greatly increase access to other tests such as HIV, Hepatitis C, and promote patients to seek treatment without delay.

Thank you for the opportunity to testify.

Submitted on: 2/9/2023 4:30:49 PM

Testimony for HET on 2/10/2023 2:30:00 PM

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

## Comments:

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