

13 September 2022

Immunisation Unit
Department of Health
50 Lonsdale Street
Melbourne VIC 3000

Delivered via email: immunisation@health.vic.gov.au

Dear Immunisation Unit

Proposed amendments to the Victorian Pharmacist-Administered Vaccination Program

Thank you for the opportunity to comment on the proposed amendments to the Victorian Pharmacist-Administered Vaccination Program to enable pharmacists to administer additional vaccines to new cohorts of people.

The Department's objective to increase availability of vaccines for all age groups is welcome, given the significant public health benefits these provide to both the individual and broader community through the reduction in the prevalence of harmful illnesses. In line with this perspective, we have no policy objection to pharmacists being authorised to administer a greater suite of vaccines provided they follow safe and acceptable delivery practices approved by the relevant authorities.

We are concerned however, that this proposal will have unintended consequences for councils' secondary school immunisation programs. This program has been a long-standing feature in Victoria's achievement of high immunisation rates and delivery of the National Immunisation Program. Councils have expressed concern about the additional workload which will be generated.

These concerns include:

- Council immunisation programs becoming financially unviable if less doses are delivered due to fewer students requiring vaccination. Currently councils are funded on a per-dose funding formula, not the full costs they incur maintaining and delivering this program.
- Expectations that councils will continue to respond to questions from parents about vaccination status even if they did not provide or receive funding to deliver the vaccine.
- Increased administration being required to check students' vaccination status prior to vaccine sessions. Many councils distribute student vaccine consent cards at the beginning of the school year in order to process the many thousands of permissions which are needed prior to vaccination. Timing issues are likely to emerge from this practice, with much higher risks of students being vaccinated elsewhere after their parents have provided councils with their permission.



- An increased number of immunisation providers of school-age children is going to require even greater reliance on accurate and timely maintenance of data on the Australian Immunisation Register – not only for councils, but also GPs and other providers such as pharmacists. We expect that sufficient resources will be allocated by Federal and state governments to ensure these electronic systems meet the needs of a more dispersed immunisation system.

In light of these concerns, we seek your commitment to reviewing the funding model for councils' immunisation programs. This will be important to ensuring that the funding provided by the Department of Health is suitable to meet the changing nature of the activities councils are delivering. It will also greatly assist councils' continued assistance in working with the Department to achieve continued high vaccination rates.

We look forward to your response regarding the local government immunisation program. We are willing to work through the issues with you, so that councils can continue to support this important public health program maintain high immunisation rates, especially for school-age students and young people.

Should you have any queries about this matter, please contact Rosemary Hancock, MAV Manager Health and Local Economies – rhancock@mav.asn.au.

Yours sincerely



KERRY THOMPSON
Chief Executive Officer