



1615 Capitol Ave., Suite 73.771
P.O. Box 997377, MS 7003
Sacramento, CA 95899-7377

PHONE: 916.440.7594
FAX: 916.440.7595
Roberta.Lawson@cdph.ca.gov

Roberta Lawson
RDH, MPH
Executive Administrator

August 8, 2012

Officers

Wilma Wooten, MD, MPH
President
San Diego County

Muntu Davis, MD, MPH
President-Elect
Alameda County

Bela Matyas, MD, MPH
Secretary
Solano County

Richard Johnson, MD, MPH
Treasurer
Mono/Inyo Counties

Janet Berreman, MD, MPH
Legislative Coordinator
City of Berkeley

S. Todd Stolp, MD
Regulations Coordinator
Tuolumne County

Edward Moreno, MD, MPH
Past President
Fresno County

Directors-at-Large

Tomas Aragon, MD, DrPH
San Francisco City/County

Penny Borenstein, MD, MPH
San Luis Obispo County

Eric Handler, MD, MPH
Orange County

Olivia Kasirye, MD, MPH
Sacramento County

Tim Livermore, MD, MPH
Merced County

Mark Lundberg, MD, MPH
Butte County

Karen Milman, MD, MPH
Nevada County

Karen Smith, MD, MPH
Napa County

Richard Pan, MD, MPH
State Capitol
P.O. Box 942849
Sacramento, CA 94249-0005

RE: AB 2109 (Pan) Communicable disease: immunization exemption

Dear Assemblyman Pan:

The California Conference of Local Health Officers (CCLHO) is writing to you with a concern about AB 2109. The CCLHO Board voted at their August 2 meeting to oppose the addition of pharmacists to the list of those that could sign a Personal Belief Exemption form.

AB 2109 requires the signature on a Personal Belief Exemption form of a health care practitioner, defined as 1) a physician and surgeon, 2) a nurse practitioner, 3) a physician assistant, 4) an osteopathic physician and surgeon, or 5) a naturopathic doctor on a Personal Belief Exemption form. Recent potential revisions of the bill include adding two providers to the list of professionals who are authorized to sign the Personal Belief Exemption form: 1) School Nurses, and 2) Pharmacists. These revisions are being entertained as a way to expand the list of healthcare professionals to whom the public has access and from whom an authorized signature could be procured. The CCLHO Board voted to 1) support for the addition of school nurses, but 2) oppose the inclusion of pharmacists as authorized signatories for the Personal Belief Exemption form.

Health officers are cosponsoring AB 2109 through the Health Officers Association of CA (HOAC). HOAC has provided testimony in favor of the bill. However, we cannot support the addition of pharmacists as signatories, in part because they do not have the clinical expertise to advise individual patients about patient-specific risk factors.

CCLHO was established in statute in 1947 to advise the California Department of Health Services (now the California Department of Public Health), other departments, boards, and commissions, as well as officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

Thank you for your consideration. We expect that you will not include this latest amendment in the legislation.

Sincerely,

Original Signed By:

Wilma Wooten, MD, MPH
President, California Conference of Local Health Officers