



*Testimony to the Senate Public Health and Welfare Committee – March, 2021
In opposition to SENATE BILL 212: Prohibiting the secretary of health and environment
from permanently requiring additional immunizations to attend a child care facility or school.*

Chairman Hilderbrand and members of the Senate Public Health and Welfare Committee, I want to thank you for the opportunity to respond in opposition to the proposed SB 212. Specifying the required childhood immunizations for child care facility and school attendance.

I respectfully submit that it is important that the list of required vaccines remain in the current regulatory process with legislative oversight rather than being individually listed in statute due to the need to respond to the changes in ACIP (Advisory Committee on Immunization Practices) recommendations in a timely manner. Medical research and best practice changes rapidly and does not lend itself well to the legislative process. To the extent that Kansas statute has legislated health practice in schools, it has become dated. Evidence of this is KSA 72-6241 which was written in 1959 but still legislates vision screening in Kansas schools. Districts relying on legislative statute to set their standard of vision screening practice would be led to utilize the Snellen test (no longer accepted) every two years (no longer recommended as best practice).

It is my position, based on current medical evidence and years of experience as a school nurse, that school immunization requirements should remain under the regulation of KDHE with the support of Kansas statute. Current statute sets the standard that all school children should be immunized with the most recent appropriate dose of each required vaccine. The statute leaves the determination of the listing of those required vaccines (which may change over time according to latest research and emerging diseases) with public health and immunization experts in the Kansas Department of Health and Environment aided by Immunize Kansas Coalition. **If vaccines are listed in statute, this will change the selection of required immunizations for school attendance from a public health determination based in science and latest research to a political process.**

Summary: *The development of immunizations and establishment of broad population immunization standards and practices has been one of the foremost advances in public health and has contributed to decreases in infant and childhood mortality and morbidity rates in countries with access to these advances.* State immunization requirements for school age children exist to protect children against vaccine preventable diseases. These requirements are important in keeping students in school. The herd immunity of the majority of students helps protect the most vulnerable of our community-individuals with complex medical conditions (immune suppression) or allergy to an immunization-by wrapping them in a community of vaccinated peers. Moving governance of the specific list of required immunizations from the Department of Health and Environment to a legislative process would impose political processes on a public health issue at a time when national experience has shown the need for strong, proactive, science-based guidance in immunization.

As an experienced school nurse, I strongly oppose Senate Bill 212 and support the current practice which already provides legislative oversight and exemptions for medical or religious reasons only.

Respectfully submitted,

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