



**Geary County
Health Department**
1212 West Ash Street
P. O. Box 282
Junction City, Kansas 66441

18 Mar 2021

Testimony of Geary County Health Department to the
Senate Committee on Public Health and Welfare
Opponent for SB 212 • March 22, 2021

Chairman Hilderbrand and Members of the Committee:

Thank you for the opportunity to supply written testimony in opposition to Senate Bill 212 which would shift childcare and school immunization requirements from administrative regulation by the Secretary of KDHE to being listed in statute. As a local health department, we are greatly concerned with protecting the health of the public and view SB 212 as bad public policy.

The Kansas Legislature lacks the expertise in disease prevention and immunization decision-making to be the appropriate body to make such vaccine determinations. KDHE employs public health experts who are trained in such science and are the ideal decision-makers to protect the public's health from vaccine-preventable diseases. The administrative regulation process that currently exists is deliberative and transparent, so there is no real gain to be had from a public knowledge perspective by shifting over to the Kansas Legislature. The administrative process provides flexibility, such as the need to respond to changing ACIP (Advisory Committee on Immunization Practices) recommendations.

Given the dangers posed by vaccine-preventable diseases and the high level of expertise needed to properly make immunization schedule recommendations, we believe the existing system is ideally posed to determine which vaccines should be mandated by schools and childcare facilities. It is for these reasons that the Geary County Health Department opposes SB 212.

Sincerely,

TAMMY A. VON BUSCH, DVM, MPH
Director, Geary County Health Department