

*Testimony to the House Education Committee – February, 2020
In opposition to HOUSE BILL No. 2601: Specifying the required
childhood immunizations for child care facility and school attendance.*



Chairman Huebert and members of the House Committee on Education, I want to thank you for the opportunity to respond in opposition to the proposed HB 2601 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 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. Immunize Kansas Coalition (IKC) is a group of healthcare providers, health department officials, educators, and researchers working together to increase vaccination rates and protect Kansas from vaccine-preventable diseases.

Current statute appropriately sets the standard that all children, prior to school entry, should be immunized with the most recent appropriate dose of each required vaccine while leaving the determination of the listing of those required vaccines to public health experts.

HB 2601 would remove the regulatory authority of public health experts at KDHE to establish vaccination requirements, would risk Kansas' ability to respond to the best scientific recommendations for immunizations as set forth by the Advisory Committee on Immunization Practices (ACIP), and would add an additional layer of complexity.

It also establishes a sunset to immunization requirements in July that could cause confusion for parents who were already notified per state regulation by May 15th of immunizations for the next school year in order to give ample time to comply. This could lead to immunization non-compliance as parents "wait out" the interim period to see if the legislature enforces the list of immunizations. This would unnecessarily delay timely implementation. If a required immunization one year is not supported by legislation the following July and therefore is eliminated, there will be frustration among parents and districts alike as they strive to maintain compliance. Therefore, it is important that these regulations remain consistent and not expire after adoption.

Summary: The development of immunizations and establishment of childhood 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 and are important in keeping students in school. 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 this bill.

Respectfully submitted,

Sharon A. Morris, MSN, RN
Kansas School Nurses Organization
National Association of School Nurses, Kansas Director