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Healthy People Build Strong Communities

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Testimony of the Kansas Association of Local Health Departments (KALHD) to the

House Committee on Education

Neutral on HB 2601 • February 12, 2020

Chairman Huebert and Members of the Committee,

Thank you for the opportunity to supply written, neutral testimony on House Bill 2601 which would shift childcare and school immunization requirements from administrative regulation by the Secretary of KDHE to being listed in statute. KALHD is a nonprofit association dedicated to strengthening local health departments for the purpose of improving and protecting the health of all Kansans. While KALHD does not have a position on where vaccine requirements reside (in regulation or in statute), this proposed change raises concerns.

The Kansas Legislature lacks expertise in disease prevention and immunization decision-making. KDHE houses such experts. As such, it would appear HB 2601 as written would shift decision-making away from where the expertise lies, which does not seem to be good public policy. If such a plan were to move forward, KALHD would favor seeing a method to ensure subject-matter experts are still a part of the process in determining what immunizations should be mandated.

Another concern we have is to the purpose of the shift. The administrative regulation process that currently exists is deliberative and transparent, so from KALHD's perspective there is no real gain to be had on those fronts 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, and the legislative process can be quite slow and not driven by the same public health concerns that KDHE operates around. So KALHD is concerned HB 2601 adds no additional transparency to the process yet compromises the speed at getting needed changes in place.

KALHD believes the existing system functions well to determine which vaccines should be mandated by schools and childcare facilities. While we remain neutral on HB 2601, we believe the above concerns should be carefully considered before moving the bill forward.

Respectfully,

Dennis Kriesel

Executive Director, Kansas Association of Local Health Departments