



House Committee on Education  
February 13, 2020

Carrie Delfs, BSN, RN, IKC Member

Chair Huebert, Vice Chair Dietrich, and Members of the Committee, as a member of Immunize Kansas Coalition, this written testimony **is submitted in opposition of House Bill 2601.**

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. Together with IKC, I oppose HB 2601 because it limits public health expertise from making timely decisions for public health matters.

Vaccinations are among the greatest achievements of public health. The current childhood vaccination schedule protects against many diseases that once claimed the lives of thousands each year in the U.S. With the potential for the epidemiology of diseases to shift over time, new diseases to emerge, and vaccination recommendations to change, it is important that the list of childcare and school vaccination requirements remain under the authority of the Kansas Department of Health and Environment (KDHE). It is also important that these regulations not expire annually after adoption, which would cause an undue burden to repeat the regulation process for required vaccines that are not written into statute. By removing the regulatory authority of public health experts at KDHE to determine vaccination requirements, HB 2601 risks Kansas' ability to respond to the best scientific recommendations for immunizations as set forth by the Advisory Committee on Immunization Practices (ACIP) to protect our children from vaccine-preventable diseases.

Each quarter, ACIP, which is comprised of medical and public health experts, reviews all available science before deciding on vaccine recommendations. ACIP recommendations inform decisions to both add *and* remove vaccines from the list of Kansas requirements. We oppose this bill and are in favor of the KDHE Secretary *retaining* the flexibility and authority to respond to new vaccines recommended by the ACIP as part of the routine child and adolescent vaccination schedule.

Listing vaccines in statute, as proposed in HB 2601, would lead to confusion as recommendations change. A duplicative legislative step would only serve to delay protection of Kansas citizens from preventable diseases and would add a layer of politicization to vaccinations, a proven public health strategy.

It is also worthy of note that nearly every state delegates to their respective state health department the authority to determine vaccination requirements. In Kansas, minimal changes have been made to the list of school vaccination requirements, only three times in the past 41 years. The current regulation process is used only as necessary to align Kansas childcare and school requirements with the best evidence-based, scientific recommendations available.

Vaccinations have significantly decreased rates of vaccine-preventable diseases protecting the lives and health of Kansans from once-common diseases. Vaccines are safe and given to millions of children each year. Side effects are generally minor and temporary; serious reactions are very rare. The United States vaccine safety program closely and constantly monitors the safety of vaccines.

Thank you for the opportunity to present our concern. In summary, we **oppose HB 2601** and are in favor of the Kansas Department of Health and Environment Secretary retaining the flexibility and authority to be responsive to new vaccines recommended by the ACIP as part of the routine child and adolescent vaccination schedule.

Carrie Delfs, Member  
Immunize Kansas Coalition