# KALHD

KANSAS ASSOCIATION
OF LOCAL
HEALTH DEPARTMENTS

Healthy People Build Strong Communities

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

Senate Committee on Public Health and Welfare

Opponent to SB 212 • March 22, 2021

Chairman Hilderbrand and Members of the Committee,

Thank you for the opportunity to supply written, opponent testimony on Senate Bill 212 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.

The Kansas Legislature lacks expertise in disease prevention and immunization decision-making. KDHE houses such experts. As such, it would appear SB 212 as written would shift decision-making away from where the expertise lies, which does not seem to be good public policy.

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 SB 212 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. As such we oppose SB 212 and ask the committee to not recommend it for passage.

Sincerely,

Dennis Kriesel

Executive Director, Kansas Association of Local Health Departments