

To Chairman Nader Hashim and the Vermont Senate Judiciary Committee,

I would like to comment on S.0166/H545.

My concerns are that this bill is consuming the legislature's precious and limited time that would be better spent on the pressing issues for Vermont—education, budget, drug crisis, the environment and climate.

Most of the language in the bill is the same as existing Statute with the exceptions of switching out the word “vaccines” for “immunizations” or “recommended immunizations”. The VT Immunization Advisory Council already exists —this bill wants to add two member categories.

So why spend the legislature’s precious and limited time and resources on this bill?

The significant changes/additions to the law are the following:

1) Section 1130 section a4 changes the establishment of what are the recommended vaccines from the Advisory Committee on Immunization Practices (ACIP) /CDC - Changes this to the Vermont Commissioner of Health.

The CDC’s ACIP board is a council of experts, and while that process can be flawed, it is at least based on a council of expert advisors, not one single person. While the current make-up of ACIP has changed under the current administration, it seems inefficient and irresponsible to overhaul the State law based on those politics. After comparing the current Federal vaccine recommendations and Vermont recommended vaccines and access, there is no real difference. So once again, why are we consuming energy on this bill?

2) The Bill proposes a whole new section to the law - 1130a -- including the following:

A) The Commissioner’s ability to issue recommendations about vaccines—a task that already happens—not sure why it had to be added to the law.

B) The Commissioner is to consider recommendations by the CDC as well as a list of medical organizations-- Again, this already exists.

C) Gives civil and administrative immunity for liability to health practitioners for any adverse events from vaccine administration. This is the issue for your committee to seriously consider. Vermont can not afford a liability protection program. This still exists at the Federal level and should stay there. Any consideration of the Vermont taking this

program on should be seriously researched and studied, not cavalierly included in an otherwise administrative bill.

D) Commissioner may issue standing orders for recommended vaccines. The Commissioner and Governor already have the capacity to do this. That said, standing orders present a slippery slope away from informed consent and doctor-patient discussion.

Thank you for your time and consideration and service to the citizens of Vermont.

Respectfully submitted,

Dorian Yates