



North Carolina Pediatric Society

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Dear Sens. Tarte, Barringer and Van Duyn –

Thank you for your concern about appropriate immunizations for children. As a practicing pediatrician of 20+ years and President of the NC Pediatric Society, this is an issue very near and dear to my heart as well. On behalf of NCPeds, we are very appreciative of the intent behind S346/Enact Stricter Immunization Requirements.

(<http://www.ncga.state.nc.us/gascripts/BillLookup/BillLookup.pl?Session=2015&BillID=S346>) However, we have some concerns about specific provisions.

1. Legislative intent – Page 1, lines 15-17 – We are very concerned that language saying that it is not the intent of the General Assembly to require any child in this State to be immunized weakens our current law. (See, for example, 130A-152 and 130A-155). Would it be possible to strike this language or say that it is the intent of the General Assembly that no child in our State die of vaccine-preventable illnesses?
2. Vaccines for school entry – Page 1, lines 17 –18. ACIP has a recommended schedule for vaccines, many of which are in the first two years of life. Currently 130A-155 more closely mirrors these recommendations which requires age-appropriate vaccines for attendance at child care facilities. Young children in particular are often in close proximity and have not mastered hygiene habits to reduce spread of diseases, especially those that are air-borne, such as measles. Age appropriate vaccines are critical to stop the spread of deadly or crippling diseases. We realize that the proposed language would still allow children to be vaccinated on schedule, but we are concerned that some parents may put off all vaccines until school entry.
3. ACIP recommended vaccines – Page 1, lines 25 – 27. We are concerned that the omission of vaccines for any sexually transmitted diseases could impact both Hep B and HPV vaccines. Our national body – the American Academy of Pediatrics – supports ACIP recommendations, including for Hep B and HPV. NCPeds is supportive of the efforts of the Public Health Commission to roll out requirements for all ACIP recommended vaccines over time and we are concerned this provision would undermine these efforts.
4. Severe Combined Immunodeficiency Screen - Page 1, lines 29-31. We are concerned about the requirement to screen for Severe Combined Immunodeficiency prior to receiving any vaccines. This is a rare condition, especially compared to many of the diseases vaccines prevent. The time to conduct the test could delay a child receiving a needed vaccine, perhaps resulting in exposure to a virus. This additional test prior to any vaccine could also be expensive for families, Medicaid and private insurance.

If I can be of any assistance or provide further information, please let me know. Please also feel free to contact our Executive Director, Elizabeth Hudgins, (elizabeth@ncped.org; 919-839-1156 x104) or our lobbyist, Jon Carr (JCarr@jordanprice.com).

Thank you again for your willingness to tackle this important but fire-storm raising issue!

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Ainsworth MD".

Deborah Ainsworth, MD, FAAP
Chapter President