



DATE: March 7, 2023
TO: Members of the Joint Committee for Review of Administrative Rules
FROM: Wisconsin Public Health Association, Wisconsin Association of Local Health Departments & Boards
RE: Please Support DHS 144 (Scope Statement SS 067-17) – Updates to the Student Immunization Program

Co-Chair Nass, Co-Chair Neylon, and Committee Members,

Representing over 1,200 public health professionals statewide, the Wisconsin Public Health Association (WPHA) and the Wisconsin Association of Local Health Departments and Boards (WALHDAB) are dedicated to promoting and protecting public health in Wisconsin. WPHA and WALHDAB support the recent updates to chapter DHS 144 of administrative rules. We respectfully request the committee to allow the recent updates to stand as written and not vote to suspend any portion thereof.

As DHS identifies in its plain language analysis, DHS 144 has not been substantially updated since 1981, over forty years ago. Simply stated, these updates bring Wisconsin student immunization rules into the 21st century by conforming to the latest recommendations from the Centers for Disease Control and Prevention (CDC) and the Advisory Committee on Immunization Practices (ACIP). Ensuring students are immunized in accordance with the latest science is essential to protecting not just the health of Wisconsin students but the population at large.

From the point of view of public health professionals, who represent local and state health departments, health care systems, community based-organizations, academia and much more, vaccinations are one of our safest and most effective tools to protect the public from disease. As you likely know, vaccinations against diseases like smallpox and polio have nearly eliminated the widespread threat of those diseases throughout the world.

Immunization programs like DHS 144 are vital to a healthy population in making sure preventable diseases remain preventable. However, they only continue to be vital if they rely on the latest in evidence-based best practices. The recent changes to DHS 144 guarantee the program's effectiveness for today's population and for today's vaccine-preventable illnesses.

It is important to note that this rule does not eliminate any vaccination waivers currently allowed under state law. Rather, for families who do choose to vaccinate their children, the rule language makes sure those children are protected according to the best practice recommendations from the CDC.

Please stand with public health and medical experts in supporting the recent updates to DHS 144 and allow it to stand without suspending any portion thereof.

Sincerely,

Maureen Busalacchi & Elizabeth Giese

WPHA & WALHDAB Joint Policy and Advocacy Committee Co-Chairs