December 12, 2016

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RE: IDPH Rulemaking Child Health Examination Code (77 IL Admin Code 665) (including repeal of Immunization Code (77 IL Admin Code 695)

Dear Honorable Members of JCAR:

On behalf of the Illinois Academy of Family Physicians, I am writing to urge your support for the Illinois Department of Public Health's proposed immunization rulemaking now before your Committee on 2<sup>nd</sup> notice.

These rules would NOT remove religious exemptions for parents or legal guardians who object to school required health examinations, screenings or immunizations (or any part thereof) on religious grounds. It does NOT change what constitutes a religious belief. The signed certificate would reflect that the parent or legal guardian understands their school's exclusion policies in the case of a vaccine preventable disease outbreak or exposure. Furthermore, the Certificate must also be signed by the authorized examining health care provider responsible for the performance of the child's school-required health examination, confirming that they have provided education to the parent on the benefits of immunization and the health risks to the student and community of the communicable diseases for which immunization is required. The health care provider's signature on the Certificate reflects only that education was given and does not allow a health care provider to determine a religious exemption.

Certificates would be required on the same schedule as school physicals (Kindergarten, 6th and 9th grades) and therefore, would not require any extra visits with a health care provider or added costs to those persons requesting a religious exemption. Most importantly, the rules do not change the ability of children to receive a medical exemption for immunization. However, studies have shown that states with easily obtained non-medical exemptions have higher rates of pertussis and measles. Furthermore, states with simpler immunization exemption procedures have non-medical exemption rates that are more than twice as high as those states with more complex procedures.

If these rules can help lower the rate of religious exemptions even slightly, that can result in less people spreading dangerous vaccine-preventable diseases to our most vulnerable populations in Illinois.

Vincent D. Keenan, MSPH, CAE Executive vice president