



Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

February 21, 2025

The Honorable Brian J. Feldman  
Chair, Education, Energy, and the Environment Committee  
2 West Miller Senate Office Building  
Annapolis, MD 21401

**RE: Senate Bill 821 – Primary and Secondary Education – Student Immunization –  
Temporary Admission Period – Letter of Opposition**

Dear Chair Feldman and Committee members:

The Maryland Department of Health (the Department) respectfully submits this letter of Opposition for Senate Bill (SB) 821 – Primary and Secondary Education – Student Immunization – Temporary Admission Period. This bill grants a temporary admission period of 60 calendar days for students without proof of required immunizations.

Currently, pursuant to Health-General (HG) §7-403, the Department adopted Code of Maryland Regulations (COMAR) 10.06.04 allowing the temporary admission of students without required immunizations for up to 20 calendar days. The Department also considers requests for extensions for warranted circumstances (e.g., a temporary shortage of a particular vaccine). Over the last ten years, there have been three requests to extend the deadline for school exclusion: in 2014 due to new middle school vaccine requirements; in 2021 due to the COVID pandemic; and in 2024 due to a vaccine ordering issue.

Historically, compliance with school vaccination requirements is high – more than 98 percent. The authority granted to adopt regulations, as opposed to establishing a defined period in statute, allows the Department to adapt to evolving public health concerns. Implementing a rigid timeline through statute would hinder timely, evidence-based responses to emerging issues. The Department believes the current regulatory approach of providing families with 20 days to obtain vaccinations or acquire documentation of prior vaccination is both appropriate and necessary to maintain Maryland's high childhood immunization rates and protect Maryland children from vaccine preventable diseases.

SB 821 will unnecessarily prolong the time children without school-required immunizations remain unvaccinated, increasing the risk for acquiring a vaccine-preventable disease and the likelihood of ongoing transmission in the school setting. This would endanger vulnerable children and staff who cannot be vaccinated due to medical contraindications, putting them at a greater risk for infection.

The Department also wishes to note that local health departments have reported that students have been able to schedule their vaccination appointments and receive their required vaccines within the 20 day extension period COMAR allows. No county, including Prince George's, has approached the Department with the need for additional assistance in vaccinating students.

To the extent that school students are experiencing problems receiving necessary vaccination, the Department firmly believes the issue can be solved through cooperation at the state and local level, without the need to enact new legislation which will be injurious to the health of Maryland's school-aged children.

If you would like to discuss this further, please do not hesitate to contact Sarah Case-Herron, Director of Governmental Affairs at [sarah.case-herron@maryland.gov](mailto:sarah.case-herron@maryland.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Laura Herrera Scott". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Laura Herrera Scott, M.D., M.P.H.  
Secretary