



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

February 12, 2025

The Honorable Vanessa E. Atterbeary
Chair, Ways and Means Committee
Room 131, House Office Building
Annapolis, MD 21401-1991

**RE: House Bill 608 – Primary and Secondary Education – Student Immunization –
Temporary Admission Period – Letter of Opposition**

Dear Chair Atterbeary and Committee members:

The Maryland Department of Health (the Department) respectfully submits this letter of Opposition for House Bill (HB) 608 – Primary and Secondary Education – Student Immunization – Temporary Admission Period. HB 608 grants a temporary admission period of 60 calendar days for students without proof of required immunizations.

HB 608 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.

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. Further, the Department adds that local health departments have reported that students are able to schedule their vaccination appointments and receive their required vaccines within the 20 day extension period COMAR allows.

The Department believes the current regulatory approach, 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.

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.

Sincerely,

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