

Requirements of New Mandatory Vaccination Law as Enacted*		Proposed DOH Rule**	
Act 37 Section 3 (p10)	All schools are to communicate aggregate vaccination rates of student body to parents and make publicly available.	Does not address.	aggregate rates do not include partially vaccinated, only those who are in "full compliance"
Act 37 Section 4 (p11)	Exemptions. Child may remain in school: 1. With provisional admittance for 6 months only - If submits a form signed by a licensed HCP stating the child is in the process of being vaccinated; or 2. With medical exemption if submits a form signed by a licensed HCP certifying that a specific vaccine is or may be detrimental to the child's health; specifies which vaccine and probable duration of exemption, terminates medical exemption if condition no longer applies; or 3. With religious exemption if parent submits a form stating the parent holds religious beliefs* opposed to vaccination, after reviewing required educational materials provided by the DOH.	See Section 6 of proposed rule.	*Deletes "or philosophical convictions"; required educational materials provided by the DOH still highly inadequate. See detailed comments on proposed rule on next sheet.
Act 37 Section 5 (p13)	Says Health Dept shall adopt rules to administer this subchapter together with the Agency of Education for schools and Dept. of Children and Families for childcare. Rules will establish list of required vaccines and number of doses, manner of administration.	Comment deadline: Dec. 2, 2015	DOH posted rules, held a hearing on Nov 20th; no other agencies to our knowledge have been present but new rule establishes penalties for school and childcare admins who do not enforce the law. See detailed comments on proposed rule on next sheet.
Act 37 Section 6 (p13)	In addition to data collection required by the CDC, DOH will collect compliance data on "at least" 1st and 8th graders for each mandatory vaccination including # of medical and religious exemptions and # provisional admitted students.	See Section 11 of proposed rule.	Heavy workload for childcare and school admins, nurses. See detailed comments on proposed rule on next sheet.
Act 37 Section 7 (p14)	Dept. may implement quality improvement initiatives in any school that has provision admittance rate or exemption rate above the state average.	Does not address.	Schools report DOH providing "catch up schedules"
Act 37 Section 8 (p14)	Mandatory vaccination registry for all Vermonters, developed by Information Technology Leaders, a 501C3. Dept may exchange information with other states or with researchers who present an IRB approval.	Does not address.	No opt out for any Vermonter and no way to correct information. No penalty for breach/disclosure of data.
Act 37 Section 9 (p17)	Creation of advisory council composed of members from VT Board of Medical Practice, Secretaries of Human Services and of Education, state epidemiologist, practicing pediatrician, any other persons by the Commissioner. Purpose: to provide "educational policy, medical and epidemiological expertise and advice to Dept. with regard to safety of vaccination and schedules." Powers and duties: review and make recommendations regarding the state's vaccination schedule for schools and child care. To convene at least 1x/yr.	Does not address.	No public representation, no dissenting voice, and no meetings were held to our knowledge - despite the fact that proposed rules spell out a schedule (see detailed comments on next sheet.)
Act 37 Section 10 (p18)	HCP shall report to VAERS all significant adverse events even if practitioner is unsure.	Does not address.	define "significant"?
Act 37 Section 11 (p18)	Prepares report on legal policy for Mandatory Vaccination of School Personnel due Jan 15, 2016 to be given to House Committee on Healthcare and Senate Committee on Healthcare.	Does not address.	teachers take note!
*Act 37: http://legislature.vermont.gov/assets/Documents/2016/Docs/ActS/Act037/Act037 As Enacted.pdf		**Proposed Rule: http://healthvermont.gov/regs/documents/imm_regulations_proposed_amended_annotated.pdf	

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