

LETTER TEMPLATE

Just fill in the name of your Health Officer and the name of your town in the allotted spaces. Then copy and send it to your Health Officer and local board of health.

Dear __ (Health officer)_____ and Members of
the _____ (Municipality) _____ Board of Health,

I am writing to express my concern about the **proposed rule revisions to N.J.A.C. 8:57**. I understand that the local New Jersey Boards of Health are considered “stakeholders” in the process and have been solicited for feedback. I am hoping you can provide some clarification with regard to your public health goals and how the proposed measures would help to achieve them.

- The NJ Department of Health’s [Official Message No.: 111758-5-10-2023-PHIN](#) says ***“The Department is not suggesting regulatory changes that would introduce new required vaccines (such as COVID-19 vaccines) for K-12 attendance.”*** However, their memo dated May 8, 2023 and accompanying presentation on the proposed changes clearly state the objective to, ***“Align immunization requirements specified in this subchapter with the current ACIP recommendations.”***
 - Can you explain these incongruous statements?
- The NJ Department of Health is also proposing to ***“not limit a private entity's ability to add additional vaccination requirements that are recommended by the ACIP but not required by NJDOH.”***
 - Is the NJDOH proposing to allow all private schools (preschools, daycares, elementary, secondary schools & colleges) the freedom to require any vaccinations they choose as a requirement for attendance?
 - If so, what is the public health benefit of granting private schools the authority to require additional vaccinations, particularly as [some vaccinations serve no role in protecting public spaces](#)?
 - Why would they propose inconsistent health policies throughout the state?
- Since the local Boards of Health are named stakeholders, and represent the interest of the local municipalities, I ask you,

- What is the position of our local BOH as it relates to added vaccinations on the required schedule for school attendance?
 - Will the Board voice the concern of parents and physicians who believe that medicine should NOT be one-size-fits-all and that parents in collaboration with their child's physician should determine appropriate medicines?
- The official message of the NJDOH states that there will be a public comment period after the proposed changes are officially published in the NJ Register. Given the fact that these changes will impact all families,
- Will our local BOH invite comments from our community during the public comment period?
- The New Jersey Department of Health proposes to ***"expand reporting requirements by increasing the upper age limit of who is required to be reported into the New Jersey Immunization Information System."***
- Is this intended to track the vaccination status of all New Jersey children up to age 18? Why is the NJDOH proposing to expand the requirement to all practitioners who administer vaccines to children under 18 (currently it is 7 and under) to report vaccine administration, **without parental consent**, to the New Jersey vaccine registry for tracking?
 - Will parents be permitted to opt-in to this medical surveillance system or be told how to opt-out of this medical tracking system?
- The Scope and Authority section of N.J.A.C. 8:57-1 of NJ DOH presentation states that there will be a ***"broader scope of required reporters and groups responsible to comply..."*** and that it will establish, ***"More explicit authority to access premises and things to enforce health laws,"*** granting ***"Access to public or private place and records/things at these premises to enforce, administer or confirm compliance with health laws."*** This suggests that the local health departments will have considerably greater responsibility for tracking, surveillance, and reporting. It also places significant emphasis on compliance and enforcement, potentially at the expense of patient privacy.
- Will this put a strain on current resources and thus on municipal budgets?
 - Can you provide details about this "more explicit authority" and access to ensure that patient rights and privacy are adequately protected?

I thank you for your attention to my concerns and your informed responses.

Most respectfully,