please find attached comments on the proposed vaccination rules

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Dear Judge Lipman,

Please allow me to offer a few comments on the matter of the proposed immunization rules.

While I do believe there is positive benefit to our state immunization program, I believe that there is the need for caution before we decide to expand it.

Well-intended persons have and will present arguments on either side of this matter. They argue their case based on the evidence they possess. The State cites national trends and epidemiological research. The opponents express concern about side-effects and unintended consequences. Both are delivered with integrity, given the available data.

The critical weakness in the State's epidemiological evidence, which results in glowing benefit and safety reports, is that those conclusions are based on grossly incomplete data. Contrary to the Vaccine Adverse Events Reporting System (VAERS) guidelines, the clinicians are simply underreporting adverse reactions. In practice they frequently pre-screen out the ill-effects they deem to be unrelated to the their administration of the vaccine.

The following instruction comes from the home page of the VAERS program:

"Which adverse events should I report to VAERS?"

We encourage you to report any adverse event that occurs after the administration of any vaccine licensed in the United States. You should report adverse events even if you are unsure whether a vaccine caused them." (Emphasis mine.)

I have had many conversations over my years in practice and in the legislature about this, and personally know of cases where a doctor/nurse/PA declined to report substantive reactions because they were unconvinced that the effect was related to the vaccine administration. In some cases, they told the parents the reaction was simply a coincidence or something spontaneous, but still didn't report the reaction. Some of those reactions were moderate or even severe, involving obvious behavior changes, neurological changes, and even paralysis.

For this reason, the well-intended epidemiologists lack much of the data that is in the possession of those parents and those who express their sincere concern about these proposed expansions.

When confronted by this information several years ago, the MDH agreed that they would renew their efforts to remind the clinicians of the need to report even mild symptoms. I am not optimistic that a very rigorous effort was undertaken or that any real improvement in clinical reporting behaviors occurred. And even if it did, the epidemiology from the "pre-improvement" era would be tainted with underreports.
I suggest that you listen carefully to the testimony of the parents who bring forward their personal anecdotes of injury to their children. They know their child, and they know what normal or abnormal behaviors are for their child. You may detect much frustration that these side-effects have been denied as related to vaccination by those to whom these families entrusted their care.

Personally I find it unfortunate that the MDH and national related organizations have taken such a strong position against believing the very legitimate concerns of those families who report injury from vaccine use. This attitude causes a lack of trust, and dissuades many people from availing themselves of the worthy benefits that could be attained from the appropriate use of a vaccine.

A free people, such as we espouse in America, should be totally free to select the disease prophylaxis it chooses, given full information. Inaccurately minimizing vaccine side effects, which seems to be the standard of practice by many of those who deeply believe in their benefit, is not science but faith.

The expansion of this program should be only voluntary until such time as the VAERS program can be fully and credibly operated. Even though a family can opt out through filing a notarized conscientious objector form, the coercive power of a mandate does not provide true choice.

The decision to add additional vaccines to a child's regimen is best kept as a decision between the practitioner and the patient/family at this juncture. To require otherwise is to use the power of the state to require that citizens partake of treatment that is not as safe as advertised.

Respectfully submitted,

State Representative Jim Abeler

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