



**Florida Chapter of the
American Academy of Pediatrics**
INCORPORATED IN FLORIDA

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American Academy of
Pediatrics, Inc.**

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September 14, 2026

RE: Public Comment on Proposed Rule 64D-3.046

Dear Bureau Chief,

On behalf of the Florida Chapter of American Academy of Pediatrics, Inc. (FCAAP), I submit these comments on the Department of Health's Proposed Rule, 64D-3.046, concerning childcare and school-entry immunization requirements and related forms, including DH 680, DH 681, and the Immunization Guidelines for Florida Schools, Child Care Facilities, and Family Day Care Homes. FCAAP opposes the proposed rules in their entirety and respectfully requests that the Florida Department of Health not promulgate them.

FCAAP is Florida's premier organization representing the interests of pediatricians and pediatric health care professionals in Florida. FCAAP and its approximately 2,900 members believe it's a moral imperative that all children receive quality healthcare, not just for their immediate wellbeing, but also to encourage their growth into productive adults that will ensure a bright future for our state and its residents for decades to come.

Prevention is a cornerstone of pediatric care. Pediatricians routinely work with families to help keep their children happy, safe, and healthy. This includes regular conversations with caregivers to answer questions and address concerns about vaccines. Pediatricians help caregivers to navigate systems-level barriers to care to ensure that they can access the vaccines that their children need. Pediatrician also provide support to families with children whose health conditions contraindicate vaccination. Pediatricians are the trusted experts on children's health and the overarching goal in everything they do is to support families and to protect children and help them grow.

It is because of pediatricians' mission and duty to support families and protect children that FCAAP submits these comments in strong opposition to the changes proposed to Rule 64D-3.046. As proposed, the rule would undermine the health of Florida's children and communities.

Children's Health

Rule 64D-3.046 currently requires school-aged children to be vaccinated against Hepatitis B, Varicella (chickenpox), Haemophilus influenzae b (Hib), and Pneumococcal disease. If these requirements are removed, immunization rates will go down, and more children will become vulnerable to contracting these dangerous diseases and suffering serious, potentially life-long and life-threatening, health effects.

Hepatitis B can lead to chronic liver infection, cirrhosis, and liver cancer decades after it is contracted. In the United States, 1 in 4 children chronically infected with hepatitis B will die prematurely from cirrhosis or liver cancer. Today, birth-dose vaccination has cut childhood infections by approximately 95%.

Varicella, more commonly known as chickenpox, can cause severe skin infections, pneumonia, and encephalitis. In the 1990's, pre-vaccine, there were approximately four million cases of varicella, 10,500–13,500 hospitalizations, and 100–150 deaths each year. The virus remains dormant in the body for life and can reactivate later as Shingles – causing severe nerve pain and other complications.

Before vaccines, Haemophilus influenzae b (Hib) was the leading cause of bacterial meningitis in young children, capable of causing deafness, seizures, disability, and even death. Each year about 20,000 children in the United States under five years of age contracted severe Hib disease leading to the death of approximately 1,000 of them. Since the introduction of the vaccine in the 1980s, this number has significantly decreased – saving thousands of children from life-long disabilities.

Pneumococcal disease remains one of the leading vaccine-preventable causes of death in young children globally. It causes pneumonia, bloodstream infections, and meningitis. Before routine use of pneumococcal conjugate vaccine in 2000, an estimated 17,000 cases of invasive disease occurred in the United States each year in children younger than five years of age causing approximately 700 cases of meningitis and 200 child deaths each year.

Community Protection

Higher rates of vaccination among school-aged children are associated with higher rates of community-wide immunization levels. Weakening school entry requirements or broadening exemptions for immunizations, including those within the rulemaking discretion of the Department of Health which currently protect against Hepatitis B, Varicella (chickenpox), Haemophilus influenzae b (Hib), and Pneumococcal disease, will not only limit the rights of children to be disease-free at school, but will also make communities more susceptible to preventable diseases.

Young children, the elderly, and people who are immuno-compromised or who are otherwise unable to receive immunizations due to health conditions rely

upon the rest of the community to help keep them safe. When immunization rates decrease, vaccine preventable diseases spread more easily – putting everyone at increased risk for infection which could lead to serious illnesses, lifelong health complications, and even death. Community-wide levels of immunity against contagious illnesses protect everyone in Florida, including the thousands of people who visit our state annually.

However, Florida has struggled to maintain strong childhood immunization rates. For example, only 88.8% of Florida kindergarteners received the MMR vaccine for the 2024-2025 school year, well below both the national average immunization rate of 93% and the 95% needed to prevent outbreaks of diseases like measles. 88.8% also represents a 4.7% decrease within our state since the 2019-2020 school year. In fact, the Department of Health itself cautioned on declining immunization rates and an increase in exemptions as recently as April of 2025 in its Vaccine-Preventable Disease Surveillance Report.

Even when exercised infrequently, nonmedical exemptions are neither harmless nor benign. They lead to lower immunization rates and weaken our ability as a state to protect ourselves against dangerous diseases. Given these trends and the 2026 measles outbreak with cases reported across dozens of states including Florida, the Department of Health should be increasing its efforts to protect Florida's families against vaccine preventable diseases – not weakening them.

Economic and Societal Impact

Policymakers in Florida and the Department of Health have a duty to safeguard the public against the threat of communicable diseases and to resist pressures from a vocal minority seeking these dangerous changes to our current rules. Immunizations afford the state of Florida and our nation an incredible return on public investment. Between the years 1994 and 2023, routine childhood immunizations in the United States have prevented approximately 500 million cases of illness, 32 million hospitalizations, and more than one million deaths. This has resulted in \$540 billion in direct savings and \$2.7 trillion in societal savings.

Weakening childhood vaccination requirements would directly weaken Florida's economy. Our workforce is reliant upon healthy families and dependable schools and daycares. When children are sick or need to quarantine due to exposure to other sick children, caregivers miss work, and Florida's employers are left with reduced staffing. When diseases spread through schools and daycares, children and staff are affected – resulting in teacher shortages, combined classes, and environments in which contagious diseases can spread more easily. Additionally, outbreaks of these contagious diseases can impact where tourists decide to visit and spend their money.

All of this has a real impact on Florida's economy and is estimated to result in a reduction of the state's GDP by \$74 million in the first year and nearly \$9 billion

over a decade should the vaccine requirements for school-aged children be weakened.

Public Health Infrastructure

The state's immunization registry, Florida SHOTS, is crucial to the state's public health infrastructure. This was recognized by the Florida legislature in 2024 when legislation was passed requiring that healthcare practitioners report vaccination data for children from birth through 17 years of age to the state registry, unless a parent or guardian opts their child out. This data is vital to the state's ability to help schools, childcare centers, and public health officials effectively respond to outbreaks, to maintain accurate records for use by healthcare professionals when providing care in an emergency, and to help families and healthcare professionals avoid over or under vaccinating someone. Changes that reduce the accuracy of or access to Florida SHOTS will weaken the ability of the state's public health officers and healthcare professionals to respond effectively to vaccine-preventable diseases.

The proposed changes to Rule 64D-3.046 will have a substantial impact on child health, school safety, public health preparedness, clinical practice, immunization records, community protection, and Florida's economy. For these reasons, FCAAP urges the Department of Health to not promulgate the proposed changes to Rule 64D-3.046.

Thank you for considering these comments. We remain ready to collaborate with the Florida Department of Health to strengthen the state's immunization efforts to protect Florida's children, families, and economy.

On behalf of FCAAP,



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Executive Director