Good Morning and thank you for the opportunity to talk to you today.

My name is Meghan Flaska and I am a mother of 4 from Kalkaska, MI.

I am here to speak as witness to the fallout of a poorly written, disastrously executed and frankly inappropriate administrative rule regarding vaccine waivers.

The chaos that has resulted appears to be widespread throughout state and local organizations including school districts, health departments and their personnel, resulting in wildly inconsistent waiver experiences and frustrated parents turning to social media for answers because the "official channels" can't consistently or even accurately provide them.

The full negative impact of this rule really hit my family when it was revealed the largest school system in northwest lower Michigan, Traverse City Area Public Schools (TCAPS), had chosen to mandate all students not in 100% compliance with the recommended vaccine schedule MUST get the new authorized waiver from the health department, regardless of current waiver status, ignoring the guidelines sent out by Director Lyon himself in an April letter.

I have sought a legal opinion which has confirmed TCAPS' mandate is above and beyond the administrative rule change requiring authorized waivers for school years K, 7th and new to the district. At best, it is a retroactive enforcement of a well-intentioned new rule, at worst it is outright illegal in its conflict with existing law under Michigan Public Health Code 333.9215 in effect since 1978 and Michigan School Code 380.10.

To make matters worse, the Grand Traverse County health department advised TCAPS against such action, but when they proceeded anyway, the health department opted to accommodate the district rather than be the leader in establishing a healthy cooperation per the Health Code (333.9221), which clearly states the dept of education is to cooperate with the health dept in implementation of policy. Regardless, I contacted the health department for Kalkaska County, where we reside, in an attempt to comply and was told they would "not issue waivers [to me] for students outside of the required years specified in the rule".

As further fallout of the new rule, the obvious added strain on the health department resources led to concerns they could not meet the full demand for appointments before classes were to begin. Without proper documentation, TCAPS as encouraged by the health department effectively planned to exclude possibly 700 students from participation on Day 1. As a partial solution to the limited resources, the health department has instead thought it appropriate to hold "educational sessions" in groups of 50+ people at one time. Wouldn't the health department, of all people, know better than to violate individual health privacy in this manner?

But consequences for exercising this legal right are myriad. Should there be an outbreak (defined as one lab-confirmed case) of a vaccine-preventable disease, all unvaccinated children that share a class with the ill child will be excluded from school for 21 days, regardless of their own health status. While TCAPS policy manual specifically states "from class", when pressed on the matter administration staff has clarified they would include any and all extracurricular activities, marching band, theatre, sports, etc. including prom if necessary. Will students soon have to worry their vaccination status will prevent them from getting a role in a play or a spot on a sports team, because their full participation cannot be counted on? Children with IEPs could also be entirely without an educational experience, as TCAPS believes they have no legal obligation to provide such support to their homes during an exclusion.

It is nothing short of a travesty that procurement of a piece of paper, unnecessarily and inappropriately granting "approval" of exercising a right I already have appears to hold greater value than the actual education of our children. And as a taxpayer; as a citizen; as a mother-I want to know why the Health Department has not stepped in to correct such an obvious bureaucratic debacle that smacks of discrimination and ultimately has the potential to keep hundreds of children out of school.