



A VOICE FOR CHOICE

LETTER OF CONCERN UNIVERSITY OF CALIFORNIA IMMUNIZATION POLICY

July 31, 2016

This letter is in response to the new immunization policy that is being implemented by the University of California.

A Voice for Choice Advocacy sincerely objects to the new policy with the express intent to require the MMR, Varicella, Tdap and Meningococcal conjugate vaccines for matriculation within the UC system, starting 2017 and asks for it to be withdrawn immediately, and if left in place for the following to be amended:

- **Allow religious and personal beliefs exemptions.**
- **Allow medical exemption to be at the discretion of the physician.**
- **For those using the medical exemption option, for the form to allow additional space for names of each vaccine from which the student is exempt, and for the form to exclude the request for student's specific condition/diagnosis.**

There is no place in the current California statute that requires students who are in college or university to be vaccinated in order to enroll. **Please explain how the UC Regents have the authority to supersede current California law, as well as the declarations of medical professionals giving medical exemptions?**

SB277 set a precedent as the most far reaching legislation in the country regarding vaccines in child care facilities, pre-schools and public and private schools in California last year. During the formation of this legislation, the legislatures recognized that the Medical Exemption has to be at the discretion of the medical doctor. There is no one that should evaluate the merits of a medical exemption other than the patient's physician. No student health staff or member of a UC Immunization Appeals committee would have the medical knowledge of that particular patient to be able to determine if the medical exemption were warranted or not.

The new UC policy relies on the CDC published contraindications which are very narrow and fail to include all contraindications and precautions stated in the vaccine product inserts. Two of the four vaccines you will require do not have a CDC published contraindication for a medical exemption. For example, according to product insert warnings, women who are pre-pregnant, pregnant or lactating should not be vaccinated with the proposed vaccines. However, these women would have their medical exemptions denied because they do not fall under CDC guidelines.

The contraindications which the CDC does state are limited to anaphylaxis from a previous vaccine dose or death. Therefore if a student has a less severe reaction, such as seizures they would still be expected to get another dose of the vaccine in order to comply with the new policy. Similarly, family history is not taken into consideration. For example, if a student's sibling died from a vaccine reaction and their physician has determined based on family history that the student should not be vaccinated, they would be denied

enrollment based on the new UC policy. The latest research indicates that there are genetic factors that may increase the likelihood of vaccine adverse reactions, and therefore other reasons for a medical exemption should include but are not limited to family history of a vaccine reaction, family history of an autoimmune disorder and certain genetic mutations.

A subset of adults who are vaccinated suffer unique adverse reactions for which there are no routine screening processes, but physicians might identify risk factors not listed as CDC contraindications. For example, up to 26% of postpubertal females suffer crippling arthritis and arthralgia following MMR vaccination, with symptoms persisting for a duration of months up to years. Providers might look to genetic testing or family history to determine if the risk of the vaccine outweighs the benefits.

A doctor may also recognize that the immune system of a patient is not strong enough to handle a vaccination for a period of time, but the vaccination can safely be administered in 6 months. It is for these reasons that our healthcare system operates on the basis of informed consent. Informed consent ensures that the doctor and patient make the decision regarding any medical procedure and weigh the risks and benefits as they pertain to the best interest of the health and safety of the patient, not the strong arm policy of an educational institution or even the state legislature. **Therefore, we ask that you leave the medical exemption up to the discretion of the patient's doctor.**

For those that do require a medical exemption from their physician, the Medical Exemption Request Form is problematic in that it does not offer space to include more than one vaccine from which the student might be exempt. The form also includes a space for the provider to name the student's condition/diagnosis, which violates the student's right to medical privacy. **Therefore, we ask that you change the Medical Exemption Form to allow for each vaccine and remove the request for medical information.** (Note: it should not be named a request form as it should not be a request but a information form.)

This policy is also a violation of students' first amendment right to religious exemption, and is without legal precedence. The Rubella portion of the MMR vaccine is grown using aborted fetal cells. This practice is in direct contradiction to the religious beliefs of many. Denying students the ability to honor their religious convictions goes against the founding principles of the US Constitution. There is no immediate threat of a severe adverse reaction to a contagious disease that justifies stripping students of their freedom of religion, especially given that this is seen as discrimination under the UC Principles Against Intolerance.

Among other sections, the UC Principles Against Intolerance state:

b. University policy prohibits discrimination based on race, color, national origin, religion, sex, gender, gender expression, gender identity, pregnancy, physical or mental disability, medical condition (cancer-related or genetic characteristics), genetic information (including family medical history), ancestry, marital status, age, sexual orientation, citizenship, service in the uniformed services, or the intersection of any of these factors. Prohibited discrimination arising from historical biases, stereotypes and prejudices jeopardizes the research, teaching and service mission of the University. This mission is best served when members of the University community collaborate to foster an equal learning environment for all, in which all members of the community are welcomed and confident of their physical safety.

These UC Principles Against Intolerance are in direct conflict with the new UC Immunization Policy. **Therefore, we ask that the religious and personal belief exemptions are reinstated similar to what is allowed on the personal beliefs exemption form offered by the California Department of Health (form 8262) for enrollment in predetermined grade spans.**

The UC Regents Health Committee was addressed last month by a number of concerned citizens and organizations. These included Del Bigtree, the Director of the documentary *VAXXED: From Cover-Up to Catastrophe*. He shared with the committee the alleged fraud committed at the CDC in regards to MMR vaccine research. Given that this is one of the vaccines included in the requirements for enrollment, it would be irresponsible to move forward with a vaccine mandate when the possibility of harm to students from a dysfunctional vaccine is a known possibility. Until the CDC Whistleblower, William Thompson, is given a forum to testify to the fraudulent practices he's witnessed and performed and until the supporting documents are provided to the Congress by the CDC, there is no way to proceed with this policy without malice. There has also been no research conducted on the combination of the full CDC vaccine schedule or the combination of vaccines required by the UC Immunization Policy. In fact in 2011 the US Supreme Court deemed vaccines "unavoidably unsafe". **Therefore, we ask that the UC Immunization Policy be retracted until further investigation and research is conducted into the MMR vaccine and the combination of certain vaccines.**

The current documentation is also not clear on how this policy will be implemented. The following questions need to be clarified in the policy:

- Will current students be required to get the required vaccinations or will they be grandfathered in?
- How will students who agree to attend a UC school, and reject acceptance to another school, prior to this policy being implemented be accommodated?

In short, the UC Immunization Policy is wrong, it is unnecessary, and in its overreach it violates the rights of all families and physicians. It needs to be stopped and withdrawn immediately.

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Giving issues a voice, A Voice for Choice advocates for people's rights to be fully informed about the composition, quality, and short- and long-term health effects of all products that go into people's bodies, such as food, water, air, pharmaceuticals and cosmetics.