

In Opposition to HB 1584-FN

An Act Directing the Department of Health and Human Services to Provide Notice of Medical and Religious Exemptions from Immunization Requirements and Relative to the Form of Such Exemption

New Hampshire House Health, Human Services and Elderly Affairs Committee

Chairman MacDonald and Members of the Health, Human Services and Elderly Affairs Committee—

My name is Joseph Zamboni, and I submit this testimony in opposition to HB 1584-FN on behalf of the Pro-Vaccine Legal Alliance (PVLVA), a project of American Families for Vaccines. PVLVA builds a national network of legal, public health, and medical experts dedicated to protecting access to safe, effective vaccines and supporting evidence-based immunization policy. Our work focuses on ensuring that laws governing vaccination promote child health, equity, and public trust while remaining grounded in sound science and long-standing public health practice.

HB 1584-FN, as written, would substantially weaken New Hampshire's immunization framework by mandating the promotion of vaccine exemptions, eliminating meaningful standards for claiming religious exemptions, and penalizing public health officials for communicating accurate vaccine information without prominently advertising opt-outs. While framed as a notice and reporting bill, its practical effect is to undermine vaccination as the public health default and normalize exemption-seeking behavior in ways that place New Hampshire children and communities at risk.

The bill would require the Department of Health and Human Services to display the statement "MEDICAL AND RELIGIOUS EXEMPTIONS ARE AVAILABLE UNDER NEW HAMPSHIRE LAW" on any communication, publication, website, or material that promotes vaccination, in bold, starred print, at least as prominent as the primary vaccination message. This mandate applies broadly and without exception. This is not neutral disclosure. It is compelled speech that elevates exemptions to parity with vaccination itself, regardless of medical consensus, epidemiology, or context. Public health messaging relies on clarity, proportionality, and evidence-based prioritization. HB 1584-FN would legally require the state to frame exemptions as co-equal with vaccination, even in materials intended to address outbreaks, protect vulnerable populations, or respond to public health emergencies. Such requirements do not enhance informed decision-making. They distort it.

HB 1584-FN further amends existing law to provide that any written signed statement attesting to a religious objection shall be sufficient, and that parents may not be required to use any standardized form or provide additional information. This language removes any functional boundary between sincerely held religious belief and generalized personal objection. In practice, it invites exemption claims that are unreviewable, hard to quantify for data collection, unverifiable, and untethered from religious practice,

undermining the balance New Hampshire law has maintained between individual liberty and public health protection.

Experience across states is clear, when exemption standards are lowered, exemption rates rise. When exemption rates rise, diseases return, often clustered geographically, disproportionately affecting infants, medically vulnerable children, and communities with limited healthcare access.

The bill also authorizes civil penalties of up to \$1,000 per violation against DHHS employees or agents for distributing vaccination materials that fail to include the mandated exemption notice, with each communication constituting a separate violation. This provision is especially troubling. It exposes hard-working public health professionals and their agencies to financial penalties for prioritizing accurate, science-based health messaging, or simply making a mistake. It risks chilling essential communications, delaying outreach during disease outbreaks, and diverting agency resources toward compliance policing rather than disease prevention. At a time when public health agencies are already stretched thin, HB 1584-FN would force DHHS to choose between effective communication and legal exposure.

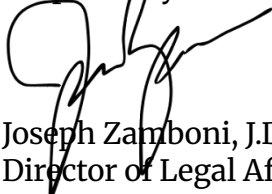
The fiscal note confirms that the bill will impose new ongoing costs on the state, including staffing to manage compliance and reporting requirements, funded through the General Fund. These expenditures do not improve vaccination coverage, reduce disease, or strengthen health outcomes. Instead, they subsidize a regulatory scheme that predictably increases exemption rates and downstream public health risk. Once vaccination rates decline, the resulting costs, outbreak investigations, emergency responses, hospitalizations, and long-term complications, far exceed the administrative expenses acknowledged in the bill.

New Hampshire has long been recognized as a leader in protecting children from vaccine-preventable disease through thoughtful, balanced, and evidence-based policy. HB 1584-FN would move the state in the opposite direction, away from prevention, away from clarity, and away from policies that have safeguarded public health for decades.

For these reasons, on behalf of the Pro-Vaccine Legal Alliance, I respectfully urge the Committee to vote Inexpedient to Legislate on HB 1584-FN and to preserve New Hampshire's strong, science-based immunization protections.

Thank you for your time and consideration.

Respectfully submitted,



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