

Children's Healthcare Is a Legal Duty, Inc.

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Equal rights for children under the law



Image source: CDC

Tide turns against personal belief exemptions

2015 has been a year of historic victories for protecting children from infectious disease. In some U.S. states and even a nation governments have reduced or eliminated personal belief exemptions from immunizations of children.

Measles may be the most infectious virus on the planet and can be deadly. It is airborne and can infect an unvaccinated person two hours after an infected person has been in a room. Furthermore, the symptoms may not appear until several days after a person is infectious. In an era of global travel it is extremely difficult and costly to contain.

The catalyst for policy change this year was a measles outbreak, which began at Disneyland in Anaheim, California, and sickened 147 U.S. residents from December, 2014, through April, 2015. About 20% of them required hospitalization. It also spread to Mexico and Canada (see next article).

¹ Samantha Maiden, "Anti-vaccination parents face \$15,000 welfare hit under 'No Jab' reforms, *Sunday Telegraph*, Apr. 12, 2015.

Australia

Last year the World Health Organization (WHO) declared that Australia had achieved measles elimination, meaning that no local strain of measles was circulating in the country. However, measles is still introduced by foreign travelers. And as in the United States vaccination rates varied widely, with many cities far below 90% and the number of exmptors climbing.

On April 13 Scott Morrison, Minister for Social Services, announced that federal welfare and child-care subsidies would be discontinued for conscientious objectors who refused to vaccinate their children on the recommended schedule. Families may lose up to \$15,000 a year in benefits by refusing to immunize a child.¹

Medical exemptions would still be allowed, and Morrison also said there was one and only one church that would still have a religious exemption for its members.

Morrison repeatedly refused to disclose which church it was. "I'm not about to advertise it for fear of it having a lot of new followers," he said.

The press, however, dug through agency documents and quickly found out that the entity getting this special privilege was the Christian Science church.²

When the church's public relations manager finally returned calls she said the church was actually "very neutral" about vaccination and never advised its followers to avoid them.³

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² Judith Ireland, "Vaccination-exempt church revealed as Christian Scientists," *Sydney Morning-Herald*, Apr. 15, 2015.
³ *Loc cit*.

Christian Science exemption revoked

By week's end Morrison had changed course and discontinued the exemption for Christian Scientists. His office reported that the government had "had discussions with the only religious organization with an approved vaccination exemption, the Church of Christ, Scientist and has formed the view that this exemption, in place since 1998, is no longer current or necessary. . . ."

"Having been informed the religion is not advising members to avoid vaccinating their children and following engagement with members, the government no longer sees that the exemption is current and the authorization for this exemption has been withdrawn," Morrison continued. "Having resolved this outstanding matter the government will not be receiving nor authorizing any further vaccination exemption applications from religious organisations."⁴

"The choice made by families not to immunize their children is not supported by public policy or medical research nor should such action be supported by taxpayers in the form of child care payments," said Prime Minister Tony Abbott in a joint statement with Morrison.⁵

A month later the country had a dramatic example of the costs of measles. A Queensland paramedic who did not know he had measles transported patients to four public hospitals and potentially infected 4500 people.⁶

Vermont makes history

This spring Vermont became the first state to repeal a personal belief exemption from immunizations. The religious exemption remains in place but the "philosophical" exemption was repealed.

Three years earlier a similar bill was defeated by vaccine opponents who virtually camped out at the capitol and testified in hearings that went on for hours.

Though neighboring Quebec then had a measles outbreak of more than 700 cases and pertussis cases were climbing in Vermont, Governor Peter Shumlin, a Democrat, publicly disagreed with his own Health Commissioner and opposed the bill. "I

do not believe it is the job of government to mandate what parents should do," Shumlin said.⁷

Representative Warren Kitzmiller, a polio survivor, initially supported the bill but after the anti-vaxxers lobbied him, he attributed his recovery from polio to a miracle and voted against the bill, which died in committee.

What was enacted instead was a requirement that belief exponents sign a form attesting that they had reviewed and understood Health Department educational materials on risks of vaccines and risks to the individual child and others of not vaccinating. The anti-vaxxers objected to that also, claiming it violated their First Amendment freedom of speech rights to force them to "understand" anything. The Department removed the word "understand" from its regulations.

Second try fails too

By 2013 Vermont had more than 800 confirmed cases of pertussis in the outbreak that began in 2011. Representative George Till, M.D., who had sponsored the bill to repeal philosophical exemptions, tried again. In 2013 he introduced a bill to require all children in schools and child care (except the medically fragile) to be vaccinated against pertussis. Shumlin opposed that bill also. It died without a hearing.

Belief exemptions continue to climb

By 2015 it was crystal clear that requiring the anti-vaxxers to review educational material was not working. In the 2011-2012 school year before the education requirement was enacted, 5.4% of Vermont children entered kindergarten with a philosophical exemption from immunizations. The percentage climbed to 5.9% this 2014-2015 school year. The percentage with a religious exemption is about .2%.

Dr. Till's third try

In 2015 Till and other vaccine proponents tried again with H.98, which included repeal of the philosophical exemption from immunizations.

Vaccine opponents brought in medical doctors to testify against repeal from as far away as Washington State.

⁴Hon. Scott Morrison, media release, April 19, 2015.

⁵Naomi Ng, "No jab, no pay," *CNN*, Apr. 13, 2015.

⁶Rae Wilson, "Up to 4500 people at risk in Queensland measles outbreak," *The Morning Bulletin*, May 20, 2015.

⁷"Immunization debate hits fevered pitch," *Burlington Free Press*, March 29, 2012.

Civic engagement a New England tradition

Three committees held hearings on the amended bill. New England has a long and strong tradition of participatory democracy. Legislative leaders said they wanted Vermonters to have ample time to express their views. Several days of hearings were held; some were four hours long. Vaccine opponents paid for Robert Kennedy, Jr., to come testify against the bill. His inflammatory vitriol made headlines; he claimed vaccines were poisoning children and the Centers for Disease Control and Prevention were “a sock puppet” for “Big Pharma.” The week before he had had to apologize for claiming vaccines had caused “a holocaust” to children.⁸

Stephanie Winters, the lobbyist for the Vermont Medical Society and the state chapter of the American Academy of Pediatrics, did a magnificent job of countering the opponents. She made sure Vermont doctors were at every hearing in person to defend vaccines. She also submitted 147 pages of written testimony in support of the bill.

She advised me as president of a national organization not to write so as to keep their side of the debate “local.” But CHILD’s handful of Vermont members did write their legislators and got others to write.

Governor Shumlin signed the bill though he expressed regret that the education requirement was not enough to bring down exemption rates.

California first to repeal religious exemption from immunizations

Vermont made history as the first state to repeal a personal belief exemption from immunizations. A month later California made history as the first state to repeal a religious exemption from immunizations and only the third state to require immunizations of all children, except the medically fragile, in schools and childcare.

In 2012 California had enacted a law requiring personal belief objectors to go to a healthcare provider and listen to risk-benefit information about vaccines. Freshman legislator Assemblyman

Richard Pan, D-Sacramento, the only physician in the legislature, was the prime sponsor of the bill.

Governor Brown signed the bill but nevertheless directed his Health Department to allow religious objectors to have an exemption without listening to information. Professor Dorit Reiss at UC Hastings College of Law charged that Brown exceeded his authority in violating the law as passed by the legislature.⁹

Financial costs and risks very high

The bill did reduce the percentage of schoolchildren with belief exemptions, but in December, 2014, the Disneyland measles outbreak began.

California Public Health contacted thousands of persons who might have been exposed but the index patient who started it all was never found. Immune-compromised children and adults had to be quarantined at home for weeks for their own protection. After an infant with measles came to a Santa Monica daycare facility all the children were sent home. At one hospital just one infected person exposed 14 pregnant women and 98 infants (including 44 in the neonatal intensive care unit) to measles.

Researchers found that the outbreak spread to areas of low vaccine compliance, some with fewer than 50% of schoolchildren vaccinated.¹⁰

The costs to Public Health have been estimated to be \$11,933-\$29,833 per measles case.¹¹ That does not include costs to hospitals and clinics, schools, or income of quarantined persons.

In 2015, now a freshman Senator, Pan was the prime sponsor of SB277 to repeal religious and other personal belief exemptions from immunizations. Senator Ben Allen, D-Santa Monica, an attorney whose father is crippled by polio, was a hard-working cosponsor.

The bill was scheduled for public hearings in five committees. Multiple hearings are sometimes a strategy for killing a bill but they worked to our advantage as shrill opponents became tedious and more Senators voted for the bill in each committee.

⁸ Robert Kennedy, Jr., Testimony opposing H.98 before Vermont House Health Committee, May 5, 2015, and Patrick McGreevy, “Robert Kennedy Jr. apologizes for likening vaccine effects to a holocaust,” *Los Angeles Times*, Apr. 13, 2015.

⁹Dorit Reiss, UC Hastings Professor of Law, “Viewpoint: Signing statement on vaccines is not law,” *The Recorder*, Oct. 9, 2013.

¹⁰Maimuna Majumder et al., “Substandard vaccination compliance and the 2015 measles outbreak,” 169 *JAMA Pediatrics* (May 2015):494-5.

¹¹Ismael Ortega Sanchez et al., “The economic burden of sixteen measles outbreaks on public health departments in 2011,” 32 *Vaccine* (March 2014):1311-1317.

Education a constitutional right

A significant objection raised by the ACLU was that education is guaranteed in the California constitution as a fundamental right. Opponents argued that if unvaccinated children were not allowed in school, the state would be in violation of its own constitution.

Pan and Allen amended the bill to exempt students in homeschool or independent study programs from the immunization requirement.

CHILD wrote letters tailored to each committee's subject matter and many of our California members contacted their legislators in support of the bill. Some of our points are below.

Nearly 100% measles vaccination rate needed

Though the measles vaccine is highly effective, "herd immunity is not easy to achieve because vaccine exponents are not randomly distributed throughout the population and people are mobile. The American Medical Association suggests "that nearly 100% of a nonimmune population would require vaccination with a vaccine having an efficacy of about 95% to assure elimination of [measles] in this country."¹²

No 1st amendment right to refuse immunizations

Parents do not have a constitutional right to deprive their children of the great benefit of immunizations, and California should not give them a statutory right to do so. Courts have consistently held that mandatory immunizations without exception for personal beliefs are an appropriate exercise of the state's power.¹³

From 1988 through 1990 California had 16,400 measles cases including 75 deaths. Many deaths were of babies too young to be vaccinated; several deaths were of children with a personal belief exemption. Direct costs of containing the outbreak were estimated to be \$30.9 million.¹⁴

Several amendments were added to the bill to keep it moving through the process. To counter opponents' charges that vaccine policy is motivated

by the greed of "Big Pharma," an amendment prohibited new vaccines from being mandated without legislative approval. Another amendment grandfathered in children who already had a belief exemption until they transferred schools or entered first or seventh grade.

Is religious exemption a solution?

We were always concerned that legislators would want to keep a religious exemption and repeal only the exemption for other personal beliefs. Several states with both exemptions as separate categories have far more "conscientious" or "philosophical" objectors than religious objectors. Some scholars have recommended making the conscience exemptions harder to get but not touching the religious exemptions.



Dr. Pan testifies for SB277

CHILD argued strongly against that position. Parents who want to avoid vaccines because of perceived dangers will greatly resent being denied an exemption if others have a religious exemption.

Furthermore, it is difficult to enact a religious exemption that will not be open to judicial challenge. Many courts have ruled unconstitutional religious exemptions that are limited to members of certain churches or adherents of certain religious beliefs.¹⁵ And the state's authority to question

¹²AMA Council on Scientific Affairs, "Religious exemptions from immunizations," Report: B, 1987.

¹³*Jacobson v. Massachusetts*, 197 U.S. 11 (1905); *Board of Education of Mountain Lakes v. Maas*, 567 N.J. Super. Ct. 245 (1959); *Cude v. State*, 377 S.W.2d 816 (Ark. 1964); *City of New Braunfels v. Waldschmidt*, 207 S.W.2d 967 (Tex. 1918); *Boone v. Boozman*, 217 F.Supp. 2d 938 (Ark. 2002); *et al.*

¹⁴LG Dales et al., "Measles epidemic from failure to immunize," 159 *Western Journal of Medicine* (1993):455-464.

¹⁵*E.g. Dalli v. Board of Education*, 267 N.E.2d 219 (Mass. 1971); *Maier v. Besser*, 341 N.Y.S. 2d 411 (N.Y. 1972); *Davis v. State*, 451 A.2d 107 (Md. 1982); *Brown v. City of Corning School Dist.*, 429 N.Y.S. 2d 355 (1980); *McCarthy v. Boozman*, 217 F.Supp.2d 938 (Ark. 2002).

applicants about the sincerity or consistency of their religious beliefs or practices is severely limited.¹⁶

Fortunately, no churches testified against SB277 and the press could not find any denominations in California who admitted to having religious beliefs against medical care.

“Pitchforks and torches” at capitol

More than a thousand people came to testify at some of the five-hour hearings with opponents greatly outnumbering proponents. When you call Senator Pan’s office, a message directs you to press 1 if you are calling about SB277 and press 2 for everything else. Pan received death threats and was given state protection. Online he was Photoshopped with a Nazi soldier’s uniform and a mustache like Hitler’s. One group is collecting signatures to force a vote to recall Senator Pan.

Lobbyists for the bill were stalked and harassed. The California Medical Association gave the police a video in which a California Chiropractic Association official suggested stalking them.¹⁷

Andrew Wakefield, who has lost his UK medical license, told chiropractic students that they needed to be the “pitchforks and torches” in Sacramento against the bill. “Your rights are being ripped from you. Parents are no longer going to be in charge of their own children,” he charged.¹⁸

Leukemia patient could not go to school

Among proponent witnesses was 7-year-old Rhett Krawitt who had more than three years of chemotherapy for leukemia and could not be vaccinated because of his weakened immune system. He lives in Marin County where only 84% of schoolchildren are current on vaccinations. He had to stay at home for three weeks during the measles outbreak for his own protection.

He received much media attention with ABC calling him “adorable,” but the vaccine opponents tried to discredit him by posting online that he was the grandchild of a GlaxoSmithKline consultant.

Fatal complication for California toddler

Several opponents argued that curtailing their “rights” was not warranted because the measles outbreak was over and done with and there had been no deaths.

In response a Palo Alto doctor’s letter about one of her patients was read at a hearing. A baby boy contracted measles when he was five months old, too young to be vaccinated. He seemed to recover but two years later he was diagnosed with a rare, but fatal complication of measles and will soon die.

Other proponents pointed out that the only reason the measles outbreak was over was the difficult, expensive work of a superior public health infrastructure.

Some opponents charged that vaccinations themselves spread disease. One claimed that a vaccinated child can infect others with measles for 28 days after the child receives the measles vaccine. This is false.¹⁹

Despite the intense opposition SB277 was passed by large margins and Governor Brown signed it before I could finish composing CHILD’s letter urging him to do just that.

Final thoughts

Australia’s approach is a high financial incentive to vaccinate a child rather than compelling vaccination per se. That might be a good tactic in the United States. We would like to see, for example, American insurance carriers charging higher premiums for health insurance if parents do not vaccinate their children.

Drawbacks of prohibiting benefits

Australia’s policy is not without controversy. Some are posting online that the government is punishing the poor while letting the rich avoid vaccination. Some say they will never put “poisons” into their children even though they need the subsidies. They also point out that another condi-

¹⁶ In *LePage v. Wyoming*, 18 P.3d 1177 (Wy. 2001) the Wyoming Supreme Court ruled that the state had no right to question the sincerity of the religious beliefs of a parent applying for an exemption from immunizations.

¹⁷Jeremy White, “‘Stalking’ of pro-vaccine lobbyists prompts warning from doctors’ group,” *Sacramento Bee*, May 19, 2015.

¹⁸ Erin Allday, “Anti-vaccine leader tells parents to fight immunization bill,” *SFGate*, Apr. 25, 2015.

¹⁹Vaccine expert Dr. Paul Offit says the measles vaccine cannot effectively spread the disease to others because it is an attenuated virus vaccine.

tion of the subsidy is an annual medical examination and without the subsidy, children may not be seen each year by a physician.

Most worrisome is that some vaccine opponents are planning to set up childcare facilities at discount rates specifically for the unvaccinated children.²⁰

Grandstanding frowned upon

My husband got his Ph.D. from the University of Vermont, and we're very fond of the state. Vermonters are fiercely independent. They value citizen participation in all levels of government and expect to be able to interact with their legislators face-to-face. In 2012 those traditions led to the defeat of the bill.

Vermonters also, however, have the stereotypical New England reserve. They don't like extravagance or grandstanding. Their state bird, after all, is the plain brown hermit thrush. The anti-vaxxers may have hurt their cause this year by bringing in outside witnesses and the celebrity Robert Kennedy, Jr., though he signed many autographs and got a standing ovation in the hearing room.

California joins Mississippi & West Virginia

As mentioned earlier, California is the first state to repeal a religious exemption from immunizations. The other states with no belief exemptions from immunizations are West Virginia and Mississippi. West Virginia never had a belief exemption and Mississippi's was overturned by its state Supreme Court.²¹ We enjoyed telling California to follow the good example of Mississippi, which has the nation's highest percentage of fully immunized kindergarteners at 99.7% and has not had a measles case since 1992.

Health Departments in West Virginia and Mississippi have worked hard to defeat many bills granting belief exemptions. One Mississippi exemption promoter blasted her state as extorted by drug companies because of its ignorance. The state's vaccine policy is just another example of its "bring[ing] up the rear in everything,"²² she charged. But now these impoverished rural states are joined by the Golden State with 11% of the U.S. population and often a trendsetter for legislation.

²⁰ Melissa Davey, "Vaccine-free childcare 'potentially catastrophic', says industry group," *The Guardian*, May 21, 2015.

Anti-vaxxers in California have not given up. They hope to get belief exemptions restored by ballot referendum. They have until September 28 to gather 365,000 signatures to qualify their measure to be put on the ballot.

Measles travels from Disneyland to Quebec eugenics sect

The Disneyland measles outbreak ended with 147 U.S. measles cases in seven states but also spawned cases in Mexico and Canada.

Quebec had 159 cases of measles because of a family who visited Disneyland. 157 of the cases were among twenty families in an anti-vaccine group called La Mission de l'Esprit Saint or Message of the Holy Spirit.



Photo by François Roy, La Presse

The group's webpage calls itself "a peaceful and evolutionary movement, independent of all sects and religions, which is working to make available and spread the message and revelations brought to earth by EUGENE RICHER DIT ARROW, especially regarding regeneration of humanity or the birth of children brought to good by means of the EUGENICS, spiritual and voluntary."

Eugenics to transform the planet

The Message aims to selectively breed better children and transform the planet over time. Getting an infectious disease confers stronger immunity

²¹*Brown v. Stone*, 378 So.2d 218, 221 (Miss. 1979).

²²Allen Blinder, "Mississippi, a vaccination leader, stands by its strict rules," *New York Times*, Feb. 4, 2015.

than vaccination and helps build a superior race, the sect claims. Their founding prophet Eugene Richer Dit LaFleche preached living by “natural laws” and called vaccines poison.

Families tend to be large. The twenty families stricken with measles each had between seven and ten children.

Protected by long-dead prophet

Former members said the huge measles outbreak would not change the group’s beliefs. Members feel protected by the spirit of Richer, who died in 1925. Side effects and misfortunes are blamed on a member’s lack of sincerity or of loyalty to the sect beliefs, exmembers said.

LaFleche proclaimed he was Jehova, Jesus Christ, and the Holy Spirit. He asked followers to give him all their money. His successors have twice predicted the end of the world and gotten members to turn over all their assets to them.

Most of the children in the Quebec sect have some of the prophet’s name included in their names.

One of their schools was closed down in 2011 for operating without a permit so then many families began homeschooling their children.

Quebec does not require immunizations

The Holy Spirit sect has had other outbreaks of vaccine-preventable disease in the past. But Quebec does not require immunization of schoolchildren. In fact, only three provinces—New Brunswick, Ontario, and Manitoba—do require immunizations for schoolchildren and they allow personal belief exceptions.

Sources include CBC, March 12-13, 2015, and coolopolis.blogspot.com, March 12, 2015.

Where was the church in 2015?

Christian Science church founder Mary Baker Eddy said vaccinations were evil and worthless. When a reporter asked her if she rejected the germ theory, she replied, “Entirely. If I harbored that

idea about a disease, I should think myself in danger of catching it.”²³

To this day the church reiterates Eddy’s claim that all disease is caused by mental and moral factors. Contagious disease is caused by popular belief not by bacteria or viruses.²⁴

Historically, the Christian Science church has lobbied for religious exemptions from immunizations. They used to tell their members it was important for them to claim the exemptions.

The 1988 edition of their handbook for their lobbyists states:

“We actively seek to have children of adherents and members excused from vaccination and inoculation. . . . In Christian Science we have a positive, systematic, effectual method of maintaining health—through prayer. When a Christian Science child is exempted from vaccination, this does not mean he is lacking in protection. Our way of worship, represented in the religious practice of those responsible for him, provides this protection. While the non-Scientist may not subscribe to this means of protection as effectual, it is not reasonable for governmental agencies to arbitrarily discriminate in favor of one method of maintaining health against another. . . . Medical services forced upon Christian Scientists, especially in the case of children, interfere with the responsibility of the parents to determine and choose the method of treatment. Also they conflict with the religious teachings of the children given in the home and the Sunday School and tend to indoctrinate the children with a concept of health which is contrary to their religious teaching.”²⁵

In 2000 when we worked in Iowa for a bill to repeal the religious exemption, the Christian Science lobbyist contacted many legislators to urge votes against it and the bill was killed.

In 1972 a Christian Science school in Connecticut had one of the largest North American polio outbreaks in the post-vaccine era with eleven children suffering varying degrees of paralysis.

From 1985 to 1994 there were four measles outbreaks (each with more than fifty cases) at Christian Science schools and camps. Three young persons died.

²³Mary Baker Eddy, *First Church of Christ, Scientist, and Miscellany* (Boston: Christian Science Publishing Society): 344.

²⁴Eddy, *op cit.*:344-5.

²⁵*Handbook of Policies and Procedures for Christian Science Committees on Publication*, 1988 edition, “Legislative” section: 12-13 (presumably published by the First Church of Christ, Scientist in Boston).

Christian Science children died of diphtheria in 1982 and 1994.²⁶

Church claims superior protection from infectious disease

When contagious disease outbreaks are in the news, the church regularly responds with articles on “How to stay safe from contagious disease,” “How to prevent illness,” “Safe from contagion,” etc., promoting their spiritual method as the true, reliable protection.²⁷

This year was no exception. The church’s periodicals have had many articles promoting their spiritual protection from contagious disease. They claim that contagious disease is caused by “fear” and “suggestion” and that Christian Science is “trustworthy” protection from “mental contagion.”²⁸

No defense, no advice this year

What was different this year is that the church made no effort to defend its statutory exemptions in statehouses. When asked by the press, church publicists said the church was “neutral” about vaccinations, did not oppose bills to repeal religious exemptions, and never advised its members one way or another about vaccinations.²⁹

To our sense this is a dishonest position and cognitive dissonance. The church *is* promoting avoidance of vaccines by claiming they have no value and that Christian Science has the trustworthy, infallible protection against contagious disease. But if the church plans to stop lobbying for religious exemptions from child health laws, we certainly welcome that.

Audrey Schiebler: In memoriam

Prominent child advocate and long-time CHILD member Audrey Schiebler of Amelia Island, Florida, died in June. She asked that memorial gifts be made to CHILD. At this writing we have received 90 donations in her honor, many with lovely tributes to her character.



Audrey and daughter Kristen

Audrey led work to establish Florida’s guardian ad litem program, the nation’s first GAL program with state funding. She was the first director of the Eighth Judicial Circuit GAL program.

In 1990 Audrey led the National Committee for the Prevention of Child Abuse to adopt a position calling for repeal of religious exemptions in child abuse laws. This policy statement has been very helpful to CHILD, and the NCPA’s successor has reaffirmed it.

Audrey worked with Paul Newman and General Norman Schwarzkopf to establish the Boggy Creek Camp for children with chronic illnesses.

Audrey served on 39 boards, mostly of organizations focused on children’s issues. For many years she was on staff of the University of Florida’s Institute for Child Health Policy. She and her husband of 61 years, pediatrician Dr. Gerold Schiebler, received many awards for their work for children, including the Chiles Advocacy Award and Child Advocates of the Year Award in 2012.

She is survived by her husband, six children, 17 grandchildren, and a great-grandson.

Even her lengthy obituary at www.legacy.com captures only a fraction of the achievements and kindness of this gentle woman who, as one friend wrote, “will live in our hearts forever.”

²⁶ See http://childrenshealthcare.org/?page_id=200.

²⁷ See *Christian Science Sentinels*, Oct. 26, 1998; Dec. 13, 1999; Nov. 14, 2005.

²⁸ See *Christian Science Sentinels*, June 22, 2015; June 1, 2015; May 1, 2015.

²⁹ Cynthia Barnett, Letter to editor, *Raleigh News and Observer*, Apr. 3, 2015.