

**STATEMENT OF BASIS AND PURPOSE
AND SPECIFIC STATUTORY AUTHORITY FOR**
Proposed Amendments to Rules and Regulations Pertaining to
The Infant Immunization Program and
The Immunization of Students Attending School
Amendments to 6 CCR 1009-2

February 20, 2013

(Adopted by the Colorado Board of Health on February 20, 2013)

Basis and Purpose.

There has been confusion regarding the “recommended” immunization schedule versus the “required” school immunization schedule. The recommended immunization schedule is approved by the Advisory Committee on Immunization Practices (ACIP), the American Academy of Pediatrics (AAP), the American Academy of Family Physicians (AAFP) and the Centers for Disease Prevention and Control (CDC) and provides guidance to health care providers administering vaccines to children. The recommended vaccine schedule is a “best-practice” schedule. The Colorado “required” immunization schedule determines which immunizations must be administered (or exempted) for school and child care attendance. Some of the school immunizations follow the ACIP/AAP recommended schedule and some do not. In order to eliminate confusion for clinicians, schools, and child cares, and to provide a best-practice immunization schedule for required immunizations in schools, the Colorado Immunization Section attempts to align the Colorado “required” immunization schedule with the ACIP “recommended” schedule so that children will be optimally immunized against vaccine preventable diseases and the confusion about the two schedules will be eliminated. It should be noted that no new vaccines are being proposed.

Immunization schedules can be confusing. Language has been included to add clarity to the Table 1, specific footnotes (o, b, c, d, g) and Table 2.

1. In Table 1, update the dates of implementation to the 2012-14 School Year
2. In Table 1, update the Hib column by including the possible number of 4 doses
3. *In Table 1, update the Pneumococcal dosing to include 1 dose*
4. In Table 1, remove the reference to footnote “o” in the Varicella row as it does not apply due to changes in the rules last year. In the Meningococcal row, remove the reference to the “p” footnote and add the reference to the “o” footnote.
5. Clarify and add in footnote “b” (DTaP) to reflect recommendations by ACIP:
“If DTaP #4 is given with at least a 4 month interval after DTaP #3, it does not need to be repeated.
6. Clarify and updated footnote “c” (Tdap) to reflect recommendations by ACIP:
“Any student 7 years of age or older at school entry in Colorado who has not completed a full series of DTaP will be certified after a single dose of Tdap if it is given 6 months or more after the last dose of DTaP. *Appropriately spaced includes at least 4 weeks between dose 1 and 2 and at least 6 months between dose 2 and 3. A student 7 years of age or older who receives single dose of Tdap to complete this tetanus/diphtheria requirement will have also met the Tdap requirement for 6th through 12th grades.*

7. Clarify and update footnote “d” (Tdap) to reflect recommendations by ACIP:
One dose of Tdap is required for students 11 to 12 years of age at 6th grade entry, regardless of the interval since the last dose of DTaP, DT or Td. *If a student has received a Tdap between the ages of 7 – 10 years, as noted in footnote “c,” they have met the Tdap requirement for 6th through 12th grades.*
8. Clarify and add in footnote “g” (MMR)
“Documentation of 1 dose of rubella vaccine and 2 doses of measles and 2 doses of mumps vaccines on or after the first birthday meets the school requirement.”
9. Table 2 - Remove references to Tdap implementation in the table as all grades (6th through 12th) should have met this requirement initially instituted in the 2007-08 school year
10. Include in footnote “f” *clarify the intervals for both the 4 dose and the 3 dose series of polio: “A fourth dose is not required if the 3rd dose was administered at age 4 years or older and at least 6 months after the 2nd dose.”*

(Note- Those items italicized are changes made since the BOH Request for Hearing)

Specific Statutory Authority. These rules are promulgated pursuant to the following statutes:

Colorado Revised Statutes: School Entry Immunization, Title 25 (Health), Article 4 (Disease Control), Part 9 (School Entry Immunization)

Major Factual and Policy Issues Encountered.

The consideration of the proposed rule changes are consistent with the terms and language in statute and with the recommendations issued by the Advisory Committee on Immunization Practices and the Center for Disease Control and Prevention. No factual or policy issues were encountered. Issues were discussed in a BOH workgroup meeting (members included school nurses, child care nurse consultants, immunization coalition representatives, physicians involved in children’s health and immunization issues and public health agency representatives).

Alternative Rules Considered and Why Rejected.

Alternative rules were not considered in the discussions.