

REGULATORY ANALYSIS
for
Proposed Amendments to Rules pertaining to
The Infant Immunization Program and
The Immunization of Students Attending School
6 CCR 1009-2

February 20, 2013

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

- 1. A description of the classes of persons who will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule.**

The classes of people affected by the rule changes are children and adolescents immunized against vaccine preventable diseases as required for school attendance, physicians and clinicians who administer vaccines and school nurses and support staff that ensure that children are appropriately vaccinated for attendance at Colorado schools. It is not expected that there will be an increase in costs associated with aligning the required Colorado school immunization schedule with the ‘best practices’ recommended immunization schedule established by the Advisory Committee on Immunization Practices (ACIP). The ACIP is the standard immunization schedule and is the guide for health care providers who administer vaccines for children and adolescents. The other changes proposed by the Colorado Immunization Program are for the purposes of clarification and there will not be a burden of increased costs for any class of people.

- 2. To the extent practicable, a description of the probable quantitative and qualitative impact of the proposed rule, economic or otherwise, upon affected classes of persons.**

Changing and clarifying the rules pertaining to children/adolescent immunizations in childcares and schools should have no economic impact upon the affected classes of persons. Aligning the required school immunization schedule with the ACIP recommended schedule should optimally protect students from vaccine preventable disease and lessen the confusion about the two immunization schedules for health care providers and schools.

- 3. The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.**

It is not expected that there will be additional costs to agencies affected as a result of these proposed changes to the rules, nor should there be changes in state revenues.

4. A comparison of the probable costs and benefits of the proposed rule to the probable costs and benefits of inaction.

As mentioned in the Statement of Basis & Purpose, the two different schedules, “required” and “recommended,” have created confusion for some of our immunization partners. Our purpose in making these proposals is to better protect children/adolescents from vaccine preventable diseases and enhance our collaborative efforts with our partners by providing clarity in the rules.

5. A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.

Changing and updating the immunization rules to provide clarity, to better protect children/adolescents against disease and to improve relationships with our immunization partners is the most efficient and practical way to achieve our purpose.

6. A description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule.

There were no seriously considered alternative methods for achieving the purpose of the rule changes.

7. To the extent practicable, a quantification of the data used in the analysis; the analysis must take into account both short-term and long-term consequences.

The proposed changes to the rules will provide clarity and support the immunization standards set by the Advisory Committee on Immunization Practices. There should be no short-term or long-term consequences.