



## The Colorado Health Foundation™

March 30, 2015

Colorado Board of Health, A5 - 0100  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530

Re: Changes to the frequency and process of submitting non-medical immunization exemptions

Dear Colorado Board of Health:

The Colorado Health Foundation supports the Colorado Department of Public Health and Environment's (CDPHE) proposed changes to the frequency and process of submitting non-medical immunization exemption forms. The Colorado Health Foundation is a non-profit organization guided by a vision of making Colorado the healthiest state in the nation together with partners from the public and private sectors. We engage in grantmaking, public policy, evaluation, private sector initiatives and communications outreach to ensure a future state where Colorado's communities promote health and its health care systems deliver excellent, affordable care to Coloradans who both have and desire good health.

Colorado scores poorly for percentage of preschool-age children who have received all recommended doses of six key vaccines, ranking 30<sup>th</sup> among states. The poor performance of Colorado in this metric is made more alarming when examining the recent downward trend. [The 2015 Colorado Health Report Card shows that only 69.2 percent of these children received the recommended vaccines, down from 75.8 percent in 2011 and 79.4 percent in 2008.](#) This gap negatively impacts a goal of The Colorado Health Foundation: Reduce the number of days Coloradans are kept from doing usual activities due to physical or mental illness.

Under the current Colorado BOH Rule 6 CCR 1009-2, parents are required to submit a record showing receipt of all required vaccines or submit an immunization exemption form for religious, medical or personal belief reasons when enrolling a child in a school or licensed child care center. Exemption forms only need to be provided once, unless the student changes schools or child care facilities. This makes it far easier for parents to elect a personal belief exemption than to provide immunization records on multiple occasions. As a result, some parents may choose to submit an exemption form for the purpose of convenience. This is troubling considering Colorado has experienced a pertussis epidemic in recent years and the return of measles. With resurgences of vaccine-preventable illnesses such as these, parents may need to more frequently evaluate their choices.

The proposed rule changes would require parents claiming non-medical immunization exemption for children attending licensed child care facilities to submit a form following each recommended immunization, as established by the Advisory Committee on Immunization Practices (ACIP). This provision gives parents the ability to reaffirm their choices with consideration for the current circumstances and best-available information.

The proposed rules also include other important steps toward creating healthier schools, healthier child care facilities, and healthier communities. As directed by HB 1288, CDPHE would develop an evidence-based online learning module to be administered to parents claiming non-medical immunization exemption to provide them with the best available information to inform their decisions. Other provisions will help to ensure schools and child care facilities provide accurate, up-to-date information on immunization rates among their student populations. These will empower parents to use this data to make an informed decision about where to send their children. Improving data accuracy will also enable schools and child care facilities to better communicate with parents and CDPHE in the event of an outbreak.

CDPHE's proposed changes continue to respect the rights of parents to make decisions for their families and respect the rights of parents to know the level of risk of the environments in which they put their children. We strongly urge the Colorado Board of Health to adopt these rules as they have been proposed to better protect Colorado children and communities. Please do not hesitate to contact Dustin Moyer, policy officer at the Colorado Health Foundation, at [dmoyer@coloradohealth.org](mailto:dmoyer@coloradohealth.org) or 303.953.3600 with any questions regarding our position on these important issues.

Thank you for the opportunity to provide input on this development for the State of Colorado.

Sincerely,

A handwritten signature in black ink that reads "Rahn K Porter". The signature is written in a cursive, flowing style.

Rahn Porter  
Interim CEO and President  
CFO