



The Colorado
Health Foundation™

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June 5, 2017

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

RE: Comments on Proposed Rule 6 CCR 1009-2 Infant Immunization Program and Immunization of Students Attending School

Members of the Colorado Board of Health,

The Colorado Health Foundation supports proposed rule 6 CCR 1009-2 regarding the Infant Immunization Program and Immunization of Students Attending School. Thank you for the opportunity to comment on this proposal.

The Foundation is singularly focused on helping Coloradans live their healthiest lives by advancing opportunities to pursue good health and achieve health equity.

We applaud the staff at the Colorado Department of Public Health and Environment (CDPHE) for their work in drafting this proposed rule. In this proposal, we believe CDPHE staff adheres to the intent of HB 16-1245 in regards to ski-school definitions and what is required of them. Also, by allowing immunization records to account for a positive titer in lieu of immunization for certain required vaccines and allowing delegated physician's assistants to sign for 'official school immunization records,' CDPHE is demonstrating commitment to enabling flexibility for Coloradans while still upholding vital protections for the public's health. The proposed rule continues to advance science-based immunization policy in a manner which respects consumers' choices and values.

Vaccination rates in Colorado remain well below the national average. This leaves Coloradans unnecessarily vulnerable to preventable diseases and presents a substantial risk to the public's health. We remain firmly committed to advancing science-based preventive measures like immunizations and whole-heartedly resist efforts to erode vital protections that help Coloradans to be and stay healthy.

We would like to thank the Board of Health for the opportunity to advocate for strengthening immunization policy in the State of Colorado and for the opportunity to comment on this proposal. Please do not hesitate to contact Dustin Moyer, public policy officer at the Colorado Health Foundation, at dmoyer@coloradohealth.org or (303) 953-3650 with any questions regarding our position on these important issues.

Sincerely,

Kyle Legleiter
Senior Director of Policy
The Colorado Health Foundation

