



Frequently Asked Questions: Immunization Exemption Policy in Colorado

With the recent passage of California's Senate Bill 277, which removed the state's personal and religious exemptions from school-required vaccines, many Coloradans are wondering what's being done to address nonmedical exemptions in our state.

Following are the Colorado Children's Immunization Coalition's (CCIC) responses to commonly asked questions about immunization exemption policy in Colorado.

About CCIC

The Colorado Children's Immunization Coalition (CCIC), is dedicated to keeping Colorado kids healthy by building awareness for vaccines, educating health care providers, and advocating for policies that protect children with the goal of increasing childhood vaccination rates. As Colorado's only statewide independent 501(c)(3) committed to children's immunization, CCIC elevates the essential role vaccines play in promoting health for all of Colorado. *CCIC does all this without accepting funding from vaccine manufacturers or distributors.*

What is CCIC's position on Personal Belief Exemptions?

Evidence shows that exemptions result in higher risk of vaccine preventable disease to both the children who take the exemption and to others in the community; therefore we support meaningful exemptions after consultation with a health care provider.

What types of vaccine exemptions are allowed under Colorado law?

Under the current Colorado Board of Health (BOH) Rule 6 CCR 1009-2, in order to attend a school or child care center parents/students are required to submit a record showing receipt of all required vaccines or submit an immunization exemption form for personal belief, religious or medical reasons. A personal belief exemption (PBE) allows parents and guardians to opt out their infants and children from one or all immunizations required for childcare and school attendance based on a philosophical reason or belief.

Medical exemptions must be signed and dated by a physician; personal and religious exemptions must be signed and dated by a parent or guardian.

[Read more about Colorado school immunization requirements.](#)

How is Colorado doing when it comes to vaccinating its children?

According to the [latest available data](#)...

- Colorado ranks 45th among U.S. states for childhood immunizations, with 27.9% of children under-immunized at 36 months of age.
- In 2013, 538 Colorado children were hospitalized with vaccine-preventable diseases, resulting in \$29.2 million in hospital charges.
- In 2013, vaccination prevented nearly 31,000 cases of vaccine-preventable disease in Colorado children and over \$440 million in hospitalization charges.
- In 2013, 70.1% of children hospitalized with vaccine-preventable disease in Colorado were four years of age or younger.
- Measles Mumps Rubella (MMR) vaccine coverage among 19-35 month-old children was only 86 percent in Colorado in 2013, well below the 92-95% levels required to achieve herd immunity.
- More than 25% of all 7-month-old infants in Colorado are behind in DTaP (Diphtheria, Tetanus, and acellular Pertussis) and PCV (pneumococcal) vaccinations. Pertussis and Pneumococcal disease were the second and third most common reasons for hospitalization for vaccine-preventable diseases in young children in Colorado in 2013.
- Individual on-time vaccination completion rates vary dramatically in young Colorado children, ranging from 10% to 30% non-compliance in children 36 months of age or less for common vaccines, implying that barriers – whether voluntary or involuntary – exist.

What has Colorado done to better protect children through vaccination?

For several years, PBEs in Colorado has remained an important policy priority for CCIC. Despite evidence that vaccines are safe and effective, Colorado has among the highest rates of PBEs in the nation. Colorado has also seen a [resurgence of vaccine-preventable diseases](#), such as pertussis (whooping cough), varicella (chicken pox), and influenza (flu).

2013 Personal Belief Exemption Stakeholder Engagement Process

In response to the increase in vaccine-preventable diseases and use of PBEs, CCIC participated in and helped fund an [extensive stakeholder process](#), led by the Colorado Department of Public Health and Environment (CDPHE), which culminated in the release of a report with six recommendations (Table 1) to strengthen Colorado's personal belief exemption process.

The vast majority of stakeholders agree with the recommendations in the report, which include two categories of recommendations: 1) disclosure of public health benefits and risks to parents and 2) disclosure of immunization exemption data by licensed child care facilities and public schools.

- **The report did not recommend eliminating the religious exemption or personal belief exemption.**
- The recommendations proposed strengthening current policies while protect personal freedoms, such as requiring parents to take additional steps to educate themselves about the risks and benefits of vaccines before electing an exemption.

Table 1. Stakeholder PBE Recommendations, 2013

Stakeholder Support	Recommendation
FULL CONSENSUS	1) Colorado Department of Education (CDE) and/or Board of Education to hold school districts accountable for immunization policy. 2) CDPHE, CDE and Colorado Department of Human Services to establish joint policy on immunization data collection and sharing.
MAJORITY SUPPORT	3) Require education and/or counseling prior to exemption. 4) Publically available publication of immunization and exemption rates by schools and licensed child care centers.
HIGH LEVELS OF SUPPORT	5) Medical practitioner or health official signature for exemption. 6) Annual renewal of exemption.

Source: "Colorado's Personal Belief Exemption Policy for Immunizations: Stakeholder Engagement Process," prepared by the Keystone Group, October 2013.

House Bill 14-1288

The stakeholder recommendations led to grassroots parent advocacy, media attention and legislator interest in addressing PBEs in Colorado and, ultimately, the introduction of HB 14-1288 in the Colorado General Assembly in 2014. While HB 14-1288 was amended before being signed into law by Gov. Hickenlooper at a May 21, 2014 ceremony, CCIC and over 50 organizations garnered global media attention and bi-partisan support for the passage of the bill in both chambers of the Legislature.

The law, which took effect July 1, 2014, states:

- Licensed childcare centers and schools must publicly disclose, upon request, their immunization and exemption rates
- The Colorado Department of Public Health and Environment (CDPHE) is required to assist school districts in the analysis and interpretation of the immunization data collected
- CDPHE is also required to create an online education module on the benefits and risks of vaccines
- The Colorado Board of Health is directed to promulgate rules regarding the requirements related to the frequency of a submitting a personal belief exemption certificate
- A joint policy on immunization data collection and information sharing between the Colorado Department of Public Health and Environment and other state agencies must be established

2015 Board of Health Rule Changes

One of the key components of HB 1288 directs the Colorado Board of Health (BOH) to create rules about how often a parent or student must submit a nonmedical (personal belief or religious) exemption certificate from required immunizations.

On April 15, 2015, the Colorado Board of Health voted unanimously (6-0) to CDPHE's proposed changes to the frequency and process of submitting non-medical immunization exemptions for school or child care.

The following changes will begin in July of 2016:

- For pre-kindergarten children attending a licensed child care facility, non-medical immunization exemption forms will be submitted following each age immunizations are recommended on the schedule developed by the Advisory Committee on Immunization Practices (ACIP).
- For students attending kindergarten through 12th grade, non-medical immunization exemption forms will be submitted during annual enrollment/registration.
- Schools and licensed child care centers with children birth through 12th grade will be required to annually report aggregate immunization and exemption information to CDPHE via an online form by December 1 of each year.
- CDPHE will publish school and child care immunization rates annually.

No changes were made for medical exemptions or for colleges or universities.

The BOH changes respect the rights of parents to make decisions for their families *and* respect the right for parents to know the level of risk of the environments in which they put their children.

Additional Efforts

In addition to Colorado's legislative and Board of Health successes, CCIC and many of our partners are committed to improving children's immunization rates through systems-level changes.

In 2013, Colorado health partners from across the state convened to identify the top priorities for enhancing and improving the Colorado Immunization Information System (CIIS), Colorado's statewide immunization registry that makes it easy for healthcare providers to keep track of a child's immunization records and provide timely immunizations. Since then, CCIC and others successfully advocated for a \$1.3million increase in funding for the registry to address data enhancements. Also, the SB222 Vaccine Access Taskforce, convened as a result the passage of a law spearheaded by CCIC, released a number of recommendations on improving vaccine financing and delivery in Colorado. Many of those recommendations are in the process of being implemented, including evaluating several private sector solutions designed to remove or alleviate some of the most common barriers in vaccination service delivery.

How can I become a voice for Colorado kids?

There are many ways you can get involved and participate in the public policy arena. Organizations such as [CCIC](#), the [Colorado Children's Campaign](#), [Children's Hospital Colorado](#), [Healthier Colorado](#), and [Vaccinate for Healthy Schools](#), make it easy for parents and members of the community to speak up for children's health when important decisions are being made.

Where can I get more information?

For information about recent and ongoing immunization-related policy initiatives, visit the [CCIC website](#) and the [CDPHE Colorado Immunization Branch website](#).

For information about childhood vaccines, vaccine safety, and vaccine-preventable disease, visit www.ImmunizeforGood.com or www.VacunalosPorSuBien.com.

Keeping Colorado Kids Healthy!

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