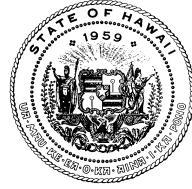


SB1138

LATE

TESTIMONY



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply, please refer to:
File:

**Senate Committee on Health
Senate Committee on Education**

S.B. 1138, Relating to Vaccination Guidelines

**Testimony of Loretta J. Fuddy, A.C.S.W., M.P.H.
Director of Health**

February 22, 2013, 1:15 p.m.

1 **Department's Position:** Strongly Support.

2 **Fiscal Implications:** Parents and guardians as well as immunization providers must bear the cost of
3 vaccinations provided at intervals no longer recommended according to standard medical practices yet
4 remain requirements for school attendance according to the Hawaii Administrative Rules, Title 11,
5 Chapter 157 (chapter 11-157), "Examination and Immunization."

6 **Purpose and Justification:** The purpose of this legislative proposal is to authorize the Director of
7 Health to adopt the immunization recommendations of the United States Department of Health and
8 Human Services, Advisory Committee on Immunization Practices (ACIP), including interim
9 recommendations, as they apply to a list of vaccines specified in chapter 11-157, as rules. The ACIP is a
10 national group of 15 medical and public health experts that develop recommendations on how to use
11 vaccines to control diseases in the United States. Fourteen of the members have expertise in
12 vaccinology, immunology, pediatrics, internal medicine, nursing, family medicine, virology, public
13 health, infectious diseases, and/or preventive medicine; one member is a consumer representative who
14 provides perspectives on the social and community aspects of vaccination. The ACIP holds three
15 meetings each year at the Centers for Disease Control and Prevention in Atlanta, Georgia. All meetings

1 are open to the public, are available online via webcast, and have scheduled public comment periods.
2 During the meetings, members present findings and discuss vaccine research and scientific data related
3 to vaccine effectiveness and safety, clinical trial results, and manufacturer's labeling or package insert
4 information. The ACIP recommendations stand as public health advice that will lead to a reduction in
5 the incidence of vaccine preventable diseases and an increase in the safe use of vaccines and related
6 biological products.

7 Since chapter 11-157 was last updated in 2001, many vaccines have been added to the national
8 recommended immunization schedules for children and adolescents and numerous updates to the
9 recommended timing and spacing of vaccinations were advised by the ACIP. These changes are not
10 reflected in the current State pediatric immunization requirements and preschool, compulsory school,
11 and post-secondary school entry and attendance requirements. This may result in children who received
12 vaccinations according to current ACIP recommended immunization schedules but are non-compliant
13 with chapter 11-157 because of updates to recommended immunization timing or intervals that have not
14 yet been incorporated into the rules. Currently, these students are placed on preschool, compulsory
15 school, or post-secondary school provisional entrance status until the additional dose is administered and
16 the outdated chapter 11-157 immunization requirement is met. Parents or guardians, as well as
17 immunization providers, must pay for these additional vaccines, vaccine administration fees, and office
18 visits in order for children affected by these discrepancies to attend school in Hawaii.

19 The inconsistency between current national vaccination standards and chapter 11-157
20 immunization requirements can create unnecessary and potentially costly barriers to school attendance
21 in Hawaii. The proposed legislative solution seeks to streamline the school immunization requirements
22 approval and adoption process to ensure the timely harmonization of Hawaii's immunization
23 requirements with current ACIP recommendations.

24 Thank you for the opportunity to testify on this measure.

February 21, 2013

The Honorable Senator Josh Green, Chair of Committee on Health
The Honorable Senator Rosalyn H. Baker, Vice Chair of Committee on Health
The Honorable Senator Jill N. Tokuda, Chair of Committee on Education
The Honorable Senator Michelle N. Kidani, Vice Chair of Committee on Education
& Members of the Senate Committees on Health and Education
State Capitol
Honolulu, Hawaii 96813

Dear Chairs Green and Tokuda, Vice Chairs Baker and Kidani and Members of the Committees:

IN SUPPORT OF SB 1138– RELATING TO VACCINE GUIDELINES
Joint Hearing: Friday, February 22, 2013, 1:15 pm in Room 229

As Private Citizens who work as Public Health Nurses (PHN) in the community and the public schools we are strongly in support of the Senate Bill 1138 and its companion measure, House Bill 907, “Relating to Vaccination Guidelines”. The bill will assure that children attending school in Hawaii will receive the recommended immunizations according to the current recognized standard medical practice established by the United States Department of Health and Human Services, Advisory Committee on Immunization Practices (ACIP).

Through our experiences as PHNs working with public schools in assuring their students meet requirements for school entry we found that several of the requirements specified in Hawaii Administrative Rules (HAR), “Examination and Immunization” (chapter 11-157) no longer follow the recommendations set by ACIP. Since the last update of the HAR for school entry in 2001, many vaccines have been included into the national recommend immunization schedules as well as numerous updates to the timing and spacing of vaccines by the ACIP. As a result children who received vaccinations according to the ACIP recommendations may not meet the current school entry requirements because the HAR does not reflect the updated changes. Families must seek out and pay for unnecessary vaccinations to meet school entry requirement.

We strongly feel that SB 1138 will help support families and health care providers together to ensure that Hawaii’s children are properly and fully vaccinated and are appealing your support of this bill. Thank you for the opportunity to testify on this important measure. .

Sincerely,
Jan Nishihira, RN
Maricel Abad, RN

Testimony of the American Academy of Pediatrics—Hawaii Chapter

RE: SB 1138; Relating to Vaccination Guidelines

Thank you to Senator Josh Green, MD, Chair of the Senate Committee on Health and to committee members for the opportunity to provide testimony on SB 1138 with regards to providing the Department of Health (DOH) with the authority to adopt vaccination guidelines without using the Chapter 91 HRS rules process. **The Hawaii Chapter of the American Academy of Pediatrics (HAAP) is in strong support of SB 1138.**

The public health benefits and life saving measures that the current vaccination schedule has provided our keiki is well understood. As science and the medical profession add new immunizations to our vaccination schedule, we are continuing to do an even better job at protecting Hawaii's children.

However, with the increasing number of vaccines available and with each vaccine having its own timing schedule for safe and appropriate administration, the complexity of the current vaccination schedule is significant, will continue to evolve and will increase in complexity.

Senate Bill 1138, put forward by the DOH, allows more expedient compliance with the federally recommended vaccination schedule put forth by the CDC Advisory Committee on Immunization Practices (ACIP).

The currently used Guide to Hawaii Pediatric Immunization Requirements (July, 2002) is obsolete and is not in alignment with the ACIP schedule. This leads to confusion in terminology and leads to errors in vaccine administration. This is demonstrated with the following example using the hepatitis B vaccine. The ACIP recommendation states, "the final dose in the hep B vaccine series should be administered no earlier than 24 weeks,". The Guide to Hawaii Pediatric Immunization Requirements states the 3rd (and final) dose should be given, "not before 6 months".

Six months and 24 weeks are not the same!

To illustrate this point, if a child received his/her first hepatitis B vaccine on January 1, 2013 and then following the CDC ACIP guidelines (of 24 weeks), the final dose can be given on or after June 18th, 2013. However, according to the Guide to Hawaii Pediatric Immunization Requirements the final dose cannot be given until on or after July 1, 2013. This is a difference of 12 days.

Infants can and do get the 3rd vaccine dose between the gap of "24 weeks" and "6 months". The providing physician is following the federally recommended ACIP guidelines which are considered standard medical practice, but this is not accepted in Hawaii based on the current Hawaii rules.

Thus, because of the outdated Hawaii rules, these infants need an extra injection which leads to increased cost and time for the family as well as increased cost and time to the health care system, not to mention added discomfort to the child.

Further, the Guide to Hawaii Pediatric Immunization Requirements is so outdated that they don't even mention many of the currently recommended vaccines, such as Tdap, Rotavirus vaccine, HPV, and the meningococcal vaccine.

Please pass SB 1138 so that a more timely update of the Hawaii Immunization Requirements for school entry can occur and they can remain in alignment with the CDC Advisory Committee on Immunization Practices. This is good medicine and prudent fiscal responsibility.

Respectfully submitted,

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