

Advisory Committee on Medical Exemptions
Virtual Meeting November 3, 2021

Attendees:

Jody Terranova M.D.; Chair Pediatrician UConn School of Medicine
Kathy Kudish; DVM Department of Public Health Immunization Program Manager
Ricky Baltimore; Chief Legal Council State Democrats
Susan Amster; Physician Assistant Willows Pediatrics
Keisha Hewitt; Nurse Consultant State of Connecticut Office of Early Childhood
John Frassinelli; State of Connecticut Department of Education Division of School Health
Lori Flaherty; Supervisor of Non-Public Schools West Hartford
Inci Yildirim M.D.; Yale School of Medicine Absent

Meeting was called to order at 6:00 PM by Dr. Terranova and introductions were made.

Review of Public Act 21-6 “An Act Concerning Immunizations” and the removal of the non-medical exemption except in certain situations that was passed by the state legislation on April 27, 2021.

Section 7 of Public Act 21-6 requires DPH to create and publish a medical exemption certificate and post to the DPH website by October 1, 2021 and that has been completed.

Section 8 of Public Act 21-6 requires DPH to establish an Advisory Committee on Medical Exemptions to meet at least twice per year and this is the first meeting of the committee.

Section 9 of Public Act 21-6 requires the Advisory Committee to provide a report to the Public Health Committee of the state legislature by January 1, 2022 an annually thereafter.

Dr. Terranova then reviewed the charge of the committee: to advise the Commissioner of Public Health on issues concerning exemptions that result from a physician, physician assistant, or APRN but not be responsible for confirming or denying the exemption of a specific individual.

In order to carry out its duties the committee shall have access to the state childhood registry CT WIZ to:

- 1: Evaluate the process DPH uses in collecting data concerning medical exemptions and whether DPH should have any oversight over such exemptions.
- 2: Examine if enrollment of an unvaccinated child should be conditioned upon a child meeting certain criteria.
- 3: Calculate the ratio of school nurses to students in each public and non-public school and funding issues surrounding such ratio.
- 4: Assess whether immunizations should be required more frequently than prior to enrollment and prior to entering 7th grade.
- 5 a: Determine whether there are discrepancies in issuance of medical contraindication certificates
b: Recommend continuing education for providers in vaccine contraindications and precautions.

Kathy Kudish then discussed the process that the state Immunization Program uses to verify that children are up to date with required vaccines before they can attend any public or non-public school in the state through use of the annual school survey which is legislatively mandated. The school surveys are used to assess trends in exemptions and coverage levels and is a snapshot in time but is not an enforcement tool.

Data is captured online through a software application called REDCap and only captures aggregate numbers-no specific student information is shared with DPH. The survey is usually mailed out in the September/October timeframe and is due back in late November/early December. Data is then reviewed by program staff and any follow up is conducted during the winter before the final data is submitted to CDC in April. CDC publishes a national report in October.

The Immunization Program also collects information from annual day care and college surveys but those are not legislatively mandated.

Discussion of Charge #1

Evaluate the process DPH uses in collecting data concerning medical exemptions and whether DPH should have any oversight over such exemptions.

Discussion ensued about the enforcement of immunization requirements, any changes to the school survey for 2021-22 with the new medical exemption certificate, questions about the reporting of data for each individual vaccine (i.e. # of medical exemptions for each specific vaccine instead of a child being counted as just a medical exemption in general).

Ricky Baltimore proposes that perhaps school nurses specify medical exemption data and report it to DPH but that may be problematic due to potential FIRPA violations.

Susan Amster asked if there is a way for CT WiZ to identify and flag Medical Exemption data but Kathy Kudish answered that unfortunately not all children may be in CT WiZ and even if they are HL7 issues would prohibit this from happening.

Ricky Baltimore asked what the purpose would be of getting this data and Kathy Kudish answered that this would be a pre-emptive move to have the data available for any future inquiries.

John Frassinelli added that he doesn't think that medical exemptions are currently being abused and Lori Flaherty said she doesn't see many medical exemptions in her current role as Supervisor of Nursing in West Hartford Non-Public Schools. She feels that many parents have in the past used religious exemptions for philosophical reasons and feels medical exemptions will increase with the change in the language allowing greater discretion for a physician, P.A., or APRN to grant a medical exemption. Kathy Kudish stated that the rate of medical exemptions on the school surveys has remained at around 0.2 % for a number of years and that the rate for religious exemptions is around 2.5 %.

Discussion of Charge #2

Examine if enrollment of an unvaccinated child should be conditioned upon a child meeting certain criteria.

Discussion centered around the possibility of doing a statewide survey about what is currently happening right now not just statewide but within each school district and even within each individual school. Suggested guidelines from the state would be helpful. John Frassinelli has been asked to come back in April to the next scheduled committee meeting with some responses of what is happening statewide right now with the understanding that responses will vary.

Keisha Hewitt added that the Office of Early Childhood's policy is that if a child has an appointment to be vaccinated they can attend daycare and they then must follow the catch up schedule in order continue to attend. John Frassinelli mentioned that with the expected influx of students coming in from Afghanistan in the coming weeks many of those students will be behind on their immunizations and we will need to accommodate them.

Discussion of Charge #3

Calculate the ratio of school nurses to students in each public & non-public school & funding issues surrounding such ratio.

John Frassinelli stated that he will have this information for the next scheduled meeting in April and that Connecticut law requires adequate nursing staff for each school district-and that does not mean having a school nurse in each school. Lori Flaherty mentioned that the National Association of School Nurses recommends 1 school nurse for every 750 students.

Discussion of Charge #4

Assess whether immunizations should be required more frequently than prior to enrollment and prior to entering 7th grade.

There were questions on what exactly this charge means. Dr. Terranova posed a question that perhaps it was in reference to reporting data to more grade levels than just the Kindergarten and 7th grade that are currently collected on the annual school survey. Kathy Kudish's response is that we used to do that but that the Immunization Program is conscious of the burden and time that is asked of school nurses to report any additional data. Ricky Baltimore asked if it was possible that we are not currently capturing unvaccinated children on the school survey that are not being reported in grades 1-6 and Kathy Kudish's answer to that was no since school nurses are checking those children for compliance to the immunization requirements each year even though they are not being reported on the school survey.

Susan Amster requested that a copy of the school survey be sent out to the members of the committee with the power point slides and Kathy and Dr. Terranova agreed to that.

Discussion of Charge #5

a: Determine whether there are discrepancies in issuance of medical contraindication certificates

Dr. Terranova thinks it is important to look at the lessons the state of California learned after they eliminated their religious exemption and found that some physicians were abusing the medical exemption and to look at the data for Connecticut to see if we need to put in place any safeguards to ensure no abuse of the medical exemptions are taking place here as well. Ricky Baltimore also feels that

we need to gather data on the medical exemption rates and generate a report on those and John Frassinelli agrees that looking at medical exemptions filed since April 28, 2021 would be useful.

b: Recommend continuing education for providers in vaccine contraindications and precautions.

Ricky Baltimore asked if there was any information that could be used from the CDC and if this is something we can review down the road maybe in a specific timeframe (a year) and determine if it is truly needed. Susan Amster added that we should hold off on this until we have data supporting that there is a need for it. John Frassinelli asked if it is possible for the Connecticut Chapter of the American Academy of Pediatrics (AAP) to do a Continuing Education training for medical professionals. Dr. Terranova mentioned that the committee could recommend that it be offered but not required.

Dr. Terranova thanked the members for their attendance and that the minutes would be circulated to them for review in the next few days.

The next meeting is scheduled for April 2022.

The meeting adjourned at 7:55 PM

Minutes submitted by Mick Bolduc Connecticut Immunization Program