



**Connecticut Department of Public Health**

**Testimony Presented Before the Public Health Committee**

**March 13, 2019**

**Commissioner Raul Pino, M.D., M.P.H.  
860-509-7101**

**House Bill #7199 - An Act Concerning Immunizations Against The Meningococcal Virus And Human Papillomavirus.**

The Department of Public Health (DPH) provides the following information in regards to House Bill #7199, which would require immunizations against the meningococcal virus and human papillomavirus (HPV) for children entering ninth grade. Thank you for the opportunity to testify on this important issue.

Although the Department is supportive of the concepts outlined in this bill, section 19a-7f of the general statutes allows the Commissioner of Public Health to “*determine the standard of care for immunization for the children of this state, based on the recommended schedules for active immunization for normal infants and children published by the National Centers for Disease Control, and Prevention Advisory Committee on Immunization Practices, the American Academy of Pediatrics and the American Academy of Family Physicians*”. DPH regulations specify each individual immunization that is required by grade level. Therefore, the Department feels that since we already have the ability to determine immunization standards, the grade requirements outlined in this bill are not necessary. Additionally, because vaccine recommendations are subject to change based on epidemiologic data, the flexibility conferred by specific school immunization requirements detailed in regulation is preferable to specific school immunization requirements detailed in statute.

This bill would also introduce, for the first time, a required vaccine for students that would be due during high school. Enforcing vaccination of ninth and twelve graders would introduce a new and tremendous enforcement burden on schools. Currently, schools enforce immunization requirements at a child’s entry into the school system, in kindergarten, and in seventh grade. By allowing the Commissioner of Public Health the ability to determine when an HPV requirement should be met, it could potentially lessen this burden, as the HPV vaccine may be preferable in seventh grade rather than ninth grade. Since the Department makes these determinations by consulting best practices from the Centers for Disease Control and Prevention (CDC) Advisory Committee on Immunization Practices, the American Academy of Pediatrics and the American Academy of Family Physician, the immunization schedule is synchronized using best practices. Thus, it may help to prevent confusion over the schedule and avoid some of the additional enforcement burden on school nurses if the HPV vaccine is timed with the other vaccines required for seventh grade.

Thank you for your consideration of this information.

**Phone: (860) 509-7269,  
410 Capitol Avenue - MS # 13GRE, P.O. Box 340308 Hartford, CT 06134  
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