

Regulations Requiring Annual Influenza Vaccinations of Children Attending Pre-school and Licensed Day Care Centers

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Vaccine Mandates in New Jersey

- Immunization Regulations: statutorily-based on New Jersey Sanitary Code: prime method
- Legislature can pass law
- Both need Governor's approval
- Regulatory process usually takes 2 years
- 2008 vaccines required
 - 12 mandated

Rationale for Influenza Requirement for Children in Licensed daycare/preschool

- Super-spreaders of respiratory pathogens
- High hospitalization rates in children < 5 y/o
- Mortality in both those with and without underlying disease
- Protecting those in the home/community who are unvaccinated
- Productivity losses of caregivers
- School absenteeism
- ACIP/CDC recommendation

NJ regulation, December 2007

- All children 6-59 months of age attending a pre-school or a licensed daycare center must have received at least 1 dose of influenza vaccine between September 1st and December 31st of each year
- ~262,000 children impacted
- Becomes effective September, 2008

Stakeholders-Supporters

- NJ Chapter, American Academy of Pediatrics
- NJ Chapter, American Academy of Family Physicians
- Public Health Nurses
- Medical Society of New Jersey
- Dept of Education (pre-school/licensed daycare)
- Dept of Children and Families (licensed daycare)
- Local Health Officers Association

Stakeholders-Opponents

- Anti-vaccine advocates
- One legislator
- Stated rationale
 - Thimerosal and autism
 - Not enough thimerosal-free vaccine available
 - Parental choice
 - Vaccines don't always work
 - Adverse events exceed benefits
 - Too many vaccines: immune system can't handle

Post Regulation Adoption Issues

- Implementation
- Impact of vaccination policies
- Evaluation: process and outcomes
- Exemptions
- Enforcement

Implementation to Date

- VFC and CDS health educator staff
- Multiple public presentations
- Letter mailed to Stakeholders
- Letter to Vaccines for Children providers to purchase more vaccine
- Letter to go out in April to schools through NJ Dept of Education
- Newsletters

Costs to Implement

- No significant added cost
 - Existing staff provide educational activities
 - Ordered additional preservative-free vaccine (over 300,000 VFC doses will be available)
 - VFC vaccine can be ordered by eligible PH providers off the state contract
 - State only allocates \$40,000 to entire vaccine program: no increase expected

Allowable exemptions in NJ

- Medical contraindications (per ACIP)
- Religious
- Serological, but not for flu or Hib
- NOT moral/philosophical

Evaluation of Effectiveness

- Vaccination rates
 - Daycare/Preschool
 - Community ?
- ILI in daycare ?
- Influenza in home contacts?
- Immunization registry
- Daycare audits and annual reports

Enforcement Mechanism

- Part of immunization regulations
- Local health department enforces, backed up by state HD
- Local PH nurses perform audits periodically
- Up to \$1,000/day per child per vaccine
- Cannot enforce in parochial schools: separation of church and state

Implementation Issues

- What percentage of pre-school children need to be vaccinated to enhance herd immunity?
- Would use of live, attenuated inhaled vaccine among pre-schoolers be as effective as inactivated vaccine in reducing household disease?
- Can all impacted children receive timely vaccine?
- Do flu-naïve children need 2 doses to attend school?
- Will thimerosal issue impact the policy?
- How should this regulation be evaluated?

Extra slides



Steps in Adopting New Immunization Regulations in New Jersey

- Evidence-based review, ACIP/CDC recommendation
- Support from Commissioner
- Draft regulations, involve stakeholders
- Approval by Governor's office
- Office of Legal Services (OLS)
- Public Health Council (PHC) proposal/approval
- Public Comment period
- Revise drafts regulations and submit again to Commissioner, Governor's office, OLS, PHC
- Publish final rules