

June 21, 2019

Phil Griffin  
Interim Director  
Bureau of Disease Control and Prevention  
Kansas Department of Health and Environment  
1000 SW Jackson, Suite 210  
Topeka, KS 66611

Dear Mr. Griffin:

On behalf of the Immunize Kansas Coalition (IKC), we offer comments on the proposed revisions to K.A.R. 28-1-20, which adds vaccination requirements for age-appropriate vaccinations against hepatitis A and meningococcal disease. IKC is a diverse, nonprofit coalition representing health providers, health department officials, membership associations, clinics, researchers and educators working together to improve vaccination rates and protect Kansans against vaccine-preventable diseases. (Disclaimer: All comments listed here may not necessarily reflect the views of each IKC member.)

This regulation is consistent with the mission of IKC, and we recommend and support the adoption of this regulation. In particular, the meningococcal vaccine has been a priority focus for IKC the last three years. Facts informing our support of this proposed regulatory change include the following:

#### Meningococcal Disease

- Meningococcal meningitis is very serious and can be deadly. While the incidence is rare, infants, teens and young adults have the highest rates of meningococcal disease in the U.S. In addition to the morbidity and mortality risks, the medical cost burden for patients with invasive meningococcal disease is significant. Vaccines are available that can help prevent meningococcal disease. Though there are many causes of meningitis beyond the ones covered in the vaccines, the best prevention at this time is through vaccination.
- Kansas' meningococcal conjugate (MenACWY) vaccination coverage (one or more doses) among adolescents 13-17 was reported at 72.1% in 2017, which is below the national average of 85.1% and below the IKC and Healthy People 2020 goal of 80% coverage. Kansas remains among the bottom ("worst") ten states in terms of meningococcal vaccine coverage among children age 13-17 years.
- Child care and school vaccination requirements are a proven intervention for increasing vaccination rates.
- The regulation as amended is aligned with the recommendations of the Advisory Committee for Immunization Practices (ACIP) and brings Kansas in line with the majority of state requirements nationwide.

## Hepatitis A

- Hepatitis A is a vaccine-preventable, communicable disease of the liver caused by the hepatitis A virus.
- The best way to prevent hepatitis A is to get vaccinated. All children in a child care facility, family day care home, preschool, or child care program operated by a school are already required to have hepatitis A immunizations.
- Kansas' hepatitis A (HepA) vaccination coverage (two or more doses) among children 19-35 months was reported at 63.2% in 2017, which is below the Healthy People 2020 goal of 85% coverage.
- Child care and school vaccination requirements are a proven intervention for increasing vaccination rates.
- The regulation as amended is aligned with the recommendations of the Advisory Committee for Immunization Practices (ACIP) and brings Kansas in line with the majority of state requirements nationwide.

For these reasons and in support of our mission, the Immunize Kansas Coalition urges the adoption of the proposed administrative regulation adding meningitis and hepatitis A to the list of vaccinations required for individuals attending school, child care facilities, and child care program. We appreciate the opportunity to comment, and we look forward to continuing to work with Kansas Department of Health and Environment and others to protect Kansans against vaccine-preventable diseases.

Sincerely,

Immunize Kansas Coalition Chair