

IPHC Immunization Policy (effective July 1, 2021)

Integrative Pediatric Health Care (IPHC) is committed to working with parents regarding immunization practices and decision making when declining (aka refusing or exempting) vaccines for their child. The health care landscape is evolving, and recent legislation has resulted in the adoption of a new process for IPHC clients who do not vaccinate or follow alternative/selective vaccination schedules. This policy serves to inform you how IPHC will consistently and equitably handle non-medical exemptions reflecting the recent changes from the [Colorado Department of Health and Environment \(CDPHE\)](#) for our clients. We understand that changes in policy can raise questions, we are open to discuss these changes whenever needed.

Background: Colorado legislators passed a bill ([SB20-163](#)) and was signed into law now referred to as Colorado Revised Statutes ([CRS](#)) 25-4-2403, which adopts a new process for those who decline vaccines for non-medical reasons in the state of Colorado and attend public daycares, schools/universities, and camps.

Highlights of CRS 25-4-2403 include: [click here for full legal document](#)

Streamlining Non-Medical Exemption Language:

- **Previously:** Philosophical, Religious, and Personal exemptions were the options parents could choose from when submitting an exemption to the school or daycare. Medical exemptions require affidavit by Health Care Provider.
- **New Process:** Language is changed to simplify exemptions and are now simply referred to as non-medical exemptions. Medical exemptions still require signed affidavit by Health Care Provider.

Colorado Immunization Information System (CIIS): [click here for more info](#)

- **Previously:** Providers were ENCOURAGED to submit vaccine administration into the secure and private state portal to be accessed by registered and vetted users (IPHC has always used this system to document vaccines being given to clients). Vaccines refused were not often documented in CIIS which potentially caused confusion about incomplete records vs. refusals.
- **New Process:** All vaccine administrations and refusals are required to be submitted by Health Care Providers to CIIS (parents still have the right to opt out without penalty and providers are not penalized if not using CIIS.) IPHC will continue to use this system for all administrations and refusals unless clients opt out. Keep in mind, opting out may cause delays in obtaining vaccination records and are not easily accessed in case of emergency (i.e., tetanus vaccine status of client in the ER for deep penetrating wound).

Standardizing the non-medical exemption forms used in schools and daycares:

- **Previously:** parents/guardians submit a self-signed immunization refusal form to school without requiring health care provider signature, or completion of education module. This form could be hand-written, downloaded form from CPDHE, or drafted with language the parent/guardian chose.

- **New Process:** Non-medical Exemption forms are standardized and require parent/guardian to complete EITHER/OR:
 - Request an (MD/DO/NP/PA) sign that the client is making an informed refusal for non-medical reasons (**IPHC has opted out of this option**)
 - Parent can view and complete an [online module about vaccinations provided by CDPHE](#). When complete, a certificate of completion is given to the parent to self-submit to the school, daycare, and provider to fulfill the non-medical exemption rule (**IPHC has adopted this option as a policy**)

Integrative Pediatric Health Care has reviewed the module from CDPHE and finds it helpful, thorough, and efficient for education about vaccines and vaccine exemption. Providers have opted to exclusively use the module to verify parents have received vaccine education that is consistent. IPHC has also implemented the following policy:

Children ages birth+ who are NOT or are alternatively/selectively immunizing:

- Regardless of the child being in or out of daycare/school, IPHC requires parents/guardians who are not immunizing their child to fill out and sign the immunization plan to be stored in the chart. (Click here for form and select appropriate option).
- IPHC does not recommend alternative schedules; therefore, the parent must develop one themselves using resources listed on the resources page.
- Parents have until the next scheduled well child (when immunization are due) visit to view and complete the CDPHE online module and print the certificate to be filed in the child's chart. Updated signatures are required annually.
- All vaccines that are due but not administered will be documented as non-medically declined and information will be submitted to CIIS unless the client opts out (we strongly encourage you not to opt out).
- Clients who do not comply with this request will be asked to seek care at another office.

Children ages birth+ who are following the CDC schedule:

- No action is needed aside from attending routine well visits.

In summary, all parents/guardians of children in daycare and school who are declining vaccines for non-medical reasons must view and complete the CDPHE online module which fulfills the exemption requirement for school and daycares. According to law, IPHC providers **DO NOT NEED** to sign the non-medical exemption. Instead, the parent can submit the online module completion certificate to the school or daycare. **For clients who are not attending school or daycare, IPHC providers are still requiring completion of the module so we can document the parent/guardian has met the accepted standard to make an informed choice to refuse vaccines. This will be stored in the chart and serve as documentation that appropriate education has been obtained. There are no exceptions to this policy.**

Below is an excerpt from CDPHE's website: [click here to jump to their site](#)

Beginning in the 2021-2022 school year (7/1/2021), the process of submitting a nonmedical exemption will change. There will be two ways to submit a nonmedical exemption.

Be sure to check with your student's school, child care or college/university to find out if they need a printed copy of the Certificate of nonmedical exemption or if you submit to CIIS, the school is able to access the Certificate of nonmedical exemption from CIIS.

- Submit the Certificate of nonmedical exemption WITH a signature from an immunizing provider in Colorado who is a medical doctor, doctor of osteopathic medicine, advanced practice nurse, delegated physician's assistant, or pharmacist OR
- Submit the Certificate of nonmedical exemption received upon the completion of CDPHE's Online Immunization Education Module.
 - Per Colorado Revised Statutes 25-4-2403, immunizing providers who sign the Certificate of Nonmedical Exemption must submit nonmedical exemption data to CIIS
- *Parents of students in preschool or child care* must submit nonmedical exemptions at 2, 4, 6, 12 and 18 months of age. These exemptions expire when the next vaccines are due or when the child enrolls in kindergarten.
- *Parents of students in grades K-12* claiming a nonmedical exemption must submit one annually. **Nonmedical exemptions expire June 30th each year.** If you submit a Certificate of nonmedical exemption on or before June 30th, it will not be valid for the upcoming school year unless you submit the exemption during early registration.
- *Students in college/university* claiming a nonmedical exemption must submit a Certificate of Nonmedical Exemption upon enrollment.
- Accessing the Immunization Education Module for NONMEDICAL VACCINE EXEMPTIONS:
 - Begin by accessing the CDPHE's following URL: **cdphe.colorado.gov/vaccine-exemptions**
 - Scroll down to the "Online Immunization Education Module", and click on the title.
 - This education module takes about 20 minutes to complete, and expires 365 days from the certificate date. The module needs to be repeated annually with re-submission of the certificate.
 - Complete the education module in its entirety and submit your certificate of completion to our office. This can be done through the patient portal, or in person at your upcoming appointment.