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March 12, 2012

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Ron Chapman, MD, MPH
CA Department of Public Health
1615 Capitol Avenue, Suite 73.770
PO Box 997377, MS 0500
Sacramento, CA 95899-7377

Re: Canine Rabies Vaccination

Dear Dr. Chapman:

On March 1, 2012 the California Conference of Local Health Officers (CCLHO) voted at the CCLHO Board meeting to recommend a change to California law that outlines the primary rabies vaccination of every dog. Health and Safety Code 121690 and Title 17 of the California Code of Regulations, Section 2606.4 requires that the owner of every dog over the age of four months shall ensure that his or her pet is currently vaccinated for rabies by a licensed veterinarian. Unfortunately, this California Law is an anachronism as current vaccines are labeled for use at three months of age and national recommendations are for canine rabies vaccination at three months. It is recommended that the California law be updated to comply with the current recommendation for canine rabies vaccination at three months of age. It is also suggested that language be used that would allow future vaccination schedule updates to occur automatically as vaccination recommendations are updated by the professional veterinary associations.

Both the CCLHO Communicable Disease Control Committee and the CCLHO Board voted unanimously to amend California law because its implementation is confusing as California is the only State whose law is for initial vaccination at four months. The law is specifically onerous for imported dogs that may need to be kept in quarantine for over a month before they can be vaccinated.

As you are aware, CCLHO was established in statute in 1947 to advise the California Department of Health Services (now the California Department of Public Health), other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

Thank you for your consideration. If you have questions, please feel free to contact me at wilma.wooten@sdcounty.ca.gov or 619-542-4181.

Sincerely,

Original Signed By:

Wilma Wooten, MD, MPH
President, California Conference of Local Health Officers