

Addendum to Final Statement of Reasons

6000

The Department proposes a nonsubstantive change in the Reference section to removing the citation “2000, et seq.” because the regulation is not interpreting, clarifying, or making specific the Business and Professions Code. The Department’s authority to adopt section 6000 doesn’t stem from the physician licensing statutes, it stems from Health and Safety Code. The Department is not regulating physician licensing.

6020 (repealed)

Table 1

The Department proposes a nonsubstantive change by deleting the struck through word “measles” at the end of the fourth column of the “Seventh Grade” row.

6025

Table A

In response to a public comment, the Department proposes to add footnote 1 to clarify that as pupils age in pre-kindergarten they become subject to additional requirements and to allow parents up to 30 days after a pupil ages into a new requirement to submit proof of immunization. This period of thirty days promotes the goal of timely immunization to protect children while providing reasonable accommodation for the possibility of limited availability in the schedules of available medical providers.

In footnote 2, the Department proposes to clarify that the combination vaccine “DTP” may count toward the DTaP requirement. This is consistent with ACIP recommendations.

Table B

In footnotes 2 and 5, the Department proposes to clarify that the combination vaccine “DTP” may count toward the DTaP requirement. This is consistent with ACIP recommendations.

6035

The Department proposes a nonsubstantive change to subdivision (a)(4) to correct the omission of “a pupil” from ~~“he or she is a pupil entering a child care center...”~~

Subdivision (d)(1) is proposed to be adopted. It amends text moved from section 6070(e) by reformatting it. The amendments are nonsubstantive. Additional information is on page 13 of the ISOR.

6040

Section 6040 is amended with nonsubstantive changes to the wording and format to improve clarity. Subdivision (a) is proposed to be reformatted by organizing the text into paragraphs. Additional information is on page 13 of the ISOR.

6045

Section 6045 contains nonsubstantive changes, including revising the language “immunization schedules not confirming” to “alternative schedules.” The language in this section includes discretionary, but not regulatory, actions that could be taken by the Department.

6070

Subparagraphs (b)(11)(A) and (b)(12)(A) are proposed to require the name of the staff who reviewed the pupil’s immunization record. This information is currently required in regulated form CDPH 286 that is proposed to be repealed.

Subparagraphs (b)(3) and (b)(5)-(b)(7) include data elements currently required in regulated form CDPH 286 that is proposed to be repealed. The proposed additional race and ethnicity categories not currently in form CDPH 286 are consistent with data collected by CDE in accordance with federal law.

6075

Subdivision (a)

The Department proposes a nonsubstantive change to delete the sentence starting with “Procedures and instructions.” It is not necessary to include this sentence as any procedures or instructions would be informative not regulatory.

STATEMENTS OF DETERMINATIONS

ALTERNATIVES CONSIDERED

The California Department of Public Health (the Department) has determined that no reasonable alternative considered by the Department or that has otherwise been identified and brought to the attention of the Department would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

LOCAL MANDATE DETERMINATION

Existing regulations (17 CCR sections 6000 through 6075) and the governing statutes (HSC sections 120325 through 120380) may impose a mandated cost for pupil immunization assessment by schools pursuant to Government Code section 17514 and 17561. The State Controller's Office may be required to reimburse public school districts for the additional costs associated with the new immunization requirement to check for 2 doses of varicella vaccine at K-12 admission and 7th grade (until 2024). This reimbursement is based on estimated workload costs to implement the regulation. As schools already check for other required immunizations at kindergarten and 7th grade, including the first dose of varicella vaccine that is currently required, the additional workload of the new requirements would be small. If a test claim for reimbursement is submitted, the Commission on State Mandates will determine whether the costs are reimbursable.

IMPACT ON BUSINESS

The Department has determined that the proposed regulations would not have any impact and or effect on the creation or elimination of new business within the state of California.