

3 May 2018

The Secretariat  
Australian Technical Advisory Group on Immunisation  
Department of Health  
E: [atagi.secretariat@health.gov.au](mailto:atagi.secretariat@health.gov.au)

Dear ATAGI Secretariat,

**Re: Proposed changes to the meningococcal and *Haemophilus influenzae* type B disease chapters**

The Royal Australian College of General Practitioners (RACGP) is pleased to provide our response to the request from the Australian Technical Advisory Group on Immunisation (ATAGI) for feedback on the proposed changes to meningococcal vaccination recommendations. Our answers to your consultation questions are below:

**1. General comments on the document**

The consultation paper clearly outlines the rationale and evidence on the proposed changes to the meningococcal and *Haemophilus influenzae* type B vaccination in the Australian Immunisation Handbook.

The RACGP is supportive of the proposed changes given the trends and variations in the epidemiology of meningococcal disease, and if adopted, we will encourage the implementation across Australian general practice.

**2. Potential benefits, risks or unintended consequences which could arise from the proposed changes to the use of meningococcal vaccines**

The RACGP foresees two main issues that could arise from the proposed changes:

a) Implementation challenges

The ongoing updates to the vaccination schedule in the Australian Immunisation Handbook can pose a challenge to health professionals. Migrating to a new system can be problematic, as it usually requires time from GPs and practice nurses to gain sound knowledge and understanding of new vaccination schedules. Additionally, the new recommendations add complexity, particularly about patients with different levels of risk. It is important to ensure adverse events are minimised by appropriate training, decision aids, posters and catch-up schedules as provided as part of any implementation scheme.

b) 'Schedule crowding' effect

GPs are aware of the 'schedule crowding' effect with the increased number of doses to be provided in older children ie. 3 doses at 18 months (or 4 doses for indigenous children). Although the RACGP anticipates most patients will accept the changes, parents and carers should be assured that multiple simultaneous injections are safe and well tolerated by infants and young children. As the number of vaccinations given to infants at 12 months of age will increase with the

proposed changes, it is beneficial to advise parents and carers to consider the number of vaccinations the child receives at any one time.

### **3. Additional clinical or implementation considerations**

A well-developed change management strategy is crucial for the successful implementation of the new schedule and should include the following:

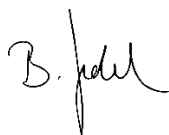
- updating clinical and practice management software used in general practice to reflect the changes in vaccination schedule
- developing print and online marketing and educational material that highlight the changes to GPs and their teams outlining:
  - the rationale for change in vaccination schedule, and the additional meningococcal strains
  - the difference between recommended and funded vaccine
  - the difference between the old and new vaccination schedule, for example using tables with colour coding to ensure the new changes are clearly demonstrated

### **4. Future considerations for changes to the immunisation schedule in children**

GPs play an important role and have the advantage of being a regular point of contact with a child through all stages of their development. General practices have the appropriate infrastructure in place to support the delivery of early childhood development outcomes. Future changes to the immunisation schedule should take into account not just immunology but also the important health gains from using immunisations as a trigger for opportunistic developmental screening and health checking. In addition, future changes to the immunisation schedule should also consider change-management costs to the community.

Thank you again for the opportunity to comment and we welcome future opportunities for engagement and progression of the issues discussed in this submission.

Yours sincerely,



Bastian Seidel  
President