

## **Updated 2018-2019 S.C. Immunization Records**

Please be sure to send in your child(s) updated immunization records over the summer. These can be dropped by the lower school office, mailed (1310 India Hook Rd, Rock Hill, SC 29732), or faxed to 803-325-8191. **Scroll down for the updated 2018-2019 list of requirements.**



February 9, 2018

Dear Immunization Provider:

In accordance with South Carolina Code of Laws, Section 44-29-180, and South Carolina Regulation 61-8, the 2018-2019 "Required Standards of Immunization for School Attendance" and the "Required Standards of Immunization for Day Care Attendance" are enclosed. These requirements are effective for the 2018-2019 school year.


#### Changes for the 2018-2019 School Year

- 4<sup>th</sup> grade has been added to the requirement for (2) doses of varicella. A child with a positive history of the disease is considered immune and is exempt from this requirement.
- 6<sup>th</sup> grade has been added to the requirement for three (3) doses of oral and/or inactivated polio vaccine **with at least one (1) dose received on or after the fourth birthday.**
- 12<sup>th</sup> grade has been added to the requirement for (1) Tdap (tetanus, diphtheria, and pertussis) booster. Tdap is routinely administered at 11-12 years of age; however, a dose administered on or after the seventh birthday will meet this requirement.

#### General Guidance Points

- On the day of an office visit, if a child cannot obtain all age-eligible vaccine(s) required for day care and/or school for a **medical reason**, a medical exemption (temporary or permanent as determined by the clinician) must be issued for the certificate to be valid. DHEC supports the provision of all Advisory Committee on Immunization Practices (ACIP) recommended vaccines according to the current ACIP schedules and vaccine specific recommendations (<http://www.cdc.gov/vaccines/hcp/acip-recs/index.html>).
- **SC State Law only allows the following exemptions to vaccine requirements:**
  - Medical Exemption: A valid SC Certificate of Immunization (DHEC 2740) which includes all administered vaccines to date and notes a documented medical exemption (temporary or permanent) for vaccines which are not administered for a medical reason. For temporary medical exemptions, an expiration date in the future is noted when next immunizations are due to be obtained. **THIS IS THE ONLY EXEMPTION A PRIVATE IMMUNIZATION PROVIDER CAN AUTHORIZE.**
  - Religious Exemption: A SC Certificate of Religious Exemption (DHEC 1126) is issued by a DHEC Health Department. The parent or guardian must sign the DHEC form in the presence of a notary.
  - Special Exemption: A SC Certificate of Special Exemption (DHEC 1123) may be issued by the school to a student that has been unable to secure immunizations or documentation of immunizations already received. This exemption is only valid for 30 calendar days for the current enrollment and may be issued only once.
- A valid South Carolina Certificate of Immunization **for all enrolled children, 3 months of age and older**, must be maintained by public and private childcare facilities (as defined in Section 63-13-20 of SC Code of Laws); public, private, and parochial schools, grades kindergarten through 12<sup>th</sup> grade; and child development programs under the control of the Department of Education.
- Doses documented on the immunization certificate must be valid doses according to accepted practice standards for the minimum age(s) and intervals, as well as all ACIP comprehensive and vaccine specific recommendations (<http://www.cdc.gov/vaccines/hcp/acip-recs/index.html>). The "Minimum Ages and Intervals Between Doses of Routinely Recommended Vaccines" table is enclosed for your reference.
- Vaccine administration must be in accordance with CDC: General Best Practice Guidelines for Immunization. (<https://www.cdc.gov/vaccines/hcp/acip-recs/general-recs/index.html>).
- Children enrolled in PreK or 4K programs and younger must meet Day Care Requirements (see enclosed), even if attendance is in a school setting. Children enrolled in 5-year-old kindergarten through Grade 12 must meet School Requirements (see enclosed).
- Children enrolled in grades 5K or greater who also attend a childcare facility (e.g., after school and/or summer program) must meet School Requirements and have a valid South Carolina Certificate of Immunization on file at both day care and school.

DHEC appreciates your continuing efforts to protect South Carolina children from vaccine-preventable diseases. Please advise your patients to receive all age-appropriate vaccines as recommended by the Centers for Disease Control and Prevention (CDC). Procedural and other questions may be directed to DHEC's Immunization Division at 803-898-0460 or 1-800-277-4687 (1-800-27-SHOTS), or [immunize@dhec.sc.gov](mailto:immunize@dhec.sc.gov).

Sincerely,  
  
Teresa Foo, MD, MPH  
Medical Consultant, Division of Immunization

  
Stephen M. White, MHA  
Director, Division of Immunization

## 2018-2019 REQUIRED STANDARDS OF IMMUNIZATION FOR SCHOOL ATTENDANCE

Pursuant to Section 44-29-180, South Carolina Code of Laws, and South Carolina Regulation 61-8, "no superintendent of an institution of learning, no school board or principal of a school...may...enroll or retain a child or person who cannot produce satisfactory evidence of having been vaccinated or immunized so often as directed by the Department of Health and Environmental Control.... Records of vaccinations or immunizations must be maintained by the institution, school or day care facility to which the child or person has been admitted."

The Department of Health and Environmental Control has declared the following minimum immunization requirements are necessary for a child to be admitted to any public, private, or parochial school, grades five-year-old kindergarten through twelve (5K-12):

### Minimum Requirements:<sup>1,5</sup>

| Vaccine for:  | Grade              | <b>Grade Level Requirements:</b><br><i>Grade level requirements apply to all students entering or retained in the grades specified.</i>   |
|---|--------------------|---|
| <b>Diphtheria, Tetanus and Pertussis</b>                        | 5K – 12            | Four (4) doses of any combination of DTP, DT, DTaP, Td, or Tdap vaccine with at least one (1) dose received on or after the fourth birthday <sup>2</sup>  |
| <b>Tdap Booster</b>   | 7-12               | One (1) dose of Tdap vaccine received on or after the 7 <sup>th</sup> birthday <sup>3</sup><br><br><b>If necessary, this dose of Tdap may be included as one of the doses needed to meet the requirement for Diphtheria, Tetanus, and Pertussis noted above.</b>  |
| <b>Polio<sup>4</sup></b>  | 5K-6<br><br>7-12   | Three (3) doses of oral and/or inactivated polio vaccine with at least one (1) dose received on or after the fourth birthday<br><br>Three (3) doses of oral and/or inactivated polio vaccine (IPV) with at least one (1) dose received on or after the 4 <sup>th</sup> birthday <b>OR</b> four (4) doses of oral and/or inactivated polio vaccine (IPV) before 4 <sup>th</sup> birthday (if all doses separated by at least 4 weeks) - <b>Follow CDC recommendations for students 18 years of age and older<sup>4</sup></b> |
| <b>Rubeola (Measles)<br/>Rubella (German Measles)<br/>Mumps</b> | 5K – 12            | Two (2) doses of rubeola (Measles) vaccine with both doses received on or after the first birthday and separated by at least 4 weeks<br><br>One (1) dose of rubella (German Measles) vaccine received on or after the first birthday<br><br>One (1) dose of mumps vaccine received on or after the first birthday   |
| <b>Hepatitis B</b>  | 5K – 12            | Three (3) doses of hepatitis B vaccine with the third dose received $\geq$ 24 weeks of age and at least 16 weeks after the first dose   |
| <b>Varicella</b>  | 5K - 4<br><br>5-12 | Two (2) doses of varicella vaccine with both doses received on or after the first birthday and separated by at least 4 weeks or a positive history of disease.<br><br>One (1) dose of varicella vaccine received on or after the first birthday or positive history of disease  |

<sup>1</sup>When issuing a South Carolina Certificate of Immunization, doses documented on the immunization certificate must be valid according to accepted practice standards for minimum age(s) and intervals.

<sup>2</sup>For unvaccinated or incompletely vaccinated children 7 years of age and older, refer to currently published ACIP Catch-Up Schedule for number of doses necessary to complete diphtheria, tetanus, and pertussis series and meet this requirement.

<sup>3</sup>Tdap is routinely administered at 11-12 years of age; however, a dose administered on or after the seventh birthday will meet this requirement.

<sup>4</sup>Routine vaccination of persons 18 years of age and older who reside in the United States is not necessary or recommended, unless in the following high risk categories: 1) traveler to areas where poliomyelitis is endemic or epidemic; 2) laboratory worker handling specimens that may contain polioviruses; or 3) healthcare worker who has close contact with patients who might be excreting wild polioviruses.

<sup>5</sup>Pursuant to Section 44-29-180, South Carolina Code of Laws, and South Carolina Regulation 61-8, students may be exempt from these immunization requirements for the following reasons:

**Medical Exemption:** The Medical Exemption section of the SC Certificate of Immunization should only be completed when a child has a permanent or temporary medical reason for exclusion from receipt of vaccine(s). The Medical Exemption section must be completed by a licensed Physician (MD or DO) or his/her authorized representative (e.g. Physician's Assistant - PA, or Advanced Practice Registered Nurse - APRN).

**Religious Exemption:** A religious exemption may be granted to any student whose parents, parent, guardian, or person in loco parentis signs the appropriate section of the South Carolina Certificate of Religious Exemption stating that one or more immunizations conflicts with their religious beliefs. The South Carolina Certificate of Religious Exemption can only be obtained from the Department of Health and Environmental Control

**Special Exemptions:** A South Carolina Certificate of Special Exemption, signed by the school principal or his/her authorized representative, may be issued to transfer students while awaiting arrival of medical records from their former area of residence or to other students who have been unable to secure immunizations or documentation of immunizations already received. This exemption may be issued only once and is valid for only thirty (30) calendar days from the date of enrollment. Upon expiration of this special exemption, the student must present a valid South Carolina Certificate of Immunization or a valid South Carolina Certificate of Religious Exemption.

## 2018-2019 REQUIRED STANDARDS OF IMMUNIZATION FOR DAY CARE ATTENDANCE

Pursuant to Section 44-29-180, South Carolina Code of Laws, "...no owner or operator of a public or private childcare facility as defined in Section 63-13-20 may...enroll or retain a child or person who cannot produce satisfactory evidence of having been vaccinated or immunized so often as directed by the Department of Health and Environmental Control. Records of vaccinations or immunizations must be maintained by the institution, school or day care facility to which the child or person has been admitted."

The Department of Health and Environmental Control has declared the following minimum requirements are necessary to receive the final immunization certificate for day care attendance for **4K programs and younger**. Children enrolled in day care who have not yet received all required immunizations must present a valid SC Certificate of Immunization that indicates by expiration date of the certificate when the next immunization(s) are due. The child is allowed to remain in the day care **no longer than 30 days after the noted expiration date**.

**Children enrolled in grade 5K or greater AND enrolled in a childcare facility (e.g., after school and/or summer program) must meet school immunization requirements and have a valid SC Certificate of Immunization on file at the childcare facility.**

### Minimum Requirements:<sup>1, 3</sup>

| Vaccine for:                               | Day Care Requirements:   |
|--|--|
| <b>Diphtheria, Tetanus and Pertussis</b>   | Four (4) doses of any combination of DTP, DT, or DTaP vaccine  |
| <b>Polio</b>                               | Three (3) doses of any combination of oral or inactivated polio vaccine  |
| <b>Haemophilus influenzae Type b (Hib)</b> | Current, age-appropriate <i>Haemophilus influenzae</i> Type b conjugate vaccination according to the currently published immunization schedule. For children 15-59 months of age who have not yet completed age-appropriate Hib vaccination, one (1) dose of <i>Haemophilus influenzae</i> Type b vaccine at or after 15 months of age is required. <b>Hib vaccine is <u>not</u> required for children 5 years of age and older.</b>   |
| <b>Rubeola (Measles)</b>                   | One (1) dose of rubeola (Measles) vaccine received on or after the first birthday  |
| <b>Rubella (German Measles)</b>            | One (1) dose of rubella (German Measles) vaccine received on or after the first birthday   |
| <b>Mumps</b>                               | One (1) dose of mumps vaccine received on or after the first birthday  |
| <b>Hepatitis B</b>                         | Three (3) doses of hepatitis B vaccine with the third dose received $\geq 24$ weeks of age and at least 16 weeks after the first dose  |
| <b>Varicella</b>                           | One (1) dose of varicella vaccine received on or after the first birthday or positive history of disease   |
| <b>Pneumococcal</b>                        | Current, age-appropriate pneumococcal vaccination according to the currently published immunization schedule. <sup>2</sup> For children aged 24-59 months who have not yet completed any age-appropriate pneumococcal vaccination schedule (PCV7 or PCV13), one (1) dose of 13-valent pneumococcal conjugate vaccine on or after the 2 <sup>nd</sup> birthday is required. <b>Pneumococcal conjugate vaccine is <u>not</u> required for children 5 years of age and older.</b> |

<sup>1</sup>When issuing a South Carolina Certificate of Immunization, doses documented on the immunization certificate must be valid according to accepted practice standards for minimum age(s) and intervals.

<sup>2</sup>A single supplemental dose of PCV13 is strongly recommended for all children 14-59 months of age who have completed age-appropriate pneumococcal vaccination with the 7-valent pneumococcal vaccine (PCV7), but is not required for day care attendance.

<sup>3</sup>Pursuant to Section 44-29-180, South Carolina Code of Laws, and South Carolina Regulation 61-8, children may be exempt from these immunization requirements for the following reasons:

**Medical Exemption:** The Medical Exemption section of the SC Certificate of Immunization should only be completed when a child has a permanent or temporary medical reason for exclusion from receipt of vaccine(s). The Medical Exemption section must be completed by a licensed Physician (MD or DO) or his/her authorized representative (e.g. Physician's Assistant, or Advanced Practice Registered Nurse).

**Religious Exemption:** A religious exemption may be granted to any student whose parents, parent, guardian, or person in loco parentis signs the appropriate section of the South Carolina Certificate of Religious Exemption stating that one or more immunizations conflicts with their religious beliefs. The South Carolina Certificate of Religious Exemption can only be obtained from the Department of Health and Environmental Control.

**Recommended and Minimum Ages and Intervals  
Between Doses of Routinely Recommended Vaccines<sup>1,2,3,4</sup>**

| Vaccine and dose number                                      | Recommended age for this dose | Minimum age for this dose             | Recommended interval to next dose | Minimum interval to next dose |
|--|-------------------------------|---------------------------------------|-----------------------------------|-------------------------------|
| Diphtheria-tetanus-acellular pertussis (DTaP)-1 <sup>5</sup> | 2 months                      | 6 weeks                               | 8 weeks                           | 4 weeks                       |
| DTaP-2   | 4 months                      | 10 weeks                              | 8 weeks                           | 4 weeks                       |
| DTaP-3   | 6 months                      | 14 weeks                              | 6-12 months <sup>6</sup>          | 6 months <sup>6</sup>         |
| DTaP-4   | 15-18 months                  | 15 months <sup>6</sup>                | 3 years                           | 6 months                      |
| DTaP-5 <sup>7</sup>  | 4-6 years                     | 4 years                               | —                                 | —                             |
| <i>Haemophilus influenzae</i> type b (Hib)-1 <sup>8</sup>    | 2 months                      | 6 weeks                               | 8 weeks                           | 4 weeks                       |
| Hib-2  | 4 months                      | 10 weeks                              | 8 weeks                           | 4 weeks                       |
| Hib-3 <sup>9</sup>   | 6 months                      | 14 weeks                              | 6-9 months                        | 8 weeks                       |
| Hib-4  | 12-15 months                  | 12 months                             | —                                 | —                             |
| Hepatitis A (HepA)-1 <sup>5</sup>                            | 12-23 months                  | 12 months                             | 6-18 months                       | 6 months                      |
| HepA-2   | ≥18 months                    | 18 months                             | —                                 | —                             |
| Hepatitis B (HepB)-1   | Birth                         | Birth                                 | 4 weeks-4 months                  | 4 weeks                       |
| HepB-2   | 1-2 months                    | 4 weeks                               | 8 weeks-17 months                 | 8 weeks                       |
| HepB-3 <sup>10</sup>   | 6-18 months                   | 24 weeks                              | —                                 | —                             |
| Herpes zoster (HZV) <sup>11</sup>                            | ≥60 years                     | 60 years                              | —                                 | —                             |
| Human papillomavirus (HPV)-1 <sup>12</sup>                   | 11-12 years                   | 9 years                               | 8 weeks                           | 4 weeks                       |
| HPV-2  | 11-12 years<br>(+ 2 months)   | 9 years<br>(+ 4 weeks)                | 4 months                          | 12 weeks <sup>12</sup>        |
| HPV-3 <sup>12,13</sup>                                       | 11-12 years<br>(+ 6 months)   | 9 years<br>(+5 months)                | —                                 | —                             |
| Influenza, inactivated (IIV) <sup>14</sup>                   | ≥6 months                     | 6 months <sup>15</sup>                | 4 weeks                           | 4 weeks                       |
| Influenza, live attenuated (LAIV) <sup>14</sup>              | 2-49 years                    | 2 years                               | 4 weeks                           | 4 weeks                       |
| Measles-mumps-rubella (MMR)-1 <sup>16</sup>                  | 12-15 months                  | 12 months                             | 3-5 years                         | 4 weeks                       |
| MMR-2 <sup>16</sup>  | 4-6 years                     | 13 months                             | —                                 | —                             |
| Meningococcal conjugate (MenACWY)-1 <sup>17</sup>            | 11-12 years                   | 6 weeks <sup>18</sup>                 | 4-5 years                         | 8 weeks                       |
| MenACWY-2  | 16 years                      | 11 years <sup>19</sup><br>(+ 8 weeks) | —                                 | —                             |
| Meningococcal polysaccharide (MPSV4)-1 <sup>16</sup>         | —                             | 2 years                               | 5 years                           | 5 years                       |
| MPSV4-2  | —                             | 7 years                               | —                                 | —                             |
| Pneumococcal conjugate (PCV13)-1 <sup>8</sup>                | 2 months                      | 6 weeks                               | 8 weeks                           | 4 weeks                       |
| PCV-2  | 4 months                      | 10 weeks                              | 8 weeks                           | 4 weeks                       |
| PCV-3  | 6 months                      | 14 weeks                              | 6 months                          | 8 weeks                       |
| PCV-4  | 12-15 months                  | 12 months                             | —                                 | —                             |
| Pneumococcal polysaccharide (PPSV)-1                         | —                             | 2 years                               | 5 years                           | 3 years                       |
| PPSV-2 <sup>20</sup>   | —                             | 7 years                               | —                                 | —                             |
| Poliovirus, Inactivated (IPV)-1 <sup>5</sup>                 | 2 months                      | 6 weeks                               | 8 weeks                           | 4 weeks                       |
| IPV-2  | 4 months                      | 10 weeks                              | 8 weeks-14 months                 | 4 weeks                       |
| IPV-3  | 6-18 months                   | 14 weeks                              | 3-5 years                         | 6 months                      |
| IPV-4 <sup>21</sup>  | 4-6 years                     | 4 years                               | —                                 | —                             |
| Rotavirus (RV)-1 <sup>22</sup>                               | 2 months                      | 6 weeks                               | 8 weeks                           | 4 weeks                       |
| RV-2   | 4 months                      | 10 weeks                              | 8 weeks                           | 4 weeks                       |
| RV-3 <sup>22</sup>   | 6 months                      | 14 weeks                              | —                                 | —                             |
| Tetanus-diphtheria (Td)                                      | 11-12 years                   | 7 years                               | 10 years                          | 5 years                       |
| Tetanus-diphtheria-acellular pertussis (Tdap) <sup>23</sup>  | ≥11 years                     | 7 years                               | —                                 | —                             |
| Varicella (Var)-1 <sup>16</sup>                              | 12-15 months                  | 12 months                             | 3-5 years                         | 12 weeks <sup>24</sup>        |
| Var-2 <sup>16</sup>  | 4-6 years                     | 15 months <sup>25</sup>               | —                                 | —                             |

- 1 Combination vaccines are available. Use of licensed combination vaccines is generally preferred to separate injections of their equivalent component vaccines. When administering combination vaccines, the minimum age for administration is the oldest age for any of the individual components. The minimum interval between doses is equal to the greatest interval of any of the individual components.
- 2 Information on travel vaccines including typhoid, Japanese encephalitis, and yellow fever, is available at [www.cdc.gov/travel](http://www.cdc.gov/travel). Information on other vaccines that are licensed in the US but not distributed, including anthrax and smallpox, is available at <https://emergency.cdc.gov/bioterrorism/>.
- 3 “Months” refers to calendar months.
- 4 A hyphen used to express a range (as in “12-15 months”) means “through.”
- 5 Combination vaccines containing a hepatitis B component (Pediarix and Twinrix) are available. These vaccines should not be administered to infants younger than 6 weeks because of the other components (i.e., Hib, DTaP, HepA, and IPV).
- 6 The minimum recommended interval between DTaP-3 and DTaP-4 is 6 months. However, DTaP-4 need not be repeated if administered at least 4 months after DTaP-3. This is a special grace period of 2 months, which can be used when evaluating records retrospectively. An additional 4 days should not be added to this grace period prospectively, but can be added retrospectively.
- 7 If a fourth dose of DTaP is given on or after the fourth birthday, a fifth dose is not needed.
- 8 Children receiving the first dose of Hib or PCV13 vaccine at age 7 months or older require fewer doses to complete the series.
- 9 If PedvaxHib is administered at ages 2 and 4 months, a dose at age 6 months is not required. The minimum age for the final dose is 12 months.
- 10 HepB-3 should be administered at least 8 weeks after HepB-2 and at least 16 weeks after HepB-1, and should not be administered before 24 weeks of age.
- 11 Herpes zoster vaccine is recommended as a single dose for persons 60 years of age and older.
- 12 Gardasil and Gardasil 9 are approved for males and females 9 through 26 years of age. The minimum age for HPV-3 is based on the baseline minimum age for the first dose (i.e., 9 years) and the minimum interval of 5 months between the first and third dose. Dose 3 need not be repeated if it is administered at least 5 months after the first dose, and if the intervals between doses 1 and 2, and doses 2 and 3, are 4 weeks and 12 weeks, respectively.
- 13 A two-dose HPV vaccine schedule is recommended for most persons who begin the series before the 15<sup>th</sup> birthday. See [www.cdc.gov/mmwr/volumes/65/wr/pdfs/mm6549a5.pdf](http://www.cdc.gov/mmwr/volumes/65/wr/pdfs/mm6549a5.pdf) for details.
- 14 One dose of influenza vaccine per season is recommended for most people. Some children younger than 9 years of age should receive 2 doses in a single season. See current influenza recommendations for details.
- 15 The minimum age for inactivated influenza vaccine varies by vaccine manufacturer. See package inserts for vaccine-specific minimum ages.
- 16 Combination MMRV vaccine can be used for children 12 months through 12 years of age. See [www.cdc.gov/mmwr/pdf/rr/rr5903.pdf](http://www.cdc.gov/mmwr/pdf/rr/rr5903.pdf) for details.
- 17 Revaccination with meningococcal vaccine is recommended for previously vaccinated persons who remain at high risk for meningococcal disease. See [www.cdc.gov/mmwr/pdf/rr/rr6202.pdf](http://www.cdc.gov/mmwr/pdf/rr/rr6202.pdf) for details.
- 18 High-risk children can receive Menactra as young as 9 months and Menveo as young as 2 months. MenHibrix is given as a four-dose series at 2, 4, 6, and 12-18 months. It can be given as young as 6 weeks for high-risk children.
- 19 For routine, non-high risk adolescent vaccination, the minimum age for the booster dose is 16 years.
- 20 A second dose of PPSV23 5 years after the first dose is recommended for persons  $\leq 65$  years of age at highest risk for serious pneumococcal infection, and for those who are likely to have a rapid decline in pneumococcal antibody concentration. See [www.cdc.gov/mmwr/PDF/rr/rr4608.pdf](http://www.cdc.gov/mmwr/PDF/rr/rr4608.pdf) for details.
- 21 A fourth dose is not needed if the third dose was administered on or after the 4<sup>th</sup> birthday and at least 6 months after the previous dose.
- 22 The first dose of rotavirus must be administered no earlier than 6 weeks and no later than 14 weeks 6 days. The vaccine series should not be started for infants 15 weeks 0 days or older. Rotavirus vaccine should not be administered to children older than 8 months 0 days, regardless of the number of doses received before that age. If two doses of Rotarix are administered as age appropriate, a third dose is not necessary.
- 23 Only one dose of Tdap is recommended. Subsequent doses should be given as Td. For management of a tetanus-prone wound in a person who has received a primary series of a tetanus-toxoid containing vaccine, the minimum interval after a previous dose of any tetanus-containing vaccine is 5 years.
- 24 A special grace period of 2 months, based on expert opinion, can be applied to the minimum interval of 3 months, when evaluating records retrospectively, which results in an acceptable minimum interval of 4 weeks. An additional 4 days should not be added to this grace period.
- 25 A special grace period of 2 months, based on expert opinion, can be applied to the minimum age of 15 months when evaluating records retrospectively, which will result in an acceptable minimum age of 13 months. An additional 4 days should not be added to this grace period.