

American Academy of Pediatrics



DEDICATED TO THE HEALTH OF ALL CHILDREN™

Pennsylvania Chapter

November 26, 2006

Pennsylvania Chapter

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Mr. Alvin C. Bush
Chairman
Independent Regulatory Review Commission
333 Market Street
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Harrisburg, PA 17101

Dear Mr. Bush:

RE: Regulation ID No. 14-505 (#2549)

Thank you for the opportunity to comment on the Final Form Regulation #14-505 Child Care Facilities, Department of Public Welfare, Chapter 168. ECELS has the following comments/suggestions for the proposed regulations below:

It is essential that all children in the Commonwealth are protected from health and safety risks while in group child care settings. Regardless of the type of facility they attend, non-profit or for-profit, PA children and families deserve this protection. No non-parental child care setting should be exempt from regulations that require verifiable documentation that the children have received vaccines jointly recommended by the Advisory Committee for Immunization Practices of the Centers for Disease Control and Prevention and the American Academy of Pediatrics.

§ 168.51 Verification of Age-Appropriate Immunizations

The proposed regulation states only that documentation must be provided on a DPW form that says the child is up-to-date. Unless the requirement is for documentation of the dates immunizations were given to the child, compliance will be impossible to verify. Providing documentation on a particular form is irrelevant. The essential action is having the immunization dates for the child that verifies up-to-date status. The dates can be a photocopy of the medical record of dates when the child received vaccines, or whatever other record of vaccine dates that family has for their child. For all children, families must present the dates when vaccines were given to ensure up-to-date status for school entry. Requiring that families obtain and show the dates when vaccines were given is an important step toward readiness for school.

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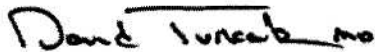
Without a requirement for the dates, many DPW forms will be filled in based on parent attestation that their children are up-to-date. Ample evidence exists that documentation of up-to-date immunized status in audited medical records is lacking for a substantial number of children. The state is obligated by the requirements for use of federal funds for child care subsidy to ensure that children who participate in subsidized child care are up-to-date for vaccines recommended by national pediatric and public health authorities (ACIP and AAP.) Both the Department of Welfare and the Department of Health need immunization dates to be able to provide the necessary evidence to meet federal reporting requirements.

Verification could occur when the family appears for the face-to-face meeting, or does a phone interview and sends hard copy of other required documents to the CCIS for determination of eligibility. At the CCIS, the records can be checked and the family instructed to fill any gaps in vaccine coverage.

The PA Chapter of the American Academy of Pediatrics provides free immunization cards that show when vaccines should have been received by age. Using these cards makes it clear when doses are missing. This type of portable record held by the family helps parents overcome the common problem that families obtain services from different sources of health care at different times.

Therefore, we suggest modifying the regulation wording to state, "The parent/caretaker must provide documentation of up-to-date immunizations by a written record of the dates immunizations were given."

Sincerely,



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cc: John H. Jewett, Regulatory Analyst - Independent Regulatory Review Commission
Robert Frein, Director - Bureau of Subsidized Child Care Services, Office of Child Development, PA DPW