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INDEPENDENT REGULATORY REVIEW COMMISSION

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DENISE E. ZIMMERMAN Executive Vice President Arthur Coccodrilli, Chair Independent Regulatory Review Commission 14th Floor, Harristown 2 333 Market Street Harrisburg, PA 17101

Re: Department of Health Regulation No. 10-181

School Immunization Requirements 28 Pa. Code Chapter 23

Dear Mr. Coccodrilli:

I am writing as President of the Pennsylvania Medical Society (PAMED) in support of the above captioned regulations relating to School Immunization requirements. As you are aware, PAMED expressed concerns during the public comment period concerning the process for adopting changes to the requirements and the length of time required for those changes to go into effect. We recommended that the Department of Health consider adoption of the Centers for Disease Control's (CDC) Advisory Committee on Immunization Practices (ACIP) guidelines for immunization.

We recognize the Department's concerns with our proposal. We appreciate that the Department was willing to discuss our concerns and open to a dialogue aimed to involve the Medical Society and other interested parties going forward to explore ways to expedite the approval process for future vaccines as they become available.

The Pennsylvania Medical Society therefore requests that the Independent Regulatory Review Commission act favorably to approve these regulations.

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The Society appreciates the opportunity to comment and wishes to thank IRRC members and staff for their responsiveness to these matters.

Sincerely,

James A. Goodyear, MD

President

Cc: Senator Edwin B. Erickson, Senate Public Health and Welfare Committee
Senator Vincent J. Hughes, Senate Public Health and Welfare Committee
Representative Frank L. Oliver, House Health and Human Services Committee
Representative Matthew E. Baker, House Health and Human Services Committee
Heather Stafford, Acting Director, Bureau of Communicable Diseases, Department of
Health

Yvette M. Kostelac, Senior Counsel, Department of Health Pennsylvania Chapter American Academy of Pediatrics