

Kathy Cooper

3146

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IRRC

From: Rachel <rachel_chaput@yahoo.com>
Sent: Monday, April 25, 2016 11:52 AM
To: IRRC
Cc: ra-stateboardofed@pa.gov; Senator Elisabeth J. Baker
Subject: In Reference to: IRRC #3146 and 3147

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In Reference to: IRRC #3146 and 3147

To Whom it May Concern:

My comments are made in reference to PA Department of Health proposed regulations #3146 and 3147 regarding vaccinations for students in Pennsylvania.

1. Regarding decreasing the provisional enrollment period from 240 days to 5 days: This is too extreme. If students are ill, they need time to recover before having vaccinations, which will cause unnecessary headache. Shortening the provisional enrollment period to 60 days should improve recordkeeping and give adequate time to parents to complete the necessary vaccinations and paperwork.
2. Proof of natural immunity must now be verified and documented by a licensed medical practitioner – this is impractical. Normal advice to those with chickenpox is to avoid public places. In addition, these children often do not feel well. Placing the burden of a doctor's visit on parents to verify the case of chicken pox puts a cost (of doctor visit or copay) on the parents and puts others in the public at risk of getting infected.
3. Addition of meningococcal vaccine for those entering 12th grade – Per Robert F. Kennedy Jr., meningitis is a rare disease that affects only 390 people nationally last year. FDA and industry testing show the meningitis vaccine to be unusually low efficacy and high risk. The manufacturer's inserts predict that 1% to 1.3% of inoculated children will suffer 'serious adverse effects'. CDC's Pink Book forecasts that 0.3% of these will die from the vaccine.

If you do the math, this vaccine can be expected to injure more children than it saves. At a cost of \$84 to \$117 per shot, and with the requirement for a two-shot series, this regulation would be a financial windfall for the vaccine manufacturers at the taxpayers' expense. Any injury that occurred from the vaccine can not be used in litigation against vaccine manufacturers because of the 1986 National Childhood Vaccine Injury Act, which grants liability protection to vaccine manufacturers for any morbidity or mortality that results from the use of their products.

Thus, this new regulation is not about protecting the public health. It is about making money for the manufacturers at the expense of the public health.

4. Inclusion of Pertussis vaccine for kindergarten admission - We are currently seeing outbreaks of pertussis among fully vaccinated populations. The CDC and top doctors are verifying the lack of efficacy and the early waning of any immunity provided by this vaccine. It seems hasty to add a vaccine that is currently under scrutiny from the medical community to the requirements.

Thank you for this opportunity to share my views.

Sincerely,

Rachel Chaput, MPH, CCH
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