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IRRC

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299 Stanford Place  
Newtown, Pennsylvania 18940

Ms. Cindy Findley, Director  
Division of Immunization  
Department of Health

Ms. Karen Molchanow, Executive Director  
Department of Education

RE: IRRC #3146 & 3147

Dear Ms. Findley & Ms. Molchanow,

- **I oppose decreasing the provisional period for student enrollment from 240 days to 5 days.** Five days is not enough time to schedule appointments or for students who may be sick to recover before getting vaccinated. A 60 day provisional period will give parents and sick children time to meet the requirements, which is on par with neighboring states.
- **I oppose requiring that proof of natural immunity for chicken pox be provided by a doctor, physician's assistant, or nurse practitioner.** Families will have the financial burden of all charges to demonstrate this proof, and additionally, this requirement creates an environment of distrust between the school staff and the parents, as the parents' declaration is questioned.
- **I strongly oppose adding Meningococcal vaccine for students entering 12th grade.** The addition of this vaccine is not only unnecessary but would significantly raise costs and risks that far outweigh any possible benefit. The incidence rate for meningococcal disease is 0.3-0.5/100,000. The CDC states that all serogroups of the disease are on the decline, including serogroup B, which is not even included in the vaccine. The Departments of Health and Education are asking parents to put their children at risk for severe and damaging side effects and unproven efficacy, all for a rare infection. Recall that **vaccine manufacturers have no civil liability, and that safety testing cannot be ethically performed prior to product release.** The public only begins to learn of the negative effects of these vaccine products in post-market surveillance.

- **I strongly oppose including Pertussis vaccine for kindergarten admission.** Currently, there are outbreaks of pertussis among fully vaccinated populations. In February 2016, The American Academy of Pediatrics published that Tdap provided only moderate defense against whooping cough (pertussis) during the first year after vaccination, with little immunity remaining within 2 to 3 years post-vaccine.
  
- **I oppose editing the current regulations to eliminate separate listings for measles, mumps, rubella, tetanus, diphtheria, and pertussis vaccination.** Evidence of immunity is different for each of the vaccines and the proposed regulations are unclear. All antigens should be listed individually.
  
- **Annex A lists enhanced "activated" polio vaccine.** This is incorrect. This should be changed to enhanced "**inactivated**" polio vaccine.
  
- **"Herd Immunity" claims are given without clarification or verification.** Disease outbreaks continue to occur in populations that have reached 100% vaccination rates, rendering this theory unreliable for massive vaccination requirements.

Thank you for your attention in this matter.

Sincerely,

Melanie Dito