

3146

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IRRC

Kathy Cooper

From: Beth Langer <bethyab@yahoo.com>
Sent: Sunday, May 08, 2016 10:50 PM
To: IRRC
Subject: Concerns about IRRC #3146 and #3147

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To whom it may concern,

We are writing in regards to changes being proposed in IRRC #3146 and #3147. There were several suggested changes that we found very concerning.

The decrease in the provisional period for student enrollment from 240 days to 5 days presents potential problems. Although a shorter provisional period is important, the drastic decrease to 5 days would put sick students at risk to receive vaccines while ill. The 5 day provisional period does not allow enough time for students to regain health from sickness before catching up on vaccines. We believe that a 60 day provisional period would provide ample time to catch students up on vaccinations without causing undue stress to parents or endangering children while sick to seek out vaccines under duress. No other surrounding states incur such a short provisional period.

We oppose the addition of the Meningococcal vaccine for students entering 12th grade. Meningococcal disease is extremely rare with an incidence rate of 0.3-0.5/100,000 according to the CDC (<http://www.cdc.gov/vaccines/pubs/surv-manual/chpt08-mening.html>). The CDC states that all serogroups of this disease are on the decline. Serogroup B, not included in the vaccine, declined along with the serogroups included in the vaccine "for reasons that are not known." Only 3% to 4% of households in which a case of meningococcal disease has occurred had secondary cases. Ninety eight percent of reported cases of meningococcal disease in the United States are sporadic, with only 2% of cases occurring due to outbreaks. Transmission in the school setting is extremely unlikely. Earlier this session, a bill was introduced to mandate this vaccine for students entering 12th grade. The legislature did not see the necessity for such a mandate and chose not to act. This insertion seems an attempt to circumvent the legislative process in enforcing mandates that are not supported by lawmakers.

The inclusion of the pertussis vaccine for kindergarten admission is concerning. Currently, there are outbreaks of pertussis among fully vaccinated populations. The CDC is verifying the lack of efficacy and the early waning of any immunity provided by this vaccine. Adding a vaccine to the requirements that is currently under scrutiny from the medical community seems hasty and irresponsible.

Lastly, we find it worrying that there is no requirement for standardized language in communications regarding vaccine requirements. It is our request that the regulations be amended to require all schools to use uniform language provided by the DOH which will include the text of 28 PA CODE CH.23 stating the accepted exemptions for PA students.

We trust that you will take our concerns into consideration in regards to the possible changes at hand. Thank you for your time and attention.

Sincerely,
Beth and John Langer
703 Pennsylvania Ave.
Irwin, PA 15642