

3146

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**Kathy Cooper**

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**From:** Jennifer Willis <jennifer.gmofreelc@gmail.com>  
**Sent:** Monday, May 09, 2016 9:35 AM  
**To:** IRRC  
**Subject:** Re: IRRC #3146 & 3147

2016 MAY -9 AM 10: 08

To whom it may concern:

Hello. My name is Jennifer Willis and I am a resident and mother here in Pennsylvania. I am writing to you today with concerns about the proposed regulation changes regarding immunizations (IRRC #3146 & 3147.) While some of the proposed changes make sense, there are a few that cause me to take pause.

To start with, I would like to say that the changes in the provisional period for children entering kindergarten is necessary and I am all for it. We have such a long provisional period that it (along with the early reporting date) skews our vaccination numbers and makes it appear that PA is well below the recommended herd immunity levels, even though we are not. However, what concerns me about the proposed changes is the incredibly short period of time it would be changed to....five days. Going from 240 days to five is quite extreme. There are many reasons someone may not be able to comply with such a timeline such as no appointment availability within said time or the child is sick and must wait to receive their vaccinations or they have so many vaccines to catch up on that it would be unsafe for them to get all the shots in one appointment. I feel 60 days is a much more reasonable time frame to comply and it would still be within the time frame needed to make our numbers more accurate regarding who is vaccinated for herd immunity.

My next concern is the need for a parent to have their child verified through a doctor if they get chicken pox. For decades it was perfectly acceptable for a parent to simply alert the school that their child has it and keep their child at home until the infectious stage is over. Why the sudden need to have a professional say what a parent has all along? Where is the big epidemic that would make anyone think that parents don't know what is going on and are sending their kids to school to infect others? This proposed regulation would cause parents to carry the financial burden of paying for an unnecessary office visit to confirm what can easily be seen and it will increase the chances of spreading the disease by having the infected child go out in public, particularly to an office where there may be other immune compromised children and adults.

I am also concerned about the desire to add more vaccines to the current schedule. It is being proposed to add a meningococcal vaccine to the schedule for 12th graders for the purpose of "post-secondary education." It seems ludicrous to me to require a vaccination on every high school student with a reasoning that it is good for them for entering college....which they are not doing yet! Let that be a college requirement if it is a concern there. It is also being proposed to add the pertussis vaccine to the schedule. It has been proven that pertussis is often spread by people recently vaccinated with this vaccine and until more studies are done and they can determine how/why that is happening and perhaps come up with a more effective and safe alternative, it should not be mandated. In the meantime, parents should be able to choose between the TD shot and the Tdap.

In regards to the vaccines required, the current language should remain the same, keeping each individual vaccine listed separately, not in combination form, as there are different, individual shots that can be obtained as well as keeping in mind that changes could be made to those vaccines in the future and that would require changes to these regulations once again. As long as each individual vaccine is listed, then they will be covered one way or another for an individual to comply with said regulations in the manner they feel most comfortable with when speaking with their doctor.

I admit I do have other concerns about the regulations as they currently stand, such as the fact we require all children to adhere to these regulations regardless if they are in a public school setting or a home school one, while most states only apply them to public school children. I am also concerned that most schools are not clear with parents that they have a legal right to an exemption if they need one. While these are not in the proposed regulation changes, I would love to see something amended to address these two issues.

It is my sincerest hope that my concerns will be seriously considered as you decide whether to move forward "as is" with these proposed regulation changes or choose to make some adjustments that would better serve the needs of the state and it's citizens.

Thank you for your time.

Sincerely,

Jennifer L. Willis  
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