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IRRC

Kathy Cooper

**From:** Nathan Flinner <ninflinner7@gmail.com>  
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**#1 - Change reporting deadline from October 15 to December 31. We support this change.**

**#2 -Decrease the provisional period for student enrollment from 240 days to 5 days. We oppose this change.**

**#3 - Proof of natural immunity for chicken pox through having contracted the disease must now be provided by a doctor, physician's assistant, or nurse practitioner. We oppose this change.**

**#4 - Addition of Meningococcal vaccine for students entering 12th grade. We oppose this change.**

**Comment:** The addition of this vaccine is not only unnecessary but would significantly raise costs and risks that far outweigh any possible benefit. The disease is extremely rare; the incidence rate for meningococcal disease, according to the CDC, is 0.3-0.5/100,000. According to the PA Department of Health EDDIE database, in 2014, there were only 16 new cases of meningitis. Vaccinating the estimated 147,040 seniors in 2014, would have cost parents and taxpayers over \$16,000,000. The CDC states that all serogroups of the disease are on the decline, including serogroup B, which is not even included in the vaccine

Earlier this legislative session, a bill was introduced to mandate this vaccine for students entering 12th grade. The legislature did not see the necessity of such a mandate and thus chose not to act. The Department of Health is seeking to circumvent the legislative process in enforcing mandates that are not supported by lawmakers. This vaccine is already available to anyone who wants it.

According to vaccine manufacturer package inserts, post marketing surveillance for the meningitis vaccine has shown the following: hypersensitivity reactions such as anaphylaxis/anaphylactic reaction, wheezing, difficulty breathing, upper airway swelling, urticaria, erythema, pruritus, hypotension, Guillain-Barré syndrome, paraesthesia, vasovagal syncope, dizziness, convulsion, facial palsy, acute disseminated encephalomyelitis, transverse myelitis, and myalgia.

**#5 - Inclusion of Pertussis vaccine for kindergarten admission. We oppose this change.**

**Comment:** 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. In February 2016, The American Academy of Pediatrics published that Tdap provided moderate defense against the illness (pertussis) during the first year after vaccination but not much longer. Immunity waned during the second year, and little protection remained 2 to 3 years

after vaccination. . It seems hasty to add a vaccine that is currently under scrutiny from the medical community to the requirements.

Meningitis and Tdap vaccines are pharmaceutical products that carry a risk of injury or death, a fact that was acknowledged by the U.S. Congress in 1986 when it passed the National Childhood Vaccine Injury Act. Since 1988, the federal vaccine injury compensation program created under that law has awarded more than \$3.2 billion to children and adults injured by vaccines or to families whose loved ones died from vaccine reactions, although two out of three who apply are denied compensation. The Institute of Medicine in a series of reports on vaccine safety spanning 25 years has acknowledged there is individual susceptibility to vaccine reactions for genetic, biological and environmental reasons that have not been fully defined by science, and doctors often cannot predict ahead of time who will be harmed. Long standing gaps in vaccine safety research and emerging evidence that certain vaccines do not prevent infection or transmission of disease, urgently require legal protection of physician's rights and parental rights regarding medical and religious exemptions to vaccination for minor children.

**Vaccine Manufacturers for Meningitis Vaccines Have No Civil Liability.** The 1986 law partially shielded drug companies selling vaccines in the U.S. from civil liability and, in 2011, the US Supreme Court completely shielded vaccine manufacturers from liability for FDA licensed and CDC recommended vaccines. There is no product liability or accountability for pharmaceutical companies marketing federally recommended and state mandated vaccines that injure Americans or cause their death, which makes flexible medical and non-medical vaccine exemptions in vaccine policies and laws the only way Americans can protect themselves and their children from vaccine risks and failures.

**#6 - The DOH proposes to edit the current regulations by eliminating separate listings for measles, mumps, rubella, tetanus, diphtheria, and pertussis vaccines that are currently most commonly consumed as combination shots. Instead, they will only be listed in the regulations in their combination forms - MMR and Tdap. Evidence of Immunity is different for some of the vaccines and the proposed regulations are unclear. We oppose this change.**

**#7 - There is no requirement for standardized language in communications regarding vaccine requirements. Change Requested.**

**#8 – Annex A lists enhanced “activated” polio vaccine. Change Requested.**

**Comment:** This is incorrect and should be changed to enhanced “inactivated” polio vaccine.

**#9 – Herd Immunity claims are given without clarification or verification. Change Requested.**

**Comment:** The Department of Health bases their reasoning for increasing vaccination mandates on the theory of herd immunity which was first developed when studying individuals who had the wild diseases, not those who had been vaccinated. Disease outbreaks continue to occur in populations that have reached 100% vaccination rates, rendering this theory unreliable for massive vaccination requirements.

Vaccines cannot promote or protect health. The strength of the immune system is the only true protection for health. The immune system needs whole foods, clean water, sunshine, and fresh air to function at its optimum level. It is incredibly powerful when given what it needs..

Vaccines introduce into the body nothing but known toxins, carcinogens, and undigested proteins from the animal and human tissues on which they are grown. Throughout the entire history of the use of vaccines they have been contaminated with other disease causing viruses and bacteria such as syphilis, tuberculosis, SV40 virus, and more recently retroviruses.

Vaccines stimulate the wrong arm of the immune system. Natural infection stimulates the first line of defense -cell mediated immunity. This stimulation is what is needed for long term immunity and to effectively clear the virus or bacteria from the body. A vaccine triggers a humoral response which is an inflammatory response. Since inflammation causes disease, this response is not desirable and is not the bodies natural response to infection. A humoral response cannot effectively eliminate the injected virus or bacteria from the body.

The body's protective barriers (skin, mucosal membranes. tonsils, etc.) are designed to prevent viruses and bacteria from gaining access to the body's vital organs. Vaccines bypass the protective barriers and put toxins into the muscle which in turn go directly into the bloodstream and then circulate to the body's vital organs.

Death rates from diseases between the 1850's and 1950's fell 90% before vaccines were introduced. The reduction in deaths was due to improved sanitation and better nutrition. (Just what the body needs.)

To date at least 413 abortions were performed specifically for the development of vaccines. Life is not valued in this country. The already born person is not more valuable than the unborn person.

Infectious diseases are not epidemic in this country because of public sanitation. The real epidemic is the 1 in 6 children with learning disabilities, autism, asthma, and allergies.

True public health cannot be attained when true measures of health are ignored, in favor of allopathic medicine. Allopathic medicine offers only toxic drugs or surgery to cover symptoms. The body uses symptoms to cure itself.

Health care and science in this country cannot advance positively if only one model of health care (the allopathic model) is forced on our society.

Please research the harmful effects of vaccines before mandating them in the pursuit of the almighty dollar.

Concerned citizen,  
Nathan Flinner