

3146

Kathy Cooper

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IRRC

**From:** Paula Chaiken <pchaiken@gmail.com>  
**Sent:** Monday, May 09, 2016 3:36 PM  
**To:** IRRC  
**Cc:** Baker, Senator Elisabeth J.; Aaron Kaufer  
**Subject:** Concerns

2016 MAY -9 PM 3: 55

May 9, 2016

Cynthia Findley, Director, Division of Immunization Department of Health  
625 Forster Street  
Health and Welfare Building, Room 1026, Harrisburg, PA 17120

Dear Ms. Findley,

As a parent and a citizen, I am concerned about the proposed changes regarding the immunization regulations for 28 PA Code Ch.23:

- # 3147 from the PA Department of Health
- # 3146 from the PA Department of Education

I am requesting the following of the Department of Health:

-Lengthen the proposed provisional period from the proposed 5 days. To force what could be many vaccinations on a child in a 5 day period could have long lasting adverse effects. Shortening this provisional period to 60 days is a more reasonable request for children and parents.

-Chicken pox verification by a medical professional should not be required. This is putting an unnecessary expense on the parents and the healthcare system.....not to mention the risk to individuals with whom they will come in contact at the Physician's office. If there is proof that the current system is being abused, the Department should produce proof of such abuse. There is no basis presented for this request.

-The Health Department should not add new pertussis and meningitis vaccines for school admission. The pertussis vaccine has shown many failures and the meningitis vaccine has risks that are not offset by the cost to the system (many millions of dollars) or by the risks to the children receiving the vaccine. Meningitis is a rare disease. According to the CDC, there were 16 confirmed cases of Neisseria Meningitidis invasive disease in Pennsylvania in 2014, which they state "usually manifests as meningitis". In 2015, there were 12 cases. Vaccine side effects of **disability** and **death** are stated in the CDC Pink Book.

This is a very large price to pay, not only in dollars but in lives affected, to protect from a disease which may only affect 15 people each year. Recently, legislators refused to mandate the meningitis vaccine, I feel the Department of Health is seeking to circumvent the legislative process.

-Specific costs were requested in questions 19-21. No specific costs are outlined, except to quote numbers from a measles outbreak in CA. This seems excessive, since many other outbreaks have been documented, all with much lower costs to the state. More accurate numbers (reliable data and total dollar cost to the commonwealth) need to be presented before any further action should be taken. The he Department should also be addressing

the cost to the commonwealth and the cost to the families who will experience adverse effects from the proposed vaccines.

I request that you reconsider these regulations and consider the seriousness of mandating additional vaccines for all Pennsylvania students.

Herd Immunity is cited as the reason for recommending new vaccines. Herd Immunity was originally based on Natural Immunity not Vaccine Induced Response. Communities with 99% vaccine compliance still experience outbreaks, further proving that Vaccine Induced Herd Immunity is unattainable.

Sincerely,  
Paula M. Chaiken

Shavertown, PA