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IRRC

September 26, 2016

Hon. George D. Bedwick  
Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor  
Harrisburg, PA 17101  
Email: [irrc@irrc.state.pa.us](mailto:irrc@irrc.state.pa.us)

RE: Regulation #10-97: School Immunizations (IRRC #3147) DOH

Dear Chairman Bedwick:

The Pennsylvania Association of School Nurses and Practitioners, the professional association representing the interests of over 2100 certified school nurses in Pennsylvania, is writing in **support** of the above referenced regulations on school immunizations.

This issue has been well vetted by the Departments of Health and Education. The July 2017 implementation date provides time for Pennsylvania's public schools to be ready for the new regulations to go into effect. We are planning now for the expected changes to go into effect for the 17-18 school year. Our responsibility as school nurses includes making sure the children we care for are adequately immunized and that records of those immunizations are maintained.

Immunizations are essential to primary prevention of disease from infancy through adulthood. Promotion of immunizations by the certified school nurse is central to the public health focus of school nursing practice. The school

immunization regulations before you provide some much needed clarity and strengthening of school immunization implementation guidelines to ensure the over 1.7 million Pennsylvania school children will benefit from the required immunizations and, to the maximum extent possible, not put others at risk of communicable diseases by helping to establish herd immunity.

We urge approval of the regulations at your upcoming meeting on October 20, 2016. Should you have any questions or desire additional information please contact our government relations consultant, Morgan Plant, at [morganplant@mac.com](mailto:morganplant@mac.com) or 717-386-1012.

Thank you for your consideration of this request.

Sincerely,

Judith Morgitan, M.Ed., BSN,RN, CSN  
President