

Stephen Hoffman

From: Amy Karschner Folk <amyleafolk@gmail.com>
Sent: Friday, October 14, 2016 8:57 AM
To: IRRRC
Subject: IRRRC #3147

While reviewing proposal IRRRC #3147, which makes changes to title 28, chapter 23 of the Pennsylvania Code, I would like to bring to your attention my concerns with the proposed changes.

The current proposal requires home education programs to report immunization data to the Department electronically, and it makes no provision for using a paper form. **While the proposal specifically gives public, private, parochial, or nonpublic schools the ability to use a paper form if they are unable to report electronically, no such provision is included for home education programs.** Home education programs should have the ability to report on paper forms.

Under the proposed changes, parents who choose to delay immunizations will not have enough flexibility in obtaining the required vaccines. Five days is far too short a provisional period. Parents should have more time (60 days) to develop a plan for their children to receive the required vaccines without being required to obtain a form from their doctor in order to do this.

Section (19) of the regulatory analysis form says the Department has removed the proposal requiring parents to provide a history of immunity to varicella from a physician, certified registered nurse practitioner, or physician assistant. The text of the final-form proposal, however, still includes language that would not allow parents to provide such a statement.

As noted in section (19), this proposal represents the greatest potential cost increase to parents and guardians. **This proposal was not recommended by the Joint State Government Commission's report. Further, varicella vaccination rates are already meeting the Healthy People 2020 Target Vaccination Rates, according to the Commission's report.** A parental statement regarding history of immunity to varicella should continue to be accepted.

Thank you,
Amy L. Folk
Pennsylvania Certified Teacher

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