

From: kanolt@comcast.net  
Sent: Friday, October 14, 2016 9:06 AM  
To: IRRC  
Subject: proposal IRRC #3147

October 14, 2016

Cindy Findley  
Director, Division of Immunization  
Department of Health  
PO Box 90  
Harrisburg, PA 17108

2016 OCT 14 AM 9:46  
RECEIVED  
IRRC

RE: Proposal IRRC #3147, proposing changes to title 28, chapter 23 of the Pennsylvania code

I submit to you my comments regarding the proposal IRRC #3147, which would make changes to title 28, chapter 23 of the Pennsylvania code.

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. Parents are not required to immunize their children until they are admitted to school (which includes attendance at a homeschool program). Five days is far too short a provisional period. Parents should have more time, 90 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 (chickenpox) 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 for your consideration and review . We urge you to make these changes.

Sincerely,

*Angela Nolt*

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