

3147

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IRRC

Kathy Cooper

From: Juli Benco <jbenco@windstream.net>
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To: IRRC; ra-stateboardofed@pa.gov
Subject: IRRC #3147

2016 OCT 14 PM 2:25

Cindy Findley
Director, Division of Immunization
Department of Health

Dear Ms. Findley,

I am writing to you concerning the proposed changes to the Pennsylvania school vaccination regulations (IRRC #3147, changing title 28, chapter 23 of the PA code). As a homeschool program supervisor, I am concerned that these changes impose unacceptable restrictions and requirements on homeschool families.

First of all, requiring homeschool programs to report immunization data to the PA Department of Health electronically, while allowing public, private, parochial or nonpublic schools to use paper forms, places an undue burden on some families. They should have the equal opportunity to submit their records on paper if this method works best for their program.

Second, some parents choose not to immunize their children until it is time for them be admitted to a school. With the proposed changes (5 days to be in compliance with the required vaccinations), these parents would not be able to complete this requirement. A plan that allows 60 days for the parents to work with their physician to meet the requirements would be far more reasonable.

Finally, the requirement of a medical practitioner to verify a child's immunity to varicella (chickenpox), is not a reasonable requirement. Many students who have been in the system for years with no medical documentation of their immunity would not be able to provide this documentation. A parental statement regarding a history of the child's varicella immunity should be accepted.

Thank you for taking the time to take my comments into consideration while these important matters are under discussion in the IRRC. I look forward to hearing how the Commission decides to rule on these matters.

Sincerely,

Julia Benco
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