

**From:** nuge31@verizon.net  
**Sent:** Thursday, October 13, 2016 5:40 PM  
**To:** IRRC  
**Subject:** Proposal IRRC #3147, which makes changes to title 28, chapter 23 of the Pennsylvania Code

Following are my comments on the proposal IRRC #3147, which makes changes to title 28, chapter 23 of the Pennsylvania Code,

**Regarding mandatory electronic reporting:**

*Home education programs should have the same ability to report on paper forms as the proposal gives to public, private, parochial, or nonpublic schools if they cannot report electronically.*

2016 OCT 14 AM 9:13  
 RECEIVED  
 IRRC

**Regarding reduced flexibility for provisional admittance to school:**

*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. Typically, unless it is an emergency, it takes longer than 5 days to get an appointment to see a doctor.*

**Regarding changes to documenting a prior history of chickenpox:**

*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 time and consideration,*

*Teresa Nugent*