

3147

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IRRC

Kathy Cooper

From: Charmaine Rusin <charmaine.rusin@gmail.com>
Sent: Sunday, October 16, 2016 4:01 PM 2016 OCT 17 AM 9:24
To: IRRC
Subject: Department of Health Regs #3147

October 15, 2016

RE: Department of Health Regulation #3147

Dear Mr. Sumner and IRRC Commissioners,

I am writing to ask that the IRRC not approve the Department of Health's final form regulation #3147. In reviewing the original proposed regulation change, the public comments, the comments from IRRC, and then the final form regulations, it is clear that the Department has not provided relevant data, cost-benefit analysis with actual relevant financial estimates, or explanations of reasonableness as requested by the IRRC and the concerned citizens who will be forced to endure the costs and labor of these regulatory changes.

The Department's dismissal of these important and pointed requests is unacceptable. Many aspects of this regulatory change are definitely NOT in the public interest. Parents and school staff will bear the brunt of these arbitrary deadlines and increased paper trails. Though neither group is in support of this extreme and costly change, the Department's only response to valid opposition seems to be that they have no idea what this is going to cost, but whatever that may be, it will be cheaper than the cost of dealing with an outbreak. This defense is absurd and based on no actual data. Pennsylvania, even with its faulty reporting and long provisional period, has no recent history of serious disease outbreaks. To impose expensive, burdensome processes on the already strapped school staff simply based on the vague possibility of an unfounded event (i.e. a measles outbreak in PA) is fiscally irresponsible and abuse of regulatory power which is not what legislation intended for the regulatory process. Since the Department has dismissed the opposition received from the clear majority of the public commenters and did not provide adequate reasoning or defense for their unreasonable new rules, the IRRC should act in the public interest and disapprove these regulatory changes as they are currently written.

Thank you for your consideration.

Sincerely,

Charmaine Rusin

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