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3147

October 17, 2016

VIA EMAIL

Cindy Findley
Director, Division of Immunization
Department of Health

Re: *Proposed Changes to Pennsylvania Immunization Requirements *
IRRC 3147

To Whom It May Concern:

By way of introduction, the Home School Legal Defense Association (HSLDA) is a national advocacy organization committed to protecting and advancing the fundamental right of parents to direct the education and upbringing of their children. With over 83,000 member families, we are the world's largest homeschool advocacy organization. We have over 2,800 member families in Pennsylvania.

These comments are made as a follow-up to previous comments made on May 9, 2016, concerning IRRC #3147, proposed changes to title 28, chapter 23 of the Pennsylvania Code relating to immunization requirements. We have reviewed the Department of Health's updated proposal and regulatory analysis of IRRC #3147.

Two primary concerns remain in the final proposal:

First, this proposal shortens the eight-month provisional enrollment period for school-age children to a five-day period during which children must receive all single dose vaccines and the next or final dose of multiple dose vaccines, along with a medical certificate documenting a schedule for any subsequent required doses. Giving parents a mere five school days to fully immunize a child or obtain a medical certificate concerning future immunizations is unreasonable. The immediate availability and convenience of competent medical assistance in administering vaccines, scheduling conflicts, family travel, and risk of child illness are a few of the many reasons why more flexibility is needed.

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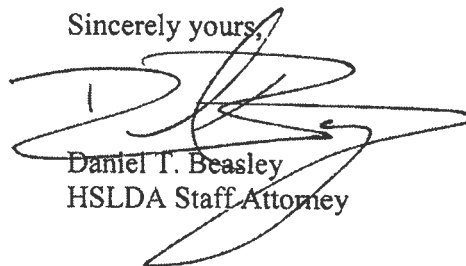
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Second, clarification is needed for how home education programs report immunization data. In practice, many home education program supervisors report immunization information to their local school district along with their annual affidavit. However, the proposal requires home education programs to submit this information electronically to the Department with no provision for alternative submission. The regulation should clarify that parents and guardians of children in a home education program can provide this information through their school district or provide an exemption for those who are unable to submit the records electronically. Such an exemption is included in the proposal for public, private, parochial, and nonpublic schools.

Thank you for your attention to these comments. Should you have any questions, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'D. Beasley', written over the typed name and title.

Daniel T. Beasley
HSLDA Staff Attorney

DTB/djd