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Kathy Cooper

From: Vicki Rowe <vicrowe@gmail.com>
Sent: Monday, October 17, 2016 2:12 PM
To: IRRC; cfindley@pa.gov; ra-stateboardofed@pa.gov
Subject: Proposed Immunization Regulation Changes Comment

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Ms. Cynthia Findley, Director
Division of Immunization, Department of Health
P.O. Box 90
Harrisburg, PA 17108

Dear Director Findley,

I am writing to express my extreme concern for the many aspects of the Department of Health's proposed changes to the immunization regulations, IRRC #3147, which makes changes to Title 28, Chapter 23 of the Pennsylvania Code. Given that the Department of Health failed to honor the comments of the majority of commenters, including myself, who oppose the unreasonable change of the provisional period from 8 months to 5 days, I am asking that these regulations not move forward as they currently read. A more reasonable provisional time frame would be 30-60 days, which is what many other states require. This would give parents time to work with their physician to develop an appropriate plan.

The Department of Health also failed to address many other concerns, such as the high cost of a meningitis vaccine mandate. Bills such as SB 797 which sought to add the meningitis vaccine to the school immunization requirements, did not move through the Senate because the citizens of this state voiced their opposition to this proposed mandate. These changes must be put on hold until clear and acceptable answers to the high cost of the meningitis mandate can be given.

Another concern is the difference in requirements between the home schooling data reporting versus public, private, parochial, or nonpublic schools. All of the latter can submit via paper documentation if they are not able to report electronically. If the state is requiring immunization data from home schooled children, then the same provision to submit via paper documentation should be given to those who are home schooled as well.

The Department needs to be held accountable to those who will be most affected by these changes so I am asking that these changes do not proceed until more thorough and satisfactory answers are given to the questions that have been raised. Please protect the rights of Pennsylvanian citizens including our most vulnerable, our children.

Thoughtfully,

Vicki Rowe

