

3147

Kathy Cooper

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IRRC

**From:** lists public <listsapm@yahoo.com>  
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**To:** IRRC; cfindley@pa.gov  
**Subject:** IRRC Regulations # 3147

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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 oppose IRRC proposal #3147 regarding PA title 23 Chapter 28 of the Pennsylvania Code.

The Department failed to make a compelling case for increasing vaccination requirements and changing reporting mechanisms for Pennsylvania school children.

The majority of commenters, even those who were for the new vaccine mandates, opposed shortening the provisional period to five days. These citizens who exercised their option to participate in the regulatory process were completely ignored, causing many to doubt the effort of issuing public comments. Many citizens question the validity of trying to participate if their comments are ignored by the Department and oversight groups.

The Department did not provide clear or compelling answers to the questions raised about the meningitis vaccine mandate. This vaccine is available without a mandate for those who wish to have it administered. The Department did not adequately address the vaccine's known adverse side effects, or clearly answer the questions raised concerning the financial impact of this new mandate.

The Department relied heavily on the theory of herd immunity to justify new vaccine mandates, even though the concept was created to describe people who caught the wild version of measles and generally retained life-long immunity. Vaccine-induced immunity does not have the same lifespan and typically wanes over time.

- The acellular pertussis vaccine wanes within two to four years according to an April 2015 Pediatrics study. (<http://pediatrics.aappublications.org/content/early/2015/04/28/peds.2014-3358>)
- Vaccine immunity is temporary and frequently ineffective, with up to 76% of people not responding to repeated vaccinations. <http://www.ncbi.nlm.nih.gov/pubmed/22423127>)
- Populations with near 100% vaccination compliance are still experiencing disease outbreaks. (<http://www.greenmedinfo.com/blog/2013-measles-outbreak-failing-vaccine-not-failure-vaccinate1>)

- In 18 different measles outbreaks in North America, vaccinated children constituted 30%-100% of the measles cases. (<http://www.ncbi.nlm.nih.gov/pubmed/8053748>)
- The pertussis vaccine reduces symptoms in those who have the whooping cough and may be associated with spreading the disease as the infected person is asymptomatic and not aware that they are carriers. Recent studies have suggested ... asymptomatic transmission from individuals vaccinated with the currently used acellular *B. pertussis* vaccines. (<http://bmcmmedicine.biomedcentral.com/articles/10.1186/s12916-015-0382-8>)

It is not acceptable for the Department to mandate vaccines for all Pennsylvania school children using the flawed theory of herd immunity without seriously addressing the known failures in this concept.

Homeschooled children should have the ability to report on paper forms rather than electronically.

The Department did not make a clear case for their proposal and I request that the regulations be withdrawn until they can adequately address the questions raised.

To reinstate the public's trust in the regulatory process, I also request that the IRRRC and oversight committees reject these proposed regulations.

Sincerely,

Alison Mullins  
Mechanicsburg, PA