

3147

**EMBARGOED MATERIAL**

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Kathy Cooper

**From:** Shelley McCartney <jdmsrm96@gmail.com>  
**Sent:** Tuesday, October 18, 2016 9:49 PM  
**To:** IRRC; ra-stateboardofed@pa.gov

2016 OCT 19 AM 8:28

Cindy Findley  
Director, Division of Immunization  
Department of Health

Dear Ms. Findley,

I am writing to you concerning the proposed changes to the Pennsylvania school vaccination regulations (IRRC #3147, changing title 28, chapter 23 of the PA code). As a homeschool program supervisor, I am concerned that these changes impose unacceptable restrictions and requirements on homeschool families.

First of all, requiring homeschool programs to report immunization data to the PA Department of Health electronically, while allowing public, private, parochial or nonpublic schools to use paper forms, places an undue burden on some families. They should have the equal opportunity to submit their records on paper if this method works best for their program.

Second, some parents choose not to immunize their children until it is time for them to be admitted to a school. With the proposed changes (5 days to be in compliance with the required vaccinations), these parents would not be able to complete this requirement. A plan that allows 60 days for the parents to work with their physician to meet the requirements would be far more reasonable. However, I do not think it is either safe nor healthy for a child to receive multiple vaccines in such a short time frame.

Finally, the requirement of a medical practitioner to verify a child's immunity to varicella (chickenpox), is not a reasonable requirement. Many students who have been in the system for years with no medical documentation of their immunity would not be able to provide this documentation. A parental statement regarding a history of the child's varicella immunity should be accepted.

Thank you for taking the time to take my comments into consideration while these important matters are under discussion in the IRRC. I look forward to hearing how the Commission decides to rule on these matters.

Sincerely,  
Shelley McCartney

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**From:** Amber Shay Nicholson <amberdini@hotmail.com>  
**Sent:** Tuesday, October 18, 2016 10:27 PM  
**To:** ra-stateboardofed@pa.gov  
**Cc:** IRRC  
**Subject:** Comments about proposed changes to school vaccination regulations - IRRC#3147

2016 OCT 19 AM 8:28

I have serious concerns about the changes proposed in IRRC #3147, making changes to title 28, chapter 23 of the PA Code.

1). Regarding mandatory electronic reporting:

The current proposal requires home education programs to report immunization data to the Department electronically, and it makes no provision for using a paper form. While the proposal specifically gives public, private, parochial, or nonpublic schools the ability to use a paper form if they are unable to report electronically, no such provision is included for home education programs. HOME EDUCATION PROGRAMS SHOULD HAVE THE ABILITY TO REPORT ON PAPER FORMS. As a home educator, making this addition/clarification is very important to me.

2) Regarding reduced flexibility for provisional admittance to school:

Parents are not required to immunize their children until they are admitted to school (which includes attendance at a homeschool program). Under the proposed changes, parents who choose to delay immunizations will not have enough flexibility in obtaining the required vaccines. FIVE DAYS IS FAR TOO SHORT A PROVISIONAL PERIOD!! This is not practical in the least. 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.

3) 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.

Sincerely,  
Amber Nicholson

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Kathy Cooper

**From:** Lisa Ragsdale <avonlea18@yahoo.com>  
**Sent:** Tuesday, October 18, 2016 4:18 PM  
**To:** IRRC; ra-stateboardofed@pa.gov  
**Subject:** Comments on Proposal IRRC #3147, which makes changes to title 28, chapter 23 of the Pennsylvania Code

2016 OCT 18 PM 4:40

Dear Ms. Findley,

I would like to submit comments regarding Proposal IRRC #3147, which makes changes to title 28, chapter 23 of the Pennsylvania Code.

First, I would like to state that I personally have two children, and have so far followed almost all of the recommended vaccinations for each of them (I did not get a flu shot for them two years ago because the vaccine was not matched well that year with the strains commonly being seen that year). So overall, I am in favor of vaccinating children.

However, I do have concerns about the changes proposed. There are two specific areas that are most concerning to me:

1. Reducing the period in which vaccines need to be completed to 5 days is simply not reasonable. I am a stay at home mom and I homeschool my children, and my schedule is more flexible than that of many parents who have an outside job. There have been times when it has been difficult to schedule a well appointment for my child in a short period of time. I cannot imagine having to try to work around work schedules, school schedules, and doctors schedules in a 5 day period. Eight months (the current time period) is certainly more than adequate, and I would not be concerned about some reduction, but 5 days is too short.

One additional thought in this area - I do know parents who are concerned about the link between autism and vaccinations. While I do not share that concern, one of the potential ways to reduce this concern is to allow the vaccinations to take place over a longer period of time. Reducing that ability to spread out the time for vaccination MAY cause additional parents to decide to NOT vaccinate their children.

2. My second concern has to do with required documentation. I have two concerns in this area. First, while many people do have access to internet, I live in a rural area, and while I personally have internet, there are many families in our area who do not have access to anything other than dial up at home. Even the DSL in this area is slow. Homeschoolers should have the option to file by paper just like the other entity. Second, I think that requiring this submission in the first place is excessive and redundant. We are required to submit documentation of vaccinations to our school districts, and I assume any child entering a public school is required to submit this documentation as well. I see no reason to have to submit this information to someone else. In addition, the December 31 deadline is horrible - it is right at the time when people are typically off school, work, etc. and it will be something that is easy to forget.

In summary, I would like to request that the proposed changes be dropped. They are unreasonable, unnecessary, and burdensome.

Thank you for your time,  
Lisa Ragsdale  
[avonlea18@yahoo.com](mailto:avonlea18@yahoo.com)  
307 Old Route 219  
Salisbury, PA 15558

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**Kathy Cooper**

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**From:** Debbie Nelson <debbiecn@verizon.net>  
**Sent:** Tuesday, October 18, 2016 11:59 AM  
**To:** IRRC  
**Subject:** IRRC #3147 title 28 chapter 23 of the PA code

2016 OCT 18 PM 12:13

To the Pa department of health,

In regards to proposal IRRC #3147 which makes changes to title 28 chapter 23 of the Pennsylvania code, I am asking that you do NOT go forward with these changes.

My concern is that parents will not have enough flexibility in obtaining vaccines with this new time limit. Parents should have more time to develop a plan for their children in regards to vaccines. Some choose to delay vaccines or spread them out over time due to other concerns. Parents have the right to make these decisions about their own children.

Regarding mandatory electronic reporting, there should also be a provision for homeschoolers to use a paper form. I ask you to please not move forward with these changes.

Thank you,  
Deborah Nelson

3147

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**Kathy Cooper**

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**From:** Amanda Richardson <amrichardson2075@gmail.com>  
**Sent:** Tuesday, October 18, 2016 10:09 AM  
**To:** IRRC  
**Subject:** Request to Preserve Medical Freedom in PA

Dear Commission,

As a U.S. Navy veteran and mother of three I am appalled at the erosion of individual liberties here in Pennsylvania. I am writing to you because of your relationship with the state Health Committee. I am strongly opposed to the Department of Health's changes to the immunization regulations and I ask that you not approve these regulations as they currently read.

The Department failed to honor the concerns of the majority of those who expressed concern or who oppose the unnecessary change of the shortened provisional period from 8 months to 5 days. Children in Pennsylvania deserve an education regardless of their medical status! Additionally they failed to address the high cost of a meningitis mandate. There are no cost estimate totals, no benefit amounts, and no statistics to account for the harshness of the 5 day provisional period.

The Department of Health needs to be held accountable to the people who will be most affected by this change and I am asking you to disapprove these changes noted in School Immunizations #10-197 (IRRC# 3147) and respect the requests of this PA state resident.

Respectfully,  
Amanda Richardson

King of Prussia, PA, USA

2016 OCT 18 AM 10:20

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