

3147

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IRRC

#10-197

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

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March 30, 2016

Dear Ms. Findley,

Thank you for the opportunity to comment on IRCC # 3147; Proposed change for PA Code Cite: 28 Pa. Code § 23.82; 23.83; 23.85; 23.86 - School Immunization Regulations.

As a concerned grandparent and healthcare provider, I believe any delay in required school vaccinations puts the general health and wellbeing of other children at severe risk. The proposed eight month delay is virtually extending the required immunization period to another school year.

The rationale for allowing such delay appears to be based more on a concern by the Department of Health to improve reported statistical rates of vaccine adherence within the Commonwealth rather than related to actual better health outcomes.

Since the Department suggests this proposed regulation is needed in order to decrease the threat of vaccine-preventable disease outbreaks in the general population, it is counterintuitive to think a proposed delay would support that premise. In reality, unprotected, unvaccinated children would potentially increase the exposure risk and disease spread for other school aged children as well as the general population within their community.

There is also expressed concern that timely provider visits in order to obtain preschool vaccinations prior to the start of the academic year may be more difficult to schedule given limited access due to the decreased number of providers. I would recommend a solution to resolve this concern with implementation of a model similar to mass immunization clinics as previously conducted within school districts in the 1950's and 1960's.

Utilization of school nurse resources could be maximized to provide in-school "team" health screening examinations and immunization administration. From an ROI perspective, the nursing staff could become more intimately involved with their student populations and their time would be well spent on other activities such as prevention with an opportunity to discuss health aspects such as appropriate hand hygiene to decrease the spread of disease. The actual cost of a mass immunization administration program could be designated as a revenue enhancement through allocated funding to the schools in support of improved health outcomes as demonstrated by decreased school absenteeism, and ultimately possibly improved academic scores.

Thank you for the opportunity to comment. I am available for further discussion and would be happy to participate in additional dialog. I can be contacted at 717-433-6049 or through email at [slmuscatell2@gmail.com](mailto:slmuscatell2@gmail.com).

Sincerely,

S.L. Muscatell, RN