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April 12, 2016

Cynthia Findley, Director
Division of Immunization
Department of Health
625 Forster Street
Health and Welfare Building, room 1026
Harrisburg, PA 17120

Director Findley:

I am writing about the proposed changes to the School Immunizations, 28 PA. CODE CH. 23. I fully support the mandated requirements for immunizations to protect the school population from vaccine-preventable communicable diseases.

My concern is with the change to the provisional period to five days. This is a good idea in theory but putting it into practice will be very difficult. School Nurses typically work on a teachers schedule, therefor are off during the summer. This is when many students move and change school districts. The start of the school year for staff is two to three days before the opening day of school for students. This will not provide enough time for immunizations to be checked, verified and notices to be sent to parents regarding exclusion in five days if they are noncompliant. This is a tremendous amount of work for the School Nurse along with trying to start the school year. Once the student has started the School Administration is cautious about excluding and interrupting education.

A more effective way to compliance would be to not allow the student to start until they have received the needed vaccines or have received the first of a series. Then strict monitoring as proposed by reviewing of certificates every thirty days.

As I have stated I am a strong supporter of immunizations. I have had students who are immuno-compromised, exposed to infectious agents that could have been prevented with a vaccine. Thank you for all the work you have been doing to tighten the requirements.

Respectfully,

Lauren Neely, RN, CSN, MEd

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