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**From:** Loring, Lisa <LLoring@wssd.k12.pa.us>  
**Sent:** Wednesday, April 20, 2016 9:14 AM  
**To:** Findley, Cynthia  
**Subject:** Thoughts on the proposed changes to the school immunization law

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We really appreciate the opportunity to comment on the proposed new regulations. Let me start by mentioning that our district does not allow, nor pay for us to come in before the beginning of the school year to go through records to figure out the status of who may need to be excluded and contact those involved. Often families are taking "one last trip" right before the beginning of the school year or their contact numbers are not valid making it very hard to contact them, especially in a 5 day window. Additionally, I hate to see a kindergartner's first days, which are already filled with emotions about starting school, be fraught with worries of being told that they "can't come to school". This is not the way to get their school career off to a good start. You know that those parents that do not comply are most often our low socioeconomic parents. Please, just for a moment, picture the face of a kindergarten child being pulled to the office and being told that they have to go home because their parents didn't have their shot records completed. This would be after a whole summer of being told that they are going to "big kid school" and often being excited about riding the bus. It is not a happy face. Not a good first impression on a child! I concur with my colleague's thoughts on the new proposal, which are the following:

The proposed 5 day window in which the parent can submit full immunizations, the next dose or a medical certificate is totally unrealistic. There is no busier time in a school health room than the first week of school!!!! I propose that the child is not given a start date, period, until the parents has either, submitted all required immunizations or submits the medical certificate. Once either is submitted, they are given a start date. Eliminate the 5 days all together.

If the state really wants to sink their teeth into the immunization problem, they will seriously consider the following:

1. **For Kindergarten, do away with the provisional enrollment period altogether. Not fully immunization = No attendance.** The age of compulsory enrollment is 8 years of age. The state should just say that the child may not start school without full immunizations. I bet this would improve immunization rates!! If parents try to register their children at age 5 and they do not submit proof of full immunizations by the week prior to school starting, the child is not eligible for enrollment until the next school year at the age of 6.
2. It is very difficult to have many kindergarten students immunized by the start of the school year because many of the children do not have their 5 year checkups until after the start of the school year. I would suggest making it standard practice that the 4/5<sup>th</sup> DPT, 3/4<sup>th</sup> Polio, 2<sup>nd</sup> MMR/V be given at the 4 year checkup and not the 5 year checkup. All children are at least 4 when they enter kindergarten so that would eliminate a lot of those children whose insurance will not let them have a well visit until 1 year after their 4 year checkup.
3. The state should require ALL doctors' offices to put immunizations in Pa-SiiS so school nurses do not spend time chasing down immunizations that a child already has but their parents/guardians just can't seem to find the time to get the paper work to us. This would allow us to look up and find the information in Pa-Siis, cross that student off our list and concentrate on those students who truly do not have the necessary immunizations.
4. The state should allow for the free exchange of immunization records between school nurses and doctors offices/health clinics without the need for any medical release. Doctors' offices should be made to follow this mandate.
5. Have mandated "buy-in" from school administrators. Enforce repercussions if immunization laws are not followed.
6. All children may not start school until the CSN has given approval that the child has the necessary immunizations to start school.

Again, thank you for the opportunity to comment and for taking the time to consider our views on the new proposal.

Respectfully,

Lisa Loring, R.N.  
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West Shore School District