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APR 25 2016

Independent Regulatory
Review Commission

Public Comment

Regarding: Proposed Immunization Regulations- Amendments to Chapter 23, Subchapter C

I am submitting these comments as a citizen of the Commonwealth of Pennsylvania with a professional background which includes thirty-nine years as a registered nurse; twenty of those as a Certified School Nurse serving in Pennsylvania public schools. The "protection of public health, safety and welfare" has been a day to day reality for me for much of my professional life. I respectfully submit my comments regarding proposed amendments to the current immunization regulations.

1. I support the addition of pertussis as a required vaccination in subsection (b)(1). This proposal is essential to stem the increasing numbers of students being diagnosed with pertussis; a diagnosis which typically is made after the student has been in school during the time of active disease transmission. Once diagnosed the student often misses several days of school until a five day course of antibiotics is completed. The student often suffers a prolonged recovery period of sub-optimal health due to persistent cough and fatigue.
2. I support the proposal to only accept a history from a physician, nurse practitioner or physician's assistant for evidence of varicella immunity from disease in subsection (b)(5). Parents are not able to determine with any validity whether a particular combination of symptoms and rash is an actual case of varicella.
3. I suggest a change to proposed amendment (e) (1) (iii) which would allow provisional enrollment for a 5-school-day period in the case of a student missing the final dose of a multiple dose vaccine. I would suggest **allowing a 10-school-day period of time** to allow time for the making of appointments, arranging for time off from work, transportation, and for records to be returned back to school and processed by the school nurse. I believe ten days would still convey the sense of urgency to parents that the new regulations are attempting to convey without creating undue hardship for school personnel to meet the requirement. The board should be aware that parents do not always return records to the school. Not all doctor's offices will share immunization information with the school nurse claiming that it violates HIPPA laws. This is an issue that needs to be clarified so that immunization information can be freely shared between the school nurse and the provider's office. Perhaps it should be required that all providers of immunizations use PASIIS to stream line the reporting process.
4. I would ask the board to consider a change in the current regulations in 23.84 pertaining to exemptions from immunization. I would urge the Commonwealth to disallow exemptions for religious or philosophical/strong moral ethical conviction. At the very least it should require more than a signature on a card or letter. I would also urge that the medical exemption clause require the health care provider signing for the exemption to require specific information including the vaccine(s) for which the child is exempted, the reason for the exemption, and whether or not the reason for the exemption is permanent or temporary. If the exemption is temporary, it should be re-evaluated annually unless a longer period of

time is indicated by the child's treating physician. A temporary exemption should not exceed a period of 24 months before re-evaluation.

Respectfully submitted,

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