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April 18, 2016

Dear Ms. Findley,

I am a School Nurse at a middle school in Edinboro Pennsylvania. One of my main challenges upon coming back to the School in late August is quickly reviewing all documents that came in over the summer and discovering which 7th graders have not successfully gotten documentation to me of their Meningitis and Tdap vaccinations. The vast majority of School Nurses across the state do not come in to their offices days in advance to do this paperwork, nor do their school districts offer them compensation to do so. Having a "provisional" time frame has provided a little cushion (a few days) for school nurses to gather their data and begin contacting parents of children without the required documentation.

The new proposed regulations eliminate this provisional time frame. Although I agree that 8 months is very long and I (as well as many others) have always wished for it to be shortened, I certainly do not favor eliminating it completely. If it could be shortened to three or four weeks, that would be ideal. It allows for school nurses to get their feet on the ground upon coming back to school after the summer and it would provide an appropriate time frame to contact parents. Many school nurses have scores of parents to contact. This takes time. Hence, logistically speaking, we need a little "grace" time at the beginning of the school year built into the new provisions.

Other than that concern, I like the new proposals. Please feel free to contact me with any other questions you may have.

Sincerely,

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