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March of Dimes Foundation

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Mr. David Sumner
Executive Director
Independent Regulatory Review Commission
14th Floor, 333 Market Street
Harrisburg, PA 17101

RE: Department of Health – Proposed Regulations No. 10-197 School
Immunization Regulations

The March of Dimes is the leading non-profit in maternal and infant health, funding scientific research, providing community programming, and advocating for laws and regulations to improve the health of pregnant women, infants and children since 1938. The March of Dimes has been committed to increasing immunization rates against infectious diseases since its founding, and led successful efforts to develop a vaccine for polio, which ultimately ended the polio epidemic in the United States. We are writing to express our support of the proposed regulatory changes to Regulation No. 10-197: School Immunizations which would require the addition of the pertussis vaccine and proposes the addition of a second dose of meningococcal vaccine before entry to 12th grade.

Meningococcal disease is the leading cause of meningococcal meningitis, an infection that causes swelling in the brain and spinal cord and can result in permanent disability or even death. According to the CDC, "About 1,000 – 1,200 people get meningococcal disease each year in the U.S. Even when they are treated with antibiotics, 10-15% of these people die. Of those who live, another 11%-19% lose their arms or legs, have problems with their nervous systems, become deaf, or suffer seizures or strokes." Anyone can contract meningococcal disease, but it is most common in infants and people 16-21 years of age.

A vaccine to immunize children and young adults against meningococcal disease covering 4 of the 5 major causes of bacterial meningitis (strains A, C, W and Y) is readily available. The CDC recommends *routine* administration of this vaccine to all children at age 11 or 12 years, with a booster dose at age 16 years old.

Following outbreaks on college campuses, the Food and Drug Administration (FDA) approved two vaccines for the remaining major circulating strain of bacterial meningococcal disease in the U.S., meningitis B. The CDC has recommended *permissive* use of this vaccine in all children and young adults ages 10-25 years, with preferred age of administration at age 16 through 18 years of age. In addition, at its February 2015 meeting, the ACIP recommended that certain persons aged ≥ 10 years who are at increased risk for meningococcal disease should receive a routine meningococcal B vaccine. Relevant risk factors include persistent complement component deficiencies; anatomic or functional asplenia; and exposure to a serogroup B meningococcal disease outbreak.



The proposed regulatory change also includes adding a requirement to immunize against pertussis, the incidence of which has gradually been increasing in the United States since the 1980s. Pertussis, a respiratory illness commonly known as whooping cough, is a very contagious disease caused by a type of bacteria called *Bordetella pertussis*. These bacteria attach to the cilia (tiny, hair-like extensions) that line part of the upper respiratory system. The bacteria release toxins (poisons), which damage the cilia and cause airways to swell. Pertussis is a very contagious disease only found in humans. It is spread from person to person. Individuals with pertussis usually spread the disease to another person by coughing or sneezing, or when spending a lot of time near one another in shared breathing space. Many babies who get pertussis are infected by older siblings, parents, or caregivers who might not even know they have the disease. Infected individuals are most contagious up to about 2 weeks after the cough begins. Antibiotics may shorten the amount of time someone is contagious. The best way to prevent pertussis is to receive the vaccination. The Centers for Disease Control and Prevention's Advisory Committee on Immunization Practices (ACIP) recommends that all adolescents receive a single dose of Tdap at 11-18 years of age, with preferred administration at 11 or 12 years of age.

Recognizing the significant impact of vaccines in preventing infectious diseases like polio, measles, and pertussis, the CDC declared vaccines to be one of the top 10 public health achievements of the 20th century. Expanding Pennsylvania's current vaccine schedule to include immunization against pertussis as well as adding the second dose of meningococcal vaccine before entry to 12th grade will protect our young people from a terrible, but preventable, diseases.

If you have any questions, please contact Aleks Casper, Regional Director of Advocacy and Government Affairs at 302-256-5177 or acasper@marchofdimes.org.

Thank you for your consideration,



Aleks Casper
Regional Director of Advocacy and Government Affairs
March of Dimes Foundation

