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Kolva, Patti

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IRRC

From: Alice Uhrich <aliceuhrich@gmail.com>
Sent: Saturday, April 23, 2016 8:06 PM
To: Findley, Cynthia
Subject: Open comment for proposed immunizations
Attachments: OPen comment for immunizations.docx

2016 APR 28 AM 10:32

Cynthia

Please find my attached comments. Dear Cynthia Findley,

I am writing to you in regard to the proposed amendments to Chapter 23, Subchapter C regarding immunizations.

As a high school nurse I am in favor of the proposed amendments being instituted this coming school year but have concerns about the feasibility for school nurses as many of us do not receive compensation for summer hours. I hope all departments involved will recommend school administrators adopt a plan for either financial compensation or time returned compensation.

Another concern is that all the Department of Health centers will have an adequate supply of vaccine to accommodate the proposal.

I am in agreement of the 5 day exclusion period.

I recommend the wording for the exclusion to say that school administrators "will or shall exclude" not the current verbiage of "may" exclude. My administrators refuse to exclude children who do not meet the current requirements and as a result I still have four freshmen students who lack the 7th grade requirements and 35 eighth students.

I would like to see the religious and philosophical exemption removed unless there is confirmation that the parents have consulted with the child's physician first and the physician confirms this discussion.

Tdap immunization: I believe all students grade 7 through 12 should all be required to receive the Tdap. This would include students transferring from outside of the Commonwealth as well as homeschooled students who chose to attend school as a visiting student for classes like band, technology, etc.

Varicella: I agree that the note of disease come from the laboratory with a note of confirmation from the child's physician.

MCV: So many physicians are not administering a second MCV and not all post secondary education institutions require MCV. I support the need for a second MCV dose prior to admission to grade 12 and have already reviewed all of my 1100 9 to 12th grade immunization records in preparation for this addition.

Where multi dose is concerned: I understand the student may have the first dose and support that if the student can receive the second dose during that five day exclusion period this is accepted with the certificate. My concern is for the plan for the next dose. Parents seem to be lacks in the attention of healthcare especially physicals. I support this only if the child may be excluded the day after the proposed second, third, or fourth dose of a multi dose is missed.

It makes sense to change the review time frame from 60 days to every 30 days but once again the proposal states of school administration or their designee when in all honesty it is really the school nurse so that is what the wording should read.

Thank you for any attention to this comment letter,

Alice Uhrich MSN, RN, M.Ed., PA – certified school nurse, NCSN

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