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Kolva, Patti

**From:** Lorri Harshberger <LHarshberger@fhrangers.org>  
**Sent:** Tuesday, April 26, 2016 10:42 AM  
**To:** Findley, Cynthia  
**Cc:** Lorri Harshberger  
**Subject:** comments regarding proposed rulemaking school immunizations

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Comments regarding proposed rulemaking school Immunizations:

Regarding 23.82 Definition of medical certificate: Specifies a health care provider or public health official would indicate by when a child must receive the immunization. Is there a deadline for that date? Must the 'official medical certificate' be used or can the practitioner use any form of written communication? What happens when the parent doesn't adhere repeatedly to the plan on the medical certificate (i.e. no gas in the car to get the shot, the child didn't feel well etc.) and the practitioner keeps extending the date? I understand that the record will be reviewed every 30 days but some parents come up with a multitude of excuses to delay immunizing their child.

Section 23.85 (1) the word will would be preferable to the word may in the sentence the child will not be admitted to school, unless the child has at least on dose of each multiple dose.....

For the meningitis shot for entry into 12 grade, if a student had one for entry into 7<sup>th</sup> grade and then another **before** the 16<sup>th</sup> birthday, would the student be required to receive an additional shot when they enter 12<sup>th</sup> grade?

Before the new regulations are put into effect there should be adequate time afforded to educate the practitioners that administer vaccine, physicians and their staff. Often times the staff at the doctor's office do not know the new requirements or the proper spacing between shots. I definitely thinks these proposed changes should not be rushed to go into effect for the upcoming school year due to not enough time to educate practitioners and inform parents of the new requirements. There should also be enough time for the practitioners to become informed about the new medical certificates. Also, make sure doctors are aware of the new requirement that parents cannot indicate via a statement that their child has had a case of chicken pox and that the history needs to come from a physician, nurse practitioner or PA.

In addition, consider that generally school nurses do not work during the summer months so it would be difficult for nurses to review the immunization records, and communicate with parents if this proposed regulation would go into effect the upcoming school year.

Thanks for allowing comments regarding the proposal.

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