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Kolva, Patti

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From: Mcnelis, Wendy G <McnelisW@allentownsd.org>
Sent: Monday, April 25, 2016 2:52 PM
To: Findley, Cynthia
Subject: Response to proposed Rulemaking - School Immunizations

2016 APR 28 AM 10:30

Below please find questions and concerns about the proposed changes:

Page 3- Section A- last sentence: The Department is proposing a second dose of MCV before entry into 12th grade- If the student was not in PA for 7th grade and never had dose #1 will this now be considered a 2 dose series vaccine and they will need one to start from 7th grade on?

Page 4- Section 23.83 Immunization Requirements: first paragraph: Varicella Dr. proof is difficult. I am at an urban high school that is VERY transient both in and out of state and country. Many do not have insurance and even with insurance titers are not covered and very expensive. For our age group Dr.'s didn't want them coming to the office- they took the parents word for it and treated accordingly.

Second paragraph: Discussion on Meningococcal vaccine very complicated to interpret- would suggest simplifying to something like: dose (1) in 7th grade dose (2) AFTER age 16 through age 18.

Last paragraph: single dose and multi-dose provisional time period difference- I think that is a great idea!

Page 5- First paragraph: Providing a certificate within 5 days- I do not think this will be realistic- we have a %50-60 turnover and most of our students are from another state or country such that they have no provider and often no insurance. Our local Health Bureau can't accommodate a 2-4 week turnaround now and as new patients will never get into a private provider within 5 days.

Third Paragraph: Religious/Medical/Moral exemption: Why can't we eliminate Moral exemption all together? In my experience this is used as a copout to completing a series or going for more immunes when they have been spaced incorrectly.

Page 7- C Affected Persons: Third paragraph: What does the actual data show for the Commonwealth and Nationally? In our high school (approx. 3000 students) we have experienced no disease outbreak with our students in the past decade. We have had to participate in 2 pertussis investigations after students were identified as potential exposures, but none contracted the disease, and one investigation for chicken pox this year with same results. These students all attend a Vocational School that has students from 13 other school districts attending.

Page 9- Paragraph 2: Again I am concerned about the Dr. proof and 5 day certificate requirement. Many of our students as stated previously move so frequently (I am sure this is the case in all the Commonwealth urban districts) there is no physician to call and 5 days is just not long enough to get into a new provider or Health Bureau.

Paragraph 4: Same discussion as noted previously above- The Department is proposing a second dose of MCV before entry into 12th grade- If the student was not in PA for 7th grade and never had dose #1 will this now be considered a 2 dose series vaccine and they will need one to start from 7th grade on? I think this needs further explanation.

Page 15- Section 2- As previously noted- very complicated to interpret- couldn't it be said as above or some version of this: would suggest simplifying to something like: dose (1) in 7th grade dose (2) AFTER age 16 through age 18.

Thank you in advance for following up on questions and concerns.
Wendy McNelis RN, BSN, CSN, MEd