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Kolva, Patti

From: Michele Varner <MVarner@fhrangers.org>
Sent: Tuesday, April 26, 2016 10:59 AM
To: Findley, Cynthia
Cc: Michele Varner
Subject: response to PA Bulletin - Immunizations

2016 APR 29 AM 9: 58

Dear Ms. Findley,

I have reviewed the proposed immunization regulations listed in the PA Bulletin on April 9 and have the following comments:

23.82 - I think limiting the provisional period is great but now am confused regarding the medical certificate. It appears as if it will allow a student to remain in school if they have the certificate, which has to be reviewed every 30 days by a school administrator. The wording should include designee, i.e. school nurse, because that's who is looking at the immunizations, not the administrators. This looks like the medical certificate will allow the student to be provisional and is giving more work to the school nurse to review immunizations every 30 days instead of 60. Will the providers have a copy of the medical certificate to use or will we be able to accept something type from them on letter head or a prescription pad. Will the providers and their staffs be adequately educated on these changes? Are there extensions to the medical certificate? When do we finally just exclude the student as parents frequently have numerous reasons they could not follow though. Also the wording, may be excluded, should be removed and replaced with will be excluded.

23.83- Will the providers be informed that they need to write proof of history chickenpox and we may not accept from parents?

- the meningococcal vaccine required for entry into 12th grade but if they had a dose after the age of 16, the requirement would not apply. The students need a physical for grade 11 so why not require the vaccine then because they are getting it at that time and are 16 or older.

23.85- The single dose vs. multiple dose requirement should be the same. The 5 day provisional period is posing a tremendous amount of pressure on the school nurse who is extremely busy the first 5 days of school, getting the students with diabetes, life threatening food allergies, asthma, meds, etc., set up and plans to get in place. Just get rid of the 5 day provisional period as the medical certificate makes for more confusion.

I agree we need to have stricter immunization guidelines and no provisional period, but to get there, we need an educational campaign for the parents, providers, school administrators, and school nurses. Rushing to implement the new regulations will only cause confusion for all involved. Most school nurses do not work in the summer months and would not be looking at immunizations until the first day of school. We already inform parents of the need for the required immunizations when they register their child but still, we do not have proof of adequate immunizations on the first day of school. Also the providers do not share the immunization readily with the school nurses, asking for consent forms from the parents, before they provide immunization information. I feel this should take effect for school year 2017-18 in order for everyone to be prepared adequately.

Sincerely,

Michele Varner, RN

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