

3147

Kathy Cooper

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IRRC

**From:** Edna Bloom <bloom.musicnotes@gmail.com>  
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Greetings:

Two changes included in Proposal IRRC #3147 to change title 28, chapter 23 of the Pennsylvania Code regarding School Immunization Regulations will be problematic.

The first is the **reduction of the eight month provisional period to five days**. This is definitely not enough time to interact with one's health care provider. Many primary care physicians are not even open all days of the week. Furthermore, what if one's child happens to have a viral illness? Any vaccines, much less multiple vaccines, would be adding stress to the immune system and quite possibly misery to the suffering child. Children with generally fragile health would be extra stressed by having many vaccines administered within five days. The point of vaccines is to assure immunity to disease, so it makes sense to maximize the success of each dose. As mentioned previously, it is sometimes difficult to schedule in to see one's physician on a non-acute matter; some children's health warrants more-than-routine consideration when making immunization decisions. The urgency for vaccination is considerably less for home educated children than for those in school situations, so this population especially should have wider parameters for compliance. All parents should have much more time than five days to implement an immunization plan.

Second, the **requirement for a health care provider's statement to document the history of varicella** seems impractical. The net effect would be to require all children with an active case to travel to a facility during an active outbreak for documentation. Otherwise, the health care provider would simply be forwarding a parent/family's assessment (perhaps if called for advice or self-reported to the provider) of the infection anyway. This would be redundant, would increase the potential for spreading an outbreak, and could be deleterious to some individuals' recovery. A written statement from the parents would provide the same information with fewer layers of busywork.

Respectfully submitted by Edna Bloom, 2801 Luthersburg Rockton Road, Rockton, PA 15856