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Kathy Cooper

**From:** Heather Morgan <heatheranya@hotmail.com>  
**Sent:** Wednesday, May 04, 2016 10:37 AM  
**To:** IRRC  
**Subject:** Comments concerning proposed regulation changes #3147

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Cynthia Findley, Director, Division of Immunization  
Department of Health  
625 Forster Street  
Health and Welfare Building, Room 1026  
Harrisburg, PA 17120

RE: Comments concerning proposed regulation changes to 28 PA Code Ch. 23:  
#3147

Dear Ms. Findley,

Thank you for taking the time to review my comments on the proposed regulation changes.

#1: Decreasing the provisional period

I agree with shortening the provisional period in order to obtain accurate data.

#2 Proof of natural immunity for chicken pox provided by a doctor, physician's assistant or nurse practitioner  
I disagree with this change. Chicken pox is easily identifiable in the majority of cases due to the nature of the fluid filled, itchy vesicles. It is irresponsible to take a sick and contagious child out in the public unless there is a concern with how the child is handling the illness. This greatly increases the chance of spreading the illness. Not to mention the costs that parents must incur by taking their child in for a sick visit.

#3 Addition of Meningococcal vaccine for students entering 12th grade.

I strongly disagree with this change. Although meningococcal disease is very dangerous, it is also extremely rare and its communicability is limited. Transmission in a school setting is limited. Like any vaccine, the meningococcal vaccine carries a risk of mild to severe reaction and mandating this vaccine is likely to cause more events than it will prevent. It will also increase costs since it will add a third reporting burden to school districts. I think it's also important to mention that earlier this session, a bill was introduced to mandate this vaccine for all students entering 12th grade and the legislature did not see the necessity of such a mandate. I don't like the idea that we are circumventing our legislative process.

#4 Inclusion of Pertussis vaccine for kindergarten admission

I strongly disagree with this change. There are obvious problems with this vaccine since we are seeing more and more outbreaks in vaccinated children. Why should we mandate a clearly ineffective vaccine? Children entering kindergarten are receiving the vaccine anyway since it is included with tetanus and diphtheria so it is not a question of children not receiving the vaccine. Since it is likely that the vaccine will be changed due to the ineffectiveness, it would be a waste of time and money to mandate it at this point.

I also think that all school districts should be required to include the text of 28 PA Code Ch.23 stating the accepted exemptions along with the vaccination requirements.

Thank you,

Heather Morgan