

Kathy Cooper

3147

RECEIVED
IRRC

From: Mark Roth <mproth7@comcast.net>
Sent: Wednesday, May 04, 2016 7:39 AM
To: IRRC
Subject: Proposal IRRC #3147

Kallstrom,
Susan
Posted
5/3/16
01:54 PM
EST

State Proposes Changes to Immunization Requirements

Dear HSLDA Members and Friends:

The Pennsylvania Department of Health has proposed changes to school vaccination regulations (28 Pa Code §§ 23.81-23.87) that will affect homeschool families who choose to vaccinate their children.

HSLDA does not take a position on whether parents should vaccinate their children; however, we believe that parents should have the ability to make this personal decision for their children. The exemptions to Pennsylvania's mandatory vaccination law are not affected by the proposed changes. Thus, the changes will not affect families who choose not to vaccinate and who comply with a legal exemption from this requirement.

For those families who choose to vaccinate, we encourage you to review the proposed changes and submit comments by May 9, 2016, if you have any concerns. We have identified the following changes that will affect homeschool parents:

The eight-month provisional period for school-age children who have not received all required vaccines would be reduced to a five-day period during which children must receive all single dose vaccines and the next or final dose of multiple dose vaccines along with a medical certificate documenting a schedule for any subsequent required doses.

Parents would be required to obtain a statement from a physician, nurse practitioner, or physician's assistant in order to document the history of varicella (chicken pox). Under current law, parents are able to provide this statement.

Students would be required to receive an additional dose of a meningococcal vaccine before entering 12th grade.

Students would be required to receive a pertussis (whooping cough) vaccine in conjunction with the currently required diphtheria and tetanus doses.

A fourth dose of the poliomyelitis vaccine would be required.

The full proposal can be viewed [here](#).

Action Requested

You may submit your comments on these changes to the Department of Health. However, you must do so by May 9, 2016.

Comments should be submitted via mail to:

Cindy Findley,

I am writing regarding proposal IRRC #3147, which makes changes to title 28, chapter 23 of the Pennsylvania Code.

I think it is great that you are concerned about the health of our children, but I have serious reservations regarding the reduced flexibility for provisional admittance to school that this new proposal would demand. Current state laws state that parents are not required to immunize their children until they are admitted to school. Under the proposed changes, parents who choose to delay immunizations will not have enough flexibility in obtaining the required vaccines. Five days is far too short a provisional period. There may be danger in requiring too many vaccine doses in a short period of time. A vaccine is only effective if it allows the child's natural immune system to build up an immunity to the disease. This requires some time. If too many vaccines are given at once, the child's body cannot properly handle that demand. The chances of contracting one of the diseases from the vaccine is much greater. Therefore this law is counter-productive. Parents should have much more time like several months to develop a plan for their children to receive the required vaccines.

Also, another consideration is regarding the changes to documenting a prior history of chickenpox. Many parents, for good reason, may decide not to take their child to the doctor when the child is infected by varicella (chickenpox). These children should not be required to receive the vaccine as they have a natural immunity. A written statement from the parents should be treated as sufficient evidence demonstrating a history of chickenpox.

Thank you for considering these changes to the current proposal. I think these changes would better serve the citizens of Pennsylvania and provide safer policies for our children.

Respectfully,

Pamela Roth