

**Kolva, Patti**

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**From:** Grumbein, Carol A <grumbeinc@allentownsd.org>  
**Sent:** Wednesday, April 20, 2016 12:09 PM  
**To:** Findley, Cynthia  
**Subject:** In response to

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The proposed amendments to Chapter 23, Subchapter C would take steps to ensure that children attending school in this Commonwealth are adequately protected against potential outbreaks of vaccine-preventable diseases. In some cases, the only way to ensure that children are adequately protected—particularly those children who are medically unable to obtain a vaccination and, therefore, vulnerable—is to require the immunization of all children attending school. The proposed regulations were posted in the Pennsylvania Bulletin on April 9, 2016, at <http://www.pabulletin.com/secure/data/vol46/46-15/594.html>. Interested persons are invited to submit written comments, suggestions or objections to:

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

OR

[cfindley@pa.gov](mailto:cfindley@pa.gov)

Dear Ms. Findley,

I would like to respond to the proposed changes to the School immunization law. I am a school nurse with 25+ years' experience in an urban school setting. Having experienced a vast number of situations in regard to immunizations and exposures to infectious diseases. I feel we as school nurses have not been consulted as to what is best practice in a school setting. In referring to the document cited above please follow my key points of concern.

Under Section A. 5<sup>th</sup> paragraph- Regarding to the sentence that "parents believe that they no longer need fear, as they did in the past...etc. In the past families were not as transient and had a family doctor that they went to the majority of their childhood/life. They also did not have to get their medical records to go from one place to another risking them being lost or improperly transcribed.

Under Section A. 7<sup>th</sup>-last- paragraph-Last sentence- The Department is also proposing to add a second dose of meningococcal vaccine before entry to the 12<sup>th</sup> grade. Since the inception of adding MCV to required vaccines in the 2011-2012 school year we have been asking that it is not just for 7<sup>th</sup> grade students but for students in 7<sup>th</sup> grade and continue to require one dose of MCV to students until graduation. For example, a student comes in in 9<sup>th</sup> grade from another state/country who does not have #1 MCV-we do not require them to obtain one. Therefore, to have a second dose before 12<sup>th</sup> grade is really requiring 2 doses before their entry into 12<sup>th</sup> grade.

Section B. "medical certificate"- Has the Dept. of Health discussed/proposed this to the American Academy of Pediatricians. Meaning, have PA pediatricians been notified of these proposed changes that they will need to provide medical certificates?

Under Section B.23.83 paragraph 5- That only confirmation of varicella would be able to be provided by a physician, laboratory, CRNP or PA. A parent would not be able to give history of disease. A lot of practitioners do not want parents bringing children in to their office if they think have chicken pox. Also, if a sibling has chickenpox and spreads to another the only documentation would be from parental history.

Under Section B. paragraph 6- Instead of requiring MCV in 12<sup>th</sup> grade why not require it in 11<sup>th</sup> when they are required to have a physical. That would be cost effective to the parent because they would only need one trip to the physician.

Section D. Under paragraph 4 – That parents need proof/ medical certificate /titers would mean a substantial cost to the parents. Most titers are not covered by insurance because it is cheaper to revaccinate if in doubt. Titers are also very expensive.

Section D- General public- There is an additional paperwork for the public(parents). Many parents do not have complete records and will be required to look and obtain said records.

Respectfully Submitted,  
Carol Grumbein RN CSN MEd