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Kathy Cooper

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IRRC

From: Jan Loney <jan@metalier.com>
Sent: Monday, May 09, 2016 4:53 PM
To: IRRC
Subject: Proposed changes to vaccination policy

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To Whom it May Concern:

I am writing to voice my concern over the proposed changes to the PA State vaccination policy and reporting. I suggest:

#1 - Decreasing the provisional period for student enrollment from 240 days to 60 days.

#2 - Change reporting deadline from October 15 to December 31. I support this.

#3 - Proof of natural immunity for chicken pox through having contracted the disease must now be provided by a doctor, physician's assistant, or nurse practitioner. I do not support this, why are we vaccinating children who have natural immunity by having contracted chicken pox? Titers will also support this natural immunity.

#4 - Addition of Meningococcal vaccine for students entering 12th grade. This is creating additional paperwork and raising costs and risks associated with administering this vaccination.

#5 - Inclusion of Pertussis vaccine for kindergarten admission. I do not support this, esp. when we are seeing outbreaks in fully vaccinated children.

#6 - The DOH proposes to edit the current regulations by eliminating separate listings for measles, mumps, rubella, tetanus, diphtheria, and pertussis vaccines that are currently most commonly consumed as combination shots. Instead, they will only be listed in the regulations in their combination forms - MMR and TDaP. I feel that all antigens should be listed individually. This will simplify the amendment process should these combinations change in the future. I also want to ensure accuracy in data collection and publication. Some of these vaccines are still available singularly, and so listing each antigen individually is best and should not be changed.

#7 - There is no requirement for standardized language in communications regarding vaccine requirements. Currently, each school district creates it's own language in communicating with parents regarding vaccine requirements, provisional periods, and reporting. We request that the regulations be amended to require all schools to use uniform language provided by the DOH which will include the text of 28 PA CODE CH.23 stating the accepted exemptions for PA students.

I also have concerns regarding medical privacy since the proposed regulations call for schools to send electronic reports, a condition placed on the state by the CDC.

How will the Departments of Health and Education will protect medical privacy and ensure that children will not suffer loss of privacy or discrimination with the requirement of electronic reporting? Currently, my school district places this information on my student's lunch account, which means that all the school personnel who can access my child's personal account can see her vaccination status on her lunch account. This is a ridiculous system and does not afford my daughter the privacy she deserves with regard to medical decisions.

Sincerely,

Jan Loney
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