

3147

RECEIVED
IRRC

Cindy Findley
Director, Division of Immunization
Department of Health

2016 MAY 11 PM 1:34

RE: IRRC #3146, and 3147

Dear Ms. Findley:

My name is Christine Filges and I am writing to you concerning the proposed changes to vaccine regulations. I have several concerns so I will try to be brief concerning each one.

First of all I don't believe the provisional period for student enrollment should be reduced from 240 days to just 5 days. This time reduction seems extreme and would not give parents enough time to schedule appointments for students who may be sick and need to recover before getting vaccinated. A longer provisional period would give parents and sick children time to meet the requirements without undue stress.

I also disagree with the idea that proof of natural immunity for chicken pox through having contracted the disease must be provided by a doctor. I feel it is irresponsible for a highly contagious child to visit a medical facility where they could potentially infect others for the sole purpose of receiving an official chicken pox diagnosis. Additionally, this requirement creates an environment of distrust between the school staff and the parents as the parents' word is questioned.

I don't think that inclusion of the Pertussis vaccine should be required for Kindergarten admission. We are currently seeing outbreaks of pertussis among fully vaccinated populations. In February of 2016, The American Academy of Pediatrics published that Tdap provided moderate defense against the illness of pertussis during the first year after vaccination but not much longer after that. Immunity waned during the second year and little protection remained 2 to 3 years after vaccination. It seems hasty to add a vaccine that is currently under scrutiny from the medical community to the requirements.

My final concern is about the proposal to edit the current regulations by eliminating separate listings for measles, mumps, rubella, tetanus, diphtheria, and pertussis vaccines. It is true that most of these vaccines are administered as combination shots, however some of these vaccines are still available singularly. By listing the antigens individually it would simplify the amendment process should these combinations change in the future, and ensure accuracy in data collection. Each disease should individually list what can be given as evidence of immunity.

My hope is that you would take into consideration my view points when it comes time for you to vote on this issue. I have a child myself and I take vaccination laws very seriously. I try to evaluate how they will effect not only the individual and the risks they take by getting vaccinated but also the risks they take when they don't. I thank you for taking the time to read this letter.

Sincerely,

Christine Filges

Christine Filges
316 Roosevelt Blvd
Butler, PA 16001