

From: Marissa Wilczynski <mwilczynski@ovsdpa.org>
Sent: Friday, May 06, 2016 11:35 AM
To: Findley, Cynthia
Subject: Comments to Proposed Immunization Requirements

2016 MAY 11 PM 1:45

Ms. Findley,

I am writing to you to provide comment, to make you aware of my concerns, and to ask questions about the PA Proposed Immunization Requirements.

I recognize the need to make changes to the current immunization requirements with the goal of improving immunization rates in Pennsylvania and understand and agree with the need to shorten the provisional enrollment period. However, I am concerned about the very short provisional enrollment period of 5 days and the immediate exclusion of students(missing single dose vaccine) on the first day of school.

Though my 7th grade population is small in comparison to most Pennsylvania school districts, the process of sorting through incoming medical forms is time consuming. My school district does provide the opportunity for the certified district nurses to work summer hours to update immunization records, as well as complete other tasks that cannot be completed during the school year. This time to work over the summer does enable me to have the immunization records as up-to-date as possible prior to the beginning of each school year. However, most parents do not provide updated medical information during the summer months. Parents send updated medical information into school on the first days of the new school year. Updated medical information includes physical forms, dental forms, immunization records, medication orders, allergy action plans, physical education restrictions, medical plans of care for food allergies, documentation of new diagnoses etc. The school nurse must prioritize what forms are reviewed first within the initial days of school. The priority MUST be to review forms that relate to daily medical treatments, medication administration, Physical Education restrictions, and new diagnoses. Immunization documentation can only be reviewed once medical treatment processes are in place, teachers/school staff are informed of medical needs and the daily first aid needs of students are met. These priorities take time, certainly more than 5 days to put in place and are made to ensure the safety of our students.

More than 5 days are needed to review new immunization information to ensure errors are not made in allowing a student to enter or continue attendance or to ensure a student is not excluded unnecessarily.

I am concerned about excluding students who are missing a single dose vaccine on the first day of school. Allowing for a shortened provisional enrollment period(perhaps 2 months and then excluding on October 31st) even for students missing a single dose vaccine, is beneficial to all impacted by this process. A 2 month provisional enrollment period provides time for Physician's Offices to schedule visits for those parents who always wait until the last minute and also allows Physician's Office to keep up with supply of vaccine. A 2 month provisional enrollment period would be beneficial to the student (who has little control over this process) not miss the valuable first days of class. During the initial days of school, the teacher reviews expectations, provide supplies, build a relationship with the class. A 2 month provisional enrollment period would be beneficial to all the other students as well, who would also be impacted if a portion of the student body is missing at the beginning of the school year.

Parents in my district do follow through with immunization requirements, some require the push of impending exclusion, but they do get it done. If you were to inquire about the immunization rates of my

current 7th grade(compared with data from March)-12th grade, you would find that all students are up-to date (except those requesting religious and medical exemption). A 2 month provisional enrollment would provide this same result without the significant disruption first day exclusion would cause.

The Oley Valley School District plans to be proactive in informing our parents about the proposed changes, but the district nurses have multiple questions. To inform our parents accurately we need the following questions answered:

- 1) In the revision there is frequent reference to a "medical certificate". Is this something new that we are to use and where can we obtain a copy of a medical certificate?
- 2) With regard to the meningococcal vaccine requirement for entry into 12th grade. The revision is proposing that a student going into 12th grade would be required to have a 2nd dose of MCV unless they have received a dose of MCV on or after the student's 16th birthday. Is this correct?
How would this affect a student in 8th, 9th, 10th or 11th grade who does not show proof of even 1 MCV vaccine (for example they came from out of state which did not require the vaccination for entry into 7th grade)? Will they be required upon entry into any of those grades to get the first dose of MCV and should they be excluded?

Please review and consider the above suggestions before enacting the proposed immunization requirements. I thank you for your attention to my email.

Sincerely,

Marissa Wilczynski

Mrs. Marissa Wilczynski
Certified School Nurse
Oley Valley Middle School
610-987-4100 Ext. 4306
mwilczynski@ovsdpa.org

NOTICE OF CONFIDENTIALITY: This e-mail, including attachments, is intended only for the use of the individual or entity to which it is addressed and may contain confidential information that is legally privileged and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are notified that any review, use, disclosure, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please contact the sender by reply e-mail immediately and destroy all copies of the original message.