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2016 MAY -5 AM 9:38

May 2, 2016

Cynthia Findley, Director, Division of Immunization  
Pennsylvania Department of Health  
625 Forster Street, Health and Welfare Building, Room 102  
Harrisburg, PA 17120

**Re: Public comments in response to the proposed amendments to PA Chapter 23, Subchapter C (Relating to Immunization).**

Dear Director Finley:

On behalf of GlaxoSmithKline(GSK), thank you for the opportunity to submit comments on the proposed regulatory amendments to Chapter 23 which promote public health by ensuring that children attending school in the Commonwealth are appropriately protected against potential outbreaks of vaccine-preventable disease. GSK is a science-led global health care company that researches, develops and manufactures a broad range of innovative medicines including vaccines to help patients do more, feel better, and live longer.

GSK believes that public health can be enhanced by establishing a predictable, science based landscape for the timely uptake of revised ACIP recommendations. The proposed updates to the Tdap and Meningococcal Conjugate Vaccine policies are consistent with the recommendations of the Federal Advisory Committee on Immunization Practices (ACIP), and therefore GSK fully supports the proposed updates to the immunization schedule as detailed in the proposed regulation.

We propose that the Department consider the automatic uptake of ACIP recommendations in order to improve the public health of the Commonwealth. Under this proposal, any change recommended by the ACIP for disease state already included within the Department's immunization schedule would be adopted by the Department pursuant to an agreed-upon timeline. For example, if ACIP changes are made in the first quarter of a given year, the Department would then review the changes, adopt them, and publish a Statement of Policy by the 4<sup>th</sup> quarter of that year that details changes to the immunization schedule for the following school year. This process would permit stakeholders an easily understood and predicable framework while ensuring the efficient uptake of ACIP recommendations.

This proposed change recognizes that ACIP recommendations evolve over time and allows the Department greater flexibility to modify vaccine requirements on an ongoing basis. We believe this approach is appropriate given the recent ACIP change to Tdap and the evolving Meningitis policy landscape.

Thank you for considering these comments. GSK looks forward working with the Department to protect students and their communities, and we stand ready to assist you in any way we can.

Please do not hesitate to contact Timothy Sullivan at [timothy.x.sullivan@gsk.com](mailto:timothy.x.sullivan@gsk.com) / 717-566-9666 if we can help.

Sincerely,



Tanisha Carino  
Vice President, Public Policy  
GlaxoSmithKline