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May 9, 2016

Mr. David Sumner
Executive Director
Independent Regulatory Review Commission
14th Floor, 333 Market Street
Harrisburg, PA 17101

RE: Department of Health —
Proposed Regulations No. 10-197 School Immunization Regulations

Dear Mr. Sumner

On behalf of the Pennsylvania Immunization Coalition (PAIC) Board of Directors, I am writing to voice support of recent proposals by the Pennsylvania Department of Health and the State Advisory Health Board to amend Chapter 23, Subchapter C of the School Immunization Regulations. It is critical to do all we can to maintain our high rates of childhood/student immunizations in Pennsylvania. The proposed changes to the immunization regulations will definitely increase “community immunity” in schools and communities and more accurate data collection.

Specifically, PAIC supports:

- Requiring the immunization of all children attending school, while prohibiting school admission to children who have not received the at least one dose of any of the required multiple-dose vaccinations or the required single-dose vaccines.
- Eliminating the 8-month provisional period, allowing for a provisional school admission for a 5-day period to allow students to obtain a medical plan from their healthcare provider stating the plan for obtaining required vaccines. .
- Adding Pertussis to subsection (b)(1) – (Tdap required in 7th grade)
- Requiring MMR, as a combination vaccine, and allowing proof of measles and rubella immunity through laboratory testing and written statement of history of mumps from a physician, nurse practitioner or physician’s assistant.
- Requiring evidence of Varicella immunity shown by either vaccination history, laboratory confirmation, or statement of history from a physician, nurse practitioner or physician assistant

- Requiring a dose of meningococcal vaccine (MCV4) for entry into the 12th grade or in the grade that the child turns 18 years of age (not applicable if the child had meningococcal vaccine on or after their 16th birthday).

These proposed changes to the immunization regulations will provide increased protection against vaccine preventable diseases among our student population. It will also decrease the time and labor dedicated by school nurses to remind parents to complete required vaccine series.

We commend the Pennsylvania Department of Health, the State Advisory Health Board, and the Division of Immunizations for taking on the task of working through these proposed changes. The Pennsylvania Immunization Coalition will do all we can to support the final regulations.

Sincerely,

Joanne C. Sullivan 

Joanne C. Sullivan
Executive Director
Pennsylvania Immunization Coalition
204 Saint Charles Way, Unit 303E
York, PA 17402

cc: PAIC Board of Directors

Cynthia Findley, Director, Division of Immunizations, Pennsylvania Department of Health