

Kolva, Patti

RECEIVED
IRRC

From: Groshner, Mary <MGroshner@penncrest.org>
Sent: Tuesday, May 10, 2016 7:45 AM
To: Findley, Cynthia
Subject: FW: Proposed Immunization Regulations Comments

2016 MAY 16 PM 2: 32

Tried to send this yesterday but I apparently had your name spelled wrong. I hope you will accept it today.
Thanks,
Mary Groshner

From: Leffler, Donna [mailto:dleffler@pa.gov]
Sent: Monday, May 09, 2016 3:38 PM
To: Groshner, Mary
Subject: RE: Proposed Immunization Regulations Comments

It is because you have her name spelled wrong.
Cynthia Findley

cfindley@pa.gov

Please try again!

Donna Leffler, BSN, RN | School Health Nurse Consultant
Pennsylvania Department of Health | Northwest District Office
19 McQuiston Drive, Jackson Center, PA 16133
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www.health.state.pa.us

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 Please consider the environment before printing this e-mail.

From: Groshner, Mary [mailto:MGroshner@penncrest.org]
Sent: Monday, May 09, 2016 3:27 PM
To: Leffler, Donna <dleffler@pa.gov>
Subject: FW: Proposed Immunization Regulations Comments

Hi Donna,
I have tried to send my comments to Cindy, but it keeps coming back to me as undeliverable. Can you forward my comments to her?
Sorry, I just don’t know what to do at this late hour.
Mary

From: Groshner, Mary
Sent: Monday, May 09, 2016 3:20 PM
To: 'cfindlay@pa.gov'
Subject: FW: Proposed Immunization Regulations Comments

From: Groshner, Mary
Sent: Monday, May 09, 2016 3:19 PM
To: 'cfindlay@pa.gov'
Subject: FW: Proposed Immunization Regulations Comments

From: Groshner, Mary
Sent: Monday, May 09, 2016 3:16 PM
To: 'cfindlay@pa.gov'
Subject: Proposed Immunization Regulations Comments

Dear Ms. Findlay,

As a school nurse, I am writing to comment on the proposed Immunization Regulations. I have some concerns:

I am concerned that this says "may exclude", I felt it would be better if it said "shall exclude". When wording is "may", administrators may choose whether or not to exclude – if the wording is "shall", they must exclude. I just wonder why we would go to all this trouble to improve the regulations, yet provide a loop hole that so many administrators would potentially use? It needs to be strengthened to include "shall". IN my experience, when you "mean business", parents get it done.

Please encourage administrators to provide nurses paid days to come in before school starts, to review immunizations of new students. This is imperative if we are to be ready for exclusions and to provide assistance to families who genuinely wish to be immunized.

I understand that the DOH will be increasing clinics to get student immunized however I also understand that it is only open to those who do not have health insurance or those whose insurance does not cover immunizations. I would be much more helpful if the clinics were open to all who felt they needed an alternative.

When would this law would go into effect? We as school nurses can be prepared, we just need to know as soon as possible when these regulations will be in effect. This is especially important to know before school is out for the year.

From the proposed regulation:

(3) Completion of required immunizations. The [plan for completion of the required immunizations shall be reviewed every 60] medical certificate shall be reviewed at least every 30 days by the school administrator or the school administrator's designee. Subsequent immunizations shall be entered on the certificate of immunization or entered in the school's computer database. Immunization requirements described in § 23.83 shall be completed [within 8 months of the date of provisional admission to school. If the requirements are not met, the school administrator may not admit the child to school or permit continued attendance after that 8 month provisional period.] in accordance with the requirements of the medical certificate. If, upon review, the requirements of the medical certificate are not met, the school administrator may exclude the child from school.

What exactly is the "medical certificate" look like?

For Meningococcal, as a senior, a student would be required to have a dose if they have not received a previous dose on or after their 16th birthday, otherwise they are required a second dose (if they were immunized as a 7th grader) Therefore, if I am reading this correctly, this could make many seniors a "single dose" candidate for MCV which would exclude them day 1 of school. We need to have adequate preparation for this.

Although I have heard of several districts, with the help of their CSNs, who are actually prepared for these changes to happen this Fall, it is reasonable to feel that medical providers, district administrators, school nurses and parents need sufficient time to be educated - and especially school staff, need time to implement a process and establish protocols in order to adequately meet these new requirements.

I have also heard that many physician's offices are not aware of the proposed regulation changes. What are the efforts being made to properly inform these offices so that they don't become a barrier to care?

Thank you for this opportunity to express my concerns.

Mary A. Groshner, RN, CSN, MBA, MSN

Certified School Nurse

Maplewood Attendance Area

PENNCREST School District