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MIKE FOLMER



3146

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Senate of Pennsylvania

48TH SENATORIAL DISTRICT
April 11, 2017

George D. Bedwick, Chair
Independent Regulatory Review Commission
14th Floor, Harrisstown 2
333 Market Street
Harrisburg, PA 17101

David Sumner, Executive Director
Independent Regulatory Review Commission
14th Floor, Harrisstown 2
333 Market Street
Harrisburg, PA 17101

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IRRC

RE: State Board of Education, Final-Form Regulation#6-336 (IRRC#3146): "Nonimmunized Children."

Dear Chairman Bedwick and Mr. Sumner:

I wanted you to know of my deep concerns for the above-captioned final-form regulation from the State Board of Education.

While I understand and appreciate the need to balance public health with individual rights, I believe the State Board's final rule infringes upon liberty of conscience and parental and religious rights, and was drafted too broadly, not treating children or their parents as individuals.

I have heard from too many parents who believe they have a right to make their own decisions about treatments for their children based upon informed consent. Forcing patients, specifically children and their parents, to not be able to make informed decisions for themselves about what gets put into their bodies is governmental overreach and demonstrates highly questionable medical ethics.

I believe the State Board's response to item (17) on the Regulatory Analysis Form fails to recognize this in identifying the financial, economic, **and social impact** [emphasis added] on individuals. The answer states: "The final rulemaking will benefit the parents of school-aged children and [others] . . . in understanding regulations that address immunization requirements across state agencies." The final rule does not benefit parents with strong moral or ethical convictions or religious beliefs. The Board should consider alternative regulatory schemes, which they admit they did not do in their response to item (26) of the Regulatory Analysis Form.

Parents have also told me they are very troubled by some of the ingredients used in vaccines and they do not believe regulators have done sufficient testing to ensure vaccines are safe for children before being injected into their bodies.

While I understand that the intent of these regulations is merely for that of consistency with the Department of Health's recently adopted and published final-form regulations on school immunization (Regulation #10-197 (IRRC#3147): "School Immunizations"), I nevertheless write this comment to ensure that my concerns are on the record. Thank you.

Sincerely,

Handwritten signature of Mike Folmer in blue ink.
MIKE FOLMER

George D. Bedwick, Chairman
David Sumner, Executive Director
Independent Regulatory Review Commission

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CC: Karen Molchanow, Executive Director, State Board of Education
Honorable Pedro Rivera, Secretary of Education
Honorable John Eichelberger, Chair, Senate Education Committee
Fiona Wilmarth, Director of Regulatory Review, Independent Regulatory Review Commission
Michelle L. Elliott, Analyst, Independent Regulatory Review Commission
James M. Smith, Analyst, Independent Regulatory Review Commission