

Frequently Asked Questions

PROPOSED REVISIONS TO SCHOOL IMMUNIZATION REGULATIONS IN PENNSYLVANIA

What is the current school vaccination rate in Pennsylvania?

- Given the way in which data is collected, we are unable to provide an “overall vaccination rate.” We can only look at vaccination rates for specific antigens for either kindergarteners or seventh graders.

With that in mind, we tend to look at MMR rates for students entering kindergarten. The most recent data shows only 91 percent of Pennsylvania children entering kindergarten had the necessary vaccinations, compared with more than half the states reporting a rate of over 95 percent.

- Pennsylvania still has not yet achieved herd immunity in its schools; herd immunity is necessary to help protect the health of all Pennsylvanians.

What is “herd immunity” and why is it important to achieve it in Pennsylvania?

- “Herd” or community immunity means a situation in which a sufficient proportion of a population is immune to an infectious disease (through vaccination and/or prior illness) to make its spread from person to person unlikely.
- Herd immunity offers some protection even to individuals who are not vaccinated, such as newborns and those with chronic illnesses, because the disease has little opportunity to spread within the community.

What are the current school immunization regulations in Pennsylvania?

- Current regulations ensure that Pennsylvania school children are immunized against diseases which spread easily in schools and interrupt school life and learning for individuals and groups.
- Regulations apply to children in public, private, parochial, and non-public schools (including vocational schools, intermediate units, special education and home education programs, cyber schools and charter schools) in the commonwealth.
- Children in kindergarten through 12th grade are required to have the following vaccines:
 - Four doses of tetanus*
 - Four doses of diphtheria*
 - Three doses of polio
 - Two doses of measles**
 - Two doses of mumps**

- One dose of rubella**
- Three doses of hepatitis B
- Two doses of varicella or evidence of immunity
 - *usually given as DTaP
 - **usually given as MMR
- Children entering 7th grade are also required to have:
 - One dose of meningococcal conjugate
 - One dose of tetanus, diphtheria, acellular pertussis
- Currently, children are allowed to attend school so long as they have received the first dose of a multi dose vaccine and have up to eight months to complete all the required doses. The Departments of Health and Education believe that current regulations should be revised to ensure a higher level of herd immunity for Pennsylvania school children.

Why is it important to make sure children are fully immunized?

- In some cases, the only way to ensure that children are adequately protected from illness, particularly those children who are medically unable to obtain a vaccination, and, therefore, vulnerable, is to require the immunization of children attending school.
- The Department of Health intends to achieve this goal by revising language in Title 28 § 23.85 (relating to responsibilities of schools and school administrators) that allows for a child to be provisionally admitted to school even though the child does not have all the required immunizations for admittance or continued attendance as set out in Title 28 § 23.83 (relating to immunization requirements.)
- The Department of Education intends to achieve this goal by revising language in Title 22 § 11.20.

Current regulations include a “provisional” period for immunizations. What does that mean?

- Current Pennsylvania regulations allow students in kindergarten through 12th grade to be admitted to school provisionally for up to eight months if evidence of at least one dose of each of the required antigen for multiple dose vaccines is given, and a plan for obtaining all immunizations is in place.

What specific changes are being proposed?

- The proposed regulations will revise Subchapter C of Title 28 (relating to immunizations), to ensure that children attending school in the commonwealth are adequately protected against potential outbreaks of vaccine preventable diseases.

- Specifically, the Departments of Health and Education are proposing the following changes to the current regulations:
 - Definitions for new terms “full immunization” and “medical certificate.”
 - Clarifications to existing vaccine requirements.
 - Additional meningococcal dose before entry into the 12th grade.
 - Change to method of providing evidence of immunity for measles and for mumps from accepting a statement of history by parent or guardian to requiring a statement of history of disease by physician, nurse practitioner, or physician’s assistant.
 - Replacing the eight month provisional period with the following:
 - Requiring exclusion from school attendance of a child who lacks a single dose of a single dose vaccine and/or the first dose of a multiple dose vaccine.
 - Allowing a child that needs the next or final dose of a multiple dose vaccine five school days to obtain the next or final dose in the series before being excluded from school attendance; or
 - Allowing a child needing more than one dose of a multiple-dose vaccine series beyond the five days to attend school provisionally upon the submission of a medical certificate outlining the dates for additional vaccination.
 - Requiring school administrators to review the medical certificate and the child’s compliance at least every 30 days.
 - Allowing school administrators to exclude a child who does not comply with the dates in the submitted medical certificate.
 - Exempting from exclusion a child who is homeless.
 - Exempting from exclusion for 30-days a child who is transferring from a school or country outside the commonwealth and cannot provide records.
 - Providing limited waiver of vaccine requirements in the event of a disaster impacting the ability of children transferring into a school to provide records, or a nationally recognized vaccine shortage.
 - Changing reporting times for schools to report kindergarten and 7th grade immunizations to allow schools more time to gather information and report.

- Requiring schools to report electronically to obtain more accurate reporting.

What is a medical certificate?

- A medical certificate would be used by a health care provider, or a public health official if the child receives vaccinations through the public health system, to set out what immunizations the child requires to be fully vaccinated, and the dates when the child must receive those vaccinations.

Who will make sure that a child is meeting the dates in the medical certificate?

- As with existing regulation, it would be the responsibility of the school administrator to review that medical certificate and determine whether or not the child is following the schedule, and whether or not to exclude any child who fails to follow his or her schedule for obtaining booster vaccinations.
- The departments are proposing to change the time frame for that review, however, from 60 days to at least every 30 days to ensure more accountability.
- A child may, of course, bring to the school administrator's attention the fact that they have become up to date with their vaccination requirements at any time, without waiting for the administrator's review.
- Further, the departments are proposing to require a school to maintain the medical certificate until the child's official school immunization record is completed to ensure accurate records on immunizations. This is important in the event of an outbreak of any vaccine-preventable disease in the school.

Will schools in the commonwealth have adequate coverage by school nurses to comply with the proposed revised immunization regulations?

- Governor Wolf has proposed substantial new funding for school districts, which may use a portion of new resources ultimately made available to provide additional school nursing services as appropriate.

Will vaccines be available for children who do not have a pediatrician and are uninsured or underinsured?

- Uninsured and underinsured students can visit one of the commonwealth's state health centers or local health departments to get the required vaccines. Please call 1-877-PA-HEALTH to get more information on a location near you.
- The Department of Health works with community partners throughout the commonwealth to hold immunization clinics in multiple locations such as schools, fire halls, libraries, and community centers.

Will there be any changes proposed to the way schools are reporting data?

- The departments are proposing to change the date by which schools are required to report to the department from October 15 of each school year to December 31, and to require reporting electronically. This change would allow for more accurate reports, and allow more time for schools to gather information to make the report.
- The Centers for Disease Control and Prevention (CDC) requests annual school immunization coverage reports from the Department of Health as part of the Federal Immunization Grant process.
- In reviewing reporting data, the department has determined that by requesting the data by October 15, schools are reporting data too early in the school year, and the reporting does not accurately reflect the actual number of children receiving immunizations.
- The Department of Health recognizes, however, that some schools that are required reporters will not be able to complete a report electronically. The Department of Health proposes to require those schools to report on paper, by an earlier date, December 15 of each year. This will provide the Department of Health with sufficient time to compile and enter those reports before those schools reporting electronically begin to submit their reports.

Is the Department of Health making changes to the list of required vaccinations?

- The Department of Health is proposing to make the following changes to the vaccinations required for attendance.
 - To reflect the fact that several vaccines required for school attendance are no longer available in the United States in certain forms, the Department of Health is proposing to combine the diphtheria and tetanus vaccines into a combination form.
 - The Department of Health is proposing to add pertussis to the required list to address the need to fight the resurgence of a vaccine-preventable disease. The incidence of pertussis has been increasing since the 1980s, and during the period from 2010-2013, 13 pediatric deaths were reported in the United States.
 - Because MMR is no longer made as separate antigens, the Department of Health proposes to require the combination form for Measles, Mumps and Rubella. The Department of Health is also proposing to allow parents and guardians to meet this measles and rubella vaccine requirement by laboratory testing, and a written statement of history of mumps disease from a physician, nurse practitioner, or physician's assistant.

- The Department of Health is also proposing to allow parents and guardians to show evidence of varicella immunity (chicken pox) either by laboratory confirmation or a statement of history from a physician, parent or guardian. This is in keeping with the CDC Advisory Council on Immunization Practices (ACIP) recommendations and is intended to ensure that the child has actually had chickenpox.
- The Department of Health is proposing to add a Meningococcal Vaccine for entry into the 12th grade, or in an ungraded school, in the school year the child turns 18 years of age. This change follows the ACIP recommendations to ensure protection for students from meningitis into their post-secondary education. In accordance with ACIP recommendations for children attending college, if the child has had a previous dose on or after his or her 16th birthday, the requirement would not apply.
- The Department of Health is also proposing to follow ACIP recommendations and include one dose of Tdap in combination form children 11 through 18 years of age.

Have children been denied attendance at school in the past for failure to have immunizations?

- Students are denied admission to school when they do not have all required immunizations, and they do not meet the criteria to be provisionally admitted or they have not received at least one dose of each multiple dose vaccine.
- Last year, 139 students were denied admission on the first day of school because they did not have a least one dose of all the required vaccines.

Are the Departments of Health and Education proposing to eliminate the religious and medical exemptions?

- No. The departments are not proposing any change to these two exemptions in the regulations.

What is the process for changing the regulations?

- The Department of Health must first present the regulations to the Advisory Health Board for its review and approval; the Department of Education must present the regulations to the State Board of Education for its review and approval. Thereafter, the regulations will begin moving through the regulatory review process.
- This process allows for comments from the general public, the Office of the Attorney General, the House and Senate Oversight Committees and finally the Independent Regulatory Review Commission.

When will the decision to revise the regulations be made?

- The final regulations could be approved within nine months or take up to two years.

If revisions to the regulations are approved, when will they go into effect?

- The departments are proposing that these regulations take effect at the beginning of the school year after they are approved.

How will schools be notified of the change?

- The administration, along with the Departments of Health, Education, and Human Services will begin implementing an extensive outreach campaign to inform schools, parents, and communities about the new requirements.