

**Policy 2423: Communicable Disease Control**  
**Comment Log**  
*April 14, 2012 – May 14, 2012*

<u>Action</u>	<u>Type</u>
N: No Response	- Negative
NA: Not Accepted	+ Positive
A: Accepted	o Neutral

<b>Date</b>	<b>Individual/Organization</b>	<b>Comments</b>	<b>Action/ Type</b>	<b>Rationale</b>
<b>§126-51-1 General</b>				
04-18	Ashley Beckley WV	ANOTHER MANDATE for our children's healthcare?! DISGUSTING!! I think this is just another reason to add to the list to move out of this state.	N -	This revision of West Virginia Board of Education (WVBE) Policy 2423 is intended to update our policy to be in alignment with the Bureau for Public Health (BPH) Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-19	Kelli Caseman	The West Virginia School-Based Health	N	

	Executive Director WV School-Based Health Assembly Charleston WV	Assembly strongly supports these updates to Policy 2423-Communicable Disease Control. The new 7th and 12th grade immunization requirements, as well as the shift in accountability of immunizations to public health, further ensure that West Virginia's students are strongly protected against diseases that could devastate their futures.	+	
04-20	Heather Wood School Nurse Cabell County Board of Education Huntington WV	<p>My biggest concern is the elimination of entering any immunization data in to the WVEIS system. An immunization record is a part of the school record and should be kept in the WVEIS with the school record. It is part of the school transcript thus providing institutions of higher education easy access to a student's required shots.</p> <p>I am curious as to what has prompted this dramatic change in record keeping. It has been my experience that the WVEIS system has worked well for many years. I am in agreement that the immunization data should also be entered in to the WVSIIIS system but not at the expense of the WVEIS system. In Cabell county, we have copied our pre-k immunization records and sent them to the WVSIIIS with parent consent for several years. We have also worked very closely with our health department in the event of outbreaks of communicable diseases, our recent hepatitis A outbreak being the most recent example.</p> <p>My last comment is regarding the management of students who are not compliant with the immunization law. The policy is vague in addressing who will be managing the</p>	NA -	The immunization rule is a public health law, governed by the West Virginia (WV) BPH Interpretive Rule. Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into the West Virginia Education Information System (WVEIS) to the West Virginia Statewide Immunization Information System (WVSIIIS) (public health), allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for historical data and continuation of entering such records, but its use is

		<p>immunization compliance. It states that the health departments will be entering the data in to WVSIIS but who will be collecting the immunizations records? Expecting parents to deliver shot records to the health departments is unreasonable. If the schools continue to collect the records then deliver them to the health departments that creates an opportunity for records to be misplaced or lost. Who will be following up with the shots to make sure students get the required vaccines if they are not up-to-date upon admission? If the school nurses are still going to manage the shot records and the compliance, why not just give the school nurses change capability in the WVSIIS and allow them to enter the data in to that system. That eliminates the health department's collection of shot records and keeps the system streamlined. As a school nurse, I do not welcome spending more time entering shot data but when I enter shot records I always check the WVSIIS anyway so if I am already on that site at the same time, it would be little effort to enter the shots in to that system. Any lack of immunization data in the WVSIIS needs to be addressed with providers of immunizations, not the school system.</p>		<p>no longer required by the schools.  Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4).</p>
04-21	Jim Morgantown WV	<p>I am deeply disturbed about DHHR adding 8 more vaccinations to our education requirements without any approval from our legislators. I feel like this is a pharmaceutical driven agenda policy without any input from parents on the issue. Our kids are given to many injections and with zero exemptions I will move to one of the 48 states</p>	N -	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The</p>

		that does allow a choice. Parental choice is being taken away by our government and school districts. Sad. I'll move to PA or homeschool if this continues.		immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-21	Donna Gregory Sutton WV	I am deeply concerned about this policy change. Adding additional vaccines to an already burdoned schedule is not the answer. Parents should have the right to choose not to vaccinate for religious beliefs, or because of concerns of serious reactions that have happened in the past with a childs immunization. Parents shouldn't be forced to homeschool or school them in a neighboring state due to WV policy which limit attendance by requiring vaccinations, and these boosters.	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-22	Lucas C. Watterson Fairmont WV	WV needs to offer its parents the same civil liberties that 48 other states offer their citizens. Vaccine mandates must come to an end and we need to offer non-medical exemptions to all people. The tyranny must stop now!	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization

				requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-26	Melanie Tingler Grandmother Lindside WV	I do not fully understand how to use this comment form so I will use it to the best of my knowledge. I feel that we do not need any further immunizations thrown at our school children or adults. We need to stop this policy before it begins.	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
05-07	Kathy Bevins Wood County WV	I was unaware of the public comment period for the interpretive rule which allowed the original change. I do not agree with the requirement of adolescent immunizations for 7th and 12th graders. Shedding of these vaccinations, as well	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95

		<p>as other childhood vaccinations, put as much of a risk of exposing those who are unvaccinated. Last year, at the end of the school year, there was an outbreak of chicken pox. Why would there be an outbreak if the chicken pox vaccination is a requirement to enter kindergarten? Obviously, this vaccine is not effective.</p>		<p>- immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>
05-11	<p>Lori Fizer RN Kanawha County Schools South Charleston WV</p>	<p>I am concerned with sections 5.2 and 5.5. Many local health departments don't have the manpower to designate someone to take care of inputting immunizations into WVSIIS. This will need to be a full time position. Is the state going to provide funding for this? This needs to be discussed with local health departments before the state makes a decision that they will be responsible for this.</p> <p>As for area 5.5, you need to realize that requiring PPD's on any first time enterer isn't best practice. PPD's aren't accurate on children under the age of 6. The CDC doesn't even recommend PPD's be done on children unless their TB risk assessment done by a physician is high. We are requiring that first time enterers have a well child check and on that child check doctors are doing a TB risk assessment. Is it best practice to send a child for a PPD when they have had a TB risk assessment by a doctor who states their risk for TB is low? As a</p>	<p>A -</p>	<p>Section 5.2 has been changed to incorporate "Bureau" as an additional agency for data entry: "The immunization record shall be a public health record and provided to the local health department and/or the Bureau to be entered and reviewed annually into the West Virginia Statewide Immunization Information System (WVSIIS)."</p> <p>Information for immunizations on WVEIS will still be available for historical data and continuation of entering such records, but its use is no longer required by the</p>

		<p>school nurse I want all of my students to be healthy but if this goes into law we are going to be hurting more children than helping them.</p>		<p>schools.</p> <p>Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4).</p> <p>5.5 - This revision of WVBE Policy 2423 is intended to update policy to be in alignment with the public health law under W.Va. Code §16-3D-3; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse public health requirements so comments requesting that type of action cannot be addressed by the Board. Under this code, TB tests (PPD) are required for first time enterers from out-of-state only.</p>
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05-11	Lana Harper RN KCS Charleston WV	I do not believe turning the immunization records over to the Health Department is a good idea. School nurses would not be able to obtain the records, since we do not have access. I also do not believe they have the staff to enter all of these records.	NA -	<p>The immunization rule is a public health law, governed by the WVBPH. Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into WVEIS to public health, allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for historical data and continuation of entering such records, but its use is no longer required by the schools.</p> <p>Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4).</p> <p>WVSIIS is available to all school nurses including</p>
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				school personnel managing school enrollment requirements.
<b>§126-51-2 Purpose</b>				
05-07	Kathy Bevins Wood County WV	Under the 9th Amendment, U.S. citizens have rights to privacy and freedom over their own bodies. The government cannot force its citizens to answer questions of a personal/private nature and the government cannot force itself on its citizens bodies.	N -	This revision of WVBE 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements.
05-10	Danita Nellhaus RN,School Nurse Kanawha Co. Health Services Charleston WV	In regards to Policy 2423 5.2 where the state will be responsible for immunization records, I do not think this is feasible. Local health departments would have to enter the date in WVSIIS and some simply do not have the manpower to do this. School nurses are still waiting to see the seasonal flu vaccines on the site. We need the grade and the school information to check immunizations. Another issue would be the high school seniors and others that need transcripts of their immunizations sent to their prospective colleges. Truly this is just not feasible.	A -	Section 5.2 has been changed to incorporate “Bureau” as an additional agency for data entry: “The immunization record shall be a public health record and provided to the local health department and/or the Bureau to be entered and reviewed annually into the West Virginia Statewide Immunization Information System (WVSIIS).”  The immunization rule is a public health law, governed by the WV BPH. Revisions to Policy 2423 shift the accountability and requirement from schools

				<p>for entering student immunization information into WVEIS to public health, allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for historical data and continuation of entering such records, but its use is no longer required by the schools.</p> <p>Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4).</p>
<b>§126-51-3 Application</b>				
04-26	Melanie Tingler Grandmother Lindside WV	We should have rights as parents for our children to attend public schools and be able to opt out of this endless list of vaccinations. It is proving out more and more that the vaccinations are not even protecting our children. The diseases are showing	NA -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95

		<p>up in the vaccinated population. Someone needs to get to the bottom of the money making business and bring it to a stop as we have more and more sick children. Many many families in WV home school their children to prevent doing the mandatory vaccinations. I also pray that this state would allow us our right of the religious exemption. That is only constitutional and we are not animals, we are humans with a brain.</p>		<p>- immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>
<p><b>§126-51-4 Definitions</b></p>				
04-19	<p>Dr. Richard A. Wittberg Executive Director Mid-Ohio Valley Health Department Parkersburg WV</p>	<p>4.18 has become 4.21 and does not talk about WVEIS. Does this mean that immunization information will only be on WVSIIIS? Will WVEIS and WVSIIIS be "talking" to each other?</p>	<p>N o</p>	<p>Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into WVEIS to public health, allowing for WVSIIIS to be the main repository for immunization records. Information for immunizations on WVEIS will still be available for historical data and continuation of entering such records, but its use is no longer required by the schools.</p>

04-22	Claudia M Raymer Moundsville West	<p>4.14 adding the phrase "but not limited to" is concerning due to such an open ended phrase allowing the addition of more vaccines as deemed appropriate without public input.</p> <p>4.21 What about those who have a medical exemption or who have a pediatrician in another state? How will that be accounted for?</p>	A -	<p>4.14 - This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; this terminology “but not limited to” serves as a description of the potential hazards of vaccine-preventable diseases without mentioning all requirements.</p> <p>4.21 – Medical exemptions requests are completed by the child’s physician, and initial validation is made by the local health officer, with final approval or denial by the State Health Officer.</p> <p>Added reference in section 5.2 to WV Interpretive Rule WV64CSR95 to clarify language in medical exemption process: ”5.2 Students must be in</p>
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				<p>compliance with the required immunization schedule as set forth by the Bureau for Public Health (BPH) Commissioner. The BPH Commissioner, or his/her designee (local health officer) shall make the final determination in cases in which as authorized medical practitioner's written medical exemption is challenged by school personnel as inappropriate or invalid, as defined in WV BPH Interpretive Rule, §64-95-10.</p> <p>Parents with out of state providers may share guidelines and other information regarding immunizations requirements in WV. Immunization information can be found at <a href="http://www.immunization.wv.gov">www.immunization.wv.gov</a> or refer the doctor to the WV Division of Immunization Services at 304-558-2188.</p>
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04-22	Tiffany Boles Wheeling WV	4.6, When adding vaccines to the schedule it should be something that is voted on. Not just adding what the 'bureau' sees fit. 4.14- I do not agree at all with this. I don't think its right to even temporarily disclose personal information about a child no matter what. 4.21-I do not agree with WVSIIIS	NA -	Section 4.6 defines the "Bureau" for the purpose of the terminology used in this policy.  Section 4.14 – Disclosure of personally identifiable information from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public
04-22	Alex Workman parent Hurricane WV	This a laugh! If the CDC and DHHR want to "protect" the citizens it would get out of bed with big pharma and give parents the TRUTH and knowledge to make decisions for their kids, not allow them to blindly follow what the government pressures them to do.	N -	
04-23	Christina Peters Concerned Parent Parkersburg WV	I do not understand why the Dept of Health needs to be put in charge of collecting immunization records. This is now going to be one more step that parents have to be burdened with to enroll	NA -	Revisions to Policy 2423 shift the accountability and requirement from schools for entering student

		<p>thier children. The current system of presenting it to the school has been working very well for years.</p>		<p>immunization information into WVEIS to public health, allowing for WVSIIS to be the main repository for immunization records.</p> <p>Information for immunizations on WVEIS will still be available for historical data and continuation of entering such records, but its use is no longer required by the schools. Immunization records management and data collection will be handled at the local level, and parents may still be allowed to take immunization records to the school. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4).</p>
04-26	<p>Melanie Tingler Grandmother Lindsay WV</p>	<p>Our health providers should remain in control of our immunization records, not the board of education. We are controlled and watched over enough in our lives and the board of education does not need more control of knowing more of our business. Our government does not own us</p>	<p>NA -</p>	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization</p>

		<p>individuals as it owns the school system. The laws are all far out of hand and continuing to multiply at an alarming rate. Please reconsider this new policy and again I pray it would be stopped before it is started. My 12 year old grandson commented to me about this policy. He said well I guess I will be home-schooled my senior year because they are not puncturing me with any more deadly needles. He has educated himself that immunizations are a money making scam and cause more harm than good. I pray more adults would lay aside the brainwashing that has happened to them and look up the dangers of immunizations and read some first hand truth!!! Thanks for your time and may the policy be put in file #13.</p>		<p>requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>
05-07	Kathy Bevins Wood County WV	<p>Shedding of these vaccinations, as well as other childhood vaccinations, put as much of a risk of exposing those who are not vaccinated against these diseases.</p>	NA -	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>

05-07	<p>Doctor Teays Valley WV</p>	<p>ACIP members have financial conflicts of interest to the vaccines they are recommending. To continue to add vaccines based on their recommendations should be considered negligence on all parties, yet you site them as a basis for the law.</p>	<p>N -</p>	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>
05-11	<p>Brenda C. Isaac Lead School Nurse Kanawha County Schools Charleston WV</p>	<p>4.21 I believe that it is premature to eliminate WVEIS Immunization record keeping and replace it with WVSIIS. At this point, WVSIIS is not at a point to accurately and consistently provide all of the information that school nurses and school systems will continue to need on a regular basis about immunizations in order to maintain safety and serve students. Immunization Control has a track record of not being able to provide information in a timely manner. This dramatic change needs to be piloted in one or two counties prior to a state wide implementation.</p>	<p>NA -</p>	<p>Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into WVEIS to public health, allowing for WVSIIS to be the main repository for immunization records. Information for immunizations on WVEIS will still be available for viewing historical data and continuation of entering such records, but its use is</p>

				no longer required by the schools.
05-14	Mary Jane Rinard RN Berkeley County Schools Martinsburg WV	WVEIS with all it's blemishes serves the school better than WVSIIS for enforcement. With the implentation of new requirements, we need the capacity to be able to activate a program that says 'produce a report for me of 11th grade students at XYZ High School that have NR (no record) of Q Imm and Z Imm. As I understand it, to get that information from WVSIIS, I would need to submit a list of 11th grade students and their birthdate and then those names would need to be entered into WVSIIS by BPH staff (? LHD have no staff for that) to pull up that information. I understand the provider can send notices to children/parents indicating an immunization is due. When the parent does not address that, then the child is in school non-compliant, the school is responsible for that potenal health issue, and unless we are reverting completely back to paper lists and tickler files, there will be more non-compliance (potentially unknown)of the students.	NA -	The immunization rule is a public health law, governed by the WV BPH. Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into WVEIS to public health, allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for viewing historical data and entering such records, but its use is no longer required by the schools. Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4). Records needed checked by the schools will be

				<p>limited to those students with medical exemption and provisional enrollment; assistance with WVSIS reports can be obtained by contacting the WV Division of Immunization Services at 304-558-2188.</p> <p>Additionally, the BPH is currently looking at software applications to allow county-level data to be obtained.</p>
<b>§126-51-5 Disease Prevention Measures</b>				
04-18	lori lee parent gay wv	<p>I am very disappointed regarding the additional vaccine requirements written into the 12-13 school year. As a citizen and a parent, I'm extremely concerned Ed taking away more parental rights. It is a basic right for parents to make educated, informed decisions, after consulting their family pediatrician, regarding their family's healthcare without violating their religious and philosophical beliefs. I would like to assert that the risk, religious/philosophical conflict, and individual constitution of each child and family must be respected, and there is certainly no justification for mandating additional vaccines. Please understand that no medicine and no medical procedure and no "schedule" is a one size fits all fix. Please change Tdap and Meningococcal language back to</p>	N -	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>

		RECOMMENDED as opposed to being a requirement.		
04-19	Dr. Richard A. Wittberg Executive Director Mid-Ohio Valley Health Department Parkersburg WV	I have multiple problems with 5.2: a) as written, if school personnel do not "challenge" a medical exemption, it is allowed. This puts the decision for exemptions in the school nurse's hands. This is unacceptable. b) this whole section is confusing. Since the previous sentence talks about individual immunization challenges, does this mean that only challenges are supposed to be entered into WVSIIS by local health? I do not think this is what was intended, but it is how it reads. c) From various press releases, it appears that local health departments (LHDs) are to be "accountable" for immunization records. This effort is doomed to failure in the existing system. There are pediatricians who regularly fail to enter data into SIIS, but still somehow maintain their VFC provider status. Who is responsible if a VFC provider does not comply? LHDs cannot be accountable for immunization records unless we can also police the entering of data. d) the immunization record will be "provided to the LHD to be entered and reviewed annually". Who is providing the record? Are pediatricians sending records to us? Who is entering them? As it is written, we are expected to enter their data. That is not what is expected now. And who is assuming that we have staff with not enough to do? Finally, who at my LHD is supposed to review them? For what? Are we expected to let schools know when children are deficient and let families know when more shots are needed? If	NA -	5.2 a) Policy 2423 shifts the accountability of immunization records to public health. Immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4). Immunization records received by the schools will be reviewed and entered into WVSIIS, thus managed primarily and initially by the local health officer (W.Va. Code §16-3-4). . Starting in the 2012-2013 school year, immunization records will become public health records, and language in section 5.2 was added to clarify such shift. The intent of WVBE policies is to provide guidance and requirements to schools, but not to determine how such policies will be implemented at the county

		<p>so, who is supposed to do this? If not, why are we reviewing the records?</p> <p>In theory, I agree that LHDs should be the repositories of immunization records. But I do not think that this will work in practice unless other system changes happen. If LHDs were solely responsible for the delivery of childhood immunizations, we could also assure that records are up to date and accurate. Without that, I am not sure it is possible.</p>		<p>level. Immunization records management and data collection can be decided upon at the local level.</p> <p>All Vaccines For Children (VFC) providers are responsible for entering administration of immunization into WVSIS, and compliance and management with data entry lies with the local health department and the BPH.</p>
04-21	Tammy Scott Parent and Teacher Parkersburg WV	<p>Adding vaccines is not the answer. I already personally know two 6th graders that have had adverse reactions that had to be reported to VAERS when they went to get their shots for next year. Parents should have a choice in what their children have put into their bodies. These shots do NOT work for everyone and a one size fits all it not best. Also if the BPH is not going to grant medical exemptions when you have MD's that say a child will be harmed if they get any more there is something majorly wrong with the system. Adding more shots will not stop the spread of disease. Education is the answer. Putting this out for public comment after saying that the new shots were already a must was also wrong. If we keep adding shots I know many families that will be homeschooling or moving out of state. This also includes many teachers.</p>	N -	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>

04-22	Claudia M Raymer Moundsville West	<p>The Bureau for Public Health was able to add these new adolescent health requirement using Interpretive Rule. I strongly disapprove of the use of Interpretive rule to bypass the legislature, as was done. Further, not allowing ANY provisional enrollment for 7th and 12th graders without proof of the two new immunizations is a mistake. When the first day of school happens and children are turned away at the door because they have not been immunized, you will have children already missing school. Truancy is a huge issue and this will only add to the problem. Especially with this being the first year for the new requirements, provisional enrollment should be allowed. Again, I do not agree with how the new requirements were added by the BPH and that there are not religious/philosophical vaccine exemptions.</p> <p>5.5 I'm going to assume you don't really mean that students who have visited another "county" have to show proof of the Tb skin test. In the next line, it states "country." I'm sure just a typo, but a concerning one to say the least. Why is there a 4 month provision for this requirement but not for the new adolescent immunizations?</p>	A -	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p> <p>5.5 – Accepted change to the word from “county” to “country” due to typo.</p>
04-22	Tiffany Boles Wheeling WV	<p>5.2b I am not in agreement with adding 2 new vaccines to the schedule without a vote. 5.5 I think you mean country, not county...</p>	A -	<p>5.2b - This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 -</p>

				<p>immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p> <p>5.5 – Accepted change to the word from “county” to “country” due to typo.</p>
04-22	Michelle McVaney Concerned Parent Parkersburg WV	I am completely upset that new vaccines have been added and that parents in this state are forced to give them to their children in order for children to be allowed a public education. The way this new rule was slid in and then public comment just now being asked for all this time afterward. Ridiculous. This state no longer provides freedom as per the U.S. Constitution.	N -	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed</p>

				by the Board.
04-22	Alex Workman parent Hurricane WV	Shame on you for wanting to add even more vaccines to already overloaded children! And then to FORCE these vaccines on parents who believe they are making the right health decisions for their children. Every parent should have the right to make informed choices when it comes to their kids, it is the fundamental right of the US Constitution. Not every kid is the same, so the cookie cutter approach to one size fits all vaccine schedule just DOES NOT work!	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-23	Theresa Dennison Mt. Hope WV	As it appears, the WV Dept. of Health has already decided ON THEIR OWN which vaccines to force on my children. So, at this point, I wonder why NOW you are taking public opinions? So here's my opinion as a parent and a teacher in West Virginia- whether you want it or not. The vaccine schedule is out of control and since parents (only in WV and one other poor, southern	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the

		state with comparably unhealthy citizens- Mississippi) have no right to decline or delay ANY of these- it is inexcusable to add even more. There were 8 vaccines and boosters when I was a child- now there are 45+. There is no definitive proof of the safety or efficacy of these vaccines and, at least, until parents can make their own decisions about the medical treatment of their children- as written in the constitution- then there should not be an increase.		schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-23	Elizabeth Walker Beckley West	5.2b By requiring more vaccines onto the already overloaded schedule, WV schools will lost more students to homeschooling and to parents transporting them over state borders for school. The schools need all the funding they can get and can't afford to lose the funding they will lose from so many students dis-enrolling from WV public schools.	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-23	Christina Peters Concerned Parent Parkersburg WV	I have serious concerns that additional vaccines are being added to an already large number of vaccines without giving parents a right to an exemption. This is UNCONSTITUTIONAL. The vaccines that are being added are NOT going	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95

		through the PROPER legislative process.		- immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-23	Carlos Walker Beckley West	Adding new shots is a bunch of bull, and only serves to prove these shots don't work anyway. if they did, there would be absolutley no need to give them over and over and over again. Leave our children alone, let the parents make decisions for them, and stop pushing your stupid opinions on us! Stop trying to make laws about what we have to do.	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPHBPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
04-23	Teresa Garrett Stanaford WV	I believe that there are too many vaccines and they are given too close together. They have not		This revision of WVBE Policy 2423 is intended to

		<p>been tested by an independent research team (only pharmaceutical company-funded studies). Most vaccines have not been adequately proven safe nor effective. Parents should have the option to decline or delay these vaccines just as all other states in this country- except WV and Mississippi. Add as many vaccines (without following proper procedures I might add) as this government agency wants as long as parents have the ability to decline these medical procedures- as stated in the constitution.</p>	<p>N -</p>	<p>update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.</p>
04-26	<p>Misty Cunningham Concerned Parent We the Parents Coal City WV</p>	<p>As a parent of a vaccine injured child, I have a to call in to question the reasoning for mandated vaccines in order for children to receive an education. I understand that the law now states if a a child can receive a medical exemption then the child will then be allowed into school which is a good start, however, what of that childs siblings? I believe in circumstances where a child has a disorder where genetics could play a part and put the siblings at risk, a parent should not be forced to harm the other children in order for them to receive an education. If there is probable cause there should not be a mandate!!!! As of today only two states in all of the United States require forced vaccinations and unfortunately West Virginia is one of those states. I do believe vaccines can be beneficial but there is an exeption to every rule.</p>	<p>A -</p>	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.  Medical exemptions</p>

			<p>requests are completed by the child's physician, and initial validation is made by the local health officer, with final approval or denial by the State Health Officer.</p> <p>Added reference in section 5.2 to WV Interpretive Rule WV64CSR95 to clarify language in medical exemption process:</p> <p>"5.2 Students must be in compliance with the required immunization schedule as set forth by the Bureau for Public Health (BPH) Commissioner. The BPH Commissioner, or his/her designee (local health officer) shall make the final determination in cases in which as authorized medical practitioner's written medical exemption is challenged by school personnel as inappropriate or invalid, as defined in WV BPH Interpretive Rule, §64-95-10.</p>
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05-07	Kathy Bevins Wood County WV	Under the 9th Amendment, U.S. citizens have rights to privacy and freedom over their own bodies. The government cannot force its citizens to answer questions of a personal/private nature and the government cannot force itself on its citizens bodies. I am concerned about the effects of these vaccinations on children. My older daughter has had severe reactions to routine flu vaccinations, I do not want to jeopardize her health any further with these other vaccinations.	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of action cannot be addressed by the Board.
05-07	Doctor Teays Valley WV	Again, ACIP members have financial conflicts of interest to the vaccines they are recommending. To continue to add vaccines based on their recommendations should be considered negligence on all parties. You own stock in a company, slap a recommendation tag on a product, then the school takes that product and mandates it?	N -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the BPH Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The WVBE cannot reverse the immunization requirements so comments requesting that type of

				action cannot be addressed by the Board.
05-09	Teresa Morehead Coordinator of Health Services Wood County Schools Parkersburg WV	<p>"5.2 Students must be in compliance with the required immunization schedule as set forth by the Bureau for Public Health (BPH) Commissioner. The BPH Commissioner, or his/her designee (local health officer) shall make the final determination in cases in which as authorized medical practitioner's written medical exemption is challenged by school personnel as inappropriate or invalid.</p> <p>The immunization record shall be a public health record and provided to the local health department to be entered and reviewed annually in to the West Virginia Statewide Immunization Information System (WVSIIS)."</p> <p>(1) Recommend immunization exemption have its own subsection.</p> <p>Another option is to reference WV64CSR95 for guidelines regarding immunization exemption, since the process is spelled out clearly there.</p> <p>(2) If, however, exemption specifications remain in WVDE Policy 2423, consider revision of statement in Disease Prevention 5.2. Using the wording and guidelines established in WV64CSR95 would eliminate the language that a school must challenge exemptions or that it is responsible for the outcome of a medical decision. Preferred wording would be, "To obtain a medical exemption the child's parent or</p>	A -	<p>(1) and (2) - Added reference to WV Interpretive Rule WV64CSR95 to clarify language in medical exemption process:</p> <p>"5.2 Students must be in compliance with the required immunization schedule as set forth by the Bureau for Public Health (BPH) Commissioner. The BPH Commissioner, or his/her designee (local health officer) shall make the final determination in cases in which as authorized medical practitioner's written medical exemption is challenged by school personnel as inappropriate or invalid, as defined in WV BPH Interpretive Rule, §64-95-10.</p> <p>(3) The BPH Commissioner is the authority for immunization determination, as the</p>

		<p>guardian shall present a written request for an exemption from a physician who has treated or examined the child to the local health office in the county where the child attends school.” (The school can assist the parent with submission of the request to the local health officer.)</p> <p>(3) Keep 5.2 beginning statement, “Students must be in compliance with the required immunization schedule as set forth by the Bureau for Public Health (BPH) Commissioner.” (Author(s) may want to consider referencing WV64CSR95 and any other necessary/appropriate codes/rules.)</p> <p>(4) It is noted that the statement/directive, “The immunization record shall be entered and reviewed annually into the West Virginia Education Information System (WVEIS)” has been deleted from the proposed policy.</p> <p>i. Will immunizations no longer be considered a part of the WVEIS school records for students transferred to out of state schools?</p> <p>ii. How is compliance with school entry immunization guidelines to be documented?</p> <p>iii. Is it a correct assumption with the wording of Policy 2423 that WVDE no longer requires nor recommends inputting immunization records on WVEIS?</p> <p>iv. What would be the plan for determining</p>	<p>Interpretive Rule may be subject to change based on ACIP guidelines.</p> <p>(4) – I-IV &amp; (5) -The immunization rule is a public health law, governed by the WV BPH. Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into WVEIS to public health, allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for viewing historical data and entering such records, but its use is no longer required by the schools. Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health</p>
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		<p>individual school/grade vaccination status if vaccines are only input of WVSIIIS? Within the past year it was necessary to determine varicella vaccination status for an elementary school. The local health department wanted to know how many students had only one or no varicella vaccine. This information was readily available through WVEIS by grade and even classroom, if desired.</p> <p>(5) “The immunization record shall be a public health record and provided to the local health department to be entered and reviewed annually in to the West Virginia Statewide Immunization Information System (WVSIIIS).” Is the rationale for annual WVSIIIS review that the school and parent/guardian will be notified when students are due for immunizations according to the immunization schedule?</p> <p>(6) DELETE entire sections including 5.2.b, 5.2.b.1, 5.2.b.2, and 5.2.b.3. Vaccine requirements for grades Pre-k and K-12 are not spelled out in this policy.</p> <p>(7) Keep 5.2.a, because Pre-k does have immunization specifications in Policy 2525.</p> <p>5.5  ...Anytime spent in another county or students and staff...  This appears to be a typographical error. Should this be country instead of county?</p>	<p>officer (W.Va. §16-3-4).</p> <p>IV. Records needed checked by the schools will be limited to those students with medical exemption and provisional enrollment; assistance with WVSIIIS reports can be obtained by contacting the WV Division of Immunization Services at 304-558-2188. Additionally, the BPH is currently looking at software applications to allow county-level data to be obtained.</p> <p>(6) Detail provided on this policy on adolescent immunization is to clarify the new requirements for students entering 7<sup>th</sup> and 12<sup>th</sup> grades.</p> <p>5.5 – Accepted change to the word from “county” to “country” is incorporated due to typo.</p>
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05-10	<p>Donna Sue Peros          Director of School Nurses          Boone County Schools          Madison WV</p>	<p>Does 5.2 void the exemption procedure already outlined in Interpretative Rule 64CSR95? This section outlines a different process.</p> <p>Also, while 5.2 designates WVSIIIS as the official public health record of immunizations; there needs to be a statement requiring that system to provide reports to schools that are class specific, regarding students who are in compliance. This would require a link between WOW (WVEIS) and WVSIIIS so specific reports could be generated in the future. Example: Which students in a given class or homeroom (listed in WOW) are completely immunized or which students lack dates for certain immunizations. Otherwise, school personnel would have to access every individual WVSIIIS record to obtain that information--an impossible task for large class groups. At this time, valid reports are only available per county, by birthdate of given groups. This would be totally unsatisfactory for the types of reports needed to prove compliance for school enrollment. A recent example is the report that schools received for WVSIIIS records of students who have received MCV4 or Tdap. School personnel had to enter all of these records into their WOW system in order to run reports per class of students. When reports were obtained based upon birthdate ranges, records for all grade levels were in the mix, like 16 year old 10th graders, etc. These reports would have to be created; how long would that process take for the</p>	<p>A -</p>	<p>Added reference to WV Interpretive Rule WV64CSR95 to clarify language in medical exemption process:</p> <p>”5.2 Students must be in compliance with the required immunization schedule as set forth by the Bureau for Public Health (BPH) Commissioner. The BPH Commissioner, or his/her designee (local health officer) shall make the final determination in cases in which as authorized medical practitioner’s written medical exemption is challenged by school personnel as inappropriate or invalid, as defined in WV BPH Interpretive Rule, §64-95-10</p> <p>Information for immunizations on WVEIS will still be available for viewing historical data and entering such records, but its use is no longer required by the schools. However, immunization</p>
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		<p>state WVSIIIS program?? These are just practical questions regarding the reporting needed to monitor compliance in the schools.</p> <p>5.5: This section states that a certificate from a 'licensed physician' is to be presented regarding tuberculin testing...In rural areas particularly, the skin test is often read by someone other than the individual who administered the test (due to distance traveled to the clinic, timeline of allowing a child to enter school after test is read as negative, and the issue of parents/ guardians being required to miss 2 days of employment at a new job, to transport the child for the reading of the tuberculin test, etc.). Therefore, perhaps a preferred word would be "health care provider, nurse or school nurse" to allow for other professionals to 'read' the tuberculin test result. Most results sent from clinics or other providers' offices are signed by RN, LPN, or even medical assistants on staff.</p>		<p>compliance is ultimately the responsibility of the local health officer (W.Va. Code §16-3-4). Records needed checked by the schools will be limited to those students with medical exemption and provisional enrollment; assistance with WVSIIIS reports can be obtained by contacting the WV Division of Immunization Services at 304-558-2188. Additionally, the BPH is currently looking at software applications to allow county-level data to be obtained.</p> <p>5.5 - This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the public health law under W.Va. Code §16-3D-3; The WVBE cannot reverse public health requirements so comments requesting that type of action cannot be addressed by the Board.</p>
05-10	Danita Nellhaus RN,School Nurse	Policy 2423 5.5 discusses the TB test. The CDC does not recommend that the TB test be given to		This revision of WVBE Policy 2423 is intended to

	Kanawha Co. Health Services Charleston WV	children under 6. We review the physician's well child check where a TB risk assessment is performed. If a physician determines a child to be a low risk that is what is documented. It is the best practice that we follow.	N -	update our policy to be in alignment with the public health law under West Virginia Code §16-3D-3; The WVBE cannot reverse public health requirements so comments requesting that type of action cannot be addressed by the Board.
05-11	Brenda C. Isaac Lead School Nurse Kanawha County Schools Charleston WV	5.2b WVEIS should still be the primary receptacle of immunization records until the Bureau can effectively demonstrate that they can handle everything the school systems will need on a timely and consistent basis. That includes the ability to produce records, timely inputting of records, information to receiving schools for students who transfer and information to institutions of higher learning for students who will be graduating. I recommend setting back the start date for at least another year, possibly two years, and instituting a pilot of this in perhaps one or two small counties and one or two larger counties with careful monitoring by WVDE prior to making this change. If not done correctly this will cause much additional work as well as inaccuracies and hardships for school systems, local health departments and our students and families. 5.5 CDC and AAP does not recommend giving TB skin tests to low risk children under 6. Children in kindergarten and preschool have to have well child checks prior to enrolling in school. Pediatricians and other health care	N -	5.2b - The immunization rule is a public health law, governed by the Bureau. Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information into WVEIS to public health, allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for viewing historical data and entering such records, but its use is no longer required by the schools. Immunization records management and data collection and sharing can be decided upon at the local level. However,

		<p>providers practicing evidence based best practice will do a risk assessment as part of the Well Child Check. If further testing is needed after the risk assessment, then that will be done. That might not even involve a skin test since they are shown not to be accurate in the younger aged students particularly and other tests should be performed. This knowledge didn't exist when the law was written but the intent of the law is not to go against best practice in the medical field. We will be placing an undue burden on the parents of preschool and kindergarten students who have recently moved to our state and it will serve no protective purpose. Please reconsider this ill advised procedure for children entering our school system for the first time who are enrolling in preschool or kindergarten. This is not any way to welcome newcomers to WV.</p>		<p>immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4).</p> <p>5.5 - This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the public health law under W.Va. Code §16-3D-3; The WVBE cannot reverse public health requirements so comments requesting that type of action cannot be addressed by the Board.</p> <p>Under this code, TB tests (PPD) are required for first time enterers from out-of-state only.</p>
05-11	<p>Lana Harper RN KCS Charleston WV</p>	<p>When students in k or pre-k new enrollees have had a TB risk assessment by their doctor, and it is negative, I do not believe we should have to do a TB test on this child. CDE does not recommend TB skin tests for low risk children under age 6 because there is a lack of validity.</p>	<p>NA -</p>	<p>This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the public health law under W.Va. Code §16-3D-3; The WVBE cannot reverse public health requirements so comments requesting that type of action cannot</p>

				be addressed by the Board. Under this code, TB tests (PPD) are required for first time enterers from out-of-state only.
05-14	Mary Jane Rinard RN Berkeley County Schools Martinsburg WV	Section 5.2.a references entering WV school 'for the first time'. This phrase should be removed. As I understand BPH, this is not what you mean. With this phrase it would indicate if a child attended WV school as a K student and meets the requirements of that time, left for 4 years, if returning to WV schools any new requirements (such as Varicella or Hep) would not apply. This section also references WV Code 16-3-4 which has been out-dated since varicella and Hep B were required 4 years ago??. I know this is not your change to make, but that needs changed and probably should list NO specific immunizations. 5.5-Last sentence says 'Anytime spent in another county' I believe is supposed to be country. But what does this sentence mean relating to requesting another TB test? ANYTIME? Visit to Europe over spring break? 3 months in Canada? 2 weeks in Haiti? What is the expectation here?	A -	5.2 a- Reference in this paragraph is made to W. Va. Code §16-3-4, which spells out what immunizations are required upon entry into a WV school.  5.2.a. Accepted change to add 64CSR95: “All children entering prekindergarten (Pre-K), kindergarten and a West Virginia public school for the first time must have immunizations and show proof upon enrollment as defined by W.Va. Code §16-3-4 and 64CSR95.”  5.5 – Accepted change to the word from “county” to “country” is incorporated due to typo.  Research has proven that anyone who travels to a foreign country is exposed

				to a high risk situation for contracting TB therefore should complete a TB test prior to returning to the school setting.
<b>§126-51-6 Disease Control Measures</b>				
04-19	Dr. Richard A. Wittberg Executive Director Mid-Ohio Valley Health Department Parkersburg WV	The rule often refers to "the county health department". Since we are a regional health department with one Health Officer, I would prefer it say "the local health department".	A o	Accepted two changes in sections 3.4 and 6.3 to reflect "local health department" in place where "county health department" is referenced.
04-22	Claudia M Raymer Moundsville West	I do not see a reason for "appropriate health officials" having PERSONALLY IDENTIFIABLE information of students who may have been in contact with a person suspected of having a communicable disease. If my child is at risk, the school should be the place to give me the information that I need and I should be the one to make contact with public health officials as I see fit. We aren't talking about a student who is KNOWN to have a communicable disease. This is about children who may have has contact with a child who MAY have a disease, and again, the schools have been responsible for sharing that information and should remain so.	NA -	Disclosure of personally identifiable information from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public.
04-22	Tiffany Boles	6.3 I am not ok with a child personal identifiable information being sent to 'appropriate public		Disclosure of personally identifiable information

	Wheeling WV	health officials'	NA -	from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public.
04-22	Michelle McVaney Concerned Parent Parkersburg WV	Diseases are not controlled by vaccinations. Parents deserve a right to choose if their children are vaccinated just like the parents in all of the other states have a choice. Now for more vaccinations to be added and forced on children in order for them to have public education. RIDICULOUS. I am outraged.	N -	This revision of WV Board of Education Policy 2423 is intended to update our policy to be in alignment with the Bureau for Public Health (BPH) Interpretive Rule 64CSR95 - immunization requirements. The immunization rule is a public health law; the schools act as the checkpoint to enforce the rule. The Board of Education cannot reverse the immunization requirements so comments

				requesting that type of action cannot be addressed by the Board.
04-22	Alex Workman parent Hurricane WV	It is just not right to release personal information to the health department. Once again, a fundamental right of the Constitution. You are twisting what our Founding Fathers wanted and I'm sure they are turning in their graves knowing what the "government" is forcing upon it's citizens.	NA -	Disclosure of personally identifiable information from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public
04-23	Theresa Dennison Mt. Hope WV	I believe that a family's privacy should be better protected. The exaggeration, hype and fear have blurred all possibility of reasoning logically on this topic. All the while the vaccine makers are wallowing in the profits. As always, families are continuously leaving this state and you are giving them plenty of good reasons to do so.	NA -	Disclosure of personally identifiable information from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health

				officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public.
04-23	Elizabeth Walker Beckley West	6.3 I do not think personally identifiable information should be made available to anybody, including the health department. Privacy rights of each individual student MUST be protected.	NA -	Disclosure of personally identifiable information from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public.
04-23	Carlos Walker Beckley West	You should not be sending my child's personally identifiable information to anybody! Privacy should be respected at all times!	NA -	Disclosure of personally identifiable information from students' education records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions.

				During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public.
05-14	Mary Jane Rinard RN Berkeley County Schools Martinsburg WV	6.3 and .4 Reporting communicable disease to the county health department should be done by the providers diagnosing. The school system more often has parent reported or sometime anecdotal info from other sources---some more reliable than others---. Establishing accurate info about numbers or clusters requires dialogue with LHD.	NA -	This revision of WVBE Policy 2423 is intended to update our policy to be in alignment with the Bureau for Public Health Rule 64CSR7 (Reportable Diseases, Events and Conditions) which requires schools to report suspected communicable diseases for public health and safety. The reportable disease rule is a public health law; the WVBE cannot reverse the requirements so comments requesting that type of action cannot be addressed by the Board.
<b>§126-51-7 Confidentiality</b>				
04-23	Teresa Garrett Stanaford WV	There is no necessary reason to divulge EVEN MORE personal information about families than you already require. Enough is enough. Please		Disclosure of personally identifiable information from students' education

		use any other state in the Union as an example for writing WV's vaccine policies (except , of course, Mississippi!)	NA -	records to state health officials for an outbreak of a communicable disease is permitted under the FERPA health or safety emergency provisions. During a suspected outbreak, investigation is conducted by local health officials, thus at times deemed necessary disclosure of such student information to prevent disease spread and protect student and the public.
05-07	Kathy Bevins Wood County WV	7.2 HIPAA!!! Medical records are confidential, and I don't recall giving permission to share my children's medical records with anyone except for their doctor and my family.	NA -	Section 7.2 specifies that medical records shall be shared <i>only after permission is obtained from the student's parent/guardian</i> . Education records are protected under FERPA, not HIPAA.
05-10	Donna Sue Peros Director of School Nurses Boone County Schools Madison WV	7.2: There probably needs to be some type of statement of clarification re: when the WVSIIIS records of immunizations can be released by school personnel to other entities, other than during CD outbreaks, etc. For example: to prevent unnecessary absences, school systems normally send immunization records immediately upon request of the parent to out- of- state or other agencies. Since this is to become the 'health	NA -	Procedure for disclosure of record will not be affected by this review. Immunization records stored in WVSIIIS are public health records and allowed to be shared under HIPPA.

		department's record'; will the school be allowed to forward the record, with parent consent, to out-of- state schools or other health care providers, to assist with transition of enrollment for these children if they leave one of the WV schools?		School systems are covered under FERPA and any record shared with outside agencies/parties, unless in cases of communicable disease outbreaks, must have the parent/guardian signature.
05-11	Brenda C. Isaac Lead School Nurse Kanawha County Schools Charleston WV	Sending copies of immunization records to local health departments and/or DHHR is a very risky method and would place a student's confidentiality in further jeopardy. The more "hands" and steps that are involved, the harder it is to protect a student's confidential information.	NA -	Immunization requirements for school entry are determined by the BPH Rule, with the local health officer being ultimately responsible for immunization compliance (W.Va. Code §16-3-4).. Student records reviewed by the local health department staff and DHHR staff are protected under the confidentiality protection through HIPAA.
<b>Comments received via e-mail</b>				
05-14	Yvonne Povick School Nurse Kanawha County Schools Charleston, WV	I have been a pediatric nurse for over 30 years including 25 years at the Children's Medicine Center at Women and Children's Hospital and presently as a school nurse in Kanawha County. I understand the importance of preventive care and children being protected by receiving all required immunizations. As a School Nurse I am required to stay up to date on all immunization	NA -	The immunization rule is a public health law, governed by the WVBPH. Revisions to Policy 2423 shift the accountability and requirement from schools for entering student immunization information

		<p>requirements. It is my experience that turning the entry of immunizations over to the health departments would not be “best practice” for our students. There was a time period at the Children’ Medicine Center when the state entered our immunizations in the state registry. There were multiply problems with delayed entries and immunizations entered incorrectly. This placed our patients at increased risk for getting double vaccinated or missed vaccines. The School Nurse needs to have access accurate up to date information for the students. Entering immunizations into Wveis provides this. We don’t want a graduating senior being denied admission to college because the records have not been entered into the registry or are incorrectly entered.</p>		<p>into WVEIS to public health, allowing one repository for immunization records. Information for immunizations on WVEIS will still be available for viewing historical data and entering such records, but its use is no longer required by the schools. Immunization records management and data collection can be decided upon at the local level. However, immunization compliance and accountability ultimately lies with the local health officer (W.Va. Code §16-3-4). .</p>
05-14	<p>Rahul Gupta Executive Director/Health Officer Kanawha-Charleston Health Department Charleston, WV</p>	<p>§126-51-5. Disease Prevention Measures The majority of local health departments lack the resources required to undertake the activities associated with this policy change. The Kanawha-Charleston Health Department (KCHD) estimates it will require at least 1 (one) full-time employee (FTE) to enter the data and process records requests for Kanawha County students. The fiscal note for KCHD is estimated at \$35,000.00 and comes at time when the Health Department does not have the personnel or</p>	A -	<p>Section 5.2 has been changed to incorporate “Bureau” as an additional agency for data entry: “The immunization record shall be a public health record and provided to the local health department and/or the Bureau to be entered and reviewed annually into the West Virginia</p>

		<p>funding to perform these duties. We anticipate that other local health departments across West Virginia will be in a similar situation. KCHD requests that the policy be amended so the responsibility for the data entry into the Statewide Immunization Information System (WVSIIS) can be done by the Bureau for Public Health or local health departments or both, as appropriate to local situations and resources available. This change will enable the goals of the policy to be met without placing financial hardship on local health departments such as KCHD</p>		<p>Statewide Immunization Information System (WVSIIS).”</p>
<p>5-14</p>	<p>Elaine Darling  Program Manager, West Virginia Immunization Network  The Center for Rural Health Development, Inc</p>	<p>Thank you for the opportunity to comment on the WV Board of Education’s Communicable Disease Control Policy 2423. On behalf of the West Virginia Immunization Network (WIN), I would like to express our support for the changes described in the policy. WIN is a statewide coalition that is focused on improving immunization rates in West Virginia in order to protect West Virginians from vaccine-preventable diseases.</p> <p>WIN feels that by moving the student immunization records to the West Virginia Statewide Immunization Information System (WVSIIS) as noted in Policy 2423, this process will enable schools and health departments to have a central repository of student immunization records and will subsequently ensure that the student immunization records are up to date and easily accessible by both schools and health department. Furthermore, this will help to enable</p>	<p>N  +</p>	

		<p>schools and health departments to 1) more easily determine which students have met the school immunization requirements and 2) during an outbreak of a vaccine-preventable disease, help to identify students who have not yet been immunized and are at risk for contracting the disease.</p> <p>Policy 2423 also incorporates the required adolescent vaccinations for students entering seventh and twelfth grades (Tdap and meningococcal) as described in the Bureau for Public Health’s Interpretative Rule 64CDR95. Win supports the interpretive Rule that changed Tdap and Meningococcal fro recommended to required immunizations, which will result in improved immunization rates for adolescents in West Virginia. Attached to this letter is a resolution that WIN submitted in support of these changes last year.</p> <p>Again, thank you for the opportunity to comment on Policy 2423. More importantly, thank you for the work that you do to keep West Virginia’s students healthy.</p>		
<b>Comments received via mail</b>				
05-14	<p>Beth Jordan School Health Coordinator Nicholas County Schools Summersville, WV</p>	<p>4.14 Sentence starting with “Certainly an outbreak of diseases...”: the phrase “such as” is understood to mean a list of examples follows , not meant to be all inclusive. Phrase “but not limited to” is redundant. #2 adding the word “that” after “polio”, “makes this an incomplete sentence. Omit “that” and it becomes a complete</p>	<p>A -</p>	<p>Section 4.14 has been accepted for clarification in the definition: “Certainly an outbreak of diseases, but not limited to, measles, rubella, mumps, and polio, that not only</p>

		sentence.		pose threat of permanent disability or death for the individual, but have historically presented themselves as epidemic in nature”.
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## Elizabeth McCoy

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:22 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-14 10:41:40)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, May 14, 2012 10:42 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-05-14 10:41:40)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: Mary Jane Rinard  
Organization: Berkeley County Schools  
Title: RN  
City/State: Martinsburg, WV  
Role: Professional Support  
Posted: 2012-05-14 10:41:40  
Posted from IP:

Comments for section 126-51-4 Definitions

-----  
WVEIS with all it's blemishes serves the school better than WVSIIIS for enforcement. With the implentation of new requirements, we need the capacity to be able to activate a program that says 'produce a report for me of 11th grade students at XYZ High School that have NR (no record) of Q Imm and Z Imm. As I understand it, to get that information from WVSIIIS, I would need to submit a list of 11th grade students and their birthdate and then those names would need to be entered into WVSIIIS by BPH staff (? LHD have no staff for that) to pull up that information. I understand the provider can send notices to children/parents indicating an immunization is due. When the parent does not address that, then the child is in school non-compliant, the school is responsible for that potenal health issue, and unless we are reverting completely back to paper lists and tickler files, there will be more non-compliance (potentially unknown)of the students.

Comments for section 126-51-5 Disease Prevention Measures

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Section 5.2.a references entering WV school 'for the first time'. This phrase should be removed. As I understand BPH, this is not what you mean. With this phrase it would indicate if a child attended WV school as a K student and meets the requirements of that time, left for 4 years, if returning to WV schools any new requirements (such as Varicella or Hep) would not apply.rnThis section also references WV Code 16-3-4

which has been out-dated since varicella and Hep B were required 4 years ago. I know this is not your change to make, but that needs changed and probably should list NO specific immunizations.rn5.5-Last sentence says 'Anytime spent in another county' I believe is supposed to be country. But what does this sentence mean relating to requesting another TB test? ANYTIME? Visit to Europe over spring break? 3 months in Canada? 2 weeks in Haiti? What is the expectation here?

Comments for section 126-51-6 Disease Control Measures

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6.3 and .4 Reporting communicable disease to the county health department should be done by the providers diagnosing. The school system more often has parent reported or sometime anecdotal info from other sources---some more reliable than others---. Establishing accurate info about numbers or clusters requires dialogue with LHD.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:22 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-11 13:20:36)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Friday, May 11, 2012 1:21 PM  
**To:** cboehm@access.k12.wv.us  
**Subject:** Comment Received for Policy 2423 (2012-05-11 13:20:36)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: Lana Harper  
Organization: KCS  
Title: RN  
City/State: Charleston, WV  
Role: Professional Support  
Posted: 2012-05-11 13:20:36  
Posted from IP:

Comments for section 126-51-1 General

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I do not believe turning the immunization records over to the Health Department is a good idea. School nurses would not be able to obtain the records, since we do not have access. I also do not believe they have the staff to enter all of these records.

Comments for section 126-51-5 Disease Prevention Measures

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When students in k or pre-k new enrollees have had a TB risk assessment by their doctor, and it is negative, I do not believe we should have to do a TB test on this child. CDE does not recommend TB skin tests for low risk children under age 6 because there is a lack of validity.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:22 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-11 11:49:14)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Friday, May 11, 2012 11:49 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-05-11 11:49:14)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: Brenda C. Isaac  
Organization: Kanawha County Schools  
Title: Lead School Nurse  
City/State: Charleston, WV  
Role: Professional Support  
Posted: 2012-05-11 11:49:14  
Posted from IP:

Comments for section 126-51-4 Definitions

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4.21 I believe that it is premature to eliminate WVEIS Immunization record keeping and replace it with WVSIIIS. At this point, WVSIIIS is not at a point to accurately and consistently provide all of the information that school nurses and school systems will continue to need on a regular basis about immunizations in order to maintain safety and serve students. Immunization Control has a track record of not being able to provide information in a timely manner. This dramatic change needs to be piloted in one or two counties prior to a state wide implementation.

Comments for section 126-51-5 Disease Prevention Measures

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5.2b WVEIS should still be the primary receptacle of immunization records until the Bureau can effectively demonstrate that they can handle everything the school systems will need on a timely and consistent basis. That includes the ability to produce records, timely inputting of records, information to receiving schools for students who transfer and information to institutions of higher learning for students who will be graduating. I recommend setting back the start date for at least another year, possibly two years, and instituting a pilot of this in perhaps one or two small counties and one or two larger counties with careful monitoring by WVDE prior to making this change. If not done correctly this will cause much additional work as well as inaccuracies and hardships for school systems, local health

departments and our students and families. CDC and AAP does not recommend giving TB skin tests to low risk children under 6.

Children in kindergarten and preschool have

to have well child checks prior to enrolling in school. Pediatricians and other health care providers practicing evidence based best practice will do a risk assessment as part of the Well Child Check. If further testing is needed after the risk assessment, then that will be done. That might not even involve a skin test since they are shown not to be accurate in the younger aged students particularly and other tests should be performed.

This knowledge didn't exist when the law was written but the intent of the law is not to go against best practice in the medical field. We will be placing an undue burden on the parents of preschool and kindergarten students who have recently moved to our state and it will serve no protective purpose. Please reconsider this ill advised procedure for children entering our school system for the first time who are enrolling in preschool or kindergarten. This is not any way to welcome newcomers to WV.

Comments for section 126-51-7 Confidentiality

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Sending copies of immunization records to local health departments and/or DHHR is a very risky method and would place a student's confidentiality in further jeopardy. The more "hands" and steps that are involved, the harder it is to protect a student's confidential information.

**Elizabeth McCoy**

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:22 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-11 09:29:55)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Friday, May 11, 2012 9:30 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-05-11 09:29:55)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

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#

Name: Lori Fizer  
Organization: Kanawha County Schools  
Title: RN  
City/State: South Charleston, WV  
Role: Professional Support  
Posted: 2012-05-11 09:29:55  
Posted from IP:

Comments for section 126-51-1 General

-----

I am concerned with sections 5.2 and 5.5. Many local health departments don't have the manpower to designate someone to take care of inputting immunizations into WVSIIIS. This will need to be a full time position. Is the state going to provide funding for this? This needs to be discussed with local health departments before the state makes a decision that they will be responsible for this. rnrnAs for area 5.5, you need to realize that requiring PPD's on any first time enterer isn't best practice. PPD's aren't accurate on children under the age of 6. The CDC doesn't even recommend PPD's be done on children unless their TB risk assessment done by a physician is high. We are requiring that first time enterers have a well child check and on that child check doctors are doing a TB risk assessment. Is it best practice to send a child for a PPD when they have had a TB risk assessment by a doctor who states their risk for TB is low? As a school nurse I want all of my students ! to be healthy but if this goes into law we are going to be hurting more children than helping them.

**Elizabeth McCoy**

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-10 14:20:23)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Thursday, May 10, 2012 2:20 PM  
**To:** cboehm@access.k12.wv.us  
**Subject:** Comment Received for Policy 2423 (2012-05-10 14:20:23)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: Danita Nellhaus  
Organization: Kanawha Co. Health Services  
Title: RN,School Nurse  
City/State: Charleston, WV  
Role: Professional Support  
Posted: 2012-05-10 14:20:23  
Posted from IP:

Comments for section 126-51-2 Purpose

-----  
In regards to Policy 2423 5.2 where the state will be responsible for immunization records, I do not think this is feasible. Local health departments would have to enter the date in WSIIS and some simply do not have the manpower to do this. School nurses are still waiting to see the seasonal flu vaccines on the site. We need the grade and the school information to check immunizations. Another issue would be the high school seniors and others that need transcripts of their immunizations sent to their prospective colleges. Truly this is just not feasible.

Comments for section 126-51-5 Disease Prevention Measures

-----  
Policy 2423 5.5 discusses the TB test. The CDC does not recommend that the TB test be given to children under 6. We review the physician's well child check where a TB risk assessment is performed. If a physician determines a child to be a low risk that is what is documented. It is the best practice that we follow.

## Elizabeth McCoy

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-10 14:13:42)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Thursday, May 10, 2012 2:14 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-05-10 14:13:42)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Donna Sue Peros  
Organization: Boone County Schools  
Title: Director of School Nurses  
City/State: Madison, WV  
Role: Professional Support  
Posted: 2012-05-10 14:13:42  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

-----  
Does 5.2 void the exemption procedure already outlined in Interpretative Rule 64CSR95? This section outlines a different process. Also, while 5.2 designates WSIIS as the official public health record of immunizations; there needs to be a statement requiring that system to provide reports to schools that are class specific, regarding students who are in compliance. This would require a link between WOW (WVEIS) and WSIIS so specific reports could be generated in the future. Example: Which students in a given class or homeroom (listed in WOW) are completely immunized or which students lack dates for certain immunizations. Otherwise, school personnel would have to access every individual WSIIS record to obtain that information--an impossible task for large class groups. At this time, valid reports are only available per county, by birthdate of given groups. This would be totally unsatisfactory for the types of reports needed to prove compliance for school enrollment!  
t. A recent example is the report that schools received for WSIIS records of students who have received MCV4 or Tdap. School personnel had to enter all of these records into their WOW system in order to run reports per class of students. When reports were obtained based upon birthdate ranges, records for all grade levels were in the mix, like 16 year old 10th graders, etc. These reports would have to be created; how long would that process take for the state WSIIS program?? These are just practical questions regarding the reporting needed to monitor

compliance in the schools. 5.5: This section states that a certificate from a 'licensed physician' is to be presented regarding tuberculin testing...In rural areas particularly, the skin test is often read by someone other than the individual who administered the test (due to distance traveled to the clinic, timeline of allowing a child to enter school after test is read as negative, and the issue of parents/ guardians !

being required to miss 2 days of employment at a new job, to t!

transport

the child for the reading of the tuberculin test, etc.). Therefore, perhaps a preferred word would be "health care provider, nurse or school nurse" to allow for other professionals to 'read' the tuberculin test result. Most results sent from clinics or other providers' offices are signed by RN, LPN, or even medical assistants on staff.

#### Comments for section 126-51-7 Confidentiality

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7.2: There probably needs to be some type of statement of clarification re: when the WVSIIIS records of immunizations can be released by school personnel to other entities, other than during CD outbreaks, etc. For example: to prevent unnecessary absences, school systems normally send immunization records immediately upon request of the parent to out-of-state or other agencies. Since this is to become the 'health department's record'; will the school be allowed to forward the record, with parent consent, to out-of-state schools or other health care providers, to assist with transition of enrollment for these children if they leave one of the WV schools?

## Elizabeth McCoy

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-07 22:52:30)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, May 07, 2012 10:53 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-05-07 22:52:30)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

**Name:**  
**Organization:**  
**Title:** Doctor  
**City/State:** Teays Valley, WV  
**Role:** Business-Industry  
**Posted:** 2012-05-07 22:52:30  
**Posted from IP:**

Comments for section 126-51-4 Definitions

-----  
ACIP members have financial conflicts of interest to the vaccines they are recommending. To continue to add vaccines based on their recommendations should be considered negligence on all parties, yet you site them as a basis for the law.

Comments for section 126-51-5 Disease Prevention Measures

-----  
Again, ACIP members have financial conflicts of interest to the vaccines they are recommending. To continue to add vaccines based on their recommendations should be considered negligence on all parties. You own stock in a company, slap a recommendation tag on a product, then the school takes that product and mandates it?

## Elizabeth McCoy

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-05-07 10:24:22)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, May 07, 2012 10:24 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-05-07 10:24:22)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Kathy Bevins  
Organization:  
Title:  
City/State: Wood County, WV  
Role: Parent-Family  
Posted: 2012-05-07 10:24:22  
Posted from IP:

Comments for section 126-51-1 General

-----  
I was unaware of the public comment period for the interpretive rule which allowed the original change. I do not agree with the requirement of adolescent immunizations for 7th and 12th graders. Shedding of these vaccinations, as well as other childhood vaccinations, put as much of a risk of exposing those who are unvaccinated. Last year, at the end of the school year, there was an outbreak of chicken pox. Why would there be an outbreak if the chicken pox vaccination is a requirement to enter kindergarten?  
Obviously, this vaccinate is not effective.

Comments for section 126-51-2 Purpose

-----  
Under the 9th Amendment, U.S. citizens have rights to privacy and freedom over their own bodies. The government cannot force its citizens to answer questions of a personal/private nature and the government cannot force itself on its citizens bodies.

Comments for section 126-51-4 Definitions

-----  
Shedding of these vaccinations, as well as other childhood vaccinations, put as much of a risk of exposing those who are not vaccinated against these diseases.

Comments for section 126-51-5 Disease Prevention Measures

-----  
Under the 9th Amendment, U.S. citizens have rights to privacy and freedom over their own bodies. The government cannot force its citizens to answer questions of a personal/private nature and the government cannot force itself on its citizens bodies. I am concerned about the effects of these vaccinations on children. My older daughter has had severe reactions to routine flu vaccinations, I do not want to jeopardize her health any further with these other vaccinations.

Comments for section 126-51-7 Confidentiality

-----  
7.2 HIPAA!!! Medical records are confidential, and I don't recall giving permission to share my children's medical records with anyone except for their doctor and my family.

## Elizabeth McCoy

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-26 13:15:37)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Thursday, April 26, 2012 1:16 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-26 13:15:37)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Melanie Tingler  
Organization:  
Title: Grandmother  
City/State: Lindside, WV  
Role: Parent-Family  
Posted: 2012-04-26 13:15:37  
Posted from IP:

Comments for section 126-51-1 General

-----  
I do not fully understand how to use this comment form so I will use it to the best of my knowledge. I feel that we do not need any further immunizations thrown at our school children or adults. We need to stop this policy before it begins.

Comments for section 126-51-3 Application

-----  
We should have rights as parents for our children to attend public schools and be able to opt out of this endless list of vaccinations. It is proving out more and more that the vaccinations are not even protecting our children. The diseases are showing up in the vaccinated population. Someone needs to get to the bottom of the money making business and bring it to a stop as we have more and more sick children. Many many families in WV home school their children to prevent doing the mandatory vaccinations. I also pray that this state would allow us our right of the religious exemption. That is only constitutional and we are not animals, we are humans with a brain.

Comments for section 126-51-4 Definitions

-----  
Our health providers should remain in control of our immunization records, not the board of education. We are controlled and watched over enough in our lives and the board of education

does not need more control of knowing more of our business. Our government does not own us individuals as it owns the school system. The laws are all far out of hand and continuing to multiply at an alarming rate. Please reconsider this new policy and again I pray it would be stopped before it is started. My 12 year old grandson commented to me about this policy. He said well I guess I will be home-schooled my senior year because they are not puncturing me with any more deadly needles. He has educated himself that immunizations are a money making scam and cause more harm than good. I pray more adults would lay aside the brainwashing that has happened to them and look up the dangers of immunizations and read some first hand truth!!! Thanks for your time and may the policy be put in file #13.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-26 12:53:30)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Thursday, April 26, 2012 12:54 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-26 12:53:30)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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The Complete Comments Report from the database can be found here:  
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Comment Received for Policy 2423

#####  
#

Name: Misty Cunningham  
Organization: We the Parents  
Title: Concerned Parent  
City/State: Coal City , WV  
Role: Parent-Family  
Posted: 2012-04-26 12:53:30  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

-----  
As a parent of a vaccine injured child, I have a to call in to question the reasoning for mandated vaccines in order for children to receive an education. I understand that the law now states if a a child can receive a medical exemption then the child will then be allowed into school which is a good start, however, what of that childs siblings? I believe in circumstances where a child has a disorder where genetics could play a part and put the siblings at risk, a parent should not be forced to harm the other children in order for them to receive an education. If there is probable cause there should not be a mandate!!!! As of today only two states in all of the United States require forced vaccinations and unfortunately West Virginia is one of those states. I do believe vaccines can be benifical but there is an exeption to every rule.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-23 17:46:08)

-----Original Message-----

From: Nobody [mailto:nobody@kryten.wvnet.edu]  
Sent: Monday, April 23, 2012 5:46 PM  
To: [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
Subject: Comment Received for Policy 2423 (2012-04-23 17:46:08)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Teresa Garrett  
Organization:  
Title:  
City/State: Stanaford, WV  
Role: Parent-Family  
Posted: 2012-04-23 17:46:08  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

-----  
I believe that there are too many vaccines and they are given too close together. They have not been tested by an independent research team (only pharmaceutical company-funded studies). Most vaccines have not been adequately proven safe nor effective. Parents should have the option to decline or delay these vaccines just as all other states in this country- except WV and Mississippi. Add as many vaccines (without following proper procedures I might add) as this government agency wants as long as parents have the ability to decline these medical procedures- as stated in the constitution.

Comments for section 126-51-7 Confidentiality

-----  
There is no necessary reason to divulge EVEN MORE personal information about families than you already require. Enough is enough. Please use any other state in the Union as an example for writing WV's vaccine policies (except , of course, Mississippi!)

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-23 15:12:01)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, April 23, 2012 3:12 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-23 15:12:01)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Carlos Walker  
Organization:  
Title:  
City/State: Beckley, West Virginia  
Role: Parent-Family  
Posted: 2012-04-23 15:12:01  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

-----  
Adding new shots is a bunch of bull, and only serves to prove these shots don't work anyway.  
if they did, there would be absolutley no need to give them over and over and over again.  
Leave our children alone, let the parents make decisions for them, and stop pushing your  
stupid opinions on us! Stop trying to make laws about what we have to do.

Comments for section 126-51-6 Disease Control Measures

-----  
You should not be sending my child's personally identifiable information to anybody! Privacy  
should be respected at all times!

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-23 10:32:55)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, April 23, 2012 10:33 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-23 10:32:55)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Christina Peters  
Organization:  
Title: Concerned Parent  
City/State: Parkersburg, WV  
Role: Parent-Family  
Posted: 2012-04-23 10:32:55  
Posted from IP:

Comments for section 126-51-4 Definitions  
-----

I do not understand why the Dept of Health needs to be put in charge of collecting immunization records. This is now going to be one more step that parents have to be burdened with to enroll thier children. The current system of presenting it to the school has been working very well for years.

Comments for section 126-51-5 Disease Prevention Measures  
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I have serious concerns that additional vaccines are being added to an already large number of vaccines without giving parents a right to an exemption. This is UNCONSTITUTIONAL. The vaccines that are being added are NOT going through the PROPER legislative process.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:21 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-23 07:49:49)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, April 23, 2012 7:50 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-23 07:49:49)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

**Name:** Elizabeth Walker  
**Organization:**  
**Title:**  
**City/State:** Beckley, West Virginia  
**Role:** Parent-Family  
**Posted:** 2012-04-23 07:49:49  
**Posted from IP:**

Comments for section 126-51-5 Disease Prevention Measures

-----  
5.2b By requiring more vaccines onto the already overloaded schedule, WV schools will lost more students to homeschooling and to parents transporting them over state borders for school. The schools need all the funding they can get and can't afford to lose the funding they will lose from so many students dis-enrolling from WV public schools.

Comments for section 126-51-6 Disease Control Measures

-----  
6.3 I do not think personally identifiable information should be made available to anybody, including the health department. Privacy rights of each individual student MUST be protected.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-23 01:24:00)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Monday, April 23, 2012 1:24 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-23 01:24:00)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

**Name:** Theresa Dennison  
**Organization:**  
**Title:**  
**City/State:** Mt. Hope, WV  
**Role:** Parent-Family  
**Posted:** 2012-04-23 01:24:00  
**Posted from IP:**

Comments for section 126-51-5 Disease Prevention Measures

-----  
As it appears, the WV Dept. of Health has already decided ON THEIR OWN which vaccines to force on my children. So, at this point, I wonder why NOW you are taking public opinions? So here's my opinion as a parent and a teacher in West Virginia- whether you want it or not.  
rnThe vaccine schedule is out of control and since parents (only in WV and one other poor, southern state with comparably unhealthy citizens-Mississippi) have no right to decline or delay ANY of these- it is inexcusable to add even more. There were 8 vaccines and boosters when I was a child- now there are 45+. There is no definitive proof of the safety or efficacy of these vaccines and, at least, until parents can make their own decisions about the medical treatment of their children- as written in the constitution- then there should not be an increase.

Comments for section 126-51-6 Disease Control Measures

-----  
I believe that a family's privacy should be better protected. The exaggeration, hype and fear have blurred all possibility of reasoning logically on this topic. All the while the vaccine makers are wallowing in the profits. rnAs always, families are continuously leaving this state and you are giving them plenty of good reasons to do so.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-22 21:34:08)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Sunday, April 22, 2012 9:34 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-22 21:34:08)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Alex Workman  
Organization:  
Title: parent  
City/State: Hurricane, WV  
Role: Parent-Family  
Posted: 2012-04-22 21:34:08  
Posted from IP:

Comments for section 126-51-4 Definitions

-----  
This a laugh! If the CDC and DHHR want to "protect" the citizens it would get out of bed with big pharma and give parents the TRUTH and knowledge to make decisions for their kids, not allow them to blindly follow what the government pressures them to do.

Comments for section 126-51-5 Disease Prevention Measures

-----  
Shame on you for wanting to add even more vaccines to already overloaded children! And then to FORCE these vaccines on parents who believe they are making the right health decisions for their children. Every parent should have the right to make informed choices when it comes to their kids, it is the fundamental right of the US Constitution. Not every kid is the same, so the cookie cutter approach to one size fits all vaccine schedule just DOES NOT work!

Comments for section 126-51-6 Disease Control Measures

-----  
It is just not right to release personal information to the health department. Once again, a fundamental right of the Constitution. You are twisting what our Founding Fathers wanted and I'm sure they are turning in their graves knowing what the "government" is forcing upon it's citizens.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-22 18:37:35)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Sunday, April 22, 2012 6:38 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-22 18:37:35)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Brooke McVaney  
Organization:  
Title:  
City/State: Parkersburg, WV  
Role: Community Member  
Posted: 2012-04-22 18:37:35  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures  
-----

I feel that the way these new vaccines were slid into place and not voted on by legislature was very sneaky. Parents have the constitutional right to decide what medical procedures are performed on their children. All but WV and one other state allow their citizens a choice on vaccinations. Now not only does WV not allow a choice but it is now forcing even MORE vaccinations. This is not FREEDOM. Sickening that the Health Department is now given even more control and allowed to sneak even more vaccines in and as this new code leaves plenty of room for them to continue to add even more. Unconstitutional and disrespectful to all parents and children to be forced into medical procedures that have proven side effects.

## Elizabeth McCoy

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-22 18:22:06)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Sunday, April 22, 2012 6:22 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-22 18:22:06)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: Michelle McVaney  
Organization: Concerned Parent  
Title:  
City/State: Parkersburg, WV  
Role: Parent-Family  
Posted: 2012-04-22 18:22:06  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

-----  
I am completely upset that new vaccines have been added and that parents in this state are forced to give them to their children in order for children to be allowed a public education. The way this new rule was slid in and then public comment just now being asked for all this time afterward.  
Ridiculous. This state no longer provides freedom as per the U.S. Constitution.

Comments for section 126-51-6 Disease Control Measures

-----  
Diseases are not controlled by vaccinations. Parents deserve a right to choose if their children are vaccinated just like the parents in all of the other states have a choice. Now for more vaccinations to be added and forced on children in order for them to have public education. RIDICULOUS.  
I am outraged.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-22 15:35:20)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Sunday, April 22, 2012 3:35 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-22 15:35:20)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Tiffany Boles  
Organization:  
Title:  
City/State: Wheeling, WV  
Role: Parent-Family  
Posted: 2012-04-22 15:35:20  
Posted from IP:

Comments for section 126-51-4 Definitions

-----  
4.6, When adding vaccines to the schedule it should be something that is voted on. Not just adding what the 'bureau' sees fit. rn4.14- I do not agree at all with this. I don't think its right to even temporarily disclose personal information about a child no matter what. rn4.21-I do not agree with WSIIS

Comments for section 126-51-5 Disease Prevention Measures

-----  
5.2b I am not in agreement with adding 2 new vaccines to the schedule without a vote. rn5.5 I think you mean country, not county...

Comments for section 126-51-6 Disease Control Measures

-----  
6.3 I am not ok with a child personal identifiable information being sent to 'appropriate public health officials'

## Elizabeth McCoy

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-22 15:02:25)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Sunday, April 22, 2012 3:02 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-22 15:02:25)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

**Name:** Claudia M Raymer  
**Organization:**  
**Title:**  
**City/State:** Moundsville, West Virginia  
**Role:** Parent-Family  
**Posted:** 2012-04-22 15:02:25  
**Posted from IP:**

Comments for section 126-51-4 Definitions

-----  
4.14 adding the phrase "but not limited to" is concerning due to such an open ended phrase allowing the addition of more vaccines as deemed appropriate without public input.rnrn4.21 What about those who have a medical exemption or who have a pediatrician in another state? How will that be accounted for?

Comments for section 126-51-5 Disease Prevention Measures

-----  
The Bureau for Public Health was able to add these new adolescent health requirement using Interpretive Rule. I strongly disapprove of the use of Interpretive rule to bypass the legislature, as was done. Further, not allowing ANY provisional enrollment for 7th and 12th graders without proof of the two new immunizations is a mistake. When the first day of school happens and children are turned away at the door because they have not been immunized, you will have children already missing school. Truancy is a huge issue and this will only add to the problem. Especially with this being the first year for the new requirements, provisional enrollment should be allowed. Again, I do not agree with how the new requirements were added by the BPH and that there are not religious/philosophical vaccine exemptions.

rnrn5.5 I'm going to assume you don't really mean that students who have visited another "county" have to show proof of the Tb skin test. In the next line, it states "c!"

ountry." I'm sure just a typo, but a concerning one to say the least. Why is there a 4 month provision for this requirement but not for the new adolescent immunizations?

Comments for section 126-51-6 Disease Control Measures

-----  
I do not see a reason for "appropriate health officials" having PERSONALLY IDENTIFIABLE information of students who may have been in contact with a person suspected of having a communicable disease. If my child is at risk, the school should be the place to give me the information that I need and I should be the one to make contact with public health officials as I see fit.

We aren't talking about a student who is KNOWN to have a communicable disease. This is about children who may have contact with a child who MAY have a disease, and again, the schools have been responsible for sharing that information and should remain so.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:20 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-22 13:10:10)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Sunday, April 22, 2012 1:10 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-22 13:10:10)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#  
Name: Lucas C. Watterson  
Organization:  
Title:  
City/State: Fairmont, WV  
Role: Parent-Family  
Posted: 2012-04-22 13:10:10  
Posted from IP:

Comments for section 126-51-1 General

-----  
WV needs to offer its parents the same civil liberties that 48 other states offer their citizens. Vaccine mandates must come to an end and we need to offer non-medical exemptions to all people. The tyranny must stop now!

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:19 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-21 09:54:38)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Saturday, April 21, 2012 9:55 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-21 09:54:38)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Tammy Scott  
Organization:  
Title: Parent and Teacher  
City/State: Parkersburg, WV  
Role: Parent-Family  
Posted: 2012-04-21 09:54:38  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

-----  
Adding vaccines is not the answer. I already personally know two 6th graders that have had adverse reactions that had to be reported to VAERS when they went to get their shots for next year. Parents should have a choice in what their children have put into their bodies. These shots do NOT work for everyone and a one size fits all it not best. Also if the BPH is not going to grant medical exemptions when you have MD's that say a child will be harmed if they get any more there is something majorly wrong with the system. Adding more shots will not stop the spread of disease. Education is the answer. Putting this out for public comment after saying that the new shots were already a must was also wrong. If we keep adding shots I know many families that will be homeschooling or moving out of state. This also includes many teachers.

## Elizabeth McCoy

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:19 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-21 08:52:45)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Saturday, April 21, 2012 8:53 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-21 08:52:45)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: Donna Gregory  
Organization:  
Title:  
City/State: Sutton, WV  
Role: Parent-Family  
Posted: 2012-04-21 08:52:45  
Posted from IP:

Comments for section 126-51-1 General

-----  
I am deeply concerned about this policy change. Adding additional vaccines to an already burdoned schedule is not the answer. Parents should have the right to choose not to vaccinate for religious beliefs, or because of concerns of serious reactions that have happened in the past with a childs immunization. Parents shouldn't be forced to homeschool or school them in a neighboring state due to WV policy which limit attendance by requiring vaccinations, and these boosters.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:19 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-21 06:06:53)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Saturday, April 21, 2012 6:07 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-21 06:06:53)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#  
Name: Jim  
Organization:  
Title:  
City/State: Morgantown, WV  
Role: Parent-Family  
Posted: 2012-04-21 06:06:53  
Posted from IP:

Comments for section 126-51-1 General

-----  
I am deeply disturbed about DHHR adding 8 more vaccinations to our education requirements without any approval from our legislators. I feel like this is a pharmaceutical driven agenda policy without any input from parents on the issue. Our kids are given to many injections and with zero exemptions I will move to one of the 48 states that does allow a choice. Parental choice is being taken away by our government and school districts. Sad. I'll move to PA or homeschool if this continues.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:19 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-20 09:32:04)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Friday, April 20, 2012 9:32 AM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-20 09:32:04)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Heather Wood  
Organization: Cabell County Board of Education  
Title: School Nurse  
City/State: Huntington, WV  
Role: Professional Support  
Posted: 2012-04-20 09:32:04  
Posted from IP:

Comments for section 126-51-1 General

-----  
My biggest concern is the elimination of entering any immunization data in to the WVEIS system. An immunization record is a part of the school record and should be kept in the WVEIS with the school record. It is part of the school transcript thus providing institutions of higher education easy access to a student's required shots. I am curious as to what has prompted this dramatic change in record keeping. It has been my experience that the WVEIS system has worked well for many years. I am in agreement that the immunization data should also be entered in to the WSIIS system but not at the expense of the WVEIS system. In Cabell county, we have copied our pre-k immunization records and sent them to the WSIIS with parent consent for several years. We have also worked very closely with our health department in the event of outbreaks of communicable diseases, our recent hepatitis A outbreak being the most recent example. My last comment is regarding the management of students who are not compliant with the immunization law. The policy is vague in addressing who will be managing the immunization compliance. It states that the health departments will be entering the data in to WSIIS but who will be collecting the immunizations records? Expecting parents to deliver shot records to the health departments is unreasonable. If the schools continue to collect the records then deliver them to the health departments that creates an opportunity for records to be misplaced or lost. Who will be following up with the shots to make sure students get the required vaccines if they are not up-to-date upon admission? If the school nurses are still going to manage the

shot records and the compliance, why not just give the school nurses change capability in the WSIIS and allow them to enter the data in to that system. That eliminates the health department's collection of shot records and keeps the system streamlined.

As a school nurse, I do not well!

come spending more time entering shot data but when I enter sh!

ot recor

ds I always check the WSIIS anyway so if I am already on that site at the same time, it would be little effort to enter the shots in to that system.rnAny lack of immunization data in the WSIIS needs to be addressed with providers of immunizations, not the school system.

**Elizabeth McCoy**

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:19 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-19 15:38:45)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Thursday, April 19, 2012 3:39 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-19 15:38:45)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#  
Name: Kelli Caseman  
Organization: WV School-Based Health Assembly  
Title: Executive Director  
City/State: Charleston, WV  
Role: Business-Industry  
Posted: 2012-04-19 15:38:45  
Posted from IP:

Comments for section 126-51-1 General

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The West Virginia School-Based Health Assembly strongly supports these updates to Policy 2423-Communicable Disease Control. The new 7th and 12th grade immunization requirements, as well as the shift in accountability of immunizations to public health, further ensure that West Virginia's students are strongly protected against diseases that could devastate their futures.

**Elizabeth McCoy**

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:15 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-19 15:26:00)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Thursday, April 19, 2012 3:26 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-19 15:26:00)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Dr. Richard A. Wittberg  
Organization: Mid-Ohio Valley Health Department  
Title: Executive Director  
City/State: Parkersburg, WV  
Role: Business-Industry  
Posted: 2012-04-19 15:26:00  
Posted from IP:

Comments for section 126-51-4 Definitions

-----  
4.18 has become 4.21 and does not talk about WVEIS. Does this mean that immunization information will only be on WWSIIS? Will WVEIS and WWSIIS be "talking" to each other?

Comments for section 126-51-5 Disease Prevention Measures

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I have multiple problems with 5.2: a) as written, if school personnel do not "challenge" a medical exemption, it is allowed. This puts the decision for exemptions in the school nurse's hands. This is unacceptable. b) this whole section is confusing. Since the previous sentence talks about individual immunization challenges, does this mean that only challenges are supposed to be entered into WWSIIS by local health? I do not think this is what was intended, but it is how it reads. c) From various press releases, it appears that local health departments (LHDs) are to be "accountable" for immunization records. This effort is doomed to failure in the existing system. There are pediatricians who regularly fail to enter data into SIIS, but still somehow maintain their VFC provider status. Who is responsible if a VFC provider does not comply? LHDs cannot be accountable for immunization records unless we can also police the entering of data. d) the immunization record will ! be "provided to the LHD to be entered and reviewed annually". Who is providing the record? Are pediatricians sending records to us? Who is entering them? As it is written, we are expected to enter their data. That is not what is expected now. And who is assuming that we

have staff with not enough to do? Finally, who at my LHD is supposed to review them? For what? Are we expected to let schools know when children are deficient and let families know when more shots are needed? If so, who is supposed to do this? If not, why are we reviewing the records? In theory, I agree that LHDs should be the repositories of immunization records. But I do not think that this will work in practice unless other system changes happen. If LHDs were solely responsible for the delivery of childhood immunizations, we could also assure that records are up to date and accurate. Without that, I am not sure it is possible.

Comments for section 126-51-6 Disease Control Measures  
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The rule often refers to "the county health department". Since we are a regional health department with one Health Officer, I would prefer it say "the local health department".

**Elizabeth McCoy**

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**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:15 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-18 21:56:49)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Wednesday, April 18, 2012 9:57 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-18 21:56:49)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####  
#

Name: Ashley  
Organization:  
Title:  
City/State: Beckley, WV  
Role: Parent-Family  
Posted: 2012-04-18 21:56:49  
Posted from IP:

Comments for section 126-51-1 General

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ANOTHER MANDATE for our children's healthcare?! DISGUSTING!! I think this is just another reason to add to the list to move out of this state.

## Elizabeth McCoy

---

**From:** Cybele Boehm [cboehm@access.k12.wv.us]  
**Sent:** Tuesday, May 15, 2012 8:14 AM  
**To:** 'Elizabeth McCoy'  
**Subject:** FW: Comment Received for Policy 2423 (2012-04-18 21:41:15)

-----Original Message-----

**From:** Nobody [mailto:nobody@kryten.wvnet.edu]  
**Sent:** Wednesday, April 18, 2012 9:41 PM  
**To:** [cboehm@access.k12.wv.us](mailto:cboehm@access.k12.wv.us)  
**Subject:** Comment Received for Policy 2423 (2012-04-18 21:41:15)

[fibanez@wvde.state.wv.us](mailto:fibanez@wvde.state.wv.us)

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Comment Received for Policy 2423

#####

#

Name: lori lee  
Organization:  
Title: parent  
City/State: gay, wv  
Role: Parent-Family  
Posted: 2012-04-18 21:41:15  
Posted from IP:

Comments for section 126-51-5 Disease Prevention Measures

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I am very disappointed regarding the additional vaccine requirements written into the 12-13 school year. As a citizen and a parent, I'm extremely concerned Ed taking away more parental rights. It is a basic right for parents to make educated, informed decisions, after consulting their family pediatrician, regarding their family's healthcare without violating their religious and philosophical beliefs. I would like to assert that the risk, religious/philosophical conflict, and individual constitution of each child and family must be respected, and there is certainly no justification for mandating additional vaccines. Please understand that no medicine and no medical procedure and no "schedule" is a one size fits all fix. Please change Tdap and Meningococcal language back to RECOMMENDED as opposed to being a requirement.