



December 16, 2022

Jeanette Slimmer MSN, MEd, RN, CSN  
President  
Pennsylvania Association of School Nurses and Practitioners (PASNAP)

Dear Ms. Slimmer:

I am writing in response to your letter to Janine Strick, Division of Immunizations' Nursing Services Consultant dated December 6, 2022, in which you expressed the concerns of PASNAP members regarding the rollout of recent changes to the School Immunization Law Report (SILR). Thank you for bringing the concerns to our attention and please know that we share in your commitment to the health and safety of students, faculty, and the community.

The Pennsylvania Department of Health (PADOH) began communicating the planned changes to the SILR prior to the beginning of the 2022-2023 school year and continued to provide reminders and information through November 2022. With the goal of reaching as many in the intended audience as possible, this communication was provided through a variety of channels, including school conferences, the Division of School Health's newsletter, calls with school nurses and webinars and training. We understand from your letter that our messaging did not reach as far and wide as we had intended, and that there are concerns that even with the efforts at communication there was not sufficient lead time to enable schools to provide information broken out as requested. We welcome feedback from you as to how we can do better in the future, and we welcome your assistance in communicating pertinent information to your members.

Regarding the changes that have been implemented in the SILR, they are as follows:

- 1) Beginning with the 2022-2023 school year, the report includes fields specific to homeschool students. Please note that the requirement to report information for homeschool students is not new. The difference is that information on homeschool students could previously be combined with information relating to all students, and now we are asking that it be reported separately.
- 2) There is a new field for "non-compliant but attending". This is a student who is attending school, but is not up to date with vaccinations, and who does not meet the qualifications to either obtain an exemption\* or be granted provisional status.

\*The definition of medical exemption has not changed.

From our perspective, because only the format in which the information is to be reported has changed but not the information itself, we did not anticipate significant concerns. However, we understand from your letter, and from some other feedback we are receiving that this is not the case. Unfortunately, we cannot grant an extension for the submission of the SILR, which continues to be due by December 31. However, taking into account concerns, we are requesting that school districts do the best they can to present the information in the format requested. We understand that this may be more difficult for some than others for this school year. We would ask those school districts to work toward improving the quality and completeness of their data for future reporting years.



We understand that this is a very busy time of year for the schools and the school nurses, and that many will be closed and out of office for the upcoming holidays. We greatly appreciate the work that these nurses do to positively impact the lives of the students they work with.

If you would still like to meet to discuss this further, please contact me at [tmcleaf@pa.gov](mailto:tmcleaf@pa.gov).

Sincerely,

A handwritten signature in black ink that reads 'Thomas M. McCleaf'. The signature is fluid and cursive, with the first name 'Thomas' and last name 'McCleaf' clearly legible.

Thomas McCleaf  
Director, Division of Immunizations