



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES

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August 23, 2012

Ms. Susan K. Haberstroh
Education Associate
Department of Education
401 Federal Street, Suite 2
Dover, DE 19901

RE: 16 DE Reg. 157 [DOE Proposed Immunization Regulation]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to revise its regulations as a result of the Interstate Compact on Education for Children of Military Families. The proposed regulation was published as 16 DE Reg. 157 in the August 1, 2012 issue of the Register of Regulations.

As background, in 2008, the Legislature enacted H.B. 297 which approved Delaware's participation in the Compact. One of the main features of the Compact is to reduce barriers to enrollment of children of military families given frequent relocations. This includes compliance with state immunization standards for entering students. The Compact contains the following provision:

Immunizations - Compacting states shall give thirty (30) days from the date of enrollment or within such time as is reasonably determined under the rules promulgated by the Interstate Commission, for students to obtain any immunization(s) required by the receiving state. For a series of immunizations, initial vaccinations must be obtained within thirty (30) days or within such time as is reasonably determined under the rules promulgated by the Interstate Commission.

DOE is now incorporating this standard in its immunization regulation. See §3.5. The only other proposed amendments are minor and non-substantive.

SCPD endorses the proposed regulation since it is essentially a "housekeeping" measure implementing the Compact.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our position on the proposed regulation.

Sincerely,



Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities

cc: The Honorable Mark Murphy
Dr. Teri Quinn Gray
Ms. Mary Ann Mieczkowski
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Mr. John Hindman, Esq.
Mr. Charlie Michels
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