



PENNSYLVANIA CHRISTIAN EDUCATION NETWORK

September 17, 2026

Pennsylvania Independent Regulatory Review Commission
555 Walnut Street, Suite 804
Harrisburg, PA 17101

RE: Comments on Proposed Regulation #10-242: Communicable and Noncommunicable Diseases, IRRC #3490

Dear Commissioners:

On behalf of the Pennsylvania Christian Education Network and the hundreds of Christian private schools and homeschool families across Pennsylvania we represent, I write to express our **strong opposition to Proposed Regulation #10-242**.

The proposed regulations undermine the fundamental right of parents to direct the upbringing and care of their children. Of particular concern, proposed § 27.60c would require schools to provide public health authorities access to students and permit private communications between government officials and children during the school day, while specifically prohibiting anyone from interfering with an official's private access to the student. The effect is clear: school officials are expected to stand aside while government officials privately question a child without the child's parents being notified or involved.

This approach is especially troubling in light of two recent U.S. Supreme Court decisions. In *Mahmoud v. Taylor* (2025), the Court protected parents' ability to direct their children's religious upbringing when schools expose children to instruction conflicting with their religious beliefs. More recently, in *Mirabelli v. Bonta* (2026), the Court affirmed that schools cannot shut parents out and hide a child's gender transition from them. The highest Court of the land has made it clear that parents have the fundamental right to direct the upbringing of their children.

Christian schools exist in partnership with parents. Requiring schools to facilitate private government access to children while restricting parental involvement puts schools in direct conflict with the families they serve and undermines the trust essential to that relationship. Notably, the Pennsylvania School Boards Association has raised a similar concern, warning



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that the proposal places schools “in an untenable position between parents and public health authorities.”

We are also deeply concerned about these expanded powers in conjunction with the Department of Health’s publication of school-level vaccination and exemption data. Publishing data identifying schools with higher rates of religious exemptions, while simultaneously expanding government authority over schools and students, creates a troubling scenario for religious schools and families to be singled out, publicly pressured, or targeted for heightened government intervention.

Pennsylvania can protect public health without diminishing parental rights, religious liberty, or the relationship of trust between parents and their children’s schools. **We urge the Commission to reject Proposed Regulation #10-242 in its current form.**

Thank you for your consideration.

Respectfully submitted,

Andrew R. Pry
Executive Director,
Pennsylvania Christian Education Network