

**From:** [Carrie Dinwoodie](#)  
**To:** [DOH WSBOH](#)  
**Subject:** Immunization compliance  
**Date:** Wednesday, January 27, 2016 3:25:48 PM

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I am writing to express my opinion on the conditional status guidelines for immunization compliance. In our district we have spent months (and are still working on) trying to get all of our students in compliance with immunization status. We spend so much time sending letters and phoning parents in the first month of school to give them the 30 days notice for out of compliance. There are so many that it takes us months just to get the three contacts done. If we could start our conditional status in the spring, before the next school year, so parents have all summer to get into compliance, we would be able to stop any out of compliant students at the first day of school and prevent months of trying to chase these students down. Once exclusion letters go out preventing students from coming to school on the first day, parent compliance skyrockets.

Obviously this would not work for new students who have not received notice. But for those students who are already in the district, and we know they need their Tdap or Varicella, etc.. before the start of the next school year it would avoid a lot of time and legwork to be able to exclude on the first day of school instead of 30 days from the time we make contact after the school year has already begun.

Thank you for your consideration.

*Carrie Dinwoodie RN, BSN*  
School Nurse, Mead School District  
Colbert, Midway & Prairie View  
[Call or text: \(509\) 688-9128](tel:5096889128)



*Go Cougs!*

**From:** [Sonja Bookter](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** No shots, no school  
**Date:** Tuesday, March 01, 2016 12:38:18 PM

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Hi Michelle,

I would like to voice my support of a no shots, no school change to the current immunization policy. I am having difficulty with administration support with the current policy allowing students to start, they don't support exclusion. So once kids are here and in class I am not supported to then tell them to stop coming. I am hoping that with a change in policy I may be able to prevent a start of school, if documentation is not in order!

Thank you for the work you do,

Sonja Bookter, RN

Enumclaw School District Nurse

Office: (360) 802-7505

Fax: (360) 802-7500

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**From:** [Hill, Julie A. \(ESC,LD,MT\)](#)  
**To:** [DOH WSBOH](#)  
**Subject:** RE: WAC revision of conditional immunization status  
**Date:** Wednesday, March 02, 2016 12:59:45 PM

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Hello! I am a school nurse in the Edmonds School District and I used to have close to zero students out of compliance on the first day of school as we could exclude them...we did a lot of work the previous spring and in the summer to educate them about the law requiring immunization compliance and had the support behind our request to comply because we could exclude. Since we can't exclude now, it takes months and months of persistent work and communication with parents to get students in compliance, all the time exposing students to out of compliant students and potentially to diseases as we don't have the "herd immunity". It also places staff and students who are immunocompromised at risk...I was shocked and disheartened when we no longer had the ability to exclude students, I didn't understand why the "law" behind our requests to become compliant was rescinded...now I understand it was to appease a small population of people who could have their own "conditional status" if they show military ID, if needed...but in all honesty, it is the PARENTS responsibility to keep their children's immunization information not the SCHOOL's responsibility to track it down when people are moved. Even non-military people think that they don't have to keep their children's immunization information, they say to just get it from the previous school. I respond by saying it is a courtesy that we can do this but that it is the parent's responsibility to be in compliance with the law....however, now it takes MONTHS for this to occur. Respectfully, Julie

*Julie Hill, R.N*

Certificated School Nurse

School Nurse for Mountlake Terrace Elementary, Mountlake Terrace High School, and Lynndale Elementary  
425-431-1066

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Monday-Friday: work days Monday: MTHS, Tuesday: LD, Wednesday: MTHS, Thursday: MTE, Friday: flex

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**From:** Sutherland, Nancy (ESC)  
**Sent:** Tuesday, February 9, 2016 4:38 PM  
**To:** 'wsboh@sboh.wa.gov'  
**Cc:** @Nurses

**Subject:** WAC revision of conditional immunization status

To the Washington State Board of Health.

I am the lead nurse for Edmonds School District.

Thank you for the opportunity to provide input changes in the immunization conditional status regulations, specifically the following WAC:

1. WAC 246-105-020 Which defines Conditional Immunization status.
2. WAC 246-105-040 Which addresses progress immunization compliance from conditional status.
3. WAC 246-105-080 Which provides a 30 day temporary exemption after the first day of attendance at school.

The opportunity to provide comments on this situation was opened to 19 of our district nurses at our January 28<sup>th</sup> monthly meeting. Some may elect to send individual information to you directly. Others provided the following collated information:

Comments for SBOH on Immunization Conditional status concerns, changes, etc.	Name
Laws need to match what is humanly possible to attain.	Jeanne Johnson BSN, RN
At this time, the conditional status WAC for Compliance provides a hardship. There is inadequate time/hours and manpower to get students compliant with immunizations with no strong motivator such as not being able to attend at the beginning of the school year, in place as it was before the "Conditional Status " WAC was implemented. At this time I have ~ 54 students out of compliance (OOC) and a registrar that has years of non-compliance collaboration on immunization; at my other high school I have ~ 30 OOC, with better registration collaboration,	Nancy Varg, MS, RN
According to what I understand, this provision was set up mainly to accommodate military families. Since this population is a small percentage of all students in Washington State schools, it seems that a review with an eye to <u>rescinding this change</u> would be in the best interests of public health and effective immunization compliance. Having a 30 day grace period eliminates any leverage schools have, especially at the beginning of the year or with new students. This function is an <i>unfunded mandate for an institution whose primary mission is "Education"</i> not public health. Although there are RCW and WAC to support the need for compliance, actual compliance varies <i>and has decreased</i> based on workload and staffing issues. Perhaps a more reasonable and prudent approach (if my original information on this change being motivated <u>to serve military families is correct</u> ) would be: <ol style="list-style-type: none"><li>1. Allowing that a grace period of 30 days <u>ONLY allowed upon</u></li></ol>	Nancy N. Sutherland MEd. RN

<p><u>confirmation of a parent/guardian’s <b>military</b> status and associated compliance difficulty</u>—signed by the parent/guardian.</p> <ol style="list-style-type: none"> <li>a. Thus the target population is given appropriate accommodation w/o adversely impacting immunization compliance for the larger population, not affected by this situation.</li> </ol> <p>2. The parent/guardian could sign a box, indicating their military status.</p> <ol style="list-style-type: none"> <li>a. The only confirmation would be their signature affirming this status.</li> <li>b. That way school staff is <b>not</b> also in the position of verifying a situation that is outside their scope of practice and expertise.</li> </ol>	
<p>During the 30 days that families are allowed to obtain immunizations, immunocompromised students and staff are placed at risk.</p>	<p>Cheryl Robinson, ESA School Nurse</p>

I am sharing the collated comments with our department staff, in case upon reading this information they choose to provide additional comments to you.

Thank you again for the opportunity to collaborate on the review of the regulations and possible changes.

You are welcome to contact me with direct inquiries or ways to contact specific nurses.

Respectfully,

*Nancy N. Sutherland MEd., RN*

Department Coordinator, Health Services

Edmonds School District #15

20420 68<sup>th</sup> Avenue West

Lynnwood, Wa. 98036

[sutherlandn@edmonds.wednet.edu](mailto:sutherlandn@edmonds.wednet.edu)

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**From:** Linda Johnson [<mailto:ljohnson@psd402.org>]  
**Sent:** Wednesday, March 02, 2016 11:12 AM  
**To:** Davis, Michelle (DOH)  
**Subject:** Vaccination Requirements

Michelle,

I am favor of returning to the previous policy of "No shots, No school". I spend many hours on the phone trying to reach parents of children who are out of compliance because he/she is missing one or more vaccinations. Enforcing the 30 days grace period is even more difficult. Once the child is in school, parents are less likely to supply the needed information, receive the vaccination or even return my phone calls. We have little recourse.

In the past, when parents were informed that their child could not start school until the shot record was current, parents did what was necessary much faster. By going back to No shots, No school, that would help our compliance issues as well.

Thank you for your time.

Sincerely,

Linda Johnson, RN  
Pioneer School Nurse

"The soul is healed by being with children" English Proverb

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

From: Van Haitsma, Glenda [<mailto:gvanhaitsma@nthurston.k12.wa.us>]

Sent: Thursday, March 03, 2016 10:46 AM

To: Davis, Michelle (DOH)

Cc: [lnelson@esd113.org](mailto:lnelson@esd113.org)

Subject: Feedback on "No shots, no school" topic

March 3, 2016

To: Michelle Davis, Executive Director, Washington Board of Health

Greetings!

Thank you for the opportunity to give feedback regarding immunization compliance requirements.

Each year my health room assistant (HRA) and I spend countless hours tracking our students that are out of compliance. In our school of 760 students, it is not unusual for us to have 100 students out of compliance at the start of the school year.

While my HRA strives hard at the start of the school year to contact families by phone or letter, I have to confess that my priorities for the first month of school is to establish both life-threatening and non-life-threatening health/emergency care plans for students; to train staff; and to assess each student's health history. With these priorities (responsibilities), I am not able to fully address all of the out of compliance issues in the 30 day time frame at the start of the school year.

From October through January, my HRA and I spend easily 1 to 2 hours a week (each) following up with letters and phone calls to families. My time on the phone involves constant reminders and teaching to families of the state requirements for immunizations and the teaching of available resources to obtain vaccinations. If the letters and phone calls do not convince families to take action, I seek out my principal or assistant principal to contact families and inform them of exclusion from school if they do not comply (this also would involve special mailings of the exclusion letters).

I do work at a school with a high turnover of students related to military transfers. As you can see, this process involves a lot of time from various staff members. This process also uses multiple resources of paper, phones, and postage. I take seriously my school nurse role to educate families on our state's immunizations requirements, but the work load of this task is overwhelming at times. It seems this could be simplified by having students start school when they are in compliance.

Sincerely,?

Glenda Van Haitsma, RN, BSN

Olympic View Elementary School Nurse

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**From:** Linda Sutch <[sutchl@yahoo.com](mailto:sutchl@yahoo.com)>

**Date:** March 3, 2016 at 5:26:01 PM PST

**To:** "[Michelle.Davis@sboh.wa.gov](mailto:Michelle.Davis@sboh.wa.gov)" <[Michelle.Davis@sboh.wa.gov](mailto:Michelle.Davis@sboh.wa.gov)>

**Subject:** No Shots No School Policy

**Reply-To:** Linda Sutch <[sutchl@yahoo.com](mailto:sutchl@yahoo.com)>

As nurses providing care to school age children, we are very concerned that all students are properly vaccinated against preventable diseases that have the potential to cause serious illnesses and even death. Since the repeal of the 2012 policy of No Shots No School, we have seen an increase in children not fully vaccinated. More children are starting school without being fully immunized which puts them and other students at risk.

We have also seen a major leap in the time required to attempt to bring out of compliance students into compliance. In a recent survey of LPNs, the average estimated increase is about 4-6 extra hours per out of compliance student to bring them to compliance status. An average school may start the year with 30-50 out of compliance which translates to 180-210 additional LPN hours per school that could have been saved by the No Shots No School policy. This increased focus on immunizations has definitely affected the time we have to meet other pressing student needs.

The No Shots No School policy got parent's attention and when they would learn that their student could not start school due to lack of compliance, the majority of the time they would go right out within a day or so and get the shots as not having their children in school had major consequences such as affecting their work, etc.

With the current policy, once the students are in the school system, it is very difficult to gain the cooperation of the parents. Many letters, phone calls and artificial deadlines are given. Most principals are reluctant to initiate the exclusion process based on noncompliance.

The end result of this is fewer of our children are being fully immunized in a timely manner and nurses are spending far greater time and effort trying to gain compliance.

In view of the above, I strongly support the reinstatement of the 2012 policy.

**From:** [Ruth Erb](#)  
**To:** [DOH WSOH](#)  
**Subject:** Immunization Conditional Status  
**Date:** Thursday, January 28, 2016 11:50:20 AM

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My name is Ruth Erb and I am a school nurse in the Mead School District. I am wanting to voice my concern over the existing 30 day Conditional status for Immunization Compliance. A big example of this is the new varicella requirement for 7th & 8th grade that went in to effect for 2015-2016. The families in our district were are given 3 contacts the end of the 2014-2014 school year alerting them to the new requirement (a letter mailed in march, a phone call and a second reminder letter). This was not enough though to restrict a student form starting the school year in Sept 2015 because now a 30 day Conditional status needed to be given. We have continued to follow up on many students with continued phone calls and letters reminding them of the requirement and have finally moved to the Certified letter of Exclusion for Vaccination status. The amount of nurse time, and district money is far too extensive in my opinion. It seems to come down to the fact that some parents will not complete the requirement until forced to do so.

I totally understand the provisions for our students working on completion of a series.

Thanks, Ruth Erb

--

*Ruth Erb RN,BSN*  
*School Nurse*  
Mead School District  
509-688-9132  
[Ruth.Erb@mead.354.org](mailto:Ruth.Erb@mead.354.org)

**From:** [May, Jennifer \(CP,CPM,ESC\)](#)  
**To:** [DOH.WSBOH](#)  
**Subject:** Comments regarding 30 day conditional status for students  
**Date:** Tuesday, February 02, 2016 12:21:36 PM

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Hello,

I like to compare the 30 day grace period given to families to get their students up to date on immunizations to a store that sells alcohol. The store is required to check the identification of anyone who wants to buy alcohol and looks to be under a certain age. What if the consumer could purchase the alcohol without id and had 30 days to provide identification? How effective would our alcohol laws be?

This is exactly what the DOH has done to school staff and school nurses. You've taken the teeth out of the only consequence we had to get parents to comply with the law in a timely manner. WA DOH has made an already overwhelming and thankless task nearly impossible to complete. I hope DOH rescinds the 30 day grace for immunization compliance and reverts to immunizations must be up to date by the first day of school.

Thank you for your consideration.

*Jennifer May, RN*

School Nurse

CPM-Tuesdays

ESC-Wednesdays

CPE-Thursdays

425-431-1098

**From:** [Sutherland, Nancy \(ESC\)](#)  
**To:** [DOH WSBOH](#)  
**Cc:** [@Nurses](#)  
**Subject:** WAC revision of conditional immunization status  
**Date:** Tuesday, February 09, 2016 4:38:12 PM

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To the Washington State Board of Health.

I am the lead nurse for Edmonds School District.

Thank you for the opportunity to provide input changes in the immunization conditional status regulations, specifically the following WAC:

1. WAC 246-105-020 Which defines Conditional Immunization status.
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The opportunity to provide comments on this situation was opened to 19 of our district nurses at our January 28<sup>th</sup> monthly meeting. Some may elect to send individual information to you directly. Others provided the following collated information:

Comments for SBOH on Immunization Conditional status concerns, changes, etc.	Name
Laws need to match what is humanly possible to attain.	Jeanne Johnson BSN, RN
<p>At this time, the conditional status WAC for Compliance provides a hardship. There is inadequate time/hours and manpower to get students compliant with immunizations with no strong motivator such as not being able to attend at the beginning of the school year, in place as it was before the "Conditional Status " WAC was implemented.</p> <p>At this time I have ~ 54 students out of compliance (OOC) and a registrar that has years of non-compliance collaboration on immunization; at my other high school I have ~ 30 OOC, with better registration collaboration,</p>	Nancy Varg, MS, RN
<p>According to what I understand, this provision was set up mainly to accommodate military families.</p> <p>Since this population is a small percentage of all students in Washington State schools, it seems that a review with an eye to <u>rescinding this change</u> would be in the best interests of public health and effective immunization compliance.</p> <p>Having a 30 day grace period eliminates any leverage schools have, especially at the beginning of the year or with new students.</p> <p>This function is an <i>unfunded mandate for an institution whose primary mission is "Education"</i> not public health. Although there are RCW and WAC to support the need for compliance, actual compliance varies <i>and has decreased</i> based on workload and staffing issues.</p>	Nancy N. Sutherland MEd. RN

<p>Perhaps a more reasonable and prudent approach (if my original information on this change being motivated <u>to serve military families is correct</u>) would be:</p> <ol style="list-style-type: none"> <li>1. Allowing that a grace period of 30 days <u>ONLY allowed upon confirmation of a parent/guardian's <b>military status and associated compliance difficulty</b></u>—signed by the parent/guardian. <ol style="list-style-type: none"> <li>a. Thus the target population is given appropriate accommodation w/o adversely impacting immunization compliance for the larger population, not affected by this situation.</li> </ol> </li> <li>2. The parent/guardian could sign a box, indicating their military status. <ol style="list-style-type: none"> <li>a. The only confirmation would be their signature affirming this status.</li> <li>b. That way school staff is <u>not</u> also in the position of verifying a situation that is outside their scope of practice and expertise.</li> </ol> </li> </ol>	
<p>During the 30 days that families are allowed to obtain immunizations, immunocompromised students and staff are placed at risk.</p>	<p>Cheryl Robinson, ESA School Nurse</p>

I am sharing the collated comments with our department staff, in case upon reading this information they choose to provide additional comments to you.

Thank you again for the opportunity to collaborate on the review of the regulations and possible changes.

You are welcome to contact me with direct inquiries or ways to contact specific nurses.

Respectfully,

*Nancy N. Sutherland MEd., RN*

Department Coordinator, Health Services

Edmonds School District #15

20420 68<sup>th</sup> Avenue West

Lynnwood, Wa. 98036

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**From:** [JANICE DOYLE](#)  
**To:** [DOH.WSBOH](#)  
**Subject:** Conditional Immunization Status  
**Date:** Tuesday, February 16, 2016 1:00:14 PM

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The 30 day conditional immunization status has made it very difficult for schools to implement this policy. At the beginning of the year, it can take weeks for immunizations to get entered into Skyward because we must prioritize life-threatening conditions. This results in many students being out of compliance for weeks, potentially exposed other students to infectious diseases. Our district had one of the highest incidence of pertussis during the pertussis outbreak.

Please consider reinstating immunization compliance before school entry. It is safer for students. We have many medically fragile students whose life is at risk if they are exposed to these diseases.

Please contact me if you have questions.

Janice Doyle, MSN, RN, NCSN, FNASN  
Lead Nurse  
Bethel Public Schools  
(253) 683-6940  
[jdoyle@bethelsd.org](mailto:jdoyle@bethelsd.org)

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**From:** [PAMELA THORNTON-FULGHAM](#)  
**To:** [DOH.WSBOH](#)  
**Subject:** 30 day conditional staus  
**Date:** Wednesday, February 17, 2016 8:54:11 AM

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It has been a nightmare. We are not staffed in the school to chase as much as we have had to do since 30 day conditional has come into the immunization law.

--

Pam Thornton-Fulgham RN, BSN  
School Nurse Bethel School District  
Kapowsin Elementary 253-683-8693  
Rocky Ridge Elementary 253-683-5093

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**From:** [HEATHER JULIAN](#)  
**To:** [DOH.WSBOH](#)  
**Subject:** Conditional Status  
**Date:** Thursday, February 18, 2016 10:39:33 AM

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I would like to encourage changes to the conditional status rules. I always understood an "conditional status" to be for students who have recently received a dose of vaccine and are not yet able to receive the next dose for minimum interval rules. The current rules have been interpreted to mean that any student entering school who does not have their vaccine records or has not received the next scheduled dose for years since the last dose have 30 days to get records or the next vaccine.

This interpretation of the rules has caused delay in vaccination and much work for nurses and school staff and in my opinion is not the true intent of the rule.

Thank you for asking for input.

Heather Julian RN, NCSN  
School Nurse  
North Star Elementary 253-683-8868  
Graham Elementary 253-683-8527  
Preschool Assessment Team

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**From:** [LuNell Eriksen](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** Vaccinations and school  
**Date:** Thursday, February 18, 2016 2:37:12 PM

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Hello Ms Davis,

I am a school nurse and I work in the school districts of Evaline, Toledo, and Winlock. I have also worked in the Onalaska School District as a nurse. When I first started 2 years ago, all of the districts were severely noncompliant. If you check the state compliance map for south, central Lewis County (where all of these school districts are) you will see we were way less than 40 percent compliant.

It took diligence and education, but if you were to see a map for my 3 school districts now- we are 95 percent and above compliant. Many misconceptions were eliminated and the students are protected against the diseases that maimed and killed just a few short years ago. Only one of my districts had to enforce the no school after a 30 day grace period, and it only involved one student.

Immunity is not only valuable for the children, it is also important for our communities. At one time students received their vaccinations in school. Perhaps this can be reconsidered. In my opinion, without the No Vaccination No School our students and communities will suffer. Please register my full support for the overall health of our school and communities and keep the No Vaccination No School law.

Thank you.

LuNell Eriksen

LuNell Eriksen RN  
School Nurse  
Capital Region ESD 113  
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Cell: (360) 304-2276

Fax: (360)464-6912

Website: <http://www.esd113.org/>

CapitalRegionESD113\_Logo



**From:** [Natalie Villarreal](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** School Immunizations  
**Date:** Tuesday, February 23, 2016 11:54:13 AM

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Hi Michelle,

Just this past September I stepped into the school nurse arena and have been dealing with the challenges that surround the school immunization 30 day law. I have found that with the younger children it's a tad bit easier to follow up with parents and they seem to stay on track more than the older children ( 7<sup>th</sup> grade and up). There are many children that come into the district and have no immunization information at all, and once they're in they're in. There is not many principals that want to kick children out of school, especially at the older age because many of those students do not want to be in school, therefor they end up missing more school then they should. For some children it takes 3-4 letters and just as many calls just to find out what's going on with their child. This takes up many resources and takes time away from more pressing matters. It would make much more sense to have the same kind of law as Texas does, to where if the child does not have shots or is not working towards shots then they cannot start school. I know that the law was created for military families, however being ex-military myself I know that they are the ones who are the least of our concerns. I am not experienced in other school districts so I can only speak to what I have encountered but I have noticed that the biggest population of children that come into the schools after school has started are children just coming to this country. It seems to me that they would be at the biggest risk and they should have to provide immunization information before entering school. For me it makes sense for precautionary measures for our students that are unable to receive their immunizations because of medical reasons making them the most venerable population and therefore rely on the "heard immunity" of the school.

Thank you for your time,

**Natalie Villarreal LPN**  
**Hilltop Elementary School**  
**206-631-4006**  
**[Natalie.villarreal@highlineschools.org](mailto:Natalie.villarreal@highlineschools.org)**

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**From:** [Alma McNamee](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** Repeal of "No Shot-No School"  
**Date:** Thursday, February 18, 2016 2:21:09 PM

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Hi Michelle,

I have been a school nurse since 1992 and have had to deal with getting students immunizations into compliance. I understand that when the No Shot-No School policy was repealed, it was with the thought that it would make it easier for districts to manage compliance issues-I said it then and I will say it now, it will not and it did not, help with compliance issues! In fact it made it much more difficult to get the students in compliance. Once they are allowed in, parents simply drag their feet in getting their children to either get shots or get us the information. If we don't allow them in in the first place, I guarantee you that for the most part, they will get their children in compliance-they don't want them home all day while they are at work, or have to get child care for them.

The No shot-No school policy was actually one of the only laws that we actually had some teeth into it and could enforce the regulations. Without it, it has been a nightmare!!

PLEASE-PLEASE-PLEASE go back to the original intent/interpretation of the WAC!

Sincerely,

Alma McNamee

**From:** [RITTENHOUSE, CHRISTY](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** No Shots-No School Policy  
**Date:** Monday, February 22, 2016 7:45:36 AM

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Dear Ms. Davis,

Respectfully requesting the Board please reinstitute the old policy- "No Shots-No School":

Enforcing vaccine compliance is an extremely labor-intensive task that taxes the already minimally staffed school health system. "No-Shots-No School" reduces this workload by giving real, immediate incentive for families to be proactive in getting their children up-to-date.

The current policy also puts the increasing numbers of immune impaired students at higher risk for exposure to illness and increases risk of illness outbreaks in our general populace, creating lower "herd immunity" in schools.

Thank you for your consideration of the information presented in modifying the RCW.

*Christy Rittenhouse, MSN, RN, CNOR*

School Nurse, Mount Vernon School District

Mount Baker Middle School 360-428-6127 x32008

LaVenture Middle School 360-428-6116 x 31004

**From:** [Dolora Neumaier](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** No Shots No School  
**Date:** Thursday, February 18, 2016 5:04:16 PM

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Dear Michelle,

I urge the Board of Health to reinstate the No Shots No School policy. The current policy puts increased risk to immune compromised students for exposure to illness. Other students in school with severe medical conditions are at greater risk for severe complications of vaccine preventable diseases.

In addition, school funding is not sufficient to complete all the tasks required to allow a delay in compliance. School nursing hours need to be focused on preparing and implementing the health care plans for students with special health care needs. There needs to be more time available for school nurses to devote to training staff on implementing health care plans. Time also needs to be dedicated to the processing and maintaining student medications. These and other tasks need to be prioritized over the time spent dealing with vaccine non-compliance. I urge you to reinstate the No Shots No School policy. Students need to have active steps toward vaccine compliance before entering school.

Sincerely

Dolora Neumaier BSN  
Retired School Nurse

Sent from my iPad

**From:** [Kirk, Linda](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** Immunizations and school  
**Date:** Friday, February 26, 2016 9:54:34 AM

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Michelle, this is Linda Kirk, R.N. from Prosser School District. In our district we start notifying our 5<sup>th</sup> grade parents in March of 5<sup>th</sup> grade for the required vaccines for 6<sup>th</sup> grade. We send additional reminders the first week in June and the first week in August. That's three separate notifications for the required vaccines. We still have some parents show up for 6<sup>th</sup> grade registration and their child has NOT had the required vaccine. We then refer our parents to the local health department, medical clinic, pharmacy or even grocery store for the required vaccine.

If children start school WITHOUT the required vaccines then the nurse and/or secretarial staff work diligently for a minimum of two months (following the immunization deficiency protocol) to get these students vaccinated. As you may well now, when we have unimmunized or under immunized individuals we have diseases such as measles and whooping cough that appear. For everyone's protection these students need to START school with the required vaccines to protect us all. I have lived in several other states and in every state I lived in my children were REQUIRED to have complete vaccination before they **stepped** into their new school. Washington state should look at other states' immunization successful practices and follow the most successful state for having healthy and complete immunized children!

**From:** [Kim Kannely](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** 30 day Conditional Status  
**Date:** Friday, February 26, 2016 8:05:31 AM

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Will you please direct my comments to the Board hearing on March 9th?

Please consider returning to the "no shots no school" rule. What we have found is that parents are 100% compliant when it must be done before their children start school, and remain compliant when told for example that the #2 vaccination for Varicella is due on such and such a date. The challenge with giving 30 days to do something is that it loses it's priority in the many things a family needs to do, especially if they have just moved, and again when boosters are due, they are working, or it isn't convenient.

We are not attempting to exclude everyone, we are willing to consider each incidence but would like to say, your immunizations need to be done when school starts. We have labored over immunizations almost everyday since the start of school this year. It is very labor intensive this way and I can promise there are many other things I could work on for the improved health of the students. I will say though that we have now gotten to 98% of community fully immunized so it can work, but it has more impact if we can start the year with a rule that says they must be current.

Thank you for this consideration.

--

Kim Kannely RN  
Health Services Director  
Royal School District #160

**From:** [Johnson, Julia A.](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** 30 day conditional status  
**Date:** Friday, February 26, 2016 10:41:01 AM

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Michelle,

Regarding the decision to evaluate the current 30 day conditional vaccine status versus the previous “no shots, no school” policy, it is very clear in my 10 year practice as a school nurse, that the previous policy was the most effective. With the new policy, much time and resources are wasted in sending multiple overdue vaccine parent letters and sending exclusion documents via certified mail when, under the old policy, students were given the vaccine information over the summer which allowed ample time to get the needed vaccines or discuss exemption status with their doctor prior to the start of school. Students are often missing valuable education time while being excluded for vaccine noncompliance which could have been prevented without the conditional status.

Julia Johnson, RN  
Everett Public Schools

**From:** [Sampson, Cheryl](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** 30 day conditional status  
**Date:** Friday, February 26, 2016 3:50:18 PM  
**Attachments:** [image001.gif](#)

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I would really like to see us go back to the 'no shots, no school' position we had in the past rather than continuing to allow students who are out of compliance to attend school for 30 days. I strongly believe the current position has made our ability to get all of our students adequately immunized more difficult. Very few schools in the state of Washington have a full-time school nurse. When a student is allowed to start school when they are missing required immunizations the burden of follow-up is usually given to the school nurse. I am in one of our schools only 1 day/week. I find it extremely difficult to make sure that all students are safe at school with regards to health issues that one day without having to spend hours contacting parents about missing vaccines. If we were to have a disease outbreak during that 30 days the likelihood of students who are excluded because of lacking the required immunization would likely have to wait out of school for several days because of lack of provider access.

Students entering 6<sup>th</sup> grade are all required to have received one dose of Tdap. That means that almost the entire 6<sup>th</sup> grade class will need to receive this shot. In order to make sure parents have plenty of time to have their child immunized I send out 2 – 3 notices during their 5<sup>th</sup> grade school year. We also try to call the ones who are still missing the shot in August as a final reminder. Then, many of them still start school without this booster. Some of our schools have been willing to say that students can't get their class schedule until after the school receives verification that this shot was received but that isn't really possible since we have to allow that 30 days of conditional status. Then, because the administrators really don't want to have students miss school we usually need to make 2-4 more contacts with the parents before the student gets excluded. In our community we have started holding immunization clinics in many of our school districts to make it easier for parents to get their children vaccinated. But we still always have a fairly lengthy list of students who are out of compliance come September.

Conditional status should be reserved for those students who are truly conditional – the ones who are in the process of getting their immunizations. Thank you.

Cheryl Sampson

Cheryl Sampson MN, RN, NCSN  
School Nurse Specialist  
Central Valley School District  
16307 E Cataldo  
Spokane Valley, WA 99016  
Phone: 509-228-5888  
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**From:** [Brenda Lindstrom](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** 30 day conditional  
**Date:** Saturday, February 27, 2016 9:41:09 PM

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I'm sure when law makers came up with this one they had no idea the extra burden of nurse hour time it takes to track down, keep a running system , write letters, certified letters( \$ 6.) added expense , phone calls ect.... Sometimes it's multiple phone calls, letters, and then finally the exclusion if we can make it happen, and if the administrator will support us in excluding a student who has nicely settled into 30 days of school. I am all for making it simple. No shots, no school. Make exceptions for military families for records to catch up. This would be consistent and easy and save money, and hours of time for nursing staff who are already under resourced to look after large districts.

Sent from my iPhone

**From:** [Suzanne Nelson](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** Immunizations  
**Date:** Friday, February 26, 2016 12:04:28 PM

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I would like to see a 30 day rule. The majority of the students that enter our schools you can get a CIS off of the web site, but there are always exceptions.

One of my last students to enroll was a kindergartener from Idaho. His mother had recently passed away, and the poor father had no ideas as how to get the shots. Due to HIPPA laws or the way Kaiser interpreted them they would not release them to me even though dad had signed a form for me, as it was not a proper "HIPPA form". It would have been sad to not allow a child into school due to this. The child needed stabilization in his life.

We allow foster children and homeless children in without any records.

Also many people have packed their belongings and do not know where their immunization records are. Another issue it that some schools are not good about faxing immunization records in a timely manner.

Thank you for allowing me to express my views

Suzanne Nelson RN  
Boistfort/Pe Ell School districts.

**From:** [Gret Jordan](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** re: 30 day conditional status  
**Date:** Friday, February 26, 2016 11:24:23 AM

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Hi Michelle,

Please add my comments to your discussion on March 9th about the 30 day conditional status on immunizations for students entering school:

As a school nurse in a high school of 1500+ students, I spend much too much time chasing down compliance for students who haven't received their immunizations as required by the State. If we could catch these students "at the door", it would put pressure on them to comply immediately instead of putting it off and creating ongoing conflict and frustration for the student, parents and nurses trying to enforce the law. I really wish we would go back to the old way of "No shots, no school". Thank you!

Gret Jordan, RN  
MSHS school nurse  
590-7921  
465-7215

**From:** [DZermer](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Cc:** [Nelson, Lynn](#); [dzermer@nthurston.k12.wa.us](mailto:dzermer@nthurston.k12.wa.us)  
**Subject:** School RN input on 30 day conditional rule  
**Date:** Sunday, February 28, 2016 12:30:29 PM

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Greetings Michelle and esteemed board members,

Thank you for the opportunity to provide input on a topic that has been a HUGE and unnecessary part of my practice since 1978!!

School nurses have unique talents and skill sets and continue to provide invaluable and often unrecognized services to school aged students.

Procuring and inputting data, screening for compliance and enforcing the immunization laws is NOT a good use of a Licensed Nurse's time and energy. Yet, it continues to be "our job" to assist in the most important task of forcing parents to properly immunize their vulnerable children.

I can say WITHOUT A DOUBT that if parents are denied the ability to register their student for school attendance, they will "miraculously" provide the immunization records and update their children in record time!

Just ask any nurse who has gone through the painstaking, ridiculously involved and time consuming process of excluding a student.... "wa la!" .... the parent suddenly has the means to procure records or actual vaccines!

Allowing the parents to register children with a 30 day conditional period opens the dreaded door of a bazillion calls, letters, nagging students, chasing down, begging and pleading with parents to take care of something that is THEIR RESPONSIBILITY in the first place!!

The enormous expense school districts incur in the process of bringing into compliance those who are allowed to enroll with incomplete immunization is completely unnecessary.

A simple return to "**no shots.. no school... no excuses**" would do a tremendous favor to the tax payers and free Nurses and school staff to accomplish much more appropriate direct service to students.

Sincerely,

Denise Zermer, BSN, PHN, CSN

PS: I have suggested numerous times that the DOH take over the job of "mining" data from the Skyward system and leaving the "report generation" to DOH staff. As it is currently, we are asked to generate and send reports to the DOH directly from our Skyward system. Why involve us at all? It just adds more pressure and creates more tension for those of us that are being "tracked" for reporting status. In addition, it would be equally appropriate for the DOH to take over data collection and enforcement and leave the schools entirely out of the process!

**From:** Johnson Deena B. [<mailto:JohnsonDB@mukilteo.wednet.edu>]

**Sent:** Monday, February 29, 2016 11:06 AM

**To:** Davis, Michelle (DOH)

**Subject:** Immunization non-compliance

Dear Ms. Davis,

First of all I would like to say thank you for the opportunity to express my opinion on policy.

I am a Health Services Para-educator (HSP) in the Mukilteo School District #6.

For over 16 years I have worked part time solely in the health rooms of 3 schools when the school nurse is not there.

That is a responsibility of the potential care of some kind with approximately 1800 students each week.

Besides basic first aid, emergency aid, care for ill students, toileting, clerical work, record keeping, head lice checks, helping when needed for vision checks (+ scoliosis checks when we did those), varied communication with parents and the administration of many meds: daily, rescue, analgesics, allergy meds, BG checks, insulin administration by pump and injected bolus, etc.

I have also done the majority of the immunization tracking: phone calls, letters/notices sent home, searching the WSIIS for info, telephone calling/research, inputting new & current vaccine info into our computer system and students cumulative records, follow ups & reports.

I would really like to see the 30 day conditional upon registration rule kept. It doesn't really change our timeline of trying to get immunization compliance on a student as it invariably takes at least that long anyway. It does however add a modicum of less pressure to the parents and especially the registration staff plus myself at school.

Again, thank you for giving me a voice in this!

Sincerely,

***Deena Johnson HSP***

Odyssey 425-366.3200

Fairmount 425-366.2900

Serene Lake 425-366.3500

[johnsondb@mukilteo.wednet.edu](mailto:johnsondb@mukilteo.wednet.edu)

**From:** Simmons, Sandra [<mailto:Sandra.Simmons@zillahschools.org>]

**Sent:** Monday, February 29, 2016 3:08 PM

**To:** Davis, Michelle (DOH)

**Cc:** Green, Molly

**Subject:** Thirty-day conditional immunization status

Dear Ms. Davis,

I understand that the Washington State Board of Health is considering changing the rule that allows students whose immunizations are not up to date to attend school for 30 days before being excluded for lack of immunizations. As a school nurse, I would like to see students unable to start school at all until their immunizations are current.

It sounds like a harsh policy, but it is my experience that families rarely use the 30-day grace period to get the immunizations done. What happens is that students remain under-immunized. Then in November or December, when school nurses have time, they run immunization reports and send letters to families about impending exclusion due to lack of immunizations. We cannot address the immunization issue 30 days after school starts, because we are too busy with more urgent matters such as emergency care plans and vision and hearing screening.

Students who are not fully immunized when they begin school, whether as kindergarteners or as transferring students from another district, are usually still under-immunized when we run the report later in the school year. This means we spend large amounts of time sending letters and calling parents, and it is hard to convince them to suddenly respect the deadline set by the school district when their children have been attending school for several months without being fully immunized.

If the state of Washington makes the rule that students must be fully immunized from the first day they attend public school, the message is clear: immunizations are vital to public health and they are required for school attendance. (If the state chooses to continue to allow exemptions, the requirement could be full immunization or documented exemption by a licensed health care provider.) I hope the Department of Health will choose to send this clear message to parents and discontinue the 30-day conditional immunization status.

Sandra Simmons, RN

**From:** Sarah Day [<mailto:sday@vashonsd.org>]  
**Sent:** Monday, February 29, 2016 8:47 PM  
**To:** Davis, Michelle (DOH); Kuss, Trang T (DOH)  
**Subject:** WAC 246-105-020

Dear Ms Davis,

I am writing to request that the Board of Health reconsider the 30 day immunization conditional status rule for WA State schools. Since the fall of 2012 when the Vashon Island School District began excluding children for vaccine non-compliance, we have been greatly hindered by this rule.

Although designed with good intent, the rule results in an exclusion process that is disruptive, confusing, and inefficient. It is difficult to exclude a child who is already engaged in schooling, not only for the child but for the teacher and classmates. Once school is already underway, it's also challenging to get administrator and staff support to enforce exclusions. Coming from a public health background, I work carefully with any family who is unable to access health care and try to avoid excluding any child who needs help getting health care. Here on Vashon Island, we encounter a number of families who seem resistant to providing any immunization documentation to the school. We expend our already limited time and energy trying to communicate with these parents via multiple phone calls, e-mails, letters, registered letters (that usually get returned to us because no one is at home these days to sign for a letter) and even text messages. This cumbersome process results in less time to spend working with children and families dealing with critical health issues.

Vaccine compliance takes an incredible amount of work and school nurses are a huge ally in helping the state with this issue. At the same time, school nurses are busier than ever dealing with increased numbers of children with type 1 diabetes, life-threatening allergies, asthma, mental health issues, and concussions. Let's work together with clear messaging that everyone can understand: "no shots, no school". Rescinding the conditional status rule will help get WA state school children vaccinated and ready to begin school by the first day.

Sincerely,

Sarah Day, RN, BSN

District Nurse

Vashon Island School District

(206)463-8600

[sday@vashonsd.org](mailto:sday@vashonsd.org)



**From:** [Terry Woodall](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** 30 Day Conditional  
**Date:** Tuesday, March 01, 2016 11:11:44 AM

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Dear Michelle:

I am in great favor of returning to the practice of not allowing students to enroll in my district until they are up to date on their immunizations. It takes so much time to keep track of students who need vaccinations, and then call – and call again – and email – to get parents to follow up. It would be such a time saver, plus we would have fully immunized students in our schools, if we could go back to that practice.

Thank you,

Terry

Terry Woodall, R.N., B.S.N.

Dieringer School District

[twoodall@dieringer.wednet.edu](mailto:twoodall@dieringer.wednet.edu)

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**From:** [DEANN SELLARS](#)  
**To:** [Davis, Michelle \(DOH\)](#)  
**Subject:** 30 Days Conditional  
**Date:** Tuesday, March 01, 2016 2:59:08 PM

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The 30 days given to parents allows the parent to put off their children's shots until they can get around to it. We are finding in the schools where staffing has been decreased that we are having to call, send notes home and even send certified letters, at the districts expense. Not only is it time consuming but expensive for the schools to try to get parents to comply in a timely manner. Please consider returning to "no shots, no school."

Thank you,

--

DeAnn Wood Sellars, RN, MSN, NCSN  
School Nurse

**From:** [Hill, Julie A. \(ESC,LD,MT\)](#)  
**To:** [DOH WSBOH](#)  
**Subject:** RE: WAC revision of conditional immunization status  
**Date:** Wednesday, March 02, 2016 12:59:45 PM

---

Hello! I am a school nurse in the Edmonds School District and I used to have close to zero students out of compliance on the first day of school as we could exclude them...we did a lot of work the previous spring and in the summer to educate them about the law requiring immunization compliance and had the support behind our request to comply because we could exclude. Since we can't exclude now, it takes months and months of persistent work and communication with parents to get students in compliance, all the time exposing students to out of compliant students and potentially to diseases as we don't have the "herd immunity". It also places staff and students who are immunocompromised at risk...I was shocked and disheartened when we no longer had the ability to exclude students, I didn't understand why the "law" behind our requests to become compliant was rescinded...now I understand it was to appease a small population of people who could have their own "conditional status" if they show military ID, if needed...but in all honesty, it is the PARENTS responsibility to keep their children's immunization information not the SCHOOL's responsibility to track it down when people are moved. Even non-military people think that they don't have to keep their children's immunization information, they say to just get it from the previous school. I respond by saying it is a courtesy that we can do this but that it is the parent's responsibility to be in compliance with the law....however, now it takes MONTHS for this to occur. Respectfully, Julie

*Julie Hill, R.N*

Certificated School Nurse

School Nurse for Mountlake Terrace Elementary, Mountlake Terrace High School, and Lynndale Elementary  
425-431-1066

[hillj@edmonds.wednet.edu](mailto:hillj@edmonds.wednet.edu)

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**From:** Sutherland, Nancy (ESC)  
**Sent:** Tuesday, February 9, 2016 4:38 PM  
**To:** 'wsboh@sboh.wa.gov'  
**Cc:** @Nurses

**Subject:** WAC revision of conditional immunization status

To the Washington State Board of Health.

I am the lead nurse for Edmonds School District.

Thank you for the opportunity to provide input changes in the immunization conditional status regulations, specifically the following WAC:

1. WAC 246-105-020 Which defines Conditional Immunization status.
2. WAC 246-105-040 Which addresses progress immunization compliance from conditional status.
3. WAC 246-105-080 Which provides a 30 day temporary exemption after the first day of attendance at school.

The opportunity to provide comments on this situation was opened to 19 of our district nurses at our January 28<sup>th</sup> monthly meeting. Some may elect to send individual information to you directly. Others provided the following collated information:

Comments for SBOH on Immunization Conditional status concerns, changes, etc.	Name
Laws need to match what is humanly possible to attain.	Jeanne Johnson BSN, RN
At this time, the conditional status WAC for Compliance provides a hardship. There is inadequate time/hours and manpower to get students compliant with immunizations with no strong motivator such as not being able to attend at the beginning of the school year, in place as it was before the "Conditional Status " WAC was implemented. At this time I have ~ 54 students out of compliance (OOC) and a registrar that has years of non-compliance collaboration on immunization; at my other high school I have ~ 30 OOC, with better registration collaboration,	Nancy Varg, MS, RN
According to what I understand, this provision was set up mainly to accommodate military families. Since this population is a small percentage of all students in Washington State schools, it seems that a review with an eye to <u>rescinding this change</u> would be in the best interests of public health and effective immunization compliance. Having a 30 day grace period eliminates any leverage schools have, especially at the beginning of the year or with new students. This function is an <i>unfunded mandate for an institution whose primary mission is "Education"</i> not public health. Although there are RCW and WAC to support the need for compliance, actual compliance varies <i>and has decreased</i> based on workload and staffing issues. Perhaps a more reasonable and prudent approach (if my original information on this change being motivated <u>to serve military families is correct</u> ) would be: 1. Allowing that a grace period of 30 days <u>ONLY allowed upon</u>	Nancy N. Sutherland MEd. RN

<p><u>confirmation of a parent/guardian’s <b>military</b> status and associated compliance difficulty</u>—signed by the parent/guardian.</p> <ol style="list-style-type: none"> <li>a. Thus the target population is given appropriate accommodation w/o adversely impacting immunization compliance for the larger population, not affected by this situation.</li> </ol> <p>2. The parent/guardian could sign a box, indicating their military status.</p> <ol style="list-style-type: none"> <li>a. The only confirmation would be their signature affirming this status.</li> <li>b. That way school staff is <b>not</b> also in the position of verifying a situation that is outside their scope of practice and expertise.</li> </ol>	
<p>During the 30 days that families are allowed to obtain immunizations, immunocompromised students and staff are placed at risk.</p>	<p>Cheryl Robinson, ESA School Nurse</p>

I am sharing the collated comments with our department staff, in case upon reading this information they choose to provide additional comments to you.

Thank you again for the opportunity to collaborate on the review of the regulations and possible changes.

You are welcome to contact me with direct inquiries or ways to contact specific nurses.

Respectfully,

*Nancy N. Sutherland MEd., RN*

Department Coordinator, Health Services

Edmonds School District #15

20420 68<sup>th</sup> Avenue West

Lynnwood, Wa. 98036

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