

Summary of Written Comments re: Petition to Amend Chapter 246-105 WAC

(Comments received as of 12 p.m. March 4)

Name	Affiliation	Comment Summary
Natalie Villarreal, LPN	Hilltop Elementary School	30 day requirement is challenging. Follow up with younger children is easier than older. It may take 3-4 letters and just as many calls. Takes resources away from more pressing issues. Precautionary measures are needed to protect most vulnerable.
Christy Rittenhouse, MSN, RN, CNOR	Mt Vernon School District	Reinstitute the old policy- "No Shots-No School. Enforcing vaccine compliance is labor intensive and taxes 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. Current policy puts immune impaired students at risk, creates lower "herd immunity."
Allison Cowart, RN	Mead School District	Reinstitute the old policy- "No Shots-No School. Current policy has negative repercussions including: hours diverted from office and nursing staff; time for this work competes with creating annual emergency care plans; delay in reconciling out of compliance status—increasing potential for outbreaks.
Dolora Neumaier BSN	Retired School Nurse	Current policy puts immune compromised students at risk for exposure to illness. School funding insufficient to complete all tasks required. School nursing hours need to be focused on preparing and implementing health care plans for students with special health needs and for processing/ maintaining medications. Urge reinstatement of No Shots No School.
LuNell Eriksen, RN	School Nurse Capital Region ESD 113	Serves three school districts (Evaline, Toledo, and Winlock), currently at 95 percent and above for compliance (improving from 40 percent two years ago). Perhaps reconsider vaccinating at school. Without No Vaccination, No School, students and communities suffer.
Alma McNamee	ESD 101	School nurse since 1992. Repealing No Shots No School did not make it easier for districts to manage compliance issues. It made it harder. Once children are allowed in, parents drag their feet. Please go back to original WAC.
Renee Bowzer, RN, M.Ed, NCSN	Mt. Vernon High School	Reinstate No Shots No School. Nurses typically monitor and track immunization compliance because they have no clerical assistance. Immunizations often fall behind as a priority due to more pressing matters. Once students are attending class there is no incentive to get immunizations. Sending out-of-compliance letters and other follow up is time consuming.

		Certified exclusion letters cost \$6.50. Unnecessary expense due to “grace period.” Exclusion process is much more disruptive than not allowing the student to attend.
Lori Koeb, RN, BSN	Vancouver School District	Support No shots no school. Kindergarteners are allowed to register without immunization records. Requires tremendous time to track down parents and request records. It sometimes takes years for parents to comply since staffing is not adequate to enforce timely compliance.
Heather Julian RN, NCSN	Bethel School District	Always understood "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. Current rules are 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 causes a delay in vaccination and increases work for nurses and school staff.
Pam Thornton-Fulgham RN, BSN	Bethel School District	The rule is a nightmare. We are not staffed in the school to chase down information as much as we have had to do since 30 day conditional has come into immunization law.
Lauri Miller, BSN	Mt. Vernon School District	Before the 2015 school year, bringing students who were out of compliance into compliance was easy. Gave adequate notice to parents, those families who did not provide records were not given a class schedule. Families quickly provided schools with needed documentation. Now the process is arduous, and takes months. It’s hard to exclude kids once they start school. This is not a time or cost effective way of handling this work. Place the burden of immunization compliance onto the parent.
Marty Thompson, BSN, RN	Federal Way Public Schools	Many students come to school with ongoing, complicated, health issues and need to be protected from preventable disease. Is it fair to make others vulnerable to totally preventable diseases by the few who may have to make a little extra effort to get their vaccinations done in a timely manner? Getting parents to comply is time consuming. Please take the health of all our students and staff into consideration when making these changes to policy (No Shots, No School).
Amy Frost, RN	Shelton School District	Please support “No Shots-No Schools proposal.” School principals do not want to exclude unimmunized students because they want students to be in school. School Nurses also want students to be in school. One outbreak of a preventable disease can needlessly disable a school community. Mason County’s immigrant children have slow access to health clinics for immunizations. Language barriers are also a challenge, and children may not get all the vaccinations they need. Education is needed for health

		clinics, and the parents, with special emphasis one non-English speakers to assure they get the right shots. One solution is to not allow students in schools until they are fully vaccinated- this will help clinics, families, and parents to understand the importance of vaccinations.
Shirley Carstens, RN, MS	Retired School Nurse	As a former school nurse, I support "No Shots; No School" and was disappointed with the Conditional rules being implemented. It's most effective to prevent parents from registering the student or disallowing them from class until they produce the needed documents. Principals are lax and disregard immunization status so they can include the student in the State Count for funding. We need to educate them or have monetary consequences for noncompliance by administrators.
Janice Doyle, MSN, RN, NCSN, FNASN	Bethel Public Schools	The 30 day conditional immunization status is difficult to implement. It can take weeks for immunizations to get entered into Skyward because we must prioritize life-threatening conditions. Students remain out of compliance for weeks, and potentially expose others 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, especially medically fragile students.
Nancy Sutherland MED., RN Jeanne Johnson BSN, RN Nancy Varg, MS, RN Cheryl Robinson ESA	Edmonds School District	Compilation of comments from four nurses: Laws need to match what is humanly possible to attain. Conditional status provides a hardship due to inadequate time/ hours and manpower to get students compliant. This is an unfunded mandate. Suggest a grace period only allowed upon confirmation of a parent/ guardian's military status and associated compliance difficulty. The policy places immunocompromised students and staff at risk.
Jennifer May, RN	Edmonds School District	You have taken the teeth out of the only consequence we had to get parent to comply with the law in a timely manner. WA DOH has made an already overwhelming and thankless task nearly impossible to complete. Rescind the 30 day grace for immunization compliance. Require immunizations to be up to date by the first day of school.
Ruth Erb RN,BSN	Mead School District	Concern re: the 30 day Conditional status for Immunization Compliance. Example: Varicella for 7 th & 8 th grade, we contacted families three times last year. We continue to follow up on many students. It is too expensive. Some parents will not complete the requirement until forced to. Retaining provisions for students working on completion of a series is understandable.
Carrie Dinwoodie RN, BSN	Mead School District	It takes months to get students into compliance with immunization status- 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, parents would have all summer to get into compliance, and we would be able to stop any out of compliant students at the first day of school. Once exclusion letters go out preventing students from coming to school on the first day, parent compliance skyrockets. This would not work for new students who have not received notice. For those students who are already in the district, earlier notice would save time and allow us 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.
Barbara Burleson RN	Peninsula School District	Herd immunity has been compromised due to the large number of unvaccinated or under-vaccinated people. This poses a risk to childbearing teachers. In TX only the homeless and military populations are given waivers to enroll without an immunization. Support No Shots No School.
Joanne Clare Walderman, MPA, MA, RN, CQPS	Everett Public Schools	Support mandate to have students immunized. Ok with removal of students until parents provide proof of immunization or medical waiver. The greater good to the student population needs to outweigh personal rights.
Kim Kannely RN	Royal School District	Return to "no shots no school" rule. Parents are 100% compliant when it must be done before their children start school, and remain compliant when told on subsequent doses. 30 days diminishes the priority for busy families. This is not an attempt to exclude everyone, and we are willing to consider each incidence. We have labored over immunizations since the start of school this year. Our resources need to be focused elsewhere. Our district now is 98% fully immunized, but it's more impactful if we can start the year with a rule that says they must be current.
Linda Kirk, RN	Prosser School District	District begins notifying 5 th graders in March prior to start of 6 th grade year. Reminders are sent in June and August, but parents still show up without required vaccines. We refer them to LHJ, clinics, pharmacies etc. for the vaccine. If children start without vaccinations, staff works for at least two months to get them vaccinated. Creates risk for measles and whooping cough. To protect all we need to start school with full immunization. Several other states require vaccination before school entry. WA needs to look to other states' practices.
Julia Johnson, RN	Everett Public Schools	The previous policy of No Shots, No School was most effective. The new policy wastes time and resources due to the need for multiple overdue vaccine parent letters and exclusion documents which must be sent via certified mail. Previously students had ample time over the summer to get the needed vaccines or discuss exemption status with their doctor prior to the start of school. Students miss valuable education time due to exclusion for vaccine noncompliance. This was prevented under the old policy.

Gret Jordan, RN	Mead School District	High School Nurse in a school of 1500+ students. Too much time is spent chasing down students on immunization compliance. Requiring immunization before entry would create greater compliance and reduce conflict, and frustration for all. Return to No Shots, No School.
Cheryl Sampson MN, RN, NCSN	Central Valley School District	Return to No Shots, No School. Current policy makes it difficult to get all students adequately immunized. Very few schools have full-time nurses. It's hard to assure student safety, the limited time you have is spent on follow up. The burden of notifying for TDAP is significant. Even with immunization clinics, we have a lengthy list of students out of compliance. Conditional status should be reserved for those who are in the process of getting their immunizations.
Suzanne Nelson RN	Boistfort/Pe Ell School districts	Retain the 30 day rule. Most students that enter schools have a CIS that is accessible from the website. One student who enrolled was a kindergartener from Idaho who had recently lost his Mother. His father had no idea how to get shots or records. School provides stability to this child, and this child shouldn't be excluded. We allow foster children and homeless children to attend without records. Many people who are in transition may not know where their records are. Also, some schools don't fax immunization records in a timely manner.
Denise Zermer, BSN, PHN, CSN	North Thurston School District	School nurses have unique talents and skill sets and continue to provide invaluable and often unrecognized services to school aged students. Data gathering/ input and screening for compliance, rule enforcement is NOT a good use of a Licensed Nurse's time. If parents are denied the ability to register their student for school attendance, they respond quickly. A 30 day conditional period creates a significant workload and expense to school districts. Return to "no shots, no school, no excuses." This benefits tax payers and frees Nurses and school staff to accomplish more direct service to students. Note: Suggested that DOH take over the job of "mining" data from the Skyward system and leaving the "report generation" to DOH staff. It would be equally appropriate for the DOH to take over data collection and enforcement.
Brenda Lindstrom	Cle Elum- Roslyn School District	Clearly policy makers had no idea the extra burden of nurse time it takes to track down, keep a running system, write letters, certified letters (\$6) added expense , phone calls etc., and then finally exclusion if we can make it happen, and if the administrator will support us in excluding a student. Support simplifying this issue-- No Shots, No School. Make exceptions for military families for records to catch up. Create consistency, ease—save nursing staff time and resources.

Deena Johnson HSP	Mukilteo School District	Health Services Para-educator, works part time in 3 school health rooms when the nurse is not present (approximately 1800 kids). In addition to first aid and other health tasks, conducts the majority of immunizations tracking (phone calls, letters, data entry & search). Would like to retain the 30 day conditional status. It doesn't change the timeline for immunization compliance, adds a little less pressure on parents and registration staff.
Sandra Simmons, RN	Zillah Schools	Prevent students from starting school at all until their immunizations are current. Families rarely use the 30-day grace period to get the immunizations done and students remain under-immunized. Nurses don't have time to run reports and send letters until November or December. Nurses cannot address the immunization issue 30 days after school starts, there are too many more urgent matters, e.g. emergency care plans and vision and hearing screening. Students who are not fully immunized when they begin school are still under-immunized when we run the report later in the school year. Its time consuming to send letters and call parents. It's hard to convince parents to respect the deadline set by the school district when their children have been attending school for several months without being fully immunized. If the rule requires students to be fully immunized from the first day they attend public school, the message is clear: immunizations are vital to public health and 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.) Send a clear message to parents - discontinue the 30-day conditional immunization status.
Sarah Day, RN, BSN	Vashon Island School District	Reconsider the 30 day immunization conditional status rule. Vashon Island SD began excluding children for vaccine non-compliance in 2012, this rule hinders our work. It results in an exclusion process that is disruptive, confusing, and inefficient. It is difficult to exclude a child who is already engaged in schooling, it impacts the child, teacher and classmates. Once school is underway, it's hard to get administrator and staff support to enforce exclusions. We work with families who are unable to access health care and try to avoid exclusion. On Vashon Island, lots of families are vaccine hesitant. Tremendous energy is spent trying to communicate with parents (multiple phone calls, e-mails, letters, registered letters text messages). The process is cumbersome and takes away from those dealing with critical health issues. Vaccine compliance is time intensive and school nurses are allies. School nurses work with increased numbers of children with serious health issues. "No Shots, No School" will help get children

		vaccinated and ready to begin school by the first day.
Sonja Bookter, RN	Enumclaw School District	Support a No Shots, No School. I difficulty with administration support with the current policy allowing students to start, they don't support exclusion. Once kids are in class, I have no support for exclusion. A change in policy will allow exclusion if documentation is not in order!
Terry Woodall, RN, BSN	Dieringer School District	Support preventing enrollment until the child is up to date on immunizations. It is time consuming to track and follow up on students who need vaccinations. Returning to No shots No School would save time and assure students are fully immunized.
DeAnn Wood Sellars, RN, MSN, NCSN	Bethel School District	The 30 days grace period allows parents to put off their children's shots until it's convenient. Its challenging for schools where staffing has been cut. Nurses have to call, send notes home and certified letters, at the districts expense. It is time consuming and expensive for schools to try to get parents to comply in a timely manner. Consider returning to "No Shots, No School."
Julie Hill, RN	Edmonds School District	Used to have almost zero students out of compliance because we could exclude them. We worked to educate families in the spring and summer about immunization compliance. Since we can't exclude now it takes months of work and communication with parents to bring students in compliance. This increases risk of exposure to other students and staff. We don't have herd immunity. Don't understand why the law was changed. It's the parent responsibility to be in compliance with the law, however it now takes months to make compliance happen.
Linda Johnson, RN	Pioneer School District	Favor a return to "No Shots, No School." Trying to reach parents of students who are out of compliance is time consuming. Enforcing a 30 day grace period is even more difficult. Once the child is in school we have little recourse. "No Shots, No School" will help compliance issues.
Glenda Van Haitzma, RN, BSN	North Thurston School District	Spend hours tracking students out of compliance each year. First month of school is spent on health plans for students, training staff, assessing health histories. Unable to address all out of compliance within 30 day timeframe. From October through January staff spend a couple hours each week following up with letters and calls to families. If letters/ phone calls don't prompt action, then administration is engaged. High turnover school with military transfers. The process involves a lot of staff time and resources. It could be simplified by having kids start school when they are in compliance.