

From: [Beddoe, Tammy J. \(ESC,ML,SP\)](#)
To: [DOH WSBOH](#)
Subject: We need the old WAS back.
Date: Monday, February 01, 2016 5:36:10 PM

This WAC is not working for us it needs changed back for the general populus (families in the service could be the exeption). We do not have the time available to manage all the extra work this WAC creates for our limited staff: nurses and office staff.

WAC [246-105-040](#) and within the following time frames:

- (a) Any missing immunizations must be received within thirty days after the first day of attendance or after a temporary medical exemption is no longer valid, unless receipt within such time is inconsistent with the guidelines.
- (b) . A child in this status is allowed to attend a school or child care center provided the child makes satisfactory progress toward full immunization.
- (c) (17) "Satisfactory progress" for purposes of conditional status or an expired temporary medical exemption means the start or continuance towards full immunization status through the receipt of missing immunizations in a manner consistent with the national immunization guidelines described in WAC [246-105-040](#) and within the following time frames:
- (d) (a) **Any missing immunizations must be received within thirty days after the first day of attendance** or after a temporary medical exemption is no longer valid, unless receipt within such time is inconsistent with the guidelines.

We need the old WAC back. No Shots-No School. Students must be in compliance with vaccinations to start. Trying to get ahold of parents and then the records after the fact takes many man hours that we simply do not have. If school staff are to be held accountable for getting students in compliance we need to be given reasonable assistance by reasonable laws that do not increase the already heavy burden for School staff.

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From: Beddoe, Tammy J. (ESC,ML,SP) [<mailto:BeddoeT@edmonds.wednet.edu>]
Sent: Thursday, February 11, 2016 2:53 PM
To: Davis, Michelle (DOH)
Subject: "No Shots - No School" (We need this policy to return.)

Regarding Chapter 246-105 WAC

Respectfully requesting the Board consider these factors to please reinstitute the old policy- "No Shots-No School" with reasonable modifications:

- The change in 2012 allowing an increasing number of students (families are increasingly more mobile/transient) to start school without being in compliance or actively persuing compliance for DOH required vaccines until a month later (after starting school) takes many hours of time. Office staff must track down who is not in compliance, try to reach parents: make calls, send written notice for each individual student as to what is needed after already having done this at registration and then recheck if parents have followed through. Then go back into computer screens to enter vaccine data again.
- School funding is not sufficient to complete all the added tasks required to allow a delay. Office staff have minimal hours. Nurses are employed usually one day a week at a school to meet student health and safety needs.
- No shots-No school needs to be reinstited so parents can't delay compliance. This will put some limits on the already arduous task of enforcing vaccine compliance. (Military families who were originally the ones in mind when this was changed can be the exception for the "grace period". -The need is acknowledged with their circumstances.)
- Current policy also puts the increasing no. immune impaired students at higher risk for exposure to illness and increases risk of illness out breaks in our general populace, creating lower "herd immunity" in the school.

Office staff who make such a difference in student's lives: health, safety (daily care for health impaired, sick and injured students and enforce vaccine compliance) and create an environment for student individual growth and responsibility need support and time to accomplish job tasks.

School nurses who create plans for health impaired students at school, train and support all school staff in their role and care for an increasingly large populace of all students (with an increasing no. very health impaired) and monitor vaccine compliance.

Please let us have students take active steps toward vaccine compliance before entering school. Decrease the demands that the present policy adds to our job burden. Help us all help the you with compliance.

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

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From: Davis, Michelle (DOH) [<mailto:Michelle.Davis@sboh.wa.gov>]
Sent: Friday, February 5, 2016 3:23 PM
To: Beddoe, Tammy J. (ESC,ML,SP) <BeddoeT@edmonds.wednet.edu>
Subject: Conditional Status

Ms. Beddoe:

The Board received your correspondence dated February 1, 2016. It appears that you are requesting that the Board amend Chapter 246-105 WAC, to require missing immunizations to be received within thirty days after the first day of attendance of school. We will be treating your email as a petition for rulemaking under [RCW 34.05.330](#). It would be helpful if we could talk next week to clarify the changes you are requesting so we can present your concern to the Board.

Under RCW 34.05.330, the Board has 60 days to take action on the petition. The Board's next regularly scheduled meeting is March 9, in Tumwater. It will consider your petition then. Please let me know your availability for a quick conversation next week. Thank you.

Michelle Davis, Executive Director
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