

Dear Washington State Board of Health,

2-16-16

I would like to request a change of the WAC 246-105-020 (17) (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must be received within thirty days after the first day of attendance or after a temporary medical exemption is no longer valid, unless receipt within such time is inconsistent with the guidelines.”** I would like to see this clause removed.

Students will still be conditional under section (b) “ When the immunizations are part of a series with recommended intervals between doses, each additional missing immunization must be received no later than thirty days past the recommended date of administration of the next dose as established by the guidelines”.

WAC 246-105-020 (17) (a) does not meet the health needs of students or conform with the requirements of RCW 28A.210.080. (1) “The attendance of every child at every public and private school in the state and licensed day care center shall be conditioned upon the presentation **before or on each child’s first day of attendance** at a particular school or center, of proof of either (a) full immunization, (b) the initiation of and compliance with a schedule of immunization as required by the rules of the state board of health, or (c) a certificate of exemption as provided for in RCW 28A 210.090”.

It also does not match with WAC 392-380-045 (1) “The **initial attendance** of every student at every public school in the state is conditioned upon proof of immunization as set forth in RCW [28A.210.080](#).(2) The chief administrator of each public school shall prohibit the further presence at school of each student already in attendance and who has failed to provide proof of immunization in accordance with RCW [28A.210.080\(1\)](#)”.

The first and foremost concerns are the risk of exposure to vaccine preventable diseases and the possible damage and deaths that can be caused by these diseases. This is a risk for all students but especially the students that are have existing health conditions or are immunocompromised.

From research that I have done in the past, it was established that when schools follow the “no shots, no school” policy parents get the immunizations, and it does not significantly impact the school count days. This saves time and frustration. If unimmunized or under immunized (greater than the 30 days past due for the next vaccine in the series) students are allowed to begin school, the school must:

- Verify the missing vaccines,
- Send warning letters in their native language
- Phone calls
- Follow up and review the vaccines as they are brought in
- Send exclusion letters
- Exclude the students.

It can take **at least** an hour of time per student out of compliance. There is also the costs of printing and mailing. Parents are displeased at having to get vaccines after they were told the vaccines were ok to start school. Parents are generally angry when we exclude their students after they have already begun at the school.

When the law supports "no shots, no school", parents do not question, nor are they angry regarding compliance. They consider immunizations as part of the enrollment process or requirement for the next grade (i.e. 6<sup>th</sup> grade Tdap) and will have their child immunized prior to the first day of school attendance. This requires no extra follow up on the part of the school.

The beginning of the school year school nurses' priority is preparing plans and care of students with life threatening or severe health concerns to be sure they are safe at school. Clerks' priority is enrolling and sending files for new and leaving students. Tracking down and sending warning letters and excluding in the first 30 days if you have let any student enroll under immunized is difficult if not impossible as the numbers are exceedingly high.

Our administration has always been supportive of immunizations, following the law and providing a safe environment for all students to attend.

Allowing students to attend under immunized for thirty days puts an unnecessary heavy burden on the schools. For the health and safety of students and best immunity students need a complete series. Unimmunized or under immunized students at school expose all students to increased risk of disease especially our most vulnerable and medically fragile.

Respectfully,

Valerie Hunt, R.N. BSN  
School Nurse Certificated