

March 4, 2016

To: Washington State Board of Health Members

From: Kathy Lofy, Health Officer
Washington State Department of Health

Subject: Recommendation to State Board of Health regarding petition for rulemaking

The Department of Health (department) recommends the State Board of Health (board) deny the petition to revise Chapter 246-105 WAC, Immunization of child care and school children against certain vaccine preventable diseases. The petition requests the board modify the rule to require vaccination compliance on or before the first day of school attendance in lieu of utilizing a thirty-day conditional status period where students who haven't started any immunizations are allowed thirty days from the first day of attendance to make satisfactory progress toward full immunization.

In consideration of the petition, department and board staff reviewed the current rule, the Interstate Compact on Educational Opportunity for Military Children, and the McKinney-Vento Homeless Assistance Act. It was determined there is a need for broader conversation with school nurses, school administrators, board staff and department staff regarding this issue.

Department staff also recognize the administrative burden expressed by the petitioner, and the department is in the process of requesting legislative funding to make technology improvements to the Immunization Information System that are believed will alleviate some of the administrative burdens. These improvements include the development of a validation tool and School Module that will:

- Help make school immunization records more accurate and help prevent and manage disease outbreaks;
- Provide school nurses more time to work with students' health issues instead of record keeping;
- Help the reporting of immunizations be less cumbersome, more efficient, and more accurate; and
- Create a validated certificate showing whether a student has received all required immunizations and is ready for school entry.

Along with the recommendation to deny the petition, the department recommends the following next steps:

- Evaluate the extent of workload efficiencies created through implementation of the IIS school module technology improvements mentioned above; and
- Develop plan to get input from a broad group of stakeholders to obtain further feedback on whether the rule should be changed.