



STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH

PO Box 47990 • Olympia, Washington 98504-7990

March 24, 2016

Dear Ms. Beddoe:

The Washington State Board of Health (Board) reviewed your petition for rulemaking at the last Board meeting, March 9, 2016. The Board has denied your petition for rulemaking as explained below.

Your petition requested that the Board consider amending Chapter 246-105 WAC to require children to be fully immunized before school entry. You provided additional clarification that you would be amenable to reasonable accommodation for conditional status currently afforded to children in military families under RCW 28A.705.010 Article IV, homeless children and youth under the McKinney Vento Act, and those children who are making satisfactory progress towards full immunization.

The Board reviewed your petition, the State Health Officer's recommendation regarding the petition, state and federal laws relating to conditional status, and written public comments on this issue. The Board recognizes that the administrative burden placed on schools as well as the rate of students out of compliance with the immunization requirements are important issues that require further discussion. Board Members want to ensure that the rule remains in alignment with RCW 28A.705.010 (Interstate Military Compact) and the McKinney Vento Act and that they engage in a broader conversation on this issue with diverse stakeholders including the Office of Superintendent of Public Instruction, school nurses and administrators, child care centers, parents, epidemiologists, and Department of Health staff. The Department of Health has requested legislative funding to make technology improvements to the Immunization Information System. If funded, these improvements could alleviate some of the administrative burden on schools and inform further discussion of potential changes to the rule.

The Board therefore denied the petition to amend Chapter 246-105 WAC, and directed Board staff and requested the Department of Health to engage stakeholders to identify possible inconsistencies in the immunizations rules, and strategies to reduce the administrative burden to schools while decreasing the number of children who are out of compliance with school immunization requirements. Staff will continue to keep you updated on these activities moving forward.

RCW 34.05.330 allows a petitioner to appeal any agency's decision to deny a petition to repeal or amend a rule to the Governor within 30 days of the denial.

Sincerely,

Michelle A. Davis

Michelle A. Davis
Executive Director