



STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH

PO Box 47990 • Olympia, Washington 98504-7990

March 24, 2016

Dear Ms. Hunt:

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 require children to be fully immunized before school entry by amending the definition of “satisfactory progress” in Chapter 246-105 WAC to eliminate the provision allowing missing immunizations to be received within thirty days after the first day of attendance or after a temporary medical exemption is no longer valid.

The Board reviewed your petition, the State Health Officer’s recommendation regarding the petition, state and federal laws relating to conditional status, and the 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 Article IV (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
Executive Director