



March 7, 2016

Catherine A. Shannon, RN, BSN
Coordinator of District Nursing Services - Battle Ground Public Schools
P.O. Box 200
Battle Ground, WA 98604
shannon.catherine@battlegroundps.org
360-885-5436

Michelle Davis, MPA
Executive Director - Washington State Board of Health
P.O. Box 47990
Olympia, WA 98504-7990

Dear Executive Director Davis,

As a registered nurse for 20 years and a school nurse coordinator I am well informed on the intricacies of health policy and the impact to daily operations within a school. A revision of WAC 246-105 IMMUNIZATION OF CHILD CARE AND SCHOOL CHILDREN AGAINST CERTAIN VACCINE-PREVENTABLE DISEASES regarding immunization requirements for students attending school in Washington State will benefit student health and support school districts and staffs' ability to create and maintain healthy learning environments.

The purpose of WAC 246-105 is to protect children and the public against certain vaccine-preventable diseases. Providing students and their families with an additional 30 days after the first day of attendance to receive any missing immunizations unnecessarily puts other immunocompromised or otherwise vulnerable students, staff, and the community at large at risk of exposure to vaccine preventable diseases, reduced 'herd immunity,' and an increase in the likelihood of outbreaks within the community. The revisions to WAC 246-105 change the 30 day grace period and make the provision of evidence of vaccination against vaccine-preventable diseases, or evidence of an appropriate exemption, before attending school. This revision will help to ensure the health and safety of our schools' and communities' most vulnerable individuals and also decrease the demands that the present Administrative Code places on Washington State schools attempting to enforce compliance.

Currently, WAC 246-105 advises that, "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must be received within thirty days after the first day of attendance or after a temporary medical exemption is no longer valid, unless receipt within such time is inconsistent with the guidelines." As it is presently written, WAC 246-105-020 (17) does not meet the health needs of students in Washington State, nor does it conform to the requirements of RCW 28A.210.080 which states that, "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.”

WAC 246-105 also does not align with WAC 392-380-045(1) which states, “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).”

Additionally, if unimmunized or under-immunized (greater than the 30 days past due for the next vaccine in the series) students are allowed to begin attending school without first providing proof of having obtained the required vaccinations for attendance or of a valid exemption from those requirements, the school is then obligated to diligently work to verify eventual compliance. This obligation places a tremendous work-load burden on school staff as it most often requires numerous attempts at contact with the student’s family and health care provider in an attempt to obtain the appropriate documentation of compliance.

A revision of the existing Washington Administrative Code to one which more directly supports an obligation for students to take active steps towards vaccine compliance before attending school will help ensure the health and safety of our schools’ and communities

Respectfully,

A handwritten signature in cursive script that reads "Catherine A. Shannon, RN, BSN". The signature is written in black ink and is positioned above the typed name.

Catherine Shannon, R.N. BSN