

Summary of Comments on the Working Draft of Chapter 246-760 WAC as it Relates to School-Based Vision Testing Standards

Twenty-one individuals and the Children's Vision Task Force of the Optometric Physicians of Washington provided feedback.

Many individuals and the Children's Vision Task Force provided multiple comments resulting in a total of 69 comments:

- 28 comments recommending clarification of language, grammatical changes, fixing typos, further definition, or ways to make the language more concise
- 9 comments were outside of the scope of the Board's authority or outside of the scope of this CR-101
- 32 comments recommending more substantive changes to the rule

The 32 comments recommending more substantive changes to the rule touched on 11 main points. Table 1 provides a summary of these comments.

Table 1. Summary of Stakeholder Feedback on the Working Draft	
Six individuals and the Children's Vision Task Force	Other screening tools should be allowed (photoscreening devices, applications that test for near vision when available, other charts, tools for testing near vision other than near vision acuity)
Four individuals	More specificity should be included outlining screening protocols
Two individuals	Need for separate screening tool for students with special education needs
Two individuals	Find way to not be too prescriptive and allow the rule to adapt to changing technology/standards
Four individuals and the Children's Vision Task Force	Opticians should not be included in the definition of licensed professionals
One individual	Near vision screening should only be conducted in 7 th grade
One individual	The proposed referral criteria for first graders would likely lead to an over-referral of first grade students
Three individuals	All students who meet the referral criteria on the first screen should be screened a second time before being referred regardless of who conducted the first screening in order to decrease over-referral
One individual	Allow a full eye exam to replace a school-based screening if an optometrist or ophthalmologist signs a form indicating that an examination has been administered
One individual	When possible, a notice should be distributed to parents by school nurses that vision screenings are not a substitute for comprehensive eye exams
Two individuals and the Children's Vision Task Force	Testing for near vision acuity (which measures if a child can momentarily maintain clear vision at near distances) is not sufficient as it does not capture vision problems that impact reading such as difficulty tracking, focusing, etc.