



School-based Vision Screening Rule Chapter 246-760 WAC

State Board of Health Rule Hearing
November 9, 2016

Acknowledgements

- ▶ Department of Health
- ▶ Office of Superintendent of Public Instruction
- ▶ Vision Care Experts
- ▶ School Nurses
- ▶ Lions Club
- ▶ Others who have provided comments

Outline

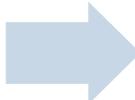
- ▶ Changes made to preliminary draft
- ▶ Public comments on CR-102
- ▶ Staff recommendations

Preliminary Draft

Stakeholder
comments on
Preliminary draft



Presentation to
Board



Changes to rule
based on
stakeholder
comments

•June – July 2016

•August 2016

•Aug – Sept 2016

Changes to Preliminary Draft

WAC 246-760-070

- ▶ Added language allowing a school to waive a student's vision screening if they show proof of a comprehensive eye exam in the past 12 months

Changes to Preliminary Draft Cont'd

WAC 246-760-071

- ▶ Added language allowing instrument-based vision screening devices (such as photoscreening devices) in lieu of optotype charts

WAC 246-760-010

- ▶ Defined instrument based-vision screening devices

Changes to Preliminary Draft Cont'd

WAC 246-760-071

- ▶ Added language requiring a single optotype to include crowding bars and a single line of optotypes to include a crowding box

WAC 246-760-010

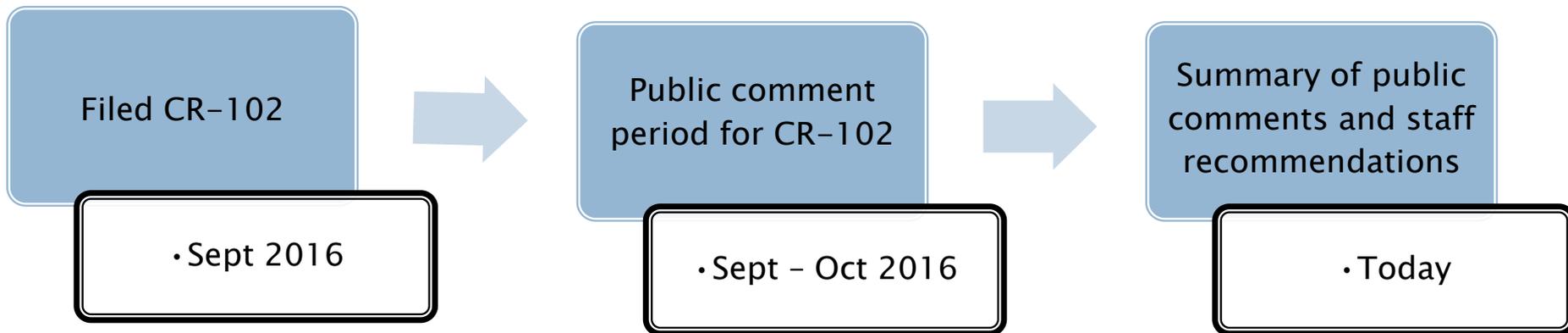
- ▶ Defined crowing bars and crowding box

Changes to Preliminary Draft Cont'd

WAC 246-760-080

- ▶ Added language requiring a school to refer any student who is unable to complete the vision screening for any reason

CR-102



Public Comments on CR-102

Rule Language

- 22 comments from 9 individuals

Significant Analysis

- 2 comments from 2 individuals

Public Comments

9 Commenters

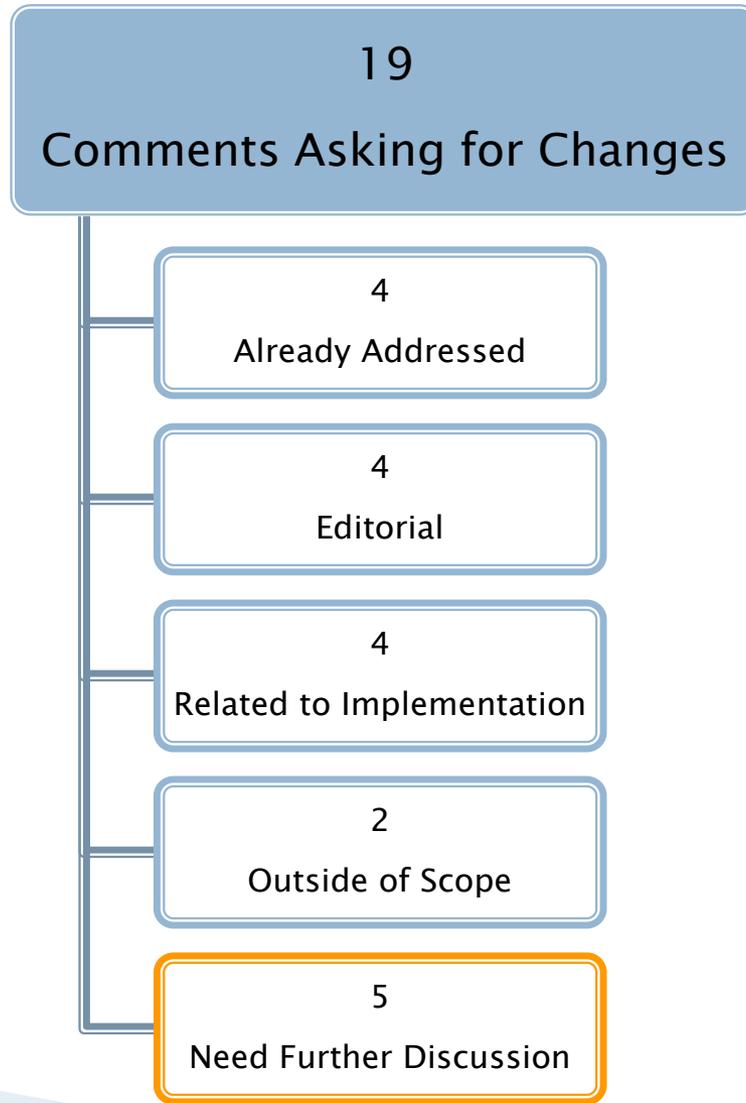
3

Concurred

6

Asked for Changes

Public Comments



Comment Needing Further Discussion #1

Comment Summary	Staff Recommendation
<p>The rule should be phased in over three years.</p>	<p>Adopt as proposed</p> <p>The RCW does not provide a provision for phasing-in near vision screening. To our knowledge there were no discussions of phasing-in near vision screening requirements during legislative hearings.</p> <p>Phasing-in the use of evidence-based vision screening tools in place of the currently required Snellen charts would further delay the use of the best-practice tools and allow for the continued use of an outdated tool.</p>

Comment Needing Further Discussion #2

Comment Summary	Staff Recommendation
<p>The referral letter should be required to be culturally and linguistically appropriate.</p>	<p>Adopt as Proposed Under state (Chapter 28A.642 RCW; Chapter 392-190 WAC) and federal law (Title IV Regulations), parents have the right to information about their child's education in a language they can understand.</p>

Comment Needing Further Discussion #3

Comment Summary	Staff Recommendation
<p>Parents/Guardians should be able to opt their children out of screening.</p>	<p>Adopt as Proposed RCW 28A.210.020 requires schools to conduct vision screening, but does not make it mandatory for a student to be screened. Therefore parents and guardians can already opt their child out of the screening. Several school nurses have noted that they already have a process in place when a parent/guardian wants to opt their child out. Staff recommends keeping the rule silent on this issue, as adding a provision to allow an opt-out for vision screening but not for auditory screening (since auditory screening is outside of the scope of this rulemaking) would likely lead to confusion.</p>

Comment Needing Further Discussion #4

Comment Summary	Staff Recommendation
<p>Students with known visual impairments such as blindness should be able to opt-out.</p>	<p>Amend Proposed Rule Staff recommend adding language allowing a school to waive a vision screening for any student who the school district has reported as having a visual impairment as required under RCW 72.40.060 – State Schools for Blind, Deaf, Sensory Handicapped, Duty of School Districts.</p>

Comment Needing Further Discussion #5

Comment Summary

A school should be able to refer a student who has been identified by the Lions Club without rescreening that student in order to decrease financial burdens on a school.

Staff Recommendation

Amend proposed rule:

Lions Club screeners undergo the same training that the Board and OPSI are trying to make available to school nurses. In addition Lions Clubs use a test-retest protocol for any student who meets the referral criteria on the first screening which decreases the risk of over-referral. Staff recommend adding language to allow a school to refer a student who has been identified as needing a referral by a nationally recognized service organization that uses a test-retest protocol without rescreening that student. Staff recommend this broad language as opposed to calling out the Lions Club specifically in case another service organization offers these services or the Lions Club changes its name in the future.

Summary of Staff Recommended Amendments

WAC	Recommended Amendment
WAC 246-760-010(7)	Amend definition of lay person
WAC 246-760-010(15)	Add definition for “Test-retest protocol”
WAC 246-760-070(4)	Add language to allow school to waive screening for students with visual impairment as reported under RCW 72.40.060.
WAC 246-760-071(2)	Editorial change
WAC 246-760-080(3)	Add language to allow a school to refer a student who has been identified by a nationally recognized service organization that uses a test-retest protocol without rescreening that student
WAC 246-760-100(1)	Editorial change/language clarification

Questions?