August 12, 2019

Alexandra Montano
State Board of Health
P.O. Box 47990
Olympia, WA 98504

Dear Ms. Montano,

On behalf of the Washington State Medical Association (WSMA) and our more than 11,000 physician and physician assistant members, we appreciate the opportunity to comment on the State Board of Health’s (Board) CR-102 proposed rule – Immunization of childcare and school children against certain vaccine-preventable diseases. This rulemaking stems from HB 1638, which eliminated the personal and philosophical exemption for the measles, mumps and rubella (MMR) vaccine required for school and childcare entry. The WSMA supports strong vaccine policy and urges the Board to protect communities and individuals by implementing HB 1638 as approved by the legislature.

The highly contagious nature of these diseases is well-documented. Vaccination is critical to preventing the rapid spread of the disease, as well as protecting the most medically vulnerable among our communities – babies too young to be vaccinated, cancer patients, pregnant women and those with compromised immune systems.

Our state’s vaccination rate for kindergarten-age children is below the 95 percent state target. The WSMA urges the Board to implement HB 1638 to the full extent as approved by the legislature, while ensuring minimal administrative burden to physicians and their staff. Pediatricians and family physicians are often a family’s best resource for medically accurate information on vaccines and unnecessary paperwork, or onerous signature requirements, limits their ability to do this effectively.

Thank you for the opportunity to share our support for strong vaccine policy and public health. Should you have further questions, don’t hesitate to contact Billie Dickinson at billie@wsma.org.

Sincerely,

Jeb Shepard
Director of Policy
Washington State Medical Association