

Notice of Public Meeting
**School Environmental Health and Safety Rule Project
 Technical Advisory Committee**
 Thursday, February 6, 2025, 10:00 a.m. – 4:00 p.m.
 Public observation location:
 Department of Health
 101 Israel Road,
 Tumwater, WA 98501
 Town Center One Room: 164
 Virtual meeting: ZOOM Webinar
 (hyperlink provided on next page)
 Language interpretation available

Agenda

Time	Agenda Item	Speaker
	Call to Order	
10:00 a.m.	1. Introduction/Minutes Review	Patty Hayes, Committee Chair
10:05 a.m.	2. Reminders	Patty Hayes, Committee Chair
10:10 a.m.	3. Objectives and Meeting Agreement	Karen Langehough, Facilitator
10:15 a.m.	4. Prioritization Refinement	Karen Langehough, Facilitator
11:45 a.m.	Lunch	
12:45 p.m.	5. Prioritization Refinement	Karen Langehough, Facilitator
2:00 p.m.	Break	
2:10 p.m.	6. Prioritization Refinement/ Implementation Timing Goal	Karen Langehough, Facilitator
3:50 p.m.	7. Recap/Next Steps	Andrew Kamali, Project Manager
4:00 p.m.	Adjournment	

To access the meeting online and to register:

https://us02web.zoom.us/webinar/register/WN_qPKHr9GIQhifo0S_43qATA

You can also dial-in using your phone for listen-only mode:

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Webinar ID: 817 4614 0069

Passcode: 971040

Important Meeting Information:

- Times are estimates only. We reserve the right to alter the order of the agenda.
- Every effort will be made to provide Spanish interpretation, American Sign Language (ASL), or Communication Access Real-time Transcription (CART) services. Should you need confirmation of these services, please email wsboh@sboh.wa.gov in advance of the meeting date.
- If you would like meeting materials in an alternate format or a different language, or if you are a person living with a disability and need [reasonable modification](#), please contact the State Board of Health at (360) 236-4110 or by email wsboh@sboh.wa.gov. Please make your request as soon as possible to help us meet your needs. Some requests may take longer than two weeks to fulfill.
- TTY users can dial 711.

Public comments and recommendations. You can comment on the draft rule by February 9, 2025 during focus groups, or you can submit comments online by going to [School Environmental Health and Safety Rule comment form](#).

Aviso de reunión pública
Proyecto de normas de salud y seguridad ambiental
escolar

Comité de Asesoramiento Técnico

Jueves, 6 de febrero de 2025, de 10:00 a.m. a 4:00 p.m.

Lugar de observación pública:

Department of Health
101 Israel Road,
Tumwater, WA 98501
Salón: 164

Reunión virtual: seminario web por Zoom
(hipervínculo en la página siguiente)

Hay servicios de interpretación a otros idiomas
disponibles.

Orden del día

Hora	Punto del orden del día	Orador
	Apertura	
10:00 a.m.	1. Introducción/Revisión de actas	Patty Hayes, presidenta del comité
10:05 a.m.	2. Recordatorios	Patty Hayes, presidenta del comité
10:10 a.m.	3. Objetivos y acuerdo de la reunión	Patty Hayes, presidenta del comité
10:15 a.m.	4. Optimización de prioridades	Karen Langehough, facilitadora
11:45 a.m.	Almuerzo	
12:45 p.m.	5. Optimización de prioridades	Karen Langehough, facilitadora
2:00 p.m.	Receso	
2:10 p.m.	6. Optimización de prioridades/ Objetivo del cronograma de implementación	Karen Langehough, facilitadora
3:50 p.m.	7. Repaso y pasos a seguir	Andrew Kamali, gerente de proyectos
4:00 p.m.	Levantamiento de la sesión	

Para acceder a la reunión en línea y registrarse:

https://us02web.zoom.us/webinar/register/WN_qPKHr9GIQhifo0S_43qATA

También puede participar por teléfono, mediante la modalidad de solo escucha:

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Id. del seminario web: 817 4614 0069

Contraseña: 971040

Información importante sobre la reunión:

- Los horarios son estimativos. Nos reservamos el derecho de modificar el orden de los puntos que se tratarán en la reunión.
- Se hará todo lo posible para proporcionar interpretación en español, ASL (por su sigla en inglés, lenguaje de señas americano) o servicios de CART (por su sigla en inglés, transcripción en tiempo real). Si necesita confirmación sobre estos servicios, envíe un correo electrónico a wsboh@sboh.wa.gov antes de la fecha de la reunión.
- Si desea acceder a los materiales de la reunión en un formato alternativo o en otro idioma, o si tiene una discapacidad y necesita una [modificación razonable](#), comuníquese con la Mesa Directiva de Salud llamando al (360) 236-4110 o enviando un correo electrónico a wsboh@sboh.wa.gov. Le pedimos que presente su solicitud lo antes posible para ayudarnos a satisfacer sus necesidades. Es posible que algunas solicitudes tarden más de dos semanas en atenderse.
- Marque 711 para el servicio de TTY.

Recomendaciones y comentarios públicos: Puede hacer comentarios sobre las normas preliminares el 9 de febrero de 2025 durante los grupos de discusión, o puede presentarlos en línea en el [formulario de comentarios del Proyecto de normas de salud y seguridad ambiental escolar](#) (solo en inglés).

School Environmental Health and Safety Rule Project 2024 - 2025

TAC Membership

MEMBER	ALTERNATE	REPRESENTING
Patty Hayes WSBOH Chair		Washington State Board of Health
Tyler Muench Director of Advocacy & External Affairs	Randy Newman Director of School Facilities & Organization	Washington State Office of Superintendent of Public Instruction
Steve Main Division Director, School Safety Lead	Sandy Phillips School Health and Safety Program Technical Advisor	Spokane Regional Health District
Gina Yonts Associate Director	Roz Thompson Director of Government Relations	Association of Washington School Principals
Geoff Lawson Operations Coordinator	Jeff Rogers Manager of Environmental Health & Safety	Washington Association of Maintenance and Operation Administrators & Tacoma School District
Tammy Allison Board Director – Region 121	Nicole Roel WASBO Board of Directors, Olympia ESD 114	Washington Association of School Business Officials
David Hammond School Construction Committee Chair	Dan Steele Assistant Executive Director, Government Relations	Washington Association of School Administrators
Suzie Hanson Executive Director	Sharon Ricci Community Relations	Washington Federation of Independent Schools
Kate Espy Board Member and Legislative Representative		South Kitsap School District
Erin Hockaday Senior Manager, Surveillance & Investigation	Bailey Stanger	Benton-Franklin Health District

School Environmental Health and Safety Rule Project 2024 - 2025

TAC Membership

MEMBER	ALTERNATE	REPRESENTING
Laurette Rasmussen School EH Specialist	Jamie Bodden WSALPHO Managing Director	Whatcom County Health & Community Services
Lauren Jenks Assistant Secretary, Environmental Public Health	Kelly Cooper Director, Policy and Legislative Relations	Washington State Department of Health
Kevin Jacka Executive Director	Richard Conley Consultant	The Rural Alliance
Samantha Fogg Co-President Seattle Council PTSA		Seattle Council PTSA
Devon Kellogg Volunteer WSPTA, Advocacy Committee	Susan Baird-Joshi Volunteer WSPTA	Washington State PTA
Laura Peterson Volunteer/Appointed Role WSPTA		Washington State PTA
Brook Wilkerson Director of Operational Supports	Anders Lindgren President	School Ops
Preet Singh Director of Health Services	Jessica Sankey Chief Operations Officer	Bellingham Public Schools
Brian Buck Executive Director of Support Services	Kenny Johnson Director of Maintenance & Operations	Lake Washington School District
Kellie Lacey Assistant Director of Human Resource	Kelsey Greenough Records Specialist	Richland School District
Nicole Daltoso Senior Director of Capital Facilities	Theodore (Ted) Dehnke Assistant Director of Maintenance	Evergreen Public Schools

School Environmental Health and Safety Rule Project 2024 - 2025

TAC Membership

MEMBER	ALTERNATE	REPRESENTING
Brian Freeman Superintendent		Inchelium School District
Becky Doughty Executive Director of School Support Services (Operations)	Sandra Jarrad Chief Communications Officer	Spokane Public Schools
Jared Mason-Gere Government Relations Staff	Julie Salvi Lobbyist/Government Relations	Washington Education Association
Pam Schwartz Assistant Superintendent	Doug Rich Superintendent	Washington State Catholic Conference
Jake Cook Public Advocate		Public

School Rule Project Staff

Andrew Kamali
School Rule Project Manager

Nina Helping
Policy Advisor

Mary Baechler
Community Engagement Coordinator

Marcus DeHart
Communications Consultant

Crystal Ogle
Administrative Assistant

GUIDANCE FOR SPEAKING WITH LANGUAGE INTERPRETATION

The Washington State Board of Health (Board) offers American Sign Language and Spanish interpretation during our regular public meetings. We do this as a part of our work towards increasing language access.

We ask all speakers at Board meetings to follow this guidance to create an accessible meeting environment. If you have any questions or need guidance for presenting, please contact Board staff for support.

WHAT TO EXPECT DURING A BOARD MEETING

- You will receive a simplified version of this document at your seat on the day of the Board meeting.
- Board staff or interpreters may give you cues to slow down your pace. The cues may include:
 - Raising a paddle sign to signal you to slow down.
 - Making a brief verbal interruption asking you to slow down.

TIPS FOR SPEAKING AND PRESENTING DURING THE MEETING

We ask that you help us mitigate the need for interruptions by speaking at a comfortable pace. Our ASL and Spanish interpreters cannot deliver your message accurately if you speak too quickly.

- Take a breath after each sentence to give the interpreter time to deliver your message.
- If you are reading from a script, please be aware that you may read faster than you speak.
- To help the interpreters and audience identify you, state your name each time you begin talking.
- Wait until someone else finishes speaking before you speak. Interpreters can only choose one person to interpret at a time.
- Pause after introducing technical terms, proper nouns, dates, numbers, or figures to allow for interpretation.

TIPS FOR TECHNICAL TERMS

- We recommend including a pause after introducing technical terms, proper nouns, dates, numbers, or figures.
 - Example: *“This briefing will discuss rulemaking around newborn screening for Ornithine Transcarbamylase Deficiency (OTCD) [pause for interpretation, wait for cue from interpreter to continue], Chapter 246-650 WAC [pause for interpretation, wait for cue from interpreter to continue].”*
- After you introduce technical terms or proper nouns use their acronyms for the remainder of the introduction.
 - Example: *“For the remainder of this discussion, I will refer to this condition as OTCD.”*
- If you are using visual materials (e.g., tables), incorporate descriptive language of the visual material.
 - Example: *“This is a table showing XXXX. And now, we’ll look at this part of the table...”*

WASHINGTON STATE BOARD OF HEALTH

Minutes for School Environmental Health and Safety Rule Project Technical Advisory Committee Meeting

January 15, 2025

Hybrid Meeting

ASL (or CART)

Seattle Airport Marriot

3201 South 176th St,

Seattle, WA 98188

Snoqualmie Ballroom

Virtual meeting: ZOOM Webinar

Technical Advisory Committee Members:

In Person Participants

Patty Hayes, RN, MSN, Chair

Becky Doughty, Spokane Public Schools

Brian Freeman, Inchelum School District

David Hammond, Washington Association of School Administrators (WASA)

Devon Kellogg, Washington State PTA (reside in Lake Washington SD)

Erin Hockaday, Benton Franklin Health District

Geoff Lawson, WAMOA and Auburn School District

Gina Yonts, Association of Washington School Principals

Laura Peterson, Washington State PTA

Lauren Jenks, Washington State Department of Health

Laurette Rasmussen, Whatcom County Health & Community Services

Nicole Daltoso, Evergreen Public Schools (Clark County)

Preet Singh, Bellingham Public School

Tammy Allison, Washington Association of School Business Officials

Online Participants

Brian Buck, Lake Washington School District

Jared Mason-Gere, Washington Education Association

Pam Schwartz, Washington State Catholic Conference/Catholic Schools

Samantha Fogg, Washington State PTA (Seattle Public Schools)

Sandy Phillips, Spokane Regional Health District

Sharon Ricci, Washington Federation of Independent Schools

Suzie Hanson, Washington Federation of Independent Schools

Technical Advisory Committee members absent:

Anders Lindgren, School OPS

Bailey Stanger, Benton Franklin Health District

Brook Wilkerson, School OPS

Dan Steele, Washington Association of School Administrators (WASA)

Doug Rich, Washington State Catholic Conference/Catholic Schools

Jacob Cook, Parent

Jaime Bodden, WSALPHO

Jeff Rogers, WAMOA and Auburn School District

Jessica Sankey, Bellingham Public School

Julie Salvi, Washington Education Association

Kate Espy, South Kitsap School District
Kellie Lacey, Richland School District
Kelly Cooper, Washington State Department of Health
Kelsey Greenough, Richland School District
Kenney Johnson, Lake Washington School District
Kevin Jacka, The Rural Alliance
Morgan Powell, Office of Superintendent of Public Instruction (OSPI)
Nicole Roel, Washington Association of School Business Officials
Randy Newman, OSPI
Richard Conley, The Rural Alliance
Roz Thompson, Association of Washington School Principals
Sandra Jarrard, Spokane Public Schools
Steve Main, Spokane Regional Health District
Susan Baird-Joshi, Washington State PTA (reside in Lake Washington SD)
Ted Dehnke, Evergreen Public Schools (Clark County)
Tyler Muench, OSPI

Technical Advisory Committee staff present:

Andrew Kamali, Project Manager
Nina Helping, Policy Advisor
Marcus Dehart, Communications
Michelle Larson, Communications
Anna Burns, Communications
Mary Baechler, Community Outreach Coordinator
Crystal Ogle, Administrative Assistant
Melanie Hisaw, Administrative Assistant

Guests and other participants:

Karen Langehough, FirstRule, Facilitator
Brian Cawley, Hargis Engineering
Ali Boris, Department of Health

1. Minutes Review

Patty Hayes, Committee Chair, welcomed committee members and convened the School Rules Technical Advisory Committee meeting at 11:00 a.m.

Chair Hayes welcomed the American Sign Language and Spanish language interpreters and expressed appreciation for their patience and support.

Chair Hayes presented meeting minutes and asked if there were any questions or comments, there were none.

2. Reminders

Chair Hayes read from a prepared statement on file. Chair Hayes stated that the meeting is being recorded and posted online shortly after the meeting, then reminded everyone to speak slowly for the translators.

3. Objectives and Meeting Agreement

Karen Langehough, Facilitator, asked for quick introductions from committee members. Facilitator Langehough explained that the objective for the day was to talk about fiscal assumptions. Tomorrow the committee will talk about details. The process will continue to be iterative and can be

brought back to future meetings. In February, more work will follow to prepare for the review with the Board at the April 9 meeting.

Facilitator Langehough shared the committee agreements.

Andrew Kamali, Project Manager, revisited the proviso for awareness of pieces that still need completing. During the 2024 session, the Legislature directed the Board and the Office of Superintendent of Public Instruction (OSPI) via the technical advisory committee to make revisions of the School Environmental Health and Safety Rules, including the fiscal portion and analysis and recommendations for implementation.

4. Fiscal Assumptions

PM Kamali explained fiscal analysis—comparing the cost of the current rule with the new requirements in the proposed rule. They acknowledged that the current rule has not been uniformly applied throughout the state. There are over 1.1 million students and 10,000 buildings in the state, so we'll be looking at ranges. Some schools can fully comply as is, others may not have that capacity. The critical piece today is plugging in the numbers and assessing the costs of the pieces.

Brian Freeman, Committee Member, asked if the numbers are based on the allocation the districts receive or the average costs.

PM Kamali said we have a document from OSPI that averages costs for positions. We need committee members to help us identify the positions and hours needed to fulfill the requirements. We can align with the average salaries provided by OSPI and the state of Washington. Much of the analysis involved reaching out to vendors to get estimations. We know the goal, but what is the process to get there? We are also looking at low-cost alternatives. We are looking at Rule Requirement Labor Hours for specific topics highlighted.

PM Kamali outlined the common school positions from the superintendent to all staff classifications. They gave a few minutes for committee members to review the Duty Code Definitions, saying they may not align perfectly and asked for committee members to help identify them.

Tammy Allison, Committee Member, asked for clarification.

PM Kamali said we need to know how much more time it will take staff and who will do the work of the new rule.

Member Freeman said contractor expenses aren't part of the duty code, so how do we quantify those numbers?

PM Kamali said we have a way to get the information for the contracting piece.

Brian Buck, Committee Member, echoed Member Freeman's question, expressing uncertainty about whether duty codes are applicable to contracted services.

Nicole Daltoso, Committee Member, mirrored the comments by Member Freeman and Member Buck.

Member Daltoso said the cost for the schools would be the amount of time school employees spend doing requests for proposals (RFP's), so maybe an hour plus review for these types of jobs. If it's a roster, that would be emailing directly. If not, it would be writing an advertisement for the paper.

Facilitator Langehough asked if we have an assumption for the time of the current rules.

PM Kamali said the current rules are vague and don't have specific requirements. PM Kamali said this is an abstract process, we can use this discussion to get to the numbers.

Member Allison asked about the money from OSPI for positions.

PM Kamali said we need to know the dollars to implement the rule for the legislature.

Member Allison said there is Classified and Classified Admin. Some Classified make over 100,000-200,000 per year, and this is at 50%.

Member Freeman talked about large districts and small districts due to capacity, saying an RFP for a small district might take two hours vs. one hour for a large district. If you don't have capacity, it takes longer.

PM Kamali appreciated the introduction of the capacity piece.

Member Freeman said most districts are small.

Facilitator Langehough asked Member Freeman if it would be three times the amount of time if averaged out.

Geoff Lawson, Committee Member, said rural districts will not have the same resources or competitiveness.

Member Freeman said it depends on the item, such as pest plan—there's nobody in their district with this expertise, but it would take the same time to work on a project since they would work with professionals.

Suzie Hanson, Committee Member, asked about assumptions.

PM Kamali said we would assume the maximum needed. We'd rather overestimate and factor in the extensive amount of coordination that needs to happen and go with the highest salary assumption.

Erin Hockaday, Committee Member, asked how frequency of service plays into this.

PM Kamali said it depends. Site assessment only happens with a new plot of land, so it might be a one-time cost. Other times are routine inspections, and it depends on the size of district, region, and more.

Member Lawson said it depends on how often bonds are passed.

Member Allison said 109 out of 313 schools are above 2,000 enrollments.

Member Buck said it's difficult to draw comparisons without seeing them side by side and what's in practice.

PM Kamali said we are aware that WAC 366 is not formally enforced throughout the state, but we must show the costs between 366 and 370.

David Hammond, Committee Member, said Bethel School District passed one in 2018 and site assessments up to seven, before that it was zero. The costs at purchase time are different, maybe two to three times when going through the process than when ready to build. Labor costs aren't too intensive unless the property is somewhat complicated.

Chair Hayes, said we must do this analysis according to fiscal rules, but our report can reflect the message here, such as what Member Buck just about actual costs.

Devon Kellogg, Committee Member, asked if the Department of Health (Department) is providing guidance to plans and templates.

PM Kamali said yes, we can get to that and it will vary if a school decides to use it.

Facilitator Langehough asked in terms of a baseline, how much time does it take today to do a site assessment versus what we have in the language. It seems about zero to one hour.

PM Kamali said we don't need to come to a consensus, and please estimate high.

Facilitator Langehough said the upcoming QR code is not a vote, it is a survey to get to an assessment of how much time to factor in and which positions would do that. When using the QR code, some questions have branching questions, and some don't.

Pam Schwartz, Committee Member, said they have a wide range of school sizes so it would be the principal or facilities manager if they have one. They didn't know how long these tasks would take or how to reply to the survey.

Facilitator Langehough said if you honestly don't know, feel free to skip the question.

PM Kamali said if your schools are on the smaller end, maybe discuss with fellow committee members.

Member Freeman said some of us have done these tasks and know and others don't. This is very role-dependent, and it might be better to approach this collectively as a committee.

Member Buck, asked if we should calculate as a one-time or annual cost.

PM Kamali said we are looking at singular projects.

Member Freeman gave an example such as Member Hammond's large district that has in-house staff, so his costs are higher than schools that will be contracted out. For a district with capacity, their costs are higher.

Member Hammond said they contract out the actual assessment of the site and they have a team of construction folks that takes about 30 hours. But an elementary site is different than a high school site. They will lean towards the higher end and see this as negotiation. They will use the salary position of Director of Planning, although their Director of Planning outsources some of the work.

Sandy Phillips, Committee Member, asked for confirmation that those from local health jurisdictions should not respond.

Facilitator Langehough confirmed that local health jurisdictions should not respond.

Member Phillips said meetings are generally about an hour for some site visits.

Member Hanson said it's a strange exercise to estimate costs, while at the same time not getting any money from the state. They recognized that the committee hopes for legislators to come up with funding to support the rule, but the private schools need to cover their own costs.

PM Kamali recognized private schools are in a different situation and that can add a layer of complexity. We might find some places that may have decreased costs.

Member Freeman said if the cost is a million, it doesn't mean the Legislature will allocate that amount.

Chair Hayes said this fiscal analysis is different than a fiscal note, saying this is our opportunity to build costs and build in assumptions at that higher level. This is our opportunity to be transparent and arm the process with the information needed to move forward. Rules go into a black hole when they go to the Legislature, but transparency is important.

Member Kellogg asked about the cost to students if we don't proceed.

Chair Hayes talked about the cost of asthma in the schools, saying we must follow rulemaking procedures that might not include that cost, but the report can include anything we want.

Member Hanson asked about adjusting the requirement with the knowledge of costs.

PM Kamali said if we review and see the high cost with net zero benefit for students, then why are we doing it. That is a piece of the conversation.

Facilitator Langehough said we aren't making decisions about what stays or doesn't stay.

Facilitator Langehough summarized that the recommendation is for group input rather than individual input. Can we still leverage individual responses and let the team consider this.

PM Kamali thinks it's good to move forward with the survey and said folks are allowed to select up to two answers.

Facilitator Langehough said if you select "other," then please enter the duty code.

Member Freeman asked about the duty codes, such as for the range of superintendents.

PM Kamali recommended they assume in this case.

Facilitator Langehough asked Nina Helpling, Policy Advisor, how to best simplify.

PA Helpling said they are more concerned with the salary amounts, so best to put the position and salary range if the codes are confusing.

PM Kamali said if members are unsure of the codes, put down the salary and title. These are preliminary numbers that can be updated later if necessary.

Member Schwartz appreciated the info but said that it doesn't help. They may get 74 different answers from 74 different people.

Member Allison asked about district sizes.

PM Kamali said that a district with more than 2,000 students is large and less than 2,000 is small. We have the average salaries for positions from OSPI.

Survey

*Will the rule change the amount of time to complete site assessments from the current requirements?
Who will perform these tasks?*

Lunch Break from 12:30 p.m. to 1:00 p.m.

5. Fiscal Assumptions

Construction Plan Review

Chair Hayes announced that the next section is a construction plan review for new alterations and portables.

Facilitator Langehough asked the committee to take a few minutes to review the components on the slide.

Sam Fogg, Committee Member, asked if we are including one-time costs to implement getting these systems in place.

PM Kamali encouraged members to share any one-time costs they might be aware of so we can include them.

Member Freeman said that they went through this section with architects and the costs didn't change because of the added step to notify a local health officer at 50% of planning. There was an extra meeting for them but the costs were an hour of prep and an hour for the meeting, between three architects, the project manager, and Member Freeman.

PM Kamali verified that these cost assumptions were included up front under the existing rule—that there would be no increase in cost.

Member Freeman replied that it was painless for them but probably more time for the local health officer as they had to review the plans at the 50% mark.

Member Hockaday replied that the 50% review is like their process. It saves time—a lot less back and forth chasing down specifications—so much smoother when we connect early.

Member Hanson thanked Member Freeman and asked if it was hard to coordinate the meeting with the local health officer.

Member Freeman said it was easy—two minutes for a phone call and then finding a time to meet that worked for everyone.

Member Phillips agreed that it pushes the project to be approved sooner because the final plans are likely to be 100% correct.

PM Kamali asked Member Freeman how long the 50% design development stage meeting was. Did it increase the time?

Member Freeman said no. We were already meeting weekly. It was the same amount of time, except for the prep for the meeting.

Laurette Rasmussen, Committee Member, said that they don't have a formal 50%, but they do offer a pre-app with their planning department, and the 50% sounds great.

Facilitator Langehough asked members to complete the survey question.

Survey

*Will the rule change the amount of time to complete site assessments from the current requirements?
Who will perform these tasks?*

Routine Inspection

Facilitator Langehough asked members to review the next section in their packet. The screen listed any changes or new components.

Member Hanson commented that it's one thing to have your own inspection and another thing to provide a written report to your local health jurisdiction. They've heard that it is cumbersome and asked if anyone had done a report and what the expectations are.

Member Daltoso asked Member Hanson if they were referring to routine inspections.

Member Hanson replied that in Spokane, they allow every third year or every second year for a school to do their own inspection using the checklist given by the health officer. It teaches the entire school staff how to look for issues in the school building that are unsafe. They added that they don't want to write detailed findings of the inspection or go through training. Will writing reports put a huge burden on the school?

Member Daltoso replied that they can't speak about the one through three-year schedule as they don't have this option; for writing reports, it depends on what issues you find, the size of the school, and what programs are included. If you don't have an art studio, then you don't have to worry about related concerns.

Member Freeman said that their school is small with no capacity, so they don't do this. The Educational Service District, insurance company, health department, or fire department will do it and then respond.

Member Lawson said that for cleaning they do a lot of routine inspections in their district. Most of their elementaries are about 75,000 square feet which is huge. They usually do a room-to-room inspection. It takes about four and a half hours, and the reports are very detailed. A company provides an app that takes a few clicks and it's done. This is specifically for cleaning.

Facilitator Langehough points out that the self-inspection language uses "may," so it's not required. They asked Member Hanson if this addressed their concerns.

Member Hanson asked that since it says "may," does the survey allow what Member Freeman says, that this would not be done.

PM Kamali replied that we would frame this section to show the costs if a school does self-inspection. If they choose not to do it, there are no new costs.

Member Buck said that in lieu of the health department doing the inspection, a school could elect to do the inspection to save money—assuming the health department is going to bill the school district. If they don't bill the school, there would be no additional costs.

Member Hockaday commented that some local health jurisdictions that offer self-inspection will still charge because they are processing the reports and reviewing, responding, and coming up with compliance plans. Some will charge only if they do the inspection. Each local health jurisdiction has its own way of doing this. They don't go into all the rooms in the school. At my health district, we just

do one specialty area at a time. This year we're doing science. Next year, we're doing another area. This makes estimating the cost difficult.

Member Hanson replied that Member Hockaday had answered their question.

Member Phillips added that they thought Member Hockaday was correct. Their jurisdiction charged for their time. Originally it was optional that schools could opt in or out. If they didn't conduct the inspection, the jurisdiction did it and charged the school. Then when their board required them to collect 100% fee recovery for their school inspections, it was going to be more expensive for the schools, so they made self-inspection mandatory as it was cost prohibitive for the schools to pay for the jurisdiction to do it. They seem happy now that they are used to doing it. Based on their experience it is probably two to three hours for an elementary school. If it includes an old playground, an hour for that, three hours for a middle school, four, possibly five hours for a high school.

Member Lawson asked about the estimates that were on the screen.

Member Phillips replied that every year they hold a half day workshop, with a checklist for them to follow through with; that they didn't know how long it would take to fill it out. It is going to depend on the number of issues identified and the size of the school.

Member Daltoso asked Member Phillips what the cost difference was for the jurisdiction doing the inspection versus reviewing the school's inspection.

Member Phillips replied that if a school couldn't do the inspection, it would be \$180 per hour on top of what they already pay. They're charged the three years like Member Hockaday mentioned because we must review the reports. The cost is split over the three years so they're not paying a large chunk of the one year that of the routine inspection. The fee numbers are on the website. If they have questions there is no charge for that. The schools decided that they would participate in the self-inspection program because it was less expensive for them.

The committee viewed the Spokane district fee schedule which ranged from \$600 to \$2,350.

Member Schwartz asked when the jurisdiction does an inspection, and they pass a fee to the school, how is that fee assessed. How is it paid? Is it property taxes? And what happens in a private school?

Member Daltoso answered that most school districts get an invoice post inspection. The school sends an application, schedules the inspection, gets the report, reviews, then gets a certificate. For their district, facilities cover the costs from the general fund. The process is the same for a private school.

PM Kamali shared that not every jurisdiction charges for inspections. Not all the fees are the same because there are differences in costs based on location.

Member Hammond commented that for most districts, when they think about this process, they're going to do whatever reduces their liability the most, and that is usually having somebody else do it. Their risk manager takes this which marries the health department with their insurance, and they don't do any of this in-house.

Member Hanson said that some jurisdictions don't charge and some charge way more. It feels arbitrary or not in the favor of the schools.

Facilitator Langehough said that the survey is asking for common school positions that would be doing this inspection. They asked for any questions or comments.

Member Daltoso had a question for Member Phillips. Member Daltoso asked if the self-inspection fee is divided over the three years so it is the same amount every year.

Member Phillips confirmed that they were correct. They are billed the same amount every year.

Member Hanson asked if the option to do the self-inspection is decided by the jurisdiction or the school.

PM Kamali replied that a school official may conduct the required additional inspection. If the school or school official opts not to do it or not to get the training, then they're not going to do it; if you're not trained for it, then you're obviously not going to do it. You must opt into the training to be able to do it.

Member Rasmussen added that they don't have the option yet, as they are just starting their school inspection program. It may be something that will develop in the future. Right now, they don't have a training program for a school official to come to. When asked, the schools answered that they did not want to do the inspection. This portion intends that the school is the one that opts in or opts out. It's not the local health officer that prompts that. If the local health jurisdiction or local health officer allows and develops this program. Then the school can opt to do it if it leads to cost savings. It's a choice.

PM Kamali added that if a jurisdiction starts this program, the local school can opt in.

Member Hanson commented that some jurisdictions refuse to do this, so the school may not be able to opt in. The second piece is whether the school will be allowed to participate. In some areas, the schools do find this as a cost savings, but the jurisdiction doesn't allow it.

PM Kamali commented that the local health jurisdiction makes the decision whether to offer based on factors they decide on. If this program is available, the school decides if they want to opt in.

Member Freeman asked if the insurance company does this, and if they don't charge, are they getting the same training?

Member Hockaday replied that this past year they offered schools the option to do self-inspection of their playgrounds, and many of them used third-party insurance companies to conduct those inspections. Even though we allowed a lot of the schools to have the insurance companies do their inspection, we still asked them to submit it in our format. It must go into our database in a specific format.

Member Freeman asked if there was a uniform reporting program across the state. That would be a savings.

Member Hockaday answered that many health jurisdictions use different software.

Member Lawson asked the local health jurisdiction members if there is an application where they could input the data into an app and then have the app send the report right back to the jurisdiction quickly.

Member Hockaday replied that they did not think anyone has anything like that, because the report requires review and discourse before it's finalized. They use REDCap, which is a database where staff directly input data. Then there's a compliance plan, and then it is formalized into a report.

Member Rasmussen commented that from a jurisdiction view, it would be good if we were all on the same report. We are working on spreadsheets that we upload.

Facilitator Langehough asked members to complete the survey.

Survey

| *What common school positions would typically perform the duties to complete a routine inspection?*

General Building Requirements

Facilitator Langehough said that this section focuses on water temperature, and if all the sinks provide hot water.

PM Kamali said that the current food code in Washington requires temperatures to be between 100 and 120 degrees. We reduced that to 85 degrees to align with the federal standard for handwashing.

Member Hockaday pointed out that for food service the temperature would still have to be 100 degrees.

PM Kamali said we are trying to see if you have any handwashing sinks that have only cold water, which would be out of compliance because then we would do a fiscal analysis.

Gina Yonts, Committee Member, replied that their district had a fiscal savings program and turned off all hot water in the student sinks. We had hot water only in the nurse's office.

Laura Peterson, Committee Member, added that they turned off the hot water because kids would scald themselves.

PM Kamali asked if these are temporary installations. Scalding temperatures would be over 120 degrees, which is outside the proposed range. We want it to be at least 85 degrees, like a swimming pool.

Member Hockaday added that our current code says you must have hot water at hand washing sinks. The issue is it just says hot water.

Member Rasmussen said there is a cost to adding that. They just had a whole bank of bathrooms go in at a football field and each bathroom had its own water heater.

Member Freeman commented that they added hot water tanks at the football fields because we thought we had to.

Member Yonts asked Member Freeman for the cost of the water tank.

Member Freeman replied that the total was about \$3,000, but it's hand-washing temperature.

Member Daltoso commented that if it's a stadium, it's a stadium, not a school facility. Our greenhouses have handwashing sinks with cold water.

Facilitator Langehough said that if members have areas with handwashing without hot water, you are going to answer no on the survey.

Member Hockaday asked if this is in the showers and restrooms or general building.

PM Kamali replied that it is the general building. It might be important in greenhouses due to toxic things. It would be good for the soap to emulsify properly.

Member Hanson responded a second time when they realized there were lots of places without hot water.

Survey

| *What common school positions would typically perform the duties to complete a routine inspection?*

Indoor Air Quality—Control sources of air contaminants

Member Daltoso asked if we are looking specifically at (1)(a).

Facilitator Langehough replied yes.

Member Freeman asked who is the official: custodians, staff, administrators?

Facilitator Langehough commented if there are no questions, you can go ahead and respond.

Survey

| *What common school positions would typically perform the duties to complete a school inspection to look for sources of air contaminants?*

Member Freeman asked if this is based on buildings or districts.

PM Kamali replied yes.

Indoor Air Quality—Radon

Facilitator Langehough introduced the next section on indoor air quality and radon.

PM Kamali asked Member Daltoso to share their experience with radon.

Member Daltoso replied that this estimate is as accurate as it can be. They developed a plan from scratch, using the American National Standards Institute (ANSI) standard and other sources like the Environmental Protection Agency and the Department. They believed that this was a fairly accurate estimate; there would be nuances based on district size. If it comes from a template, that will be easier. Everyone will be testing in the same way. A testing plan will vary by district size and school size.

Member Freeman commented that the plan is a district plan, and small districts might take ten hours, and large districts one hour, due to capacity and previous knowledge. If ten buildings, not one hour.

Member Lawson commented that we don't have a radon plan right now, we would have to develop it. It's a huge cost, and there's a need to train personnel. It's not on the radar for anyone.

Member Hanson agreed. An example is a school that rents and just has two rooms.

PM Kamali replied that you measure radon at specific levels. If you have a sublevel in a school, that's where you'd measure radon. If it doesn't have a sublevel, you'd measure it on the first floor. These times are based on specific schools, not district wide. I don't know if you could uniformly

apply one plan to a whole district, there's going to be variability there. Buildings that are rented still need to meet the code. You'd have to work with the landlord and must do it by the standard.

Member Hanson said that businesses won't rent to us if the code has an impact on them. I think it's going to limit the places available for schools.

Member Buck said they think we are looking at district-wide versus individual schools. It's a large effort to develop a plan across a district.

PM Kamali asked Member Hockaday or Member Daltoso to describe the process and added a reminder that radon is the second leading cause of lung cancer in Washington state.

Member Daltoso replied that it states testing for radon is every five years, so you could do 20% of buildings each year. They took the floor plan for every school and did a plan for 20%. If there was a basement level, they tested it right away. Once you have your floor plans then you order test kits with steps to validate the quality of the kits. They had a spike in tests, and once those were returned they were ready to test. The first time they did it, they had a company come in to train them, and then they met with the team every year. They bagged the kits, sent them out, got them on Tuesday night, and then mailed them to get the report back and a review of the results. If passed, they set up communications. If they did not pass, then they would check the ventilation system retest right away, then contract to have mitigation to install, and then develop communications about steps taken. If the building passes, it's a quick process. If not, then it's a contract process.

Member Daltoso added that you want to do those checks to support the accuracy of results and that you are following the protocol. If contracting it out, it's a similar process.

Member Freeman asked if committee members can run a radon plan.

Member Daltoso replied that with support from the local health jurisdictions and the Department, yes. The first year is a learning curve. If we can do a pandemic, we can do this. Having a template helps and supports the state. Once you've done it once, it will get easier.

Member Hammond commented that they are installing radon detectors in all their schools and asked if that meets the standard.

PM Kamali confirmed that installing radon detectors would meet the standard.

Member Hanson commented that when they listened to the description of the process that Member Daltoso described and wondered what they set aside to do this. Then Member Hammond came up with an easier way. The testers would be a way to go.

Member Hammond added that you do have ongoing maintenance, costs, and a system. They are pursuing something that monitors this via the internet, so that has costs.

Member Daltoso said that just looking at the costs, \$200 to \$300 each, or wiring it in, there is still the cost of getting that done. As a safety coordinator, nothing gets set aside, but we get the work done. It will be extra work that will land on someone. There are options whether you get monitors or conduct tests once a year.

Member Freeman said that if it's a coach, it's not going to be an hour.

Member Hockaday said this feels like the lead testing plan in water. Can we use that as an estimate?

Member Freeman added that the Department did it for them, and it didn't cost anything.

Member Hockaday asked what should happen regarding the plan to discuss with the public.

Member Fogg said that they have lived in states where you had to do it. You picked up a kit at the hardware store. Everything is more complex at a district level, but if it's a school with two rooms, anybody can set it up. They would not be comfortable testing for lead, but they would be comfortable with this.

Member Hanson asked why isn't the Department doing this, like with lead in schools.

Member Rasmussen replied that we were specifically funded for lead.

Member Daltoso estimated 170 test kits for their schools and 45 hours to set those up. If it goes well, it's easy. If it doesn't, that's where additional work comes in.

PM Kamali asked how long it would take to develop a plan for doing the testing.

Member Daltoso replied the testing plan, maybe three hours total including meetings and ordering test kits.

Member Freeman asked Member Daltoso where they put the test kits.

Member Daltoso replied that the directions tell you. For a gym, you would add two or three test kits. If you only have 20 classrooms, you'd be doing four a year. If two wings, 16 classrooms, it would be four. If there is a high reading on one side, we would retest that room and adjoining rooms.

Member Yonts commented that teachers and professionals are living in those classrooms. They are a workforce. Over a 10-year period many people get sick. Think about the Department of Labor and Industries (L&I) concerns.

Member Allison said that this could be a simple plan, testing each room once every five years.

Member Daltoso added that the actual base plan is nine pages total, including the appendix, flow chart, directions, spreadsheet, and floor plan.

Member Hanson was cautious about using the word "just." If there is mitigation, how will schools communicate it to parents and the community? The responsibility falls on the schools alone. There needs to be a stronger system from the state.

Member Daltoso explained that doing all the work for their radon testing. The local health jurisdiction was not able to support the testing. Member Daltoso had the degree and could understand the language. The responsibility will land on one person. There are three people for a 23,000-student population. Templates would provide success where there are bumps in the road.

Facilitator Langehough asked if the committee could add the need for support in the guide.

Chair Hayes commented that when we talk about phased implementation, we need a risk analysis. We need to keep compiling and we will have to prioritize. A recommendation could go in with a statement about partnership with local public health.

PM Kamali recommended that the Department develop templates and support.

Survey

| *What common school positions would typically perform the duties to develop and implement a radon testing plan?*

Afternoon Break from 3:00 p.m. to 3:15 p.m.

6. Fiscal Assumptions

Facilitator Langehough welcomed committee members back from the break and reminded them where they were in the agenda. They would continue the conversation on indoor air quality and noted that they had a subject matter expert joining at 4:00 p.m. to discuss ventilation. The committee would have to switch gears and topics if they don't finish the discussion on other indoor air quality topics.

Indoor Air Quality—Mold Remediation

Facilitator Langehough then re-opened the discussion on Indoor Air Quality and Mold Remediation.

Member Allison asked the committee if schools use their own staff to work on mold remediation or if they hire external people.

Member Daltoso said if the mold is in a small area, typically their maintenance staff or trades technicians take care of it. They added that the school ensures that these staff also have access to proper personal protective equipment to do the remediation and that the areas are properly confined so mold spores don't spread. If the mold issue is more expansive, they would hire an external remediation company and an environmental health specialist to address the issue and assess indoor air quality and then notify families about the status of this work.

Member Allison asked if insurance would cover the costs of remediation.

Member Daltoso wasn't sure.

Member Buck said that mold remediation is a complex process. The school has initial assessment activities, which are done by staff, and it usually can include an environmental industrial hygienist, and then a restoration company. They added the next steps after the initial assessment are remediation activities and post remediation activities. Sometimes an insurance claim requires this work and provided the example of pipes freezing and breaking last year. They were unsure how to answer the survey because of the complexity of who performs what duties and when it's for the complete remediation of mold.

Member Doughty said their process is like Member Daltoso's and Member Buck's. We have an industrial hygienist who works with a maintenance supervisor for the detection of it. We also bring in outside testing because it tends to be the most effective. Insurance won't cover it because we have 250,000 FIR (?).

Chair Hayes raised a concern about how mold remediation is addressed in the report. They emphasized that if schools identify mold, it must be dealt with, and it's important not to give the Legislature the impression that mold issues are being ignored. Chair Hayes asked the members to consider this aspect, noting that while the new language requires a plan, they did not create the language and had removed some provisions to reduce the burden. They questioned how the cost of mold remediation should be reflected, considering that responsibilities are already in place. They expressed concern that the situation could appear problematic or odd to external parties and asked for feedback from the group.

Facilitator Langehough suggested that the person overseeing the process should ensure it happens, rather than involving the entire team in the oversight.

Member Freeman shared an example of dealing with a leaky roof. They used fans to dry out the area and prevent mold. They emphasized that these actions were necessary regardless of the rule. The changes in costs associated with these actions are zero because schools already have to do this work.

Chair Hayes asked staff if it's possible to include this consideration with the new rule language to specify this work is already going on.

PM Kamali said the team could include it. As an example, staff could say that there is no additional cost as determined by research in our committee.

Member Hockaday reflected on the impact of explicitly calling out certain items in the code that were already in practice. They noted that this would likely only add a small amount of time to the inspection process, as it would require someone to specifically check these items, even though they were already being addressed as part of routine inspections.

PM Kamali suggested that if the committee agrees, they can move forward without assessing additional costs, as schools are already addressing mold remediation. They proposed revisiting the topic later and discussing potential implications for the inspection process, particularly if there is an increase in inspections or if schools request local health authorities to examine specific areas.

Member Jenks agreed that the proposal sounded reasonable and suggested adding it to the list in their comprehensive report. They highlighted that remediation can be very expensive and may not fit within everyone's budget. They proposed recognizing this as a potential cost, as schools are already facing the risk of having to pay for it.

Chair Hayes agreed that a note or anecdotal examples could be included in the report. However, they emphasized that the key point to communicate to the Legislature is that schools are already doing their due diligence and incurring these costs. The costs are not being driven by the rule but are a burden schools already bear due to their ongoing efforts.

Facilitator Langehough noted widespread agreement on the previous point.

Chair Hayes stated that there was no need to address the question further.

Member Philips agreed, mentioning that schools are very responsive to water intrusion and mold issues, aligning with others' comments.

Survey

| *What common school positions would typically perform the duties to complete remediation for mold?*

Indoor Air Quality Plan

Facilitator Langehough then moved the discussion to the next section, regarding indoor air quality plan development and implementation. They mentioned the hours are estimates in the table on the slide and mentioned that the focus is on the positions that would typically perform the work.

PM Kamali asked members to share any concerns about the hours estimated.

Member Freeman disagreed with the hours listed in the table and said the estimates might even be inverse of what is listed in the table. They explained that their staff have no expertise in this area, with no one on their team having any knowledge of indoor air quality plans.

PM Kamali acknowledged Member Freeman's input and suggested they could adjust the estimate later based on the feedback provided.

Member Jenks mentioned that templates will be included in the K-12 guide, which might help reduce the number of hours required for individual schools.

Member Buck agreed with Member Freeman's comments, stating that the efforts required are much larger than the eight hours estimated for schools to put everything together.

Member Hanson agreed with Member Freeman's and Member Buck's comments.

Member Freeman elaborated on the difficulty and expense of creating a routine inspection plan for heating and ventilation systems. They shared a previous experience with a contractor, where developing such a plan was both costly and time-consuming. The effort could exceed the 32-hour estimate due to the plan's complexity and the need for specialized expertise. Member Freeman asked Member Hammond how long it would take to develop a schedule for routine inspections of heating, ventilation, and cooling systems, create a plan to identify all the components, and establish a preventive maintenance plan.

Member Hammond said that they didn't know the exact time required but acknowledged that some of the work had already been implemented due to pandemic measures.

Member Allison asked for clarification from those in maintenance roles regarding typical building reviews. Are inspections usually done during the summer when school is out or at the beginning of the school year?

Member Lawson said that it depends on the staffing levels of the district. Some districts are well-staffed due to investment in maintenance, while others, regardless of size, may struggle with limited funding and may not have the resources to address basic issues like broken toilets. The approach largely depends on the district's funding and maintenance budget.

Member Freeman shared that a company submitted a bid for a three-year preventive maintenance plan for HVAC units, including repairs. They quoted just under a quarter million dollars for a 52,000-square-foot building. These plans are costly.

Member Jenks asked if this was the typical cost for a contractor to create a maintenance plan. If so, they suggested documenting the example.

Member Freeman clarified that the \$10,000 quote was only for creating the preventive maintenance plan, not for carrying out the work itself. They had to decline the plan due to lack of funds and resources. However, they noted that students missed a day of school this year because of HVAC issues.

Member Kellog asked about how indoor air quality is currently being monitored. Is it based solely on complaints? How are HVAC systems being inspected to ensure they are functioning properly?

Member Lawson explained that the ability to perform regular preventive maintenance depends on staffing levels and resources available to each district. Districts with dedicated resources can maintain regular schedules, while others may only be reactive or handle emergency repairs. They noted that community investment in schools and the ability to pass bonds also play a significant role. Some communities have the resources to invest in buildings, while others lack the taxable base to afford such improvements.

Member Freeman shared that their district had four school day closures, including one due to a snow day and another due to power or heating issues. In one instance the school contacted the health department regarding building temperatures, and they allowed certain areas to be used if the temperature could be maintained at 65°F or 62°F for gyms. Maintaining HVAC systems is a struggle, and the district is facing significant challenges in this area.

Member Jenks acknowledged the struggles districts face and stressed the importance of addressing this variation across the state in the rules. What would it take to properly implement a solution?

Member Freeman replied that for just one school in their district, the HVAC costs alone would exceed \$6 million for a 52,000-square-foot building and a 12,000-square-foot instructional space. They added that at the state level, the issue could have been addressed if priorities had been different. Resources were available but misallocated, specifically pointing out that if funds hadn't been spent on sports facilities in Seattle, the HVAC issues could have been managed. They asserted that it was not a lack of resources but rather a failure to make appropriate choices for the benefit of children.

Member Kellog asked if the \$6 million estimate was for the HVAC system, not the plan.

Member Freeman confirmed that the estimate was for the system itself and explained that the plan for the building would be to maintain a minimum temperature of 65°F for the school year. Anything beyond that was not feasible with current resources.

Member Lawson shared their experience working in Federal Way and Auburn. Although Auburn is a smaller district, it has a larger HVAC staff (seven) compared to Federal Way, which manages 46 sites and has four HVAC staff members. The cost of maintenance is tied to staffing and the current funding model is based on student count rather than the number of buildings. We need to reconsider the school's prototypical funding model to better support maintenance and operations. School budgets are controlled by superintendents, and they decide how much money is allocated for staffing and operations. The cost of running a preventive maintenance program could quickly escalate into the millions. A school in southwest Washington with a \$100,000 maintenance budget was depleted in two months—the school also had to shut down bathrooms and halt repairs due to a lack of maintenance staff. They concluded that the state faces a fundamental funding problem for maintenance and operations, which would require significant investment to address staffing shortages and perform necessary maintenance.

Member Allison stated that if schools were fully funded by the state, they would have the resources to address many of these issues. Special education is underfunded each year, and while schools would like to prioritize the health and safety of students and employees, the lack of adequate funding makes it difficult to do so.

Member Daltoso asked for clarification on the expectations for creating a plan to perform routine HVAC inspections. Are districts required to create a literal schedule or is it acceptable to provide a statement outlining goals, such as maintaining a temperature of 65°F, while acknowledging limitations due to budget and staffing? Would local health jurisdictions accept this approach, rather than requiring a detailed, costly preventive maintenance schedule?

Member Jenks replied that no specific qualifications were written for the plan, so simply having a plan would meet the requirement. Air quality has always been a priority in their discussions. The legislative conversation around air quality in schools is gaining momentum, and while immediate funding may not be available, the path forward is to identify the cost and advocate for state funding.

PM Kamali supported Member Jenks's point, noting that any rule requirements would be implemented gradually, a phased implementation potentially over a decade or more, depending on legislative funding. The requirement is for a schedule to perform routine HVAC inspections—to make sure they are operating within the intended parameters of the rule, not an expectation for schools to replace the HVAC system immediately.

Member Freeman added that, based on their experience as a superintendent, many districts' current HVAC systems won't operate within the parameters specified in the rule without undergoing a major remodel. While the rule is important, it may be aspirational, as districts cannot often meet these standards.

Member Fogg acknowledged the frustration many are feeling about the state of school buildings and the challenge of presenting a funding request to the Legislature. They described two strategies. The first is asking for the full amount needed, potentially resulting in nothing being allocated, or the second is asking for a smaller amount, which may be more likely to secure funding but fall short of meeting the full needs. It's important to prioritize the health and safety of students and it's difficult to address these issues when schools are not meeting the necessary standards. We need clarity while recognizing the challenges faced by districts and the community's concerns about sending students to schools with inadequate facilities.

Member Hanson replied that the concern isn't about asking for funding, but rather the fear that the responsibility for addressing HVAC issues would fall solely on the schools, especially since many districts lack the necessary resources. If schools are unable to replace HVAC systems due to insufficient funds, it's not the fault of the superintendent or staff, but rather a reflection of state priorities. What's the value of setting standards that schools may not be able to meet due to these financial limitations?

Member Lawson added that while some districts may already conduct HVAC inspections, starting inspections in districts that aren't doing so could uncover additional problems. Pulling employees off repairs to focus on inspections would also incur costs. While a plan could be written, executing it might not be feasible, as the ability to carry out the plan depends on available resources.

Member Buck clarified that his district already has HVAC plans in place, and their earlier comment was about consolidating these individual plans into a documented and centralized plan. Preventative maintenance for HVAC systems is part of the clean buildings requirements, and districts in the asset preservation program conduct annual assessments of major mechanical equipment through a third party. These activities are already happening in schools, but the challenge lies in organizing them into a comprehensive, robust plan.

Member Kellogg shared three points. First, the ventilation language may need to be reviewed, as there are alternatives if HVAC systems are not functioning. Second, schools may pursue funding through the Climate Commitment Act, which could help upgrade HVAC systems to become more energy-efficient and meet clean building standards. Third, on-competitive federal dollars are currently available for schools, nonprofits, churches, and government buildings, which could support HVAC improvements.

Member Allison raised concerns about cash flow issues for districts. While grants are available, districts often need to pay large upfront costs (e.g., \$300,000) and may struggle to secure loans if they don't have available funds.

Facilitator Langehough asked members to take the survey on the topic.

Survey

What common school positions would typically perform the duties to develop and implement an indoor air quality plan?

7. Language: Ventilation

Facilitator Langehough introduced the language.

Proposed Language

- (1) A school official shall ensure a school facility ventilation system:
 - (a) Operates at the maximum ventilation rates allowed by chapter 51-11C WAC. If a school facility ventilation system is unable to maintain ventilation rates as set forth in (1)(a) of this section, a school official must:
 - (A) Install and maintain integrated carbon dioxide monitors; or
 - (B) Install and maintain a ventilation filter with a minimum efficiency reporting value (MERV) rating of at least 13 or equivalent; or
 - (C) Provide portable air cleaners in each classroom.
 - (I) Air cleaners must be limited to mechanical air cleaners that only use physical filtration, such as HEPA and carbon filters, unless the local health officer approves an alternative air cleaning technology.
 - (II) Replace filters as needed to maintain operating performance.
 - (b) Has particulate filtration as set forth in WAC 51-52-0605 including ventilation systems that use small-ducted air handlers.
 - (c) Provides adequate ventilation for specialized rooms as set forth in WAC 246-370-150.
- (2) A school official shall:
 - (a) Test and balance the ventilation system every five years.
 - (b) Perform routine ventilation system inspections and replace filters as needed to achieve required ventilation flow rates.

PM Kamali introduced Brian Cawley, subject matter expert (SME), from Hargis Engineering who would explain the intricacies of ventilation. PM Kamali then explained that SME Boris, from the Department, would help to explain health-related language.

SME Cawley provided the background for their preparation. They began by consulting the Board and Department staff to understand the recommendation and then reviewed and compared associated codes and standards as well as alternatives and best practices. Having explained the background, they explained the rationale behind recommendations. Currently, CO₂ is used as a benchmark to determine the quality of indoor air management. A common practice is to manage CO₂ level by increasing the ventilation rate. MERV 13 filters remove airborne viruses and better at removing other airborne particles. If higher filtration rates cannot be achieved by an existing system, portable air filters could supplement filtration.

Member Kellogg asked if carbon dioxide monitors are a good approximation of air quality and if any values would be added to the language. At what point would air be considered unhealthy?

SME Cawley answered detectors provide a measurement but do not account for contaminants such as volatile organic compounds (VOCs) or other irritants. CO₂ detectors have a benchmark for the number of occupants in the space. SME Cawley recommended no more than 1000 parts per million

(PPM). Some opinions range from 100-1100, and some studies reviewed use the value of 500 PPM above ambient or outside air. This will vary by the quality of the air around the building.

Member Buck asked if this section would pertain to all existing schools or new construction.

PM Kamali confirmed all schools, new or existing.

Member Buck expressed concern about the cost involved in purchasing individual air purifiers for every classroom, but also the conflict of compliance with the Clean Buildings Act in doing so. Additionally, air purifiers are not efficient, they only move or exchange the air one to two times per hour. An additional concern was expressed for those schools that use naturally ventilated.

PM Kamali asked for an explanation of naturally ventilated buildings.

SME Cawley explained that naturally ventilated buildings have no ventilation system and use passive measures, such as population and radiators for heat and open windows for ventilation. Then provided a per decade history of ventilation methods to committee members.

PM Kamali asked if it would be possible to get an estimate of the number of school facilities that are naturally ventilated.

SME Cawley suggested OSPI as the best resource, though they are not sure such information is tracked.

SME Boris explained that the proposed language provides options including ventilation or filtration. There are multiple concerns with indoor air quality. Some methods focus and fix the airborne infection rates, but others focus on cleaning the air of other contaminants such as VOCs and molds. Ideally, both would be used, ventilation and filtration, but they want the requirements to be realistic for implementation. Portable air filters are a good option, they have been used during the pandemic and to deal with wildfire smoke. Downsides to the portable air filters include noise, room capacity, ancillary filtration systems (such as UV or ozone), storage of the units, and maintenance. The school district is left to make the decision. There are options for schools to consider what works best for them in their situation.

PM Kamali clarified that we want to provide alternative methods. This language is not final, what we see in February from this language may be significantly different and encouraged committee members to share about known alternative systems.

SME Cawley explained the difference between ventilation codes. The mechanical code uses a minimum ventilation and the energy code uses a maximum based on energy usage. The energy code limits to no more than 150% of the mechanical code. SME Cawley also discussed different types of systems and their effectiveness.

Member Kellogg shared the thought that if the system is not cleaning the air, then our children's lungs are cleaning the air.

PM Kamali reminded everyone that there will be a more robust conversation around this topic on February 6—today is just an introduction.

Chair Hayes requested the formation of a subcommittee that included conversations with the Board and the Department, and Engineering.

PM Kamali suggested that the subcommittee would require a longer meeting. They said they would send a survey to committee members for interest.

SME Cawley added that regarding natural ventilation and indoor air quality, thermal comfort is sometimes prioritized over air quality, and windows may be shut. That will reduce the effectiveness of ventilation.

Member Freeman proposed a question to the committee for consideration when realizing the purpose of the committee is to establish minimum requirements. In this case, we are focusing on maximum ranges based on energy consumption.

PM Kamali suggested the subcommittee could address that question and requested moving the focus to cost because without it, we cannot advocate for funding. We need to know the costs.

Facilitator Langehough thanked SME Cawley for attending the meeting and for the information and insight provided. They turned the attention of the committee back to indoor air quality and feedback on routine ventilation inspections. Members responded to the survey online.

Indoor Air Quality—Pest Management Plan

Facilitator Langehough introduced the next topic of a pest management plan.

Member Lawson shared their experience with introducing a pest management plan into their schools and shared resources available including the University of Washington which has published and has many resources available. They also shared that the plan includes aspects that are not very difficult, such as not leaving food out, cleaning out sinks from food residue, and not leaving outside doors open. However, most of the time spent on the plan is in educating staff and faculty about these preventative measures. The time of year is also a consideration, as colder months can attract pests indoors. For those circumstances, November to March is generally management of the plan and March to June is focused on prevention.

Member Daltoso added that pests can also be found outside. Outside preventative measures include methods of weed control. Pest management control involves using the least toxic or lowest risk first. When something escalates to the use of chemicals, there are costs involved with completing forms and notification to students, family, and staff to consider.

Member Buck agreed and added that they have a section in their plan to control bee nests that pose a health hazard, which has been an issue in their schools.

Facilitator Langehough asked committee members to take the survey on indoor pest management.

Survey

| *What common school positions would typically perform the duties to develop an extreme temperature readiness plan?*

Extreme Temperature Readiness Plan

Facilitator Langehough moved to the next section on temperature.

Member Lawson shared that they have a temperature recording procedure that they do when they get a temperature complaint in an occupied classroom. The procedure involves taking that temperature and comparing it to the thermostat and based on the results, they take appropriate steps.

Facilitator Langehough asked for additional comments and hearing none, asked committee members to take the survey on temperature.

Survey

| *What common school positions would typically perform the duties to develop an extreme temperature readiness plan?*

Injury Prevention—Chemical and Cleaning Storage

The committee members completed the remaining survey with minimal discussion.

Survey

| *What common school positions would typically perform a school-wide chemical inventory to ensure chemicals and cleaning supplies are appropriately stored?*

8. Recap/Next Steps

Facilitator Langehough thanked everyone and reminded the group that the next day's meeting would begin at 8:00 a.m.

ADJOURNMENT

Chair Hayes adjourned the meeting at 5:16 p.m.

WASHINGTON STATE BOARD OF HEALTH

Patty Hayes, Chair

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WASHINGTON STATE BOARD OF HEALTH

Minutes for School Environmental Health and Safety Rule Project Technical Advisory Committee Meeting

January 16, 2025

Hybrid Meeting

ASL (or CART)

Seattle Airport Marriot

3201 South 176th St,

Seattle, WA 98188

Snoqualmie Ballroom

Virtual meeting: ZOOM Webinar

Technical Advisory Committee Members:

In Person Participants

Patty Hayes, RN, MSN, Chair

Becky Doughty, Spokane Public Schools

Brian Freeman, Inchelum School District

David Hammond, Washington Association of School Administrators (WASA)

Devon Kellogg, Washington State PTA (reside in Lake Washington SD)

Erin Hockaday, Benton Franklin Health District

Geoff Lawson, WAMOA and Auburn School District

Gina Yonts, Association of Washington School Principals

Laura Peterson, Washington State PTA

Lauren Jenks, Washington State Department of Health

Laurette Rasmussen, Whatcom County Health & Community Services

Pam Schwartz, Washington State Catholic Conference/Catholic Schools

Tammy Allison, Washington Association of School Business Officials

Online Participants

Brian Buck, Lake Washington School District

Brook Wilkerson, School OPS

Samantha Fogg, Washington State PTA (Seattle Public Schools)

Sandy Phillips, Spokane Regional Health District

Suzie Hanson, Washington Federation of Independent Schools

Technical Advisory Committee members absent:

Anders Lindgren, School OPS

Bailey Stanger, Benton Franklin Health District

Dan Steele, Washington Association of School Administrators (WASA)

Doug Rich, Washington State Catholic Conference/Catholic Schools

Jacob Cook, Parent

Jaime Boddin, WSALPHO

Jared Mason-Gere, Washington Education Association

Jeff Rogers, WAMOA and Auburn School District

Jessica Sankey, Bellingham Public School

Julie Salvi, Washington Education Association

Kate Espy, South Kitsap School District

Kellie Lacey, Richland School District

Kelly Cooper, Washington State Department of Health

Kelsey Greenough, Richland School District
Kenney Johnson, Lake Washington School District
Kevin Jacka, The Rural Alliance
Morgan Powell, Office of Superintendent of Public Instruction (OSPI)
Nicole Daltoso, Evergreen Public Schools (Clark County)
Nicole Roel, Washington Association of School Business Officials
Preet Singh, Bellingham Public School
Randy Newman, OSPI
Richard Conley, The Rural Alliance
Roz Thompson, Association of Washington School Principals
Sandra Jarrard, Spokane Public Schools
Sharon Ricci, Washington Federation of Independent Schools
Steve Main, Spokane Regional Health District
Susan Baird-Joshi, Washington State PTA (reside in Lake Washington SD)
Ted Dehnke, Evergreen Public Schools (Clark County)
Tyler Muench, OSPI

Technical Advisory Committee staff present:

Andrew Kamali, Project Manager
Nina Helping, Policy Advisor
Marcus Dehart, Communications
Michelle Larson, Communications
Anna Burns, Communications
Mary Baechler, Community Outreach Coordinator
Crystal Ogle, Administrative Assistant
Melanie Hisaw, Administrative Assistant

Guests and other participants:

Karen Langehough, FirstRule, Facilitator
Ali Boris, Department of Health

1. Recap from Day 1

Karen Langehough, Facilitator, reviewed the discussion and decisions from day one.

2. Reminders

Patty Hayes, Board Chair, reminded the committee that the meeting would be recorded and posted online shortly after the meeting.

Chair Hayes congratulated Brian Freeman, Committee Member, for testing and implementing some of the requirements, saying they modeled the way by showing leadership and transparency.

Chair Hayes said the staff worked late into the night to capture the cost information discussed yesterday. They expressed appreciation to the staff and committee members for this important work and noted concern for children and families affected by it. They had shared these thoughts with Senator Robinson, who recognized the tough challenge regarding the timeline of this work.

3. Objectives and Meeting Agreement

Facilitator Langehough reviewed the meeting objectives and previously discussed committee agreements. The committee will review the material section by section. Staff will briefly describe how the calculation was done and any background information. No decisions needed to be made

today. This review was to build understanding. There were a few areas the committee still needed additional feedback on. The afternoon would be to gather information on any barriers.

Facilitator Langehough asked for member introductions online and in the room.

4. Fiscal Report Review

Facilitator Langehough said they'll use the Assumptions and Duty Code Definitions that were sent to committee members before the meeting.

Andrew Kamali, Project Manager, discussed costs, detailing both the one-time updated costs and the reoccurring costs every five years.

Ali Boris, Subject Matter Expert (SME), discussed the substantial time it took to update this year's costs.

PM Kamali opened it up for questions.

Laurette Rasmussen, Committee Member, asked about the timing of salary increases.

PM Kamali and Nina Helpling, Policy Advisor, explained that this is based on the current high end of salary ranges. They would rather overestimate than underestimate costs.

Lauren Jenks, Committee Member, asked if benefits and indirect costs were built in.

PA Helpling said it is the wages plus 26% for indirect income.

PM Kamali said for the Department of Health (Department) and the Office of Superintendent and Public Instruction (OSPI), we don't have the info included. But for school officials, it was added to the grid. We will add OSPI costs later.

PM Kamali reviewed the site assessment discussion and conclusions.

No questions from the committee.

PM Kamali discussed the additional labor hours.

Erin Hockaday, Committee Member, said in general the number of hours is from the paperwork that comes in, then any follow-up and testing results. The hourly wage shown includes the benefits (the wages alone are not \$100 per hour).

Member Rasmussen said some county employees make closer to \$80/hour with costs.

PM Kamali said these figures came from a document staff obtained. The committee can adjust it if the average is at the low end based on their working knowledge.

Member Jenks didn't think those numbers looked off.

Member Hockaday thought \$120/hour might be closer to accurate.

PM Kamali reminded committee members these are preliminary numbers and a rough estimate.

Sharon Ricci, Committee Member, asked if the costs were for the school.

PM Kamali said the vendor is the contractor that schools coordinate with for the phase one site assessment and that is not typically the local health jurisdiction—it would be to a third party. The

additional labor hours were the amount of time it would take them. Not all jurisdictions charge schools for those costs. The school official's piece shows the cost to schools.

Member Ricci said it could cost more than \$2,000 in Pierce and Clark counties. They asked for the statewide baseline.

PM Kamali said typically site assessments are a one-time cost when schools do construction. They wondered if Member Ricci was referring to routine inspections. The costs we are looking at are the difference between the current costs with the existing rule and the new costs with the updated rule.

Facilitator Langehough asked for more questions.

Member Allison asked if the school official was a 260-day employee.

PM Kamali said for each position, they researched how many days and calculated the hourly rate for an eight-hour day.

Member Freeman asked if that includes benefits.

PM Kamali said yes.

Member Freeman said they thought they needed approval to have playground equipment.

Member Rasmussen said that construction includes a playground.

Chair Hayes said Member Freeman was correct.

Construction Plan Review New, Alterations, and Portables

Member Hockaday said the language for 030 Construction Plan Review New, Alterations, and Portables, is uniform across jurisdictions.

Chair Hayes said the old rule was interpreted in a certain way and the new rule needs to be adjusted.

Member Allison asked about the school official increase, noting that 17 hours times the estimated hourly wage with benefits of \$106 equals \$1,835.07.

PM Kamali said the hourly wage shows total compensation.

Member Freeman said some things are not 50%, such as playgrounds and portables.

Member Hockaday agreed. There might be some savings in some areas, because of the 5,000 square feet clause.

Member Hockaday said that with closer connections between the jurisdictions and schools, more may come in.

Sandy Phillips, Committee Member, agreed. Since they've been requesting 50% plans, there might be an increase if it's required.

Member Hockaday asked how we are considering jurisdictions that don't currently have a program.

Chair Hayes said with the new rule, we must build a fiscal analysis. The report will transparently show the former rule has not been administered across the state, and our gap has been larger over time.

PM Kamali said there are jurisdictions that do a plan review even though they don't have a formal program.

Chair Hayes said we cannot build in any assumption to a current rule that is not happening.

PM Kamali asked if 10 hours was a better figure than 17 for the Construction Plan Review.

Member Buck said it depends if they're talking about each project or annually and the complexity of the prep and meeting.

David Hammond, Committee Member, said the variables are hard, and that 17 hours is not the norm across the state, so on average it may be lower.

Geoff Lawson, Committee Member, agreed.

PM Kamali said we could eliminate the "Annual," and was more comfortable with 10 hours if it's per review.

Member Rasmussen said that if there are more meetings, there will be more costs.

Nicole Daltoso, Committee Member, said if it goes beyond the scope, there is potential for additional proposals and costs.

Member Hockaday said this isn't necessarily an addition, it's part of the process and it balances. Maybe it takes a bit more time with meetings but ultimately it saves time.

PM Kamali asked if the cost is less than 17 hours.

Member Freeman said it depends. Playgrounds and portables won't be large, but other construction requires more time.

The committee lowered it to 10 hours.

Increase in Cost for Routine Inspections

Member Allison asked about the cycle of the old rule.

PM Kamali said in 1991 it was changed to "periodic" and that's why we have discrepancies throughout the state. The new rule would require inspections every three years.

Member Freeman asked why they would need training if the jurisdiction is doing the inspection.

PM Kamali said training is required if they are doing their own inspection. The costs are in addition to the current costs per inspection.

Member Freeman asked what the cost of routine inspection is. Cost doesn't change. Frequency may change.

Chair Hayes said good point. The current rule has a vague, undefined term. We've chosen to revise for clarity, especially for those who know nothing about what the schools or jurisdictions already do.

Facilitator Langehough said this increase is calculating costs from 366 to 366A.

PM Kamali said with a three-year inspection cycle, we are expecting to increase the jurisdictions to 200 hours and explained the chart.

Member Hockaday said it's important to reflect in the report how many counties already do the work in comparison to those that do not.

Member Ricci asked about the annual basis and chart.

PM Kamali explained the chart and gave an example that 30 inspections would be an additional \$626 per year.

Members Freeman and Member Ricci said it's more understandable, clear, and helpful to separate the training costs from the other hours.

Member Jenks asked about in-person versus virtual training and follow-up.

Member Phillips thinks the four hours reflect the in-person workshop they offer. Maybe add another hour for travel then follow-up email with videos and materials. Discussion ensued about the work and time.

Member Hammond said the increased cost is coming from the change in frequency. Inspections are the same. It's the frequency that's changing and needs to be noted.

Handwashing Sinks and Hot Water

PA Helpling asked several questions for feedback, so we could develop costs.

Member Ricci said many portables don't have hot water. Studies of hot and cold water and soap.

Pam Schwartz, Committee Member, thanked staff and talked about the time to get water hot flowing—sometimes five minutes in older buildings. The age of a facility is a huge factor.

Member Hockaday said it is a requirement in WAC 366 that we have hot water.

PM Kamali talked about studies that show hot or cold water works fine. Others say warm emulsifies the soap. If the water is cold, will children keep their hands in water for 20 seconds?

PM Kamali said the temperature is based on the food code. We are reducing it to 85 degrees from 100 degrees.

Member Hockaday said the current rule says not over 100 degrees, but it doesn't talk about a minimum.

Chair Hayes said Member Jenks pulled up the Center for Disease Control (CDC) guidelines which say hot or cold water is fine for washing hands. PM Kamali is correct that warmer water encourages hand washing. Based upon the CDC guidelines, Chair Hayes doesn't see the need to start driving the requirement for water temp with the rule.

PM Kamali said Member Hockaday's point is we already require hot water in our code and cautions of change.

Member Ricci asked if it should be guidance, not a requirement.

Facilitator Langehough mentions future meetings for revisions since we are still open for comments.

Member Hockaday talked about the science of water temperature but cautioned about certain areas such as a greenhouse with cold water, whereas kitchens and bathrooms are different.

Member Ricci, agreed saying that portables often have a small tank under the sink and older schools need to run a significant amount of time before reaching temp.

Break from 9:29 a.m. to 9:45 a.m.

5. Fiscal Report Review

Facilitator Langehough welcomed everyone back from the break.

Showers and Restrooms

PM Kamali introduced the topic of showers and restrooms and the cost estimate for a one-time update.

Member Freeman explained the requirements for bathrooms and showers. The OSPI guidance has always required toilets.

PM Kamali clarified that the draft increases the requirement and that is the basis of the cost. The requirement is more stringent than OSPI guidance.

Chair Hayes asked whether this applies only to new construction.

PM Kamali confirmed.

Chair Hayes responded that this is important for the room to remember in discussion.

Member Allison asked whether this ratio applies to the number of students in physical education programs, not the total number of students.

Facilitator Langehough confirmed.

Member Buck asked why the Department must provide a minimum requirement for something existing in the code and stated that the Department does not understand what happens in schools. This is a cost that does not provide more value. They clarified that the cost is solely for adding the fixture, not for connections to utilities or utility operating costs. 5,000 seems like an underestimate. Older schools are asking them to remove showers due to the need for additional space and lack of use.

Chair Hayes explained that this is an agenda item for the February meeting and that the 1:15 was a compromise agreed to by the committee. This was not the Department's suggestion, but a consensus from the committee. If it needs to be revisited, it can be considered next month. The additional cost considerations are helpful.

PM Kamali clarified that the cost is for installation only and asked Member Buck to provide the team with some information about the cost of the use with utilities so that the estimates could be included in the work.

Member Buck responded they would gather information from recent builds to provide.

Member Freeman asked whether the showers were solely for ninth through twelfth grade.

PM Kamali confirmed.

Member Freeman clarified additional details that make up the ratio.

Member Allison asked whether the building code has anything around showers.

PM Kamali responded that there is no mandate for showers but does have requirements for when provided.

SME Boris confirmed.

Indoor Air Quality

PM Kamali introduced the topic of indoor air quality and asked everyone to read the summary of changes.

Member Buck asked about the requirement to contain emissions from construction.

PM Kamali clarified this is already being done but not expressly stated and requires that construction materials be contained from the student population.

Member Buck asked whether this required consideration for occupied versus non-occupied times and stated there needs to be a clear understanding of what this means.

Member Hockaday stated that when construction is happening and students are occupying the space, they provide some sort of mitigation plan if the materials can be hazardous, such as harsh chemicals or particulate matter. Requires forethought and planning to ensure students aren't impacted if they occupy the space.

Member Buck stated that "contain emissions" is very generalized and doesn't reflect Member Hockaday's comments, with which they agree.

Facilitator Langehough stated that the text on the screen was a summary and not the whole section wording, which the team can review before the next meeting.

PM Kamali explained the indoor air quality task table and cost estimates.

Member Freeman commented on the average hourly total compensation to develop an integrated pest management plan.

PM Kamali stated that the numbers provided are an average of estimates provided in the survey.

Member Ricci asked about the estimates to implement a radon plan annually and what it refers to.

Member Daltoso answered that the estimate is based on a five-year testing plan where 20% of each building is tested each year. If a building has a mitigation system installed, those areas must be tested annually to ensure efficacy.

Member Lawson asked about the 140 hours to integrate a pest management plan and suggested it probably should be more.

PM Kamali responded that it is an average of numbers provided and could be adjusted if needed.

Member Lawson clarified that the education aspect plays into that too. It may be closer to 200 hours on the high end.

Member Daltoso added that the education piece is ongoing, and they often send reminders throughout the year.

Facilitator Langehough adjusted the estimates.

Member Freeman clarified that they currently must mitigate against pests even without the plan.

PM Kamali responded yes, but the current language is vague.

Member Lawson clarified additional details related to integration saying that education reduces the need for pest control.

Chair Hayes asked how an annual average cost is extrapolated to the number of schools statewide. If that assumption is accurate, does the team have the data needed or does the committee need to help so information can be adjusted for districts that already have this? Accurate costs relate to the impact on schools that don't have this and for which this is new work.

PM Kamali responded that the team does not have that data.

Member Lawson responded that when they have their conference, they teach classes on integrated pest control to encourage school districts to do it.

Member Freeman stated that the difference is for schools that don't have a plan, it is currently reactive. School districts that are reactive are likely to spend more money than if they had a plan. The development of the plan is a cost. What is the difference between implementing a plan and reacting?

Chair Hayes asked whether there is some assumption language that we could use or whether members could do a survey to help us better understand the numbers. They asked the committee to provide numbers to help the report if possible.

PM Kamali asked the group if they could share a survey that the team developed.

Member Lawson and Member Schwartz offered to share the survey.

Temperature

PM Kamali explained the key differences in the new language and the cost estimates.

Member Freeman stated that the number may not be representative of the actual cost. The plan development is a small part of the cost compared to the cost of enforcing a maximum temperature.

Chair Hayes stated that the agreement from the committee was a plan. This WAC allows schools to work with local health jurisdictions to try and achieve better temperature outcomes.

Member Buck agreed with Chair Hayes. There is not a required threshold, but if 79 degrees is exceeded there must be a plan that helps to accommodate whatever measures that will be implemented to adjust.

Facilitator Langehough stated that there are no fiscal impacts for the noise changes or lighting.

Injury Prevention & Imminent Health Hazards

PM Kamali introduced the topic and explained that schools are already following the requirements and there is no cost estimate. The same applies to imminent health hazards.

Member Hockaday argued that there would likely be a cost impact on local health due to the reporting of hazards that previously were not required.

PM Kamali asked whether the team could reach out to identify the costs.

Member Hockaday stated that information was sent previously but would follow up.

Facilitator Langehough asked whether the information was needed by others.

PM Kamali responded they would reach out to all jurisdictions to get information about what it might look like across the board.

Playgrounds

Facilitator Langehough stated that the team is still working to gather the cost estimates for playgrounds.

PM Kamali asked the group about current practices.

Member Hockaday stated that for them there would be no change. While it is a national voluntary standard, it has been utilized as a legal standard. Most jurisdictions use the two standards already as the basis for inspections.

Member Phillips agreed and stated training costs might be required.

Member Hockaday stated that the training is about \$900, not including travel.

Specialized Rooms

PM Kamali explained that specialized room requirements are unique, and cost estimates are still being worked through. The team has visited shops and career technical education (CTE) rooms at schools to see how they work and will be reaching out for cost estimates.

Member Freeman asked whether these were general statements. The actual language requires eye-washing stations in some rooms.

Member Hockaday clarified that these requirements are in the Department of Labor and Industries (L&I) standards. They are not new in practice but are stated more explicitly than the code.

Member Freeman did not realize the group agreed to towels and handwashing facilities. The understanding was the ability to dry.

PM Kamali indicated that the group preferred single-use towels because they are more effective and noted that the L&I requirements are specifically referenced, but only refer to the staff, not the students.

Member Schwartz asked whether the group should notate or otherwise state that the cost would be incurred for schools that have dryers but not towels.

Variances and Emergency Waivers

PM Kamali explained that the requirement for variances to go to the Board is not efficient, and new requirements would go to the local health officer. The estimated cost is on the jurisdiction side, but the team questioned whether school officials expect additional time because of the changes.

Member Ricci stated they were not aware of a school's requirement to apply for a waiver right now.

PM Kamali provided an example of when a waiver would be requested.

Member Freeman gave an example of a shower remodel and communications with the Department.

Member Allison stated that the waiver cost would come when fixes are needed, otherwise it is just a conversation.

Member Hockaday stated that it was not clear where emergency and permanent variance would be required here. A permanent variance would take more time.

Chair Hayes replied that the group clarified this in the rule. Normally variances are for more permanent situations.

PM Kamali explained the current rules. The exemption process requires an appeal to the Board, which is what these changes replace. They asked whether anyone has had to make a permanent request.

Member Hockaday said that they have never reviewed a formal variance. It is usually a more casual conversation with the Department.

Chair Hayes stated that it would be strange for the local health officer to build in these hours when it doesn't happen and would rather have the process available.

Member Freeman suggested the cost should be per waiver, not per year. The time depends on what is being waived.

Member Hockaday said the additional jurisdiction time comes from the required research on their end that goes into work on variances.

PM Kamali suggested the team rebuild the cost estimates here, because waivers and variances are quite different, and require different time commitments.

Member Buck agreed.

Member Rasmussen suggested there would be a startup cost for schools without these programs.

PM Kamali explained there is no fiscal impact from severability or appeals. Asked the committee about how often appeals occur, if at all.

Member Allison asked whether they'd even have the right to appeal if there is a health hazard.

PM Kamali stated not in the event of an imminent health hazard but in situations such as variance denials.

Member Phillips referred to experience with variance in water recreation and there was never an appeal. Unlikely to happen. Committee members agreed.

PM Kamali asked whether we should still assume some cost here, or if it is appropriate to assume zero.

Member Allison stated that the appeal could cost a lot of money based on the time it takes to appeal.

Lunch Break from 11:30 to 12:00.

6. Implementation Barriers

Facilitator Langehough asked committee members to brainstorm about anticipated barriers such as budget or political issues.

PM Kamali discussed funding being a barrier. Funding doesn't just affect schools; it also affects local health. For example, our local health partners see issues with their boards getting fees approved and assessed or what their processes might be. Or school districts see issues with their boards around implementation.

We have some understanding of the issues with clean building standards. We want to take this chance to highlight any other issues there might be. Other issues might be political. In some parts of the state, we don't refer to climate change, we refer to extreme weather events.

Chair Hayes asked if we could have a blank slide and put up the number one thing, money. The clean building standards are another, and then we can add to it. A second issue is whether we want a section that discusses barriers or do we want to integrate barriers along the way of the report. As we list barriers, does that help us to say what should go first or last? Our plan or recommendation should reflect that our process included this conversation more than once. I think we need to call out the difference with the private schools, so it is not just a matter of the Legislature providing more money. That doesn't necessarily address the barrier that the private schools, the Catholic schools would have with their funding issues.

Member Lawson mentioned that besides the bond requiring 60%, which is a major barrier for schools, there is something called the School Construction Assistant Program (SCAP) to make up for construction needs. That program is not well funded. That fund is very limited and a lot of schools compete for it. That will be an issue if we need to make some physical changes to buildings to meet the standards.

Member Ricci said that the funding differences between public and private schools also apply to the difference between large and very small schools that have under 50 students and schools that might have 1,500 students or more. Have we discussed waivers or exemptions for small schools?

Member Allison asked if SCAP had a time limitation where you can only apply every few years. Does something similar exist for the square footage that they allow?

Member Freeman confirmed that SCAP has the square footage per student that they allow, which doesn't meet school needs. They thought it was \$385/foot. Construction costs are three times that. Schools also need local funds. Human capacity is another limitation. In a larger district, the work is going to be distributed, but it's still work. If we exceed the minimum standards, that could be a barrier to getting the Legislature to approve it. An example that we are working on is the airflow standard. If the airflow minimum standard is the maximum allowed by the energy code, then that's not a minimum standard, that's a maximum standard.

Brook Wilkerson, Committee Member, said that even though charter schools are recognized as public schools, there are many things that they do not qualify for. They don't get the same funding.

Member Fogg added that SCAP and levy failures are ongoing issues in Washington. Looking at disparities, we rely on property tax. Across our state, legislators are not going into our buildings. They imagine that things are much better than they are. When you say how bad it is, it's unbelievable. I think if we push to have legislators visit schools, we can make a real difference. We have buildings with problems that have gone on so long that we've gotten used to it. I would love legislators to see this and then ask, why did we let our buildings get to this?

Member Lawson commented that the Washington Association of Maintenance and Operation Administrators (WAMOA) is working with legislators who want to do building walks, and Member Fogg is correct—there is a real impact. We take them to a new building that is funded by bonds and then to an old building that, for lack of better words, is falling apart. The impact is deep. Member Daltoso just pulled this up: Last year, we did 14 school visits with 16 legislators. We need to get the legislators into the buildings to see the effect it has on students and staff in the mindset, growth, and learning in a new building versus a building that's old. Some of our buildings were built differently back then, and they don't have the amenities that they need. There are no outside windows in some of these places and buildings are falling apart. We need to get our legislators out to those buildings, that will be important.

Chair Hayes asked the committee to bookmark this concept of taking legislators to schools. This could be an incredible partnership between public health and schools, modeling talking about what we need, at that local level, to support families. And to start that in places where the relationship is strong and solid, where everyone's comfortable modeling talking about what we need at that local level to support families, schools, staff, and children.

Member Hockaday said that some jurisdictions may not have a program. This is an opportunity to promote public health workforce and workforce retention. It requires an incredible range of knowledge. It takes a long time to train. Funding for programs like Foundational Public Health Services (FPHS) supports these new programs because this position of environmental health department staff is one of the most technical positions that we have. It requires an incredible range of knowledge akin to an industrial hygienist. It's hard to retain these staff, and it takes a long time to train. When we don't have trained staff, we've heard some stories about the staff not knowing what to do. Staff are key to supporting the schools with the development of plans and procedures. Continuing to promote public health workforce retention ultimately supports the whole implementation of this rule.

Devon Kellogg, Committee Member, asked how much it costs to operate new buildings versus buildings that are falling apart. Can we capture incentivizing funding for these building upgrades so they can save on operating costs?

Chair Hayes discussed the bond capacity issue and that should be on the list.

Member Freeman commented about a recent forum where a senator advocated for summer school, as a year-round school. A superintendent asked the other superintendents who had air conditioning to stand up and very few stood up. This was in southwest Washington and very few superintendents stood up. The legislative district included Yakima County. Our legislators don't understand the operating costs for schools. Our non-voted debt capacity is under 500,000, so there is very little we can do to borrow money and have the cost savings that justify that. Heating and HVAC systems are \$3,000,000 or \$4,000,000 for one of our buildings. We cannot borrow money over our non-voted debt capacity. Legally, I cannot do it.

Member Kellogg added that they have been hearing about non-voted debt capacity and grants or credits can't be accessed without upfront funding.

Member Hammond commented on barriers to our labor partners. The money could be there, but the time isn't. We can't add more days. Someone mentioned safe schools, and that reminded me that our unions keep saying why, every year, we must watch so many videos. We must watch 120 to 150 minutes of videos. Looking at some of the things we are going to be implementing with videos or training, when are we going to have time to add more? When are we going to talk about mitigation for pests with our staff? It would be great to be proactive. At the same time, when do we do that? We just don't have the time during the day.

Member Peterson commented about capacity and having our districts bring people to the table who can help. A lot of us are left out of very important decisions that we could have solved quite easily except for the money; they didn't even think of asking us. They've had someone else come in and do the inspections that do not have the proper training and have made it worse instead of better.

Chair Hayes acknowledged that staff capacities are limited. Right now, it says staff capacities are limited to comply with the WAC, especially in small schools. We're talking about this in a larger perspective. We can call out each piece, but I think there are multiple layers to that.

Member Allison commented that for staff capacity, the professional development that OSPI says we must give three days, and it is six days. Those days are full due to compliance requirements. If we add more in there, everyone is going to want another day. The funding formula does not generate enough full-time equivalents (FTEs) for the number of classified staff required to implement any of these requirements.

Member Peterson commented that with staff capacity and professional development, OSPI requires three days, but they have six days, so those days are full. The funding formula does not generate enough FTEs for the number of classified staff required to implement any of these requirements.

Member Lawson commented that the prototypical funding model for maintenance and custodial is based on student count, not based on the size of the building. A new elementary school was built for 650 students but had only 300 students in the first year. The whole building was being used because they housed their internet academy there. The prototypical funding model said 1.4 custodians were there so the school district had to make up the funding to get to a decent level of cleaning.

Chair Hayes directed to have the notes reflect the difference between per student versus the building size for funding.

Member Lawson said that there are International Sanitary Supply Association cleaning times, which are industry standards for required cleaning and maintenance. No matter how many people use that building, we still must maintain that building whether it's 300 students or 650 students.

Member Freeman commented that it's the prototypical funding model. There's a small school factor and because we are so small, we don't generate a janitor in our building that is for 180 students. Because it's the small school funding factor it generates teaching units, but it doesn't have any impact on classified staff units.

Facilitator Langehough asked if we need to add that for prototypical funding, add by student's versus by building or school.

Member Fogg said that people don't understand that when we build, we are building for the long term. Over the next 100 years we are expecting these buildings to live much longer than this current

decline in enrollment. We need to maintain the buildings we have, thinking 50 or 100 years ahead. We don't have the kids today, but historically enrollment goes up and down. Our buildings are a long-term investment. We need our funding model to support that just because this year there are fewer kids, it doesn't mean that suddenly we don't need the lights on, or we don't need to repair the roof. There does seem to be a disconnect with some legislators because there aren't as many kids. We have buildings that can't afford copy paper, or that limit toilet paper. There is a vote "No" campaign on our Seattle capital levy, based on the idea of why put money into buildings when we have fewer kids. That's just a real disconnect from the way that investment in property and investment in facilities needs to happen.

Member Allison commented that Member Lawson talks about custodians, but for this whole WAC you're also talking about nurses, and they are not funded. There are one or two nurses per 5,000 kids.

Member Freeman commented on inequities, and that for Seattle, there are school districts that can construct a building not with a bond but with a capital levy. The capital levy that our district put forward is about a \$160,000 levy. With \$160,000, I can't even fix a roof. Other districts with their capital levies can build a comprehensive high school. The largest barrier is our tolerance in this state for inequities.

Member Lawson said when it comes to maintenance and operations, that staffing is for schools only. That doesn't account for the other buildings that are support buildings which get zero funding for maintenance or operations. It's still based on student count, so that comes out of the district coffers to support those buildings, so we can try to make those healthy for employees.

Member Hockaday said we haven't captured the local health jurisdiction perspective on staffing of those counties that don't have school programs and are going to need to stand them up, like Wahkiakum. Their department has 27 environmental health staff. They have a single person to do every single environmental topic. Staffing capacity is going to be a huge issue with a lot of local health jurisdictions if they don't have established programs.

Member Rasmussen commented that to start their program they are using FPHS funding. Right now, they are not charging fees. To continue to develop a program, they are going to have to charge fees, and to mention that to school administrators will damage their relationships.

Member Hockaday agreed, saying that their jurisdiction currently doesn't charge. If funding dries up, then it is the political will to get something like that past their board. When there is an alternate stream of funding, they can justify that. At a meeting in October, there was a consensus among jurisdictions that it would be great to find a funding model where they didn't have to charge fees.

Member Phillips commented that they have an existing program. Their board required them to recover 100% of the cost of the program. At one time they only collected 40%, then upped it to 60% and then to 100%. They would have had to reduce their time in schools or charge more. They were not allowed to do that to reduce the impact. It is challenging and something that they receive complaints about. They try hard to keep the fees from going up because they know schools don't have a lot.

Chair Hayes discussed larger historical barriers. Public health used to be funded by a mileage fee that all cities participated in. When the motor vehicle excise tax came into being, there was a portion that went to public health. For some jurisdictions, it was a large portion of their budget. When the motor vehicle excise tax went away, public health lost 30% or more of its funding. It shrunk flexible dollars for programs like this. That was over twenty years ago, and this reference to foundational public health services has been an effort we've been working on as a system that

includes the Tribes, the Department of Health, local public health, and the State Board of Health for more than 10 years to get to where we're at. The counties have a responsibility for public health, and we are a home rule state. In this context, the counties have a responsibility for public health but not required to pay for public health. That is a fact in our deliberations as it creates situations like in Spokane with a move by the local board of health for the 100% fee.

Public health will have to think about how to talk about fees because of the complexity. The Legislature took years to understand that for a set of defined services, the state should be required to fund that. That's why it's foundational.

When the steering committee allocated funds for public health to the school, local public health said we need some flexibility. Some jurisdictions use it for schools, others use it for other critical things that are ancillary. I want to honor that. That was a decision that the system made on those dollars for the best protection of the public's health. Being on the steering committee for 15 or 20 years, the committee needs to understand the complexities. For us to come together as a force of nature to make change, the more we understand all those complexities, the better we can support each other.

Member Kellogg commented that increasing weather extremes is going to be an implementation barrier.

Member Daltoso responded to Member Kellogg's comment that utility costs will increase on both gas and electrical. It's very much impacted by climate because if we don't have the snowpack then we don't have the water then we don't have the hydropower to create electricity. That's just one example of those impacts and increased utility costs on school districts.

Member Freeman commented that a huge barrier is the ability of older buildings to meet some of these requirements.

Member Allison added that some of the older buildings are made of stone. You can't even remodel some of them. You just do a quick fix.

Afternoon Break from 12:50 p.m. to 1:00 p.m.

7. Implementation Recommendations

PM Kamali explained that this discussion will help prepare for our next meeting topic of prioritizing implementation for the Legislature.

Chair Hayes urged committee members to take notes over the next couple of weeks to track what's important about implementing these rules. Are there things we can suggest that may need changes by the Legislature? Some committee members brought up the funding formula being flawed. Does that need changing and how? These things can be brought to the Board to be part of the report.

Member Freeman asked for clarification about prioritization and implementation. If some portions of the WAC will take effect at different times, will corresponding portions of 366 remain in effect until that portion takes effect in the new WAC?

PM Kamali answered that as a section in 370 gets implemented, the corresponding section of 366 will go away. If the section in 370 is not implemented, then 366 will apply. We will go section by section, not line by line. Staff will send a survey to committee members to stack rank sections. For the survey, committee members will prioritize based on the impact on environmental health and safety. Cost will be factored in once we complete the fiscal analysis.

Member Jenks added considerations such as feasibility and time to implement.

PM Kamali said that the amount of time it takes to implement it may be a consideration. We will discuss this on February 6, 2025. We can recommend having it funded and implemented by a certain date. The survey that goes out will be simple, just ranking priorities. The final prioritization will be more detailed. The survey will provide staff with consistent themes to prioritize.

Member Freeman wondered if certain parts that overlap with others could be implemented at the same time, such as indoor air quality and the clean energy bill.

PM Kamali said they would have to confirm with the attorney general, but it might be feasible.

Member Freeman asked if we could hypothetically connect section (6)(b) to the clean energy bill. We have a date we must complete it. Can we have an implementation when another WAC is being implemented?

PM Kamali said they would need to confirm with our assistant attorney general, but that it might be feasible.

Member Lawson asked if funding models would be part of the ranking system. Most positions are funded based on the number of students. However, the size of the building requires specific staffing volumes to maintain them. Will that be part of the survey? It's an important part.

PM Kamali stated that the initial survey will only address the health and safety of the students, or the risks associated with each section. The survey will go out within the next day or two and will need to be completed by January 28.

8. Recap/Next Steps

PM Kamali reviewed the next steps for the committee. The committee will meet virtually on February 6, February 26, and a date in March that is to be determined. The committee and the Board will meet in-person for about three and a half hours on April 9. Staff will send a survey to committee members about attendance and travel needs.

ADJOURNMENT

Chair Hayes adjourned the meeting at 1:21 p.m.

WASHINGTON STATE BOARD OF HEALTH

Patty Hayes, Chair

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School Environmental Health and Safety Rule Project 2024 - 2025

Technical Advisory Committee (TAC) Charter

Start Date: August 1, 2024

End Date: June 30, 2025

Members: See TAC Membership Addendum A

Objective

To review and update the rule for school environmental health and safety. The State Board of Health (Board) and the Department of Health (Department) shall conduct the review with a multi-disciplinary technical advisory committee (TAC). The proposed new rule shall establish the minimum statewide health and safety standards for schools. The TAC will help the Board consider the size of school districts, regional cost differences, the age of the schools, the feasibility of implementing the proposed rule by section or subject area, and any other variables that may affect the implementation of the rule.

Team Expectations

We will:

- Be respectful of all perspectives and opinions.
- Communicate openly and respectfully, disagree without being disagreeable.
- Assume positive intent and ask for clarification.
- Share the air—allow everyone to share insights, one person speaking at a time.
- Ask questions and seek to understand.
- Be on time for meetings and calls.
- Be present and actively participate (no multitasking during meetings).
- Be efficient with our meeting time.
- Meet deadlines and commitments.
- Support the final decisions of the TAC.
- Stay focused on the goals and objectives of the committee.

Decision Making

- The committee will use Fist to Five and Ranked Choice Voting to make decisions.
- Primary or Alternate member voting: Both may attend, but the Primary speaks and votes. The alternate only speaks and votes when Primary is not in attendance.

Information Sharing

Board Project Team will:

- Email meeting materials 72 hours before the scheduled meeting
- Email updates and notices to TAC members and designated alternates
- Post information on [2024-2025 School Rule Review Project | SBOH \(wa.gov\)](https://sboh.wa.gov/rulemaking/agency-rules-and-activity/2024-2025-school-rule-review-project)^[1] to keep the public informed.

[1] <https://sboh.wa.gov/rulemaking/agency-rules-and-activity/2024-2025-school-rule-review-project>

School Environmental Health and Safety Rule Project 2024 - 2025

Reference Materials

- [Chapter 246-366 WAC\[2\]](#) Primary and Secondary Schools
- [Chapter 246-366A WAC\[3\]](#) Environmental Health and Safety Standards for Primary and Secondary Schools
- [Chapter 296-800 WAC\[4\]](#) Safety and Health Core Rules
- [Title 110 WAC\[5\]](#) Children, Youth, and Families, Department of

TAC Timeline

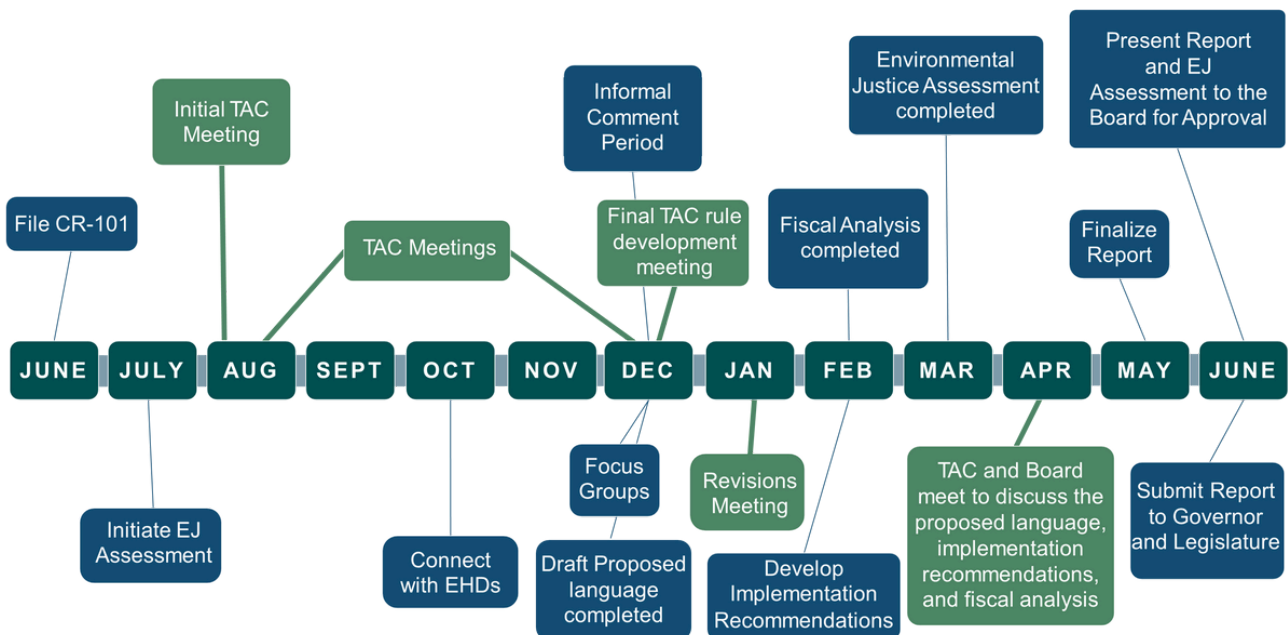
Date & Location

Thursday, August 1, 2024
 Thursday, August 22, 2024
 Tuesday, September 17, 2024
 Friday, October 4, 2024
 Thursday, October 17, 2024
 Thursday, October 31, 2024
 Wednesday, November 20, 2024
 Wednesday, December 4, 2024

Location

Wenatchee
 Olympia
 Arlington
 Leavenworth
 Olympia
 Olympia
 Spokane
 Olympia

Project Timeline



[2] <https://app.leg.wa.gov/WAC/default.aspx?cite=246-366&full=true&pdf=true>
 [3] <https://app.leg.wa.gov/WAC/default.aspx?cite=246-366A&full=true&pdf=true>
 [4] <https://apps.leg.wa.gov/WAC/default.aspx?cite=296-800&full=true&pdf=true>
 [5] <https://apps.leg.wa.gov/wac/default.aspx?cite=110&pdf=true>



School Environmental Health and Safety Rule Project

Technical Advisory Committee Meeting

Virtual, February 6, 2025



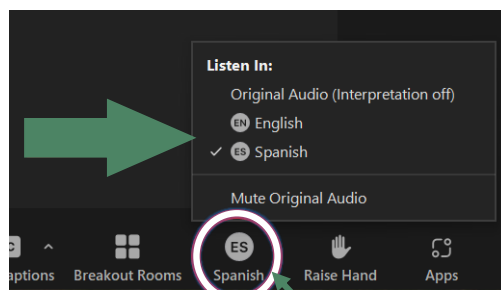
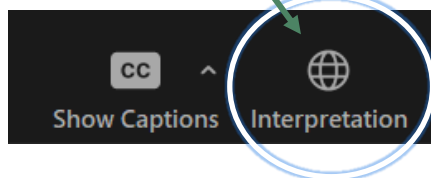
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Language channels



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1

Minutes Review



Reminders

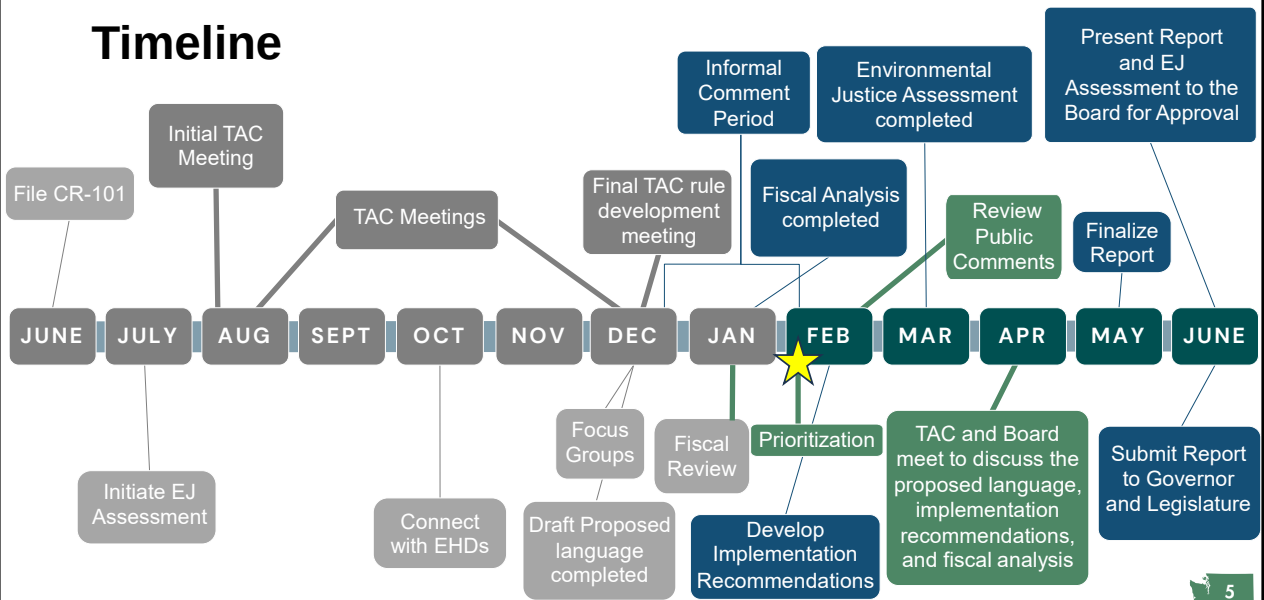


Today's Objectives



- Implementation Priorities

Timeline



TAC Agreements

- Be respectful of all perspectives and opinions
- Communicate openly and respectfully, disagree without being disagreeable
- Assume positive intent and ask for clarification
- Share the air; allow everyone to share insights, one person speaking at a time
- Ask questions and seek to understand
- Be on time for meetings/calls
- Be present and actively participate (no multitasking during meetings)
- Be efficient with our meeting time
- Meet deadlines and commitments
- Support the final decisions of the TAC
- Stay focused on the goals and objectives of the committee



Stack Ranking

Voting Data

Rank	Topic	Rank placement									
		Number of votes for rank									
		1	2	3	4	5	6	7	8	9	10
1	Imminent Health Hazard	6	3	2	0	2	0	3	1	0	0
2	Routine Inspection	5	0	4	2	2	2	0	0	1	1
3	Injury Prevention	1	2	4	5	1	0	2	0	2	0
4.5	Indoor Air Quality/Temperature	3	1	1	3	2	1	0	1	5	0
4.5	Construction Plan Review	1	4	3	0	1	0	4	1	0	3
6	Ventilation	0	3	1	1	3	2	1	2	0	4
7	Playgrounds	0	3	0	2	0	4	3	2	1	2
8	Specialized Rooms	0	0	1	1	6	3	1	2	2	1
9	Site Assessment	1	1	1	3	0	3	1	1	4	2
10	Showers & Restrooms	0	0	0	0	0	2	2	7	2	4



Prioritization Refinement



Prioritization Refinement (3)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Prioritization Refinement (4)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Prioritization Refinement (5)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Prioritization Refinement (6)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Prioritization Refinement (7)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

Prioritization Refinement (8)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

Prioritization Refinement (9)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

Prioritization Refinement (10)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage



Prioritization Refinement (11)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds



Prioritization Refinement (12)

Site Assessment

- Added: Local Health Officer (LHO) may require a site assessment for construction projects on existing school facilities.
- Added: School officials must:
 - Have a Phase 1 Site Assessment
 - Notify LHO at least 90 days prior to planning new construction
 - Submit site assessments to LHOs
- Added: LHOs must:
 - Review site assessments
 - Provide written approval to a school official within 60 days of receiving a completed site assessment

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops



Prioritization Refinement (13)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections



Prioritization Refinement (14)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

31

31

Prioritization Refinement (15)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

32

32

Prioritization Refinement (16)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

33

33

Prioritization Refinement (17)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

34

34

Prioritization Refinement (18)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

35

35

Prioritization Refinement (19)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

36

36

Prioritization Refinement (20)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

37

37

Prioritization Refinement (21)

Construction Plan Review

- Added: Specifications for types of construction that might require plan review
- Added: Set timelines for school officials and LHOs to review construction plans

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

38

38

Prioritization Refinement (22)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

39

39

Prioritization Refinement (23)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

40

40

Prioritization Refinement (24)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

41

41

Prioritization Refinement (25)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

42

42

Prioritization Refinement (26)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

43

43

Prioritization Refinement (27)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

44

44

Prioritization Refinement (28)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

Prioritization Refinement (29)

Routine Inspection

- Added: Routine inspection frequency
- Added: Allow a trained LHO designee to perform additional inspections

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

Prioritization Refinement (30)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.



47

Prioritization Refinement (31)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning



48

Prioritization Refinement (32)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.



Prioritization Refinement (33)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school



Prioritization Refinement (34)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

51

51

Prioritization Refinement (35)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

52

52

Prioritization Refinement (36)

General Building Requirements

- Added: Backflow devices on housekeeping sinks
- Added: Bathrooms and handwashing facilities are available during school hours and scheduled events

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

53

53

Prioritization Refinement (37)

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

54

54

Prioritization Refinement (38)

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

Prioritization Refinement (39)

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

Prioritization Refinement (40)

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

57

57

Prioritization Refinement (41)

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

58

58

Prioritization Refinement (42)

Showers and Restrooms

- Added: At new construction or renovation
 - Must have 1 shower per 15 individuals per each gender participating in physical education or sports teams.
 - Must have 1 toilet per 15 individuals with up to 10% of the fixtures being urinals.

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

59

59

Prioritization Refinement (43)

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

60

60

Prioritization Refinement (44)

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school



Prioritization Refinement (45)

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage



Prioritization Refinement (46)

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

Prioritization Refinement (47)

Indoor Air Quality/Ventilation

- New Section: Sets prescribed ventilation requirements like outdoor air intake rates.
- New Section: Sets prescribed indoor air quality requirements like radon testing and pest management planning

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

Prioritization Refinement (48)

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

65

65

Prioritization Refinement (49)

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

66

66

Prioritization Refinement (50)

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

Prioritization Refinement (51)

Temperature

- Added: Maximum and minimum temperature requirements
- Added: Requirement for the preparation of an extreme temperature readiness plan.

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

Prioritization Refinement (52)

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

Prioritization Refinement (53)

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

Prioritization Refinement (54)

Injury Prevention

- Added: Fall protection from balconies or orchestra pits and storage of unsecured equipment
- Added: Updated language for chemical storage
- Added: Fragrance-free and low-hazard cleaning requirements
- Added: Injury and communicable disease prevention planning when animals are allowed in school

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

Prioritization Refinement (55)

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

Prioritization Refinement (56)

Imminent Health Hazard

- New Section. Sets prescribed imminent health hazard requirements for hazards like sewage spillage

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

73

73

Prioritization Refinement (57)

Playgrounds

- New Section: Sets prescribed installation and maintenance requirements for playgrounds

Specialized Rooms

- New Section: Sets prescribed requirements for specialized rooms like health rooms, laboratories, and wood shops

74

74

Timing Discussion

Recap



Next Steps

THANK YOU

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