

WASHINGTON STATE BOARD OF HEALTH

Minutes for School Environmental Health and Safety Rule Project
Technical Advisory Committee Meeting
February 26, 2025
Virtual Meeting
ASL (or CART)
Department of Health
111 Israel Road SE,
Tumwater, WA 98501
Town Center Two Room: 153
Virtual meeting: ZOOM Webinar

Technical Advisory Committee Members:

Online Participants

Patty Hayes, RN, MSN, Chair
Brian Buck, Lake Washington School District
Brian Freeman, Inchelum School District
Brook Wilkerson, School OPS
David Hammond, Washington Association of School Administrators (WASA)
Devon Kellogg, Washington State PTA (reside in Lake Washington SD)
Erin Hockaday, Benton Franklin Health District
Gina Yonts, Association of Washington School Principals
Jared Mason-Gere, Washington Education Association
Jeff Rogers, WAMOA and Auburn School District
Kellie Lacey, Richland School District
Kevin Jacka, The Rural Alliance
Laura Peterson, Washington State PTA
Lauren Jenks, Washington State Department of Health
Laurette Rasmussen, Whatcom County Health & Community Services
Morgan Powell, Office of Superintendent of Public Instruction (OSPI)
Nicole Daltoso, Evergreen Public Schools (Clark County)
Pam Schwartz, Washington State Catholic Conference/Catholic Schools
Samantha Fogg, Washington State PTA (Seattle Public Schools)
Sandy Phillips, Spokane Regional Health District
Suzie Hanson, Washington Federation of Independent Schools
Tammy Allison, Washington Association of School Business Officials

Technical Advisory Committee members absent:

Anders Lindgren, School OPS
Bailey Stanger, Benton Franklin Health District
Becky Doughty, Spokane Public Schools
Dan Steele, Washington Association of School Administrators (WASA)
Doug Rich, Washington State Catholic Conference/Catholic Schools
Geoff Lawson, WAMOA and Auburn School District
Jacob Cook, Parent
Jaime Bodden, WSALPHO
Jessica Sankey, Bellingham Public School

Julie Salvi, Washington Education Association
Kate Espy, South Kitsap School District
Kelly Cooper, Washington State Department of Health
Kelsey Greenough, Richland School District
Kenney Johnson, Lake Washington School District
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
Kelly Kramer, Policy Advisor

Guests and other participants:

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

1. Introduction/Minutes Review

Patty Hayes, Committee Chair, welcomed committee members and called the School Rule Technical Advisory Committee meeting to order at 10:01 a.m. Meeting materials became available on February 21, 2025, and are available on the Board's website. Board staff will post the recording within three business days.

Chair Hayes reviewed the minutes from the meeting on February 6, 2025.

2. Reminders

Chair Hayes discussed the April joint meeting with the State Board of Health (Board). The committee is scheduled for the afternoon so members can join for lunch and then participate in the discussion at the meeting.

Andrew Kamali, Project Manager, noted that committee members received a survey for transportation or hotel logistics for the night after the Board meeting. This needs to be filled out by Friday.

3. Objectives and Meeting Agreement

Karen Langehough, Facilitator, noted that we will heavily refer to the meeting packet today. The committee will begin with the ventilation subcommittee work and public comments. Bryan Cawley, subject matter expert (SME), will join the meeting at 11:00 a.m. for ventilation questions.

Facilitator Langehough outlined objectives for the day. The objectives include reviewing language, public comments, and survey responses, as well as voting on new language from the subcommittee. In March, the committee will review the fiscal analysis and develop implementation recommendations.

4. Language: Ventilation

Facilitator Langehough introduced the language:

Subcommittee Proposed Language (1)(d) and (7)(a)-(b)

A school official shall:

1) Ensure the implementation of a written indoor air quality plan within five years of the effective date of this section that includes:

d) A plan for monitoring carbon dioxide levels if required by subsection (7)(b) of this section.

7) Provide adequate ventilation by:

a) Ensuring direct mechanical exhaust for specialized rooms as set forth in WAC 246-370-150.

b) Providing ongoing carbon dioxide concentration monitoring if the school facility does not have a mechanical outdoor air ventilation system or the outdoor air flow rate cannot be determined.

Facilitator Langehough said that comments provided today are based on the old language. They provided an overview of comments.

PM Kamali introduced subcommittee members and that the group met on February 10 for two hours to develop draft language.

Lauren Jenks, Committee Member, asked about subcommittee language taking public comment into account.

PM Kamali said some comments were not available at the time. They may have an additional public comment period just for ventilation language.

PM Kamali noted that they combined indoor air quality and ventilation into one section. This language amends a comment of the indoor air quality plan. They refer to each other in the same section.

Tammy Allison, Committee Member, asked about page 49 of the packet, was (7) brought in from the old section?

PM Kamali said that section (7) was rewritten based on the original section for ventilation. They brought it into Indoor Air Quality, and the language has changed.

Devon Kellog, Committee Member, thanked everyone for their attention and work on this section. They appreciated focusing on new ventilation systems. Can we copy language from (1)(d) into

(7)(b) about CO₂ monitoring and mitigating? Can we add “provide adequate ventilation and filtration” to (7)?

PM Kamali said filtration is discussed throughout.

The committee held a brief discussion about where materials were in the packet. The group paused to reread for full context.

Chair Hayes asked subcommittee members to explain the reasons for the changes to help inform members who are not on the subcommittee.

Ali Boris, Subject Matter Expert (SME), explained that we’re now asking existing schools to provide the air they were designed to provide. Schools that are older or have natural ventilation provide as much fresh air as possible. CO₂ is proxy for fresh air monitoring. New schools can provide additional outside air. Filtration and ventilation are distinct strategies for improving air quality. We included testing and balancing every 10 years, which will include a measurement of outdoor air.

Member Kellog asked about section (e), new ventilation systems after the effective date. Does that include the replacement of an HVAC system in an existing building?

Brian Buck, Committee Member, said this relates to new construction or modernization of school, not lifecycle replacement of assets.

Suzie Hanson, Committee Member, expressed concern about current buildings. Did anyone discuss how this will affect small districts? What about buildings they don’t own and can’t control airflow? How do we address this?

SME Boris said the subcommittee had in mind that schools understand their ventilation system and what it’s capable of. If a school is unable to change airflow, then they have the option to use CO₂ as a proxy. We understand there are differences in schools.

Member Hanson was concerned about (7)(c). They asked if (b) was intended as an exception: if you cannot meet (c) then (b) is applicable.

Facilitator Langehough suggested that they re-order the list.

Member Hanson asked that the language specify on where the requirements end depending on the school system’s ability to function.

Member Boris noted it is still relevant for schools to read through (c) and (d).

Member Hanson said they will re-read it and decide if the language makes sense for school leadership.

PM Kamali agreed that this is unclear. We can provide different lead in. For example: “if (b) doesn’t apply, then (c).”

Jeff Rogers, Committee Member, stated that there is no duct-cleaning language provided but it should be recommended. Particulate build-up can affect student health.

Facilitator Langehough noted that section (d) includes particulate matter filtration.

Member Rogers asked when there's a buildup of allergens in the air, is there a way to eradicate particulate buildup?

Member Freeman questioned whether schools could maintain the maximum flow rates achievable while maintaining temp on days with extreme temperatures.

SME Boris said the air flow rate should not be interpreted as having windows and doors open constantly. We can consider revising the language to clarify.

Member Freeman asked in (7)(d)(i) if the maximum capacity is not reached, do you need to upgrade your system?

Nicole Daltoso, Committee Member, replied that there is no need to upgrade

Member Kellog suggested that (7)(b) may solve confusion between (c) and (d) if we put (b) as a subsection under (c).

Chair Hayes wanted to be clear on recommendations regarding schools that do not own the building. Looking at (d), the comment makes sense. We should have consistent language for circumstances for schools that don't own the building.

Erin Hockaday, Committee Member, was unclear that (b) was intended to be an exception to (c). subsection (b) was for cases in which the school has a natural ventilation system or is unable to monitor. They were uncertain about making exceptions. All kids deserve to breathe fresh air even if in small buildings that are not owned by the school.

Member Buck said that when schools don't have a mechanical outdoor system, it's not an exception for (c), but if you cannot ventilate or measure for airflow, then use CO₂ measures as a proxy.

Member Jenks said maximum outdoor air vent flow rates refer to the HVAC system's capabilities and does not include opening doors or windows. They responded to Member Roger's statement about duct cleaning: It's part of maintenance but is not required. Language must be clear to ensure the interpretation of intent.

Member Hanson agreed that kids deserve to breathe healthy air in small schools, but the reality of ensuring clean air needs to be considered. There are different types of buildings and a variety of levels of air control. We should keep in mind that schools have a hard time proving they are trying to meet the standards. They may not have a team to meet standards and budget constraints.

Member Daltoso suggested further information in K-12 guidance regarding schools that are small or in rental spaces; mitigation options or strategies for those with high CO₂; link suggestions to improve and what levels they should be. Folks will need guidance on how to improve indoor air quality.

Sandy Phillips, Committee Member, recommended including a maximum CO₂ level and when to take action.

Member Jenks would like to include maximum CO₂, the research isn't consistent. Guidance is easy to change as research changes.

Member Kellog said (1)(d) adds a plan for monitoring and mitigating indoor air quality. In (7)(d) on filtration, what if capacity isn't adequate to provide healthy air? How do schools determine what's adequate?

Member Boris stated current guidance will point to supplementing HVAC filtration with portable units. There's a lot to consider around these units.

Member Kellog and Member Buck discussed portables and filtration units under the WAC.

PM Kamali said that the 2000-2005 requires that portables be constructed with mechanical ventilation systems. There are not many that are older, so most should have some ventilation system.

Member Freeman said for (7)(f)(iv), HVAC technicians provide a detailed invoice. It would be cumbersome to review. Some have maintenance schedules but many small schools don't follow them. Small districts don't have records of when filters were changed. A template for schedules would be helpful.

PM Kamali said every district could handle it differently. The Department can provide a template for an indoor air quality plan.

Member Buck recommended keeping all maintenance records centrally, not on-site at individual buildings.

PM Kamali stated it may be helpful to separate ventilation and filtration. Ventilation as (7) and filtration as (8). It's important to distinguish as schools may have one or the other. It's easier to digest as separate sections. Making (f) as number (9).

Laurette Rasmussen, Committee Member, asked about the new section (9) and suggested adding something about routine maintenance according to the manufacturer's instructions or including timeframes. For (c)(iii) compliance—is compliance intended for schools to evaluate?

SME Cawley said ventilation rates are usually shown in new building plans. Engineers determine the rate before a site visit occurs. They recommended having a report ahead of the site visit. The frequency is usually five years.

PM Kamali asked to change the frequency from 10 years to 15 years.

SME Boris noted testing and balancing have a cost. They recommended doing them regularly to understand if the systems are operating as intended. Every 15 years is a long time for a building's indoor air quality to be inadequate.

Member Buck appreciated SME Boris' comment but supports 15 years as there are ways to test airflow volume using the building's system. CO₂ sensors will identify if there are any issues before 15 years.

SME Cawley said some systems might look different depending on age. This is not an issue for new buildings. We should make requirements attainable for all.

Member Hanson agreed with 15 years, as there are other indicators of air problems available.

Member Kellog asked if this is different from the building code.

SME Cawley said there are differences between codes. Minimum versus maximum value for ventilation; filtration is the maximum amount the system can support. There's an exception within mechanical code for smaller systems.

Member Kellogg asked about sections (7) and (8). We ask that a building's system do what it can within reason. Would it help to refer to the indoor air quality plan if it's not meeting standards? How do we determine if it's not meeting the standards?

Facilitator Langehough asked if section 1 addresses Member Kellogg's concerns.

PM Kamali stated that CO₂ is a proxy for ventilation, not filtration. Discussion for plan if you don't have filtration systems.

Member Buck discussed concerns when looking at (7)(d) that sizing up ventilation systems to meet the maximum allowable energy code will increase the other infrastructure costs associated with the mechanical systems. They suggested something like "recirculate to meet the maximum allowable in periods of increased health risk." Member Buck asked for SME Cawley, to weigh in.

SME Cawley said that there is an uptick in costs and that it is not inclusive of the unassignable square footage. For (7)(d), maybe a comment would be whether it is appropriate to provide language to allow the system to operate at higher ventilation rates until thermal comfort is compromised.

Member Buck clarified that they have systems that are energy-code compliant, but they can't provide the maximum outdoor air allowed in the code. We do have heat pumps and can run recirculated air to meet the maximum allowable. We can meet the intent of what we're trying to get to during periods of increased health risk. But, if that's not allowed, then we must go in and oversize our units and increase unassigned space for the new construction to meet these periods of increased health risks.

SME Cawley suggested sizing the system such that you could do it but not sizing the entire system to support it. The cost is significant. Is it reasonable to spend the extra dollars on a system that you need only a percentage of the time?

Member Buck said they are trying to meet the intent for periods of increased health risk with the current, most energy-efficient systems that they are putting into their buildings. We can, if allowed, also use the recirculated air to get there.

SME Cawley said once you include the recirculated air and the filtration, that procedure aligns with American Society of Heating and Air-Conditioning Engineers (ASHRAE) 241. There are differing opinions on the value of this approach.

Member Buck asked if this is worth the cost to meet the maximum allowable for these periods of increased health risks.

PM Kamali said it would be on average an increase of \$3.44 per square foot to meet that 150% of the minimum code.

Brian Freeman, Committee Member, said to put that into perspective, that is approaching 105% of School Construction Assistance Program (SCAP) funding. Member Freeman asked if in Member Buck's building the minimum temperature is not great, would the system have to be a larger capacity than is available in a more temperate zone?

SME Cawley said generally, yes.

Member Freeman said school districts in Ferry County that have low property value would have higher costs than the school districts in a more temperate zone with extremely high valuation. For the local community, the impact would be larger in the colder regions than it would be in the more

temperate regions. The SCAP formula is set across the state, so the colder areas would need to spend more money on ventilation per square foot than they would in temperate regions. If that's the case, how will this be funded?

SME Cawley agreed. Valuations are inversely proportionate to more extreme climates.

Member Freeman said that is why they cannot get behind 150%. It is unattainable.

PM Kamali asked SME Boris if recirculated air that is filtered appropriately has the same health and safety benefits as increasing ventilation rates.

SME Boris, said no. Filtration will remove particles, but it will not remove volatile organic compounds or other gaseous concerns. We want to at a minimum increase the outdoor air that we're providing to clean out contaminants in indoor spaces. Providing that in new buildings makes more sense than trying to upgrade every existing building in the state. However, with the details we are discussing here, we want to make sure that we're doing this in a way that makes sense for all schools. SME Boris didn't think recirculation was the solution.

PM Kamali said the compromise might be a reduction from 150% to 130%.

SME Boris said there might be an opportunity to reduce due to temperature limitations.

SME Cawley suggested that if we are worried about the extremes, then we could provide provisions to limit the infrastructure increase to when you can reasonably provide it.

Member Freeman said they could get behind if it was 150% based on a 50-degree ambient temperature. That way you have a level field, and the costs will be the same no matter what your climate.

Member Buck discussed being stuck on the "needed for" period and trying to get to why we would build the new buildings to the maximum when it's not required and have figured out different ways to increase outside ventilation during these periods of increased health risk.

SME Cawley said that the research on increased ventilation rates in class environments is hard to align with the data behind it to show what the net impact is. As those studies get aggregated, anecdotal evidence suggests better attendance because of increased ventilation and better student performance.

SME Boris said that aligns with what we have said in the past. Making these systems capable of providing more than the building code minimum is going to make it flexible so schools can handle increased periods of health risks. The quantification is hard. SME Boris was unsure about providing exact numbers. Academic research has shown that this is a way to improve indoor air quality.

Member Jenks said they want to ensure that the improvements that we see in health and attendance with greater ventilation occur between the minimum of the building code regulation and the maximum. If we were able to operate at a minimum all the time that it would be substantially worse than going up to 130% or 150%? In this range do we see those improvements?

SME Boris answered that the research is within the range of the building code minimum and some of it is above range.

Member Hanson asked if there is coordination with the Department of Commerce about what the energy requirements are to sustain that level of air ventilation and the current clean building program codes.

PM Kamali suggested instead of mandating 150% in the event of an increased health risk, increasing ventilation rates if the school system can take it. During the lunch break our team will put that together.

Member Freeman thanked PM Kamali for the suggestion.

Member Kellogg said in the heat section we have a range of temperatures and if you go outside of these temperatures you refer to the plan. When we're reviewing the language to meet this 150%, can we include some sort of reference point, so that we know when to go to the plan?

Facilitator Langehough asked for clarification.

Member Kellogg said for (7)(d), can we include a statement that if you are not meeting an appropriate requirement for the health and safety of the school then go to the plan that will help you mitigate situation. Having some kind of definition of that criteria would be helpful.

Facilitator Langehough transitioned the committee into a break for lunch.

Break for lunch from 12:40 to 1:10 p.m.

Facilitator Langehough welcomed committee members back from lunch and continued with the agenda item by asking members to take a moment to read and review the language on screen for Section (1)(d) and (e). Facilitator Langehough opened the floor for comments, questions, or discussion.

Subcommittee Proposed Language (1)(d) – (e)

A school official shall:

- 1) Ensure the implementation of a written indoor air quality plan within five years of the effective date of this section that includes:
 - (d) A plan for monitoring and mitigating carbon dioxide levels if required by subsection (7)(b)(iii) of this section; and*
 - (e) A plan with actions ensuring health and safety for periods of increased health risk or poor outdoor air quality.**

Member Rasmussen proposed changing the language in (e) to “or” rather than “and.”

SME Borris agreed that “or” would allow it to apply to different scenarios.

The language was changed on screen from “and” to “or.”

Facilitator Langehough asked members to vote on the language as it read on screen using the fist-to-five method.

Voting Results

Fist	1	2	3	4	5
0	0	0	4	11	13

Facilitator Langehough announced a consensus on the language for (1)(d) – (e).

After the vote, Member Kellogg questioned the implementation time of five years. They suggested it was too long to wait for better air quality in schools.

Member Allison reminded Member Kellogg that five years was agreed upon earlier by the committee and not something recently changed in the language.

Member Kellogg acknowledged it had been agreed upon but expressed reservations and questioned it.

Member Hanson commented that schools are not starting at ground zero. There has been a lot of effort to improve indoor air quality over the years. Much of this work is already being done. It's a lot of work to create this change and it also requires funding and a budget. Five years is reasonable.

Member Kellogg thanked Member Hanson for the explanation.

Facilitator Langehough then asked committee members to review section (7) then opened the floor for comments, questions, or discussion.

Subcommittee Proposed Language (7)

A school official shall:

(7) Provide adequate ventilation by:

(a) Ensuring direct mechanical exhaust for specialized rooms as set forth in WAC 246-370-150.

(b) Ensuring all student-occupied instruction and gathering spaces during hours of occupation provide outdoor air ventilation flow rates as set forth in chapter 51-52 WAC at the time the ventilation system was permitted.

(i) If outdoor air ventilation flow rates were not established at the time of the original building construction, ventilation airflow rates must be operated to meet chapter 51-52 WAC or maximum outdoor air ventilation flow rates achievable within existing system capacity.

(ii) Compliance is determined based on variables including but not limited to:

(A) The type and area of the space;

(B) The planned number of occupants; and

(C) The type of ventilation system;

(iii) If the school facility does not have a mechanical outdoor air ventilation system or the outdoor air flow rate cannot be determined, provide ongoing carbon dioxide concentration monitoring.

Member Kellogg raised the concern that nothing refers to an indoor air quality plan if rates don't meet a threshold. Their concern was with older buildings not being built to today's standards but held to the standards at the time they were built. The language says if feasible, but we aren't addressing feasibility. Without a target ventilation rate, there is no bar.

Member Jenks clarified that the language as is ensures the system is functioning to its designed standard. It doesn't require someone to replace the system. Ventilation rates are complex to calculate and require specific professionals, such as engineers, to figure out.

Member Kellogg commented that Member Jenks' answer addressed the part "if feasible" but questioned what triggers an indoor air quality plan. What sets the standard? Member Kellogg believed there should be a threshold identified that triggers a school to use the guidance and tells them how to handle the situation.

Member Jenks explained that the carbon dioxide level is how to know if an HVAC system is working the way it's designed. The carbon dioxide level of the school will tell us that.

PM Kamali clarified that a health risk or event would trigger the indoor air quality plan.

Member Hockaday suggested leaving triggers open-ended and not defining them further, so the local health jurisdiction and school can develop a correction plan. They commented that it would be difficult to capture all the mitigation triggers in a code.

Member Kellogg asked where a school would go for guidance on effective ventilation when making a plan.

Member Jenks answered the Department's K-12 Guidance.

Facilitator Langehough asked members to move to a vote on the language in section (7) as it read on screen using the fist-to-five method.

Voting Results

Fist	1	2	3	4	5
0	0	0	2	8	7

Facilitator Langehough announced a consensus on the language for section (7).

Facilitator Langehough asked committee members to review section (8) on filtration and then opened the floor for comments, questions, or discussion.

Subcommittee Proposed Language (8)

A school official shall:

(8) Provide adequate filtration by:

(a) Ensuring particulate matter filtration as set forth in chapter 51-52 WAC at the time the heating, ventilation, and air conditioning systems were permitted, including in facilities that have small, ducted air handlers and ventilation systems.

(i) If particulate matter filtration requirements were not established at the time of the original installation of the system, the system must meet chapter 51-52 WAC or the maximum particulate matter filtration achievable within existing system capacity.

Member Kellogg suggested a minimum and would like to see a reference to guidance or a plan if they cannot meet the current rule.

Facilitator Langehough explained that section (1) captures the criteria. They asked for further questions or comments. Hearing none, they called for a vote using the fist-to-five method.

Voting Results

Fist	1	2	3	4	5
0	0	0	3	8	6

Facilitator Langehough announced a consensus on the language for section (8).

Facilitator Langehough asked committee members to review section (9) and asked PM Kamali to verify that it should read 15 years rather than the range of 10-15 years.

PM Kamali verified that 15 years was correct.

Subcommittee Proposed Language (9)

A school official shall:

(9) Perform routine maintenance of the mechanical ventilation system that includes:

- (a) Testing and balancing for heating, ventilation, and air conditioning systems every 15 years;
- (b) Performing routine inspections of heating, ventilation, and cooling systems to ensure systems are operating within intended parameters of this rule;
- (c) Replacing filters as needed to achieve required filtration and air flow rates; and
- (d) Maintaining records of these activities that are available for review.

Facilitator Langehough opened the floor for comments, questions, or discussion.

Member Kellogg asked for a definition of routine inspections.

Member Allison explained that inspections are system-dependent; following one specific timeline doesn't work.

Member Hockaday added that it's a school official that inspects the system routinely, not the local health jurisdiction.

Facilitator Langehough asked members to vote on the language in section (9) as it read on screen using the fist-to-five method.

Voting Results

Fist	1	2	3	4	5
0	0	0	4	7	6

Facilitator Langehough announced a consensus on the language for section (9).

5. Revisiting Language/ Review of Public Comments

WAC 246-370-005 Definitions

Facilitator Langehough asked committee members to review the section on Definitions. There are four terms the committee should consider adding definitions for: "kindergarten," "site assessment," "transition services," and "sun control." Facilitator Langehough opened the floor for comments, questions, or discussion.

Member Phillips suggested adding kindergarten. Not all schools use the term, so we need to clarify that it is a class where a student will enter first grade the following year. They added that there's a definition for preschool.

PM Kamali recalled that the committee had a discussion earlier to add a definition for kindergarten, but it must have fallen off the radar.

Facilitator Langehough asked committee members if we needed to define site assessment.

Member Hockaday said it's not necessary. The language determines what is needed for a site assessment.

Member Daltoso said site assessment should be defined so everyone understands the general idea of what an assessment is. The language specifies what is being looked for in a site assessment, but there isn't a high-level definition of what one is.

Member Phillips agreed with Member Hockaday.

PM Kamali asked if a high-level definition of site assessment would cause harm.

Member Hockaday and Member Daltoso agreed that a definition would not cause harm.

PM Kamali agreed with Member Daltoso and recommended adding site assessment to the list of definitions.

Facilitator Langehough asked committee members if we need to define transition services.

Samantha Fogg, Committee Member, highlighted that transition services are an area of education that is frequently left out of conversations and shared an example of unintended consequences. They also shared that they have seen lower standards in buildings for students in transition services. They would like transition services to be added, not just defined: "... and transition services."

Member Daltoso agreed with Member Fogg and added that buildings that house transitional services are typically not inspected because they're technically post high school. They support a separate definition of transition services.

Gina Yonts, Committee Member, wondered about transitional programs in preschool buildings and if they should extend to those as well.

PM Kamali asked if "related activities" would suffice.

Member Fogg argued that transitional programs are not a related activity—it's school. There is a transition at both ends—age three and ages 18-22. These are regular students, not related activities.

Member Daltoso answered that it says, "and related activities by the school as defined in RCW." The RCW does not capture transition services in its definition.

Member Allison recalled that when working on language, the committee had determined that transition students are still in grade 12.

Member Jenks wanted to clarify that transition students are included in grade 12 because they don't receive a diploma until they are done with the program. They added that services and programs are different.

Facilitator Langehough summarized that they are hearing a recommendation to include services and programs.

Member Hockaday wondered if transitional facilities are considered in the fiscal analysis piece. If they are not currently inspected in the programs, that would need to be expanded.

David Hammond, Committee Member, cautioned about liability and unintended consequences and added that perhaps that would come with a legal review. Their district is considered K-12, but they have transition to kindergarten, pre-kindergarten, and older transitional students. The older students are sent to various worksites every day. Would rules have to extend to those buildings? They suggested that the definition not be too broad.

PM Kamali clarified that the applicability section says that this applies to all facilities operated for the primary purpose of providing education, including transition services. They recommended including a definition since it's used in this rule.

Facilitator Langehough asked committee members to move to the subject of sun control. Does sun control need a definition?

Member Allison questioned the need for a definition of sun control.

PM Kamali expressed concern about defining it as it can prohibit or limit sun control options unintentionally.

Facilitator Langehough did not hear a strong recommendation from committee members to add sun control to definitions, therefore moved on to recap what was decided. The committee decided to add definitions for kindergarten, site assessment, and transition programs and services. Facilitator Langehough noted the need to check that the fiscal analysis includes these services as well.

Action items

- Add a definition for kindergarten.
- Add a definition for site assessment.
- Add a definition for transition programs and services, with the caveat of not going to broad with it.

Break from 2:15 p.m. to 2:25 p.m.

6. Revisiting Language/ Review of Public Comments

WAC 246-370-010 Applicability

Facilitator Langehough asked the committee to review the language, and the informal comment summary then called for discussion.

Chair Hayes discussed the history of Group B and regulation.

PM Kamali said that Group B schools have their own system. At least a dozen in Washington are Group B. So, if we include, "you can't have a group B system," we're not sure what the impact on these schools will be because that is how they are operating.

Member Jenks said that Group B must have a certified operator, and they would have to test their water like the Group A system. We cannot change the definition of less than 25 people per day. We can require testing for water quality standards that Group B has to meet based on Group A testing. Currently they are not required to test. The test would include a monthly bacteriological study. Now they don't have any requirements to test for bacteria, nitrate, arsenic, or anything like that.

Member Jenks asked about getting the list of Group B schools.

PM Kamali corrected that it is 32 schools and suggested getting more information about the regulation of water for the kids in those schools.

Facilitator Langehough discussed the public comment recommendation to include co-ops.

PM Kamali replied that if it's parents only teaching and its home schools, they would be out of our authority.

Member Hockaday asked about when some homeschooled kids come to a facility to get lessons on music or physical education. We should make sure those are included, but if parents are providing the instruction, then it is out of our scope.

Facilitator Langehough brought up legacy schools. If a school already has approval in a certain area, then it would not be required for any new regulations in that area.

Member Yonts asked how they would know about changes in policy if they aren't subject to regulation. How do they know what they don't know?

Member Hanson suggested that legacy schools should put their money into air quality rather than taking down bathrooms. It depends on what the need is.

Member Yonts asked for an example of a legacy school.

PM Kamali replied that there is an exception for schools already permitted and approved by the health district. If they are already approved, they don't need additional approval. If the time of the permit is after this rule is effective, then they would need to comply.

Facilitator Langehough said that's covered either by the exemption process or by the indication of when things are implemented and required to be compliant. They asked PM Kamali for clarification.

PM Kamali said that was correct and referred to the public comment. They added that we would discuss bathrooms later.

Member Kellog asked if churches are exempt if they have schools on the premises.

PM Kamali answered that they had learned from Member Hanson that private schools are required to get those inspections and approvals to operate. They can't be exempted. If it's in a church, that church must get local health jurisdiction approval.

Member Hanson confirmed that it was correct.

Member Phillips asked for clarification for home-based instruction. Based on the definition, it's parents teaching their children. Would a school co-op with multiple parents teaching other people's kids still be included under our regulation?

Member Hanson answered that co-ops are considered private schools and must go through the processes for state approval and inspection. If kids are coming together for one class, but their parents are responsible for their education (homeschooled by their parents), they are not included.

Action items

- Get more information about Group B school's regulation of water.

WAC 246-370-015 Guidance

Facilitator Langehough asked the committee to review the language, the feedback summarized on the screen, and for comments.

SME Boris asked PM Kamali if they could comment on this section.

PM Kamali replied that the language was clean as is. The update frequency could be sooner than every five years. There needs to be a full review every five years. We're not seeing any committee members having concerns, so we're probably fine not moving forward with any of these comments.

SME Boris expressed concerns about using the word "violation" in the past. But this isn't using the word violation in a report, so it might not have the same effect. We would like to provide updates more frequently than every five years, if necessary, like updates to code and that sort of thing.

Facilitator Langehough noted that there weren't any changes recommended in the pre-meeting survey.

Action items

- No action items

WAC 246-370-020 Site Assessment

Facilitator Langehough asked the committee to review the language and asked for comments. The survey did not have any requested changes. The committee did not have questions or comments, so this section will be left as is.

Action items

- No action items.

Afternoon break from 2:45 to 2:55 p.m.

WAC 246-370-030 Construction Plan Review New, Alterations, and Portables

Facilitator Langehough asked the committee to review the section language, public comment summary, and provide comments. There were no recommendations in the survey to change the language.

SME Boris mentioned concerns from local health jurisdictions regarding additions or alterations. This may be a large value—5,000 square feet or 20%—but determining what threshold to use becomes the question. They asked if any committee members were interested in reviewing that.

Member Phillips discussed concerns as a local health jurisdiction with the 5,000 square feet being too large. The way the current regulation is written has worked fine. They review the project and decide whether they need to review it. If not, they let the building department know that there are no comments and no review is needed. With the new requirements, they might miss some things that should be reviewed. They added that the public comment about “licensed architects” was theirs. They often get the WAC compliance letter, and it may come from an engineer or an architect. They recommended adding “licensed architect” to this section.

PM Kamali agreed to the “licensed architect” recommendation.

Facilitator Langehough asked Member Phillips about their comment on 5,000 square feet or more than 20% is too large. Is the size that the school project required to be reviewed by the local health officer? When you say it's too large, is it too large for one person to review?

Member Phillips clarified that there is no review at all if a project is under 5,000 square feet.

PM Kamali discussed that there are additional requirements for specialized classrooms, restrooms, and showers. PM Kamali asked if there's any examples of rooms that are outside of that if a school is augmenting or adjusting a standard classroom without any specialized equipment. Does that require a plan and review?

Member Phillips gave examples of adding a standard classroom and required inspection. They gave the example of a sink with a drinking fountain and outlets right next to it. There are things required to be reviewed that could impact learning for students, particularly lighting and sound control. It would be easy to have a classroom or two that are under 5,000 square feet.

Member Rasmussen agreed. A school can move things around. If it's less than 5,000 square feet, then there's no opportunity to comment. For example, a classroom was put in with no windows. It's

better to be aware of these things when making plans. If nothing needs to be reviewed, then we don't need to review it. It can be a conversation or a quick email. Member Rasmussen also agreed with adding "architect" in the other section.

Facilitator Langehough asked if the committee feels that the language has a gap. Should we address this differently?

Member Hockaday discussed subsection B. We could include "establishment" of a school or instructional space in an existing structure used for a different purpose. Bathrooms might be an exception.

PM Kamali reviewed Section 1 of showers or restrooms. When new installation or renovation of existing shower or restroom facilities is planned, school officials shall consult the local health officer to determine if construction review or plan approval is required. Within the construction plan review section, specialized rooms are specifically called out.

Member Hockaday discussed the loop happening in the language about 5,000 square feet. If the intent is to give flexibility, we should call that out in a different way.

PM Kamali agreed that there could be more consistency.

Member Allison said that the subcommittee had already reviewed it. Why are we discussing it if it's already decided?

Facilitator Langehough replied that these are public and member comments we are responding to. These comments are something to review as feedback and determine whether we need to change it.

Member Daltoso said in earlier discussions they used square footage so schools wouldn't have to have local health jurisdictions review everything they did.

Member Phillips pointed out that going through plan reviews is always useful for everyone's benefit. It costs a lot more to correct it after the fact.

Member Buck said that with many mini projects every year, less than 5,000 square feet is a useful benchmark due to many projects with many architects. It would be harder to submit everything to the local health jurisdiction.

Facilitator Langehough discussed keeping Section C as is with the footage and percentage requirement. Add "instructional space" to Section B if repurposing a space within the school to become instructional space that was not instructional space before. That would be a plan review.

Member Buck discussed how room function changes over time. Every change should not warrant a plan review. The language as is allows for that.

PM Kamali recommended clarifying the language and adding the restrooms back in so that all areas that require plan review will be in one place. They agreed with the committee members that negotiated these kinds of percentages and square feet to support schools and local health jurisdictions. Some local health jurisdictions may not have the capacity to look at every single project and sometimes it may not be necessary. We can capture specific areas that are critically important for minimum health and safety standards.

Action items

- Clarify language about showers and restrooms within the plan review.

- Cross-check other sections for references to a construction plan review and capture in the Construction Plan Review section itself.
- Add “licensed architect” to the language.

WAC 246-370-040 Routine Inspection

Facilitator Langehough asked the committee to review the language and asked for comments

Member Freeman asked if inspections will be a service provided or if schools will be charged a fee for use. The language should be clear.

PM Kamali replied that local health jurisdictions are responsible for setting their own fees. We plan to advocate for sufficient funding for these programs to limit costs as much as possible for schools.

Member Daltoso said that funding these inspections is a huge issue in southern Washington. Some districts will not move forward with inspections. There are no penalties for issues found, so they are not motivated to make improvements. Lack of funding is a huge barrier as districts make significant budget cuts every year. Every year our public health department increases the fee, and it's not sustainable.

Chair Hayes suggested adding this to the report because of the statutory construction of the local health programs and authorities. The Legislature needs to hear about the funding barriers that Member Daltoso outlined. It isn't something the Board can mandate within a rule, but it is something we can identify in the report as we will with other funding challenges in the report.

Member Freeman asked if the rule would say that the funding is provided to the local health jurisdictions.

Chair Hayes replied that staff can direct any questions from committee members to the Attorney General. However, since the authority resides at the local level, the decision to fund the Health Department rests with the local jurisdiction. The ability and willingness of local counties to do this varies widely across the state and is a local control decision. Some want them to charge a fee for it. The Legislature has been funding through foundational public health services the public health end of certain programming. So that goes through a process with the foundational public health services work.

PM Kamali discussed asking the Assistant Attorney General (AAG) if we can tell the Legislature or the counties that they must pay for this. The AAG said it cannot be written in the rule. We can advocate for it in the report. We know that programs are expensive and time consuming but necessary, so we want to support local health jurisdictions and schools in this process.

Member Fogg said that they see a standard funding null-and-void clause added to a lot of bills as they go through: if not funded in the budget, it's not applicable.

Chair Hayes replied that null-and-void clauses are specific to the Legislature. The Legislature has the authority to determine whether a bill will be considered as an unfunded mandate or if it will tie into the budget. Since the Board does not have the funds to control, there is no null-and-void decision possible.

Facilitator Langehough discussed making the edits suggested for section 040(2)(b).

Member Hockaday agreed, saying they support the edits under 040(2)(a)(i).

Member Phillips agreed and supported the change under transition 2(b).

Chair Hayes discussed Transition 1 and raised concerns regarding language that allows a designee to opt to do something. Chair Hayes suggested changing the wording to require them to do so and expressed concerns over the phrase “locally determined risk factors.” Noting the fine difference that the health officer is going to allow the school official to do it versus allowing the school official to choose whether they want to.

PM Kamali acknowledged the concern and added that for the transition piece, the school officials would only have to attend the training if they plan to participate in this program.

Member Freeman noted that if there is a difference between jurisdiction based on credible data or local risk factors, if local risk factors, it must be able to be uniformly applied. They could say a locally determined risk factor could be a private school and therefore inspect it more often.

Facilitator Langehough asked the committee to raise their hand if leaving language 2(a) as is versus making edits. The majority raised their hand to leave the language as is.

PM Kamali that language had to be discussed to fit with the lead-in, “the local health office may allow a school official or designee to conduct...” It wasn’t a substantive change.

Facilitator Langehough clarified the language for 2(b) is a grammatical change. PM Kamali agreed.

Action items

- Edits to 2(b) are OK.

WAC 246-370-050 General Building Requirements

Facilitator Langehough asked the committee to review the language, said that the survey results did not include any recommendations, and asked for comments.

Discussion

Chair Hayes mentioned that Member Jenks had been prepared to talk about handwashing. They had pulled local health jurisdiction folks to discuss eliminating the minimum handwashing temperature.

Member Hockaday said that self-metering handwashing fixtures are not a good handwashing environment because you must repeatedly re-engage the water supply mechanism.

Chair Hayes said that Member Rasmussen was going to discuss eliminating the minimum temperature.

PM Kamali revisited the meeting to review the science and the reports that concluded it is not necessary to have a minimum temperature to effectively wash your hands. Keeping the 120 degrees maximum is necessary to prevent scalding. When washing hands, most of the time spent scrubbing is not under flowing water. We think it is best to be silent on this since it’s covered under other rules. It’s better to have a handwashing facility, not focused on the temperature of the water as long as it’s not too hot.

Member Phillips agreed that self-metered faucets are an issue with short water flow times.

Member Daltoso supported lowering the 85-degree minimum temperature.

Member Hockaday asked PM Kamali if the building requirements for hot water were for lavatories. If it’s in our code, do we identify where we require hand washing sinks so that it’s clear. If it’s a sink in

the greenhouse, not necessary to call it a hand-washing sink, ergo meets the building requirements for laboratory temperature.

PM Kamali said they discussed that separation and then decided to not use it so local health jurisdictions do not have to inspect. It's easier if we don't have a minimum temperature requirement, but it is important to identify where handwashing sinks need to be.

Member Freeman thought we had eliminated hand blowers for drying.

Chair Hayes recalled that discussion for hand blowers was focused on not requiring schools to remove them if they were already there.

PM Kamali suggested writing not to install hand blowers for new construction.

Action items

- Add back the language around self-metering faucets.
- Remove the minimum temperature.
- For new construction, hand blowers are not allowed; existing facilities are not required to remove existing units.

Facilitator Langehough discussed that the committee has not discussed deep cleaning and pest mitigation under this section, but the committee was out of time for this meeting.

Member Kellogg asked if it was possible to get any more public comments on ventilation.

PM Kamali replied that we might not be able to get comments before the deadlines but there will be a formal comment period later.

7. Recap/Next Steps

PM Kamali discussed the need to add one additional meeting and will send a survey out with possible dates. We need a response by close of business on Monday March 3, 2025. They reminded committee members attending the joint committee and Board meeting in April that a survey went out regarding hotel rooms and asked for responses as soon as possible so we can make sure accommodations are in place.

ADJOURNMENT

Chair Hayes adjourned the meeting at 4:00 p.m.

WASHINGTON STATE BOARD OF HEALTH

Patty Hayes, Chair

WASHINGTON STATE BOARD OF HEALTH

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

March 5, 2025

Virtual Meeting

ASL (or CART)

Department of Health

111 Israel Road SE,

Tumwater, WA 98501

Town Center Two Room: 166

Virtual meeting: ZOOM Webinar

Day 2

Online Participants

Patty Hayes, RN, MSN, Chair

Brian Buck, Lake Washington School District

Brook Wilkerson, School OPS

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

Jared Mason-Gere, Washington Education Association

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)

Samantha Fogg, Washington State PTA (Seattle Public Schools)

Suzie Hanson, Washington Federation of Independent Schools

Tammy Allison, Washington Association of School Business Officials

Technical Advisory Committee members absent:

Anders Lindgren, School OPS

Bailey Stanger, Benton Franklin Health District

Becky Doughty, Spokane Public Schools

Brian Freeman, Inchelum School District

Dan Steele, Washington Association of School Administrators (WASA)

Doug Rich, Washington State Catholic Conference/Catholic Schools

Gina Yonts, Association of Washington School Principals

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
Pam Schwartz, Washington State Catholic Conference/Catholic Schools
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
Sandy Phillips, Spokane Regional Health District
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
River Lin, Management Analyst Department of Health

Guests and other participants:

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

1. Introduction/Minutes Review

Patty Hayes, Committee Chair, welcomed committee members and called the School Rules Technical Advisory Committee meeting to order at 9:30 am. Meeting materials became available on Friday, February 28, 2025 and can be found on the Boards website. Board staff will post the recording within three business days.

Chair Hayes thanked the committee for joining the extra meeting. Karen Langehough, Facilitator, is not available today, so Chair Hayes and Andrew Kamali, Project Manager, will facilitate.

Chair Hayes notified the committee that we will combine the minutes from today with the February 26 minutes and reviewed on March 19, 2025.

2. Reminders

Chair Hayes reminded everyone to speak slowly for the interpreters and notetakers. This meeting is the continuation of the February 26 meeting.

3. Objectives and Meeting Agreement

Chair Hayes focused the committee on review of the final 11 sections and public comments. The committee will consider changes to the content of any section of the rule that members feel merit changing. The timeline is the same as the last meeting.

4. Revisiting Language/ Review of Public Comments

Chair Hayes reviewed the highlighted summaries of the public comments on the slide. The staff highlighted topics that were most relevant to the sections. All comments are relevant, but the highlighting should help the committee focus. A stopwatch is in the upper right corner of each slide for the time allocated for each section.

Marcus DeHart, Communications Consultant, explained how to use the numbers on the slide to locate the section under review.

WAC 246-370-060 Showers and Restrooms

PM Kamali and Chair Hayes referenced the slide for showers and restrooms and the highlighted sections. They discussed why there are two sections for toilet requirements and the lack of specific requirements for special education.

Chair Hayes asked if the restroom section should align with the codes already in place. We are not adding in the need to renovate current buildings that are functional now. Should we rely on the building code for restrooms? The building code doesn't set requirements for the number of showers.

Member Hockaday said they support aligning with existing code. It makes it easier at the regulatory end to track one single requirement.

Member Rasmussen agreed. Let the building department decide on the number of toilets. They added their concern about showers, hearing from schools that students rarely use them.

PM Kamali suggested considering toilets and showers separately and aligning the toilet fixtures with the Universal Plumbing Code or the state building code. For showers, we should set a minimum number per gender. A vote is set up with two, three, or four showers per gender as a minimum. We propose moving away from the required ratio to make sure that there are at least a couple of showers available per gender.

Member Jenks agreed. If we follow the building code, someone else enforces that, but if we put that in this rule, then local health must enforce it. It is a workload issue for local health.

Member Allison asked if architects and builders use the building code to determine the number of showers when building a new school, aren't they using the building code for the number of showers? Why do we need to include a number if the building code gives us the number.

Chair Hayes explained that the building code does not have requirements for showers. We can decide if we need this for new construction. We can give the number and identify that it is for sports

like wrestling. It is a minimum health and safety standard to have some level of shower requirement. I recommend that we split this into two sections: to address the restrooms and then the showers. Member Jenks' remarks are important regarding guidance for local public health on what to prioritize in terms of inspections. Putting that in the report is important so the Legislature knows that it's a tactic we are taking. Chair Hayes asked Member Buck for their thoughts of aligning to the building code.

Member Buck supported aligning with the plumbing code for toilets.

PM Kamali asked for a vote on toilets, adjusting the toilet ratio to align with the uniform plumbing code.

Member Kellogg asked if the committee was changing the ratio.

PM Kamali replied that the language currently requires a ratio of one toilet per 15 individuals with up to 10% of toilet fixtures being substituted with urinals.

Member Kellogg said that we would change the language to 1:35 or 1:25.

PM Kamali replied that it was correct, which aligns with the building code.

PM Kamali said that a majority of committee members have voted in favor of this, then discussed moving on to showers and asked Member Buck to comment.

Member Buck said that the highlighted section recommends removing the required shower number but states that a shower should be available. They support that. Their schools have showers available, and they are primarily used by athletes or physical education and wrestlers. Most high schools will have showers, just not 16. We've built a high school and then added a second gymnasium to the high school and there wasn't any interest in adding more showers. The school has over 2,000 kids with six showers there.

PM Kamali shared some comments the Board has received over the last few years. One anecdote told the story of how a female student's only option for a shower was in a male coach's office. They discussed needing some specificity about availability—that there needs to be at least a couple of showers available.

Member Rasmussen asked if the rule would cover types of showers. The showers they grew up with were the big open room with 10 shower heads. Would the rule designate individual showers or private showers in consideration of privacy?

Member Buck replied that they are going away from the large space showers that were popular in the 70s and 80s at secondary schools. If the required number of showers gets too large, then there will be those open showers to meet the requirement. Their showers are individual stall showers now that provide privacy in the locker rooms.

Member Hammond said that they are building a new high school right now with individual stall showers.

Member Jenks discussed the K-12 guide and it looks similar with the exception to suggest at least one Americans with Disabilities (ADA) compliant shower provided for each gender. They asked if that should be included or left to the K-12 guide. There's nothing in the building code, and they added that ADA is an existing law.

Member Kellogg asked about verifying that the showers and toilets are functioning properly as a matter of health and safety.

PM Kamali replied that it would be covered under the inspection piece.

Member Phillips recommended requiring showers and gave the example of some districts pushing back about having any showers. They do get asked how many should be put in and would like to have guidance since it is lacking in the building code. They are comfortable with the toilets going through the building department requirements. They have not had issues except for vandalism and complaints from parents that the toilets are too far away from the classrooms. For showers, they prefer individual showers that have privacy and can shower in the nude (referencing the pool code). The larger area group showers do not get used.

Member Daltoso commented that for a new high school with capacity for 2,000 students, the sports locker room and the physical education (PE) locker room each had three single stall showers plus an ADA for a total of four. The coach's office or PE office has its own individual ADA shower.

PM Kamali asked the committee to consider voting for a minimum number of showers below the numbers that have been shared so far. There will be additional information and guidance for large, comprehensive high schools, maybe making recommendations with a gold-star ratio and recommendations about where the showers should be within the guidance.

Member Kellogg asked how this aligns with Labor and Industry (L&I).

PM Kamali said that L&I is written for the work environment where employees require showering.

Member Hammond asked if this was specific to high school.

PM Kamali said that it applies to physical education, team sports, grades 9 and above.

Member Hammond said the standard for elementary schools is to have at least one shower in the health room and one shower in a special education class.

Member Fogg said that transition services support ages 18 to 22. There's a huge issue that they do not have access to showers in schools. They requested advocating to get access to one. We need to understand that this is wanted and needed.

PM Kamali asked if all special education programs need access to at least one shower.

Member Hammond was not sure it applies to all. They might build a space for a specific program and then change the program later.

Member Rasmussen said that in the health room, it's important to have an accessible shower. Having the ability to take care of someone on site.

PM Kamali asked if for new construction, could the shower requirement be based on programs. The local health jurisdiction and the school would determine if one were needed for the space based on the program.

Member Phillips agreed with PM Kamali's proposal.

PM Kamali asked for a hand raise vote for showers based on programs in new construction.

Member Buck asked for clarification on the vote.

PM Kamali said the first vote is based on programs in new construction. This language would likely go in the specialized room section. The second vote is on the minimum number of showers.

Member Jenks asked if it would be a rule requirement. Or do we need to leave it in guidance?

PM Kamali moved to table the first vote and vote on it in a future meeting.

Member Fogg said it should be based on the needs of the students, not the program model. Facilities cannot determine the inclusion of a student in a general education model. They highlighted we should prioritize the need for accessible showers.

PM Kamali asked members to vote to determine the minimum number of showers, not the ratio. If there are no sports or physical education, schools can get a variance.

Member Buck said that some high schools are only grades 10 through 12. Is calling out 9 through 12 going to be complicated for those districts?

PM Kamali was not sure of the number of schools that would fall into that category. A variance could apply.

Member Hanson asked for clarification on the ratio. Schools can range from 50 students to 1,500 students. Are we not looking at the number of students at all?

Chair Hayes said we're going to set a minimum number in the rules and then put a recommended ratio in guidance for new construction. The rule should focus on the minimum health and safety in schools.

Member Hanson said that showers are an expensive component of a new building. They are concerned that schools wouldn't follow the rule if the ratio is the only in guidance.

Member Jenks said we've gone back and forth about not having enough showers and too many showers. What is the difference between having two, three, or four showers?

PM Kamali said that when we did the math on cost for ratios (based on class and team size, not school size), we were looking at 12 showers on the high end. These numbers may feel arbitrary, but they're meant to set the floor.

Member Hockaday asked if the minimum per school considers smaller schools with 50 students. Ratios would accommodate both small and large schools.

PM Kamali said that schools could use the variance process if these numbers don't make sense to them.

Member Hockaday said that the variance process involves costs and is challenging. Local health jurisdictions can charge a lot for variance review.

PM Kamali asked if the committee wanted to skip the vote.

Chair Hayes said we should at least get a sense of the group's opinion. Do we put it all in guidance? Do we consider not putting a number in at all? We could just say they're required and then put the numbers in guidance. They added that they didn't realize the costs for variances and wanted to be sensitive to that. Chair Hayes asked Member Buck if they wanted a hand vote on that consideration.

Member Buck said yes.

PM Kamali said were thinking of including a number because the Board has received comments in a school that the only shower available for a female student was inside a male coach's office.

Parents think that's not appropriate. We're thinking of a number. But maybe we should focus on location.

Member Jenks said that's for an existing school. We're covering new construction. They hope to see "one accessible shower" in the vote. The rest can be in guidance.

Member Hammond referenced the new Bethel High School. They have a total of 18 showers with accessible showers included, not in the coach's office. The school serves 2,000 students. A new middle school, grades 6 to 8, and 850 students has one accessible in both the boys' and girls' locker rooms, There's one universal shower in a private space.

PM Kamali said we'll come back to this and move to the next section

Action items

- Return to further discussion and vote on the topic.

WAC 246-370-080 Indoor Air Quality and Ventilation

PM Kamali reminded members of the time limit for this discussion is 20 minutes. Focus on mold and outdoor air monitoring.

Member Kellogg said they like "identify" but "promptly" feels vague.

Member Daltoso said that a school district would interpret that as "get on it quickly" or "It's immediate." If it's in a cavity or a wall, we may not identify it until it works through the sheetrock and wall, which can take a long time. We take it very seriously. The schools will respond the same.

Member Hockaday said that "routine identification" may be confusing as written.

PM Kamali shared a suggestion from Nina Helpling, Policy Advisor, to change it to "promptly control identified sources."

Member Jenks said that schools should not be required to monitor outdoor air. They can rely on local weather services and other agencies to alert them to poor outdoor air quality.

Member Phillips agreed with Member Jenks. They suggested, "be aware of local regulatory monitoring." Schools may not do it well or accurately.

PM Kamali agreed that other agencies monitor and share as relevant for schools.

Member Kellogg revisited the mold discussion. They said they would like to have active identification. They were concerned about "promptly control identified sources."

Member Daltoso said that teachers are not quiet when there are concerns in classrooms. Building administrators are aware if there are mold issues.

Member Hockaday said it's not always easy with moisture sources and mold. A visual inspection of moisture and smell usually makes it easier to identify. They were comfortable with the suggested language of "promptly control identified sources."

PM Kamali said we can easily include "promptly control identified sources." It does not change the intent of the section and provides clarity.

Member Kellogg requested that the language include clarification of what "prompt" means.

PM Kamali said “promptly” is an established term to mean “without delay” and “immediate action towards remediation.”

Action items

None.

WAC 246-370-050 General Building Requirements

PM Kamali reviewed the summary about ceiling height. This is already addressed in the building code.

Member Kellogg mentioned that they had sent PM Kamali comments in writing.

Member Phillips said this doesn't only deal with new construction. Sometimes they renovate buildings to accommodate education purposes. It's good to have something handy for the change of use situations where the building code is not always applied.

Member Hockaday said that public health implications of ceiling height are less about air flow and more concerned with vertical projections.

PM Kamali proposed focusing on vertical projections, not ceiling height.

Member Hockaday and Member Phillips agreed with the proposal.

Member Buck said that some specialized rooms have cord reels hanging from the ceiling. We want to be careful, as this is the standard for some lab settings. Would that be allowable under this language?

Member Hockaday suggested using “clear vertical distance” in the language. Cord reels are usually over a table. You wouldn't be as concerned about walking into it. We don't want something to dangle in the middle of a walking path.

Member Phillips said that cord reels are common in shops. They're usually retracted when not in use.

Member Daltoso said that if the concern is an obstruction in the walking or egress path, the fire marshal will also catch this during an inspection.

PM Kamali suggested focusing on vertical projections with clear vertical distance. That would not be a new requirement; it currently exists in 366.

Member Kellogg asked about handwashing temperature. Are we still requiring warm water? Are we taking a different approach?

Member Jenks explained that the Center for Disease Control (CDC) states that you don't need warm water for basic health and safety when handwashing. Building code and plumbing code will set temperature requirements for hand washing sinks. We can avoid mentioning the temperature. We can focus more on where handwashing sinks are required based on specific uses of spaces. Utility sinks are regulated differently.

Member Kellogg was curious if requirements for drinking fountains exist in other codes or regulations.

PM Kamali was not sure.

PA Helpling said they're not required.

Member Kellogg asked if access to potable water is in the building code.

PM Kamali said it's not called out in the building code for educational spaces and is not included in the existing code either.

Member Jenks asked if we should check the lead in school rules as well.

PM Kamali said we need additional background and will come back to the group.

Member Phillips commented on "not attached to handwashing sinks." Virtually every public elementary school has a sink in each classroom that can be used for handwashing. There usually is a drinking fountain attached to it. The language was changed in the K-12 guide that a handwashing sink in a bathroom should not have a drinking fountain attached.

Member Jenks said we can probably omit classroom sinks.

Member Buck asked if we were including the deep cleaning comments.

PM Kamali said that cleaning is the responsibility of the school to determine. It's not something that local health jurisdictions would inspect.

Member Hockaday brought up vacuum breakers. They said that the "housekeeping sink" is too general. They agreed with comments to include "serrated, threaded, or quick-coupling nozzles."

PM Kamali asked if defining "housekeeping sink" would clarify the language.

Member Hockaday said that in practice, we would look at the threaded faucets and coupling nozzles. Sinks in labs might not be considered "housekeeping."

Member Phillips agreed that it should be more about the faucet type instead of referring to it as "housekeeping." Faucet type is in the K-12 guide.

Member Rasmussen agreed with Member Phillips and Member Hockaday.

Action items

- Conduct additional research on existing regulations on drinking fountain requirements and share with the committee.
- Amend the language on vertical projections from ceilings.
- Review terminology on "housekeeping sink" to clarify the language.

WAC 246-370-090 Temperature

PM Kamali asked members to review the slide for Temperature and opened the floor to discussion, questions, or comments.

Member Kellogg agreed with the comments that specialized rooms should be included in a readiness plan.

Member Allison disagreed with the comments and is concerned that if you put every type of specialized room into a readiness plan, it may turn out to be difficult to accommodate.

Member Kellogg clarified that they would like to see maximum and minimum temperature requirements in classrooms, specialized rooms should not be included.

Member Jenks commented that certain rooms need higher or cooler temperatures such as kiln rooms or labs. They are not certain the committee discussed keeping under regular temperature ranges for art or other classes.

Member Phillips provided the example of greenhouses having different temperatures as well.

Member Rasmussen added that shop classes with big doors may be cooler. Some room temperatures may not be as easily controlled. These are different than general classrooms. They also wanted to clarify that special education rooms are not specialized rooms.

Member Allison commented that they now understand Member Kellogg's concerns about specialized rooms in a readiness plan. Specialized rooms are excluded in the language. Also, for clarification, when it states a classroom temperature, a special education room is a classroom, so it applies.

PM Kamali clarified that specialized rooms have specialized equipment and are not special education rooms. We may need to add additional clarification here.

Member Hockaday agreed that the section can be confusing; special education classrooms also contain specialized equipment such as lifts. Perhaps if the language said to include considerations for spaces where activities may dictate temperatures outside of this range to protect health and safety or something like that. It can be unique to each school. For example: "we have a greenhouse that may operate at this temperature."

Member Kellogg expressed concern because the language reads that specialized rooms don't have to have a readiness plan. They believe they should be included in the plan.

PM Kamali reminded members that they decided not to include specialized rooms in the language because they didn't want to limit the type of specialized education that could be taught. So, each school could offer programs they desire.

Member Kellogg pointed out that the language doesn't specify boundaries.

Member Phillips suggested one solution could be to add specialized rooms to the readiness plan but have a higher trigger level.

Member Rasmussen added that the plan could include things like taking more breaks, opening a window, bringing in fans, making sure students hydrate, or limiting exposure to high temps for certain amounts of time. There are various ways to mitigate this.

PM Kamali asked that the suggestions be moved to an action item for staff.

Chair Hayes summarized that the committee members are saying that a specialized room could be included in a readiness plan, but it could have its own section and might not apply the same temperature range.

Member Hockaday agreed with Chair Hayes' summary and added that there must be information in the plan addressing how they are going to mitigate safety or health risks in those scenarios.

PM Kamali asked school officials to weigh in on the discussion.

Member Buck commented that specialized rooms are used for a variety of purposes and suggested it may help to keep the temperature to that of a gym, commons, or corridor, which is 60 to 79 degrees Fahrenheit. If it goes above or below that, then it would trigger the plan.

PM Kamali reiterated that the plan is to keep the classroom safe and suggested that the committee not vote on this yet. PM Kamali suggested allowing staff to amend language and move to the next subsection.

Action items

- Provide clarification in specialized rooms to avoid confusion with special education.
- Include specialized rooms in the readiness plan.
- Consider amending specialized room temperatures to 60 to 79 degrees Fahrenheit to match gym, commons, corridor and temperatures outside of that would trigger a plan.

WAC 246-370-110 Lighting

PM Kamali directed the committee to review the slide summary on Lighting and reminded members that this section was not updated as the science has not changed. The comment is about windows in classrooms.

Member Kellogg expressed concern that some students spend the entire day in classrooms that do not have windows. They supported language saying that no student shall occupy an instruction area without windows more than 50% of the day.

Member Phillips suggested placing food storage lighting with other storage lighting at 10 foot candles. It would be better for energy codes as well.

PM Kamali clarified that the comment is to omit the language that says to include food storage and move the food storage down to non-instruction areas.

Member Phillips agreed.

Chair Hayes emphasized that this is a technical amendment and is not an additional burden.

Action items

- Change food storage to 10 foot candle and move to non-instruction areas.

Break from 11:30 a.m. to 11:40 a.m.

WAC 246-370-120 Injury Prevention

PM Kamali asked committee members to review the injury prevention section and asked if defining low hazard would be important.

Member Daltoso explained that they and the people who work to enforce the rule know the definition of low hazard. They wonder whether teachers who look at the code might create their own definition or interpretation of low hazard.

Member Hockaday wondered if there is a section on “safer chemical choices” and suggested it could be defined in guidelines.

Member Jenks explained that “safer chemical choices” are defined in guidelines.

Member Buck echoed what Member Daltoso said. Their team understands what safer products are but believes it would be helpful to be in guidance.

Member Kellogg asked if there would be a problem defining it in code.

PM Kamali explained that having low hazard in guidance provides more flexibility as things change or update rather than putting it in rule.

Action items

- None.

WAC 246-370-130 Imminent Health Hazard Procedure

Member Kellogg expressed concern that the Imminent Health Hazard section is too broad and believes examples would help.

Chair Hayes remembered there being a conversation around providing a list of imminent health hazards in guidance and believes it was decided to put it there.

Member Jenks confirmed that examples would be in guidance.

Member Kellogg expressed concern about removing the requirement to notify parents or caregivers from the language. They would like to put it back in.

Member Allison pointed out the language that schools are to consult with local health officials regarding messages to families.

Member Kellogg said that the language uses “may consult” and therefore it’s not required.

Member Allison supported it being up to local health officials to determine if communications are needed.

Member Daltoso agreed with Member Allison. The rule should not dictate too specifically when it comes to communication between schools and families.

Member Hockaday supported Member Daltoso’s comment that local health can be available as schools need it.

Member Kellogg clarified that their concern is that it says nothing about a school needing to communicate to parents and families.

PM Kamali explained that we removed a requirement to notify parents to leave the decision up to schools for the reasons Member Daltoso and Member Allison mentioned. They noted that school districts know their families and communities better than we do at the state level. PM Kamali added that staff could check on and confirm the Office of Superintendent and Public Instruction (OSPI) WAC language for required notification for schools.

Member Kellogg mentioned that if the school district doesn’t want to raise an alarm, communication doesn’t have to happen during the event. It can happen after the event. They expressed the need for parents to know if their child was exposed to a health hazard so they can monitor it at home as needed.

Member Jenks agreed with Member Kellogg and explained that the reason it was removed wasn’t because communication with a family is not important. It was because regulating communication

between a school and families is out of scope. Communication is a good idea for the reasons Member Kellogg mentioned, but the committee cannot regulate everything a school does, just the minimum health and safety standards.

Member Allison explained that as a small school district, they don't want legislators to assume from the language in the WAC that they don't communicate with their families. They are in constant communication with parents and are very transparent with families.

Member Daltoso agreed with Member Allison. Their school district doesn't keep anything from their families, especially if there is an event or exposure to a health hazard.

Member Kellogg appreciated all the comments and concluded that it would reassure them as a parent to have notification if there are any potential harmful effects they should watch for at home.

Action items

- Check and confirm OSPI WAC language for required notification.

WAC 246-370-140 Playgrounds

PM Kamali asked committee members to review the playground language and comments and then opened the floor to discussion.

Member Kellogg stated it would help to require shade somewhere on the playground so kids have a place to go for shelter.

Member Buck wanted to ensure that the committee was not confusing a playground with a play structure. Playgrounds usually have a play area that is shaded. Shade sails on a play structure do not last long in Western Washington and they cost a lot of money. They want to be sure they don't make the requirement that all play structures have shade.

Member Hockaday commented that there are no requirements for shade for playgrounds in the American Society for Testing and Materials (ASTM) and the Consumer Product Safety Commission (CPSC) standards, but they do reference recommendations. The recommendation is to have shade.

PM Kamali concurred that the ASTM standards don't mandate shade but do encourage it for specific conditions.

Member Kellogg asked Member Buck if shade is required in some other code.

Member Buck replied that their elementary schools all have a covered play area.

Member Kellogg clarified that they were referring to a space in the playground, not specifically structures, but somewhere kids can go on a hot day to cool off.

Member Allison commented that there are sunshades that are over the playground equipment itself or the play structure; they're extremely expensive. It's hard to fund playground equipment, and they're not ADA accessible when they put in the wood chips.

Member Hockaday supported that, saying that we are not requiring a shaded structure, but should; it should be as described by Member Buck. Adding that as somebody who has a health district on the eastern side of the state, it gets very hot by April or May, so they would support that.

Member Rasmussen agreed, saying that most of their elementary schools have a play barn with a big roof. They have seen a few sails, but they don't last. We don't have a rule on that. They are not sure why the Department of Children, Youth, and Families (DCYF) rule is called out here.

Member Allison discussed that they had passed a bond for shade covers for all their elementary schools. The covers are quite expensive but now the bond is gone. If you include that requirement, the money has already been used. It's not minimum, and it's very expensive.

PM Kamali discussed wording for a shaded area that is accessible for students that are on the playground. Not that the playground must be shaded, but a place where students can get out of direct sunlight.

Member Phillips asked how long children are on the playground during recess. A lot of their playgrounds do not have shade, perhaps a canopy or a building overhang. Public schools may have that, but private schools may not. Look at your fiscal analysis. With climate change and temperatures changing, it might be a burden for schools to be required. CPSC recommends shade for certain metal slides that are older equipment.

Member Hammond said that children have 15 to 20 minutes for recess—for lunch, up to 25 minutes. It's their practice to have shaded areas on all their playgrounds. They have play structures—their community expects that. If it's raining, kids can get outside and at least be under the play structure.

PM Kamali discussed that it may not be necessary to add a specific requirement for shade to be put in as it seems to be standard practice for most school districts. We may conduct a survey and ask additional questions.

Action items

- Develop a survey and ask additional questions about shade to see if we need to add it to the rule.

WAC 246-370-150 Specialized Rooms

Member Kellogg discussed that specialized rooms are different from individualized education program rooms. Specialized rooms are excluded from a lot of things like temperature and window guidelines or rules.

PM Kamali asked if Member Kellogg was asking about the differentiation between specialized rooms and special education rooms and ensuring special education rooms are not excluded from temperature requirements.

Member Kellogg said yes and window requirements.

PM Kamali discussed the highlighted comment about the epi-pen section and suggested making a statement that if they are medically necessary or required, they are exempt from that requirement.

Member Kellogg discussed not seeing that windows are required for special education, but that students needed access to light.

PM Kamali thanked Member Kellogg and asked if there were more questions. There were none.

Action items

- Ensure special education rooms are not excluded from temperature requirements and window requirements.

WAC 246-370-160 Variances and Emergency Waivers

PM Kamali introduced the public comment about exemptions at the discretion of the Board.

Member Kellogg commented that readiness plans would take into consideration emergency routes, evacuation considerations, and so on.

PM Kamali said the public comment for exemption language existed in 366. We chose to change the structure by using the variance and waiver process rather than exemptions through the Board.

Member Rasmussen said that they do variances and waivers all the time, but their local board of health is not involved. They suggested removing the "Board of Health."

Member Hockaday asked when a school wants an exception, will it be a variance or a waiver? Previously there was the language that waivers were really for emergencies or temporary facilities. Now there are two paths for an exemption, and it's unclear when to go through the full variance process or to quickly waive something.

PM Kamali replied that the determination would sit with the local health jurisdiction. The comment on exemptions is unclear. Is it looking for a permanent exemption from part of the regulation? With a variance, the local health jurisdiction has the authority to say that this variance can continue, or it needs to be reviewed at a future date.

Member Hockaday agreed with that option. Keep it as defined by the local health jurisdiction because if the school has already paid to turn in a construction plan, then Member Hockaday may be able to work on a waiver during the plan review and not charge an additional fee for a variance.

Member Rasmussen asked if this commentator invented a new pathway, or did we already have both of those considered.

PM Kamali replied that this verbatim is in place in 366.

Member Jenks asked whether this comment changed what we had already had in place.

PM Kamali replied that in 370, the school official may submit a written variance request to the local health officer or that the local health officer may grant a school official an emergency waiver for some or all the requirements in these rules. Currently in 366, if you want a variance or exemption, you must appeal it to the Board.

Member Jenks replied that they liked what we had better than the comment.

Member Hockaday agreed with Member Jenks to leave it as is because a local health jurisdiction can decide on whether they charge or don't charge for a variance. For example, in their food safety program, they don't charge for simple variances. They recommend that the committee leave that discretion in terms of the complexity up to the local health jurisdiction and then the true waivers are for emergency situations.

Member Allison asked if there is a time frame for how long the variance is going to last. Does it have to renew every year? Is that something that could be added into the variance language? They were concerned about charges happening every year.

Member Rasmussen said that for a variance those numbers are a permanent variance to that requirement. A waiver is for something like “there’s been a fire in the kitchen, so the school is getting food from another district.” That would have a timeframe of when things are repaired. Variances are one-time only—a permanent situation.

Chair Hayes said that our approach has been to allow a process for variance. We can have guidance in the report that variances don't have to be renewed. In response to this comment, we must clarify that we are not providing a direct path to the Board for an exemption process. This is a process that can be efficiently and quickly done between a local health department and the school. We don't want confusion by having a separate process at the state level.

Action items

- Clarify language about the authority of local health jurisdictions to approve variances and waivers.

WAC 246-370-180 Appeals

PM Kamali asked if there were any concerns with the Appeals section. They noted that the Board and committee don't have any authority to compel local health jurisdictions on the exact process that they must use within their own internal organization. It's not within our scope.

Member Rasmussen agreed with PM Kamali. There's no way to make this consistent between all the local health jurisdictions. They have their own processes for appeals and didn't think it should be included.

Member Kellogg asked if there is a reason why we don't have emergency plans or evacuation procedures required.

Member Hockaday replied that there are already requirements for emergency plans for schools. In our area, these are managed by the educational service districts (ESDs) and OSPI. The health district does not do emergency preparedness plans with the schools.

Member Kellogg thanked Member Hockaday and asked about seismic upgrades. A lot of these buildings are considered seismically unsafe. There's a huge cost and a big risk.

Member Allison replied that they annually review buildings with their risk management insurance company. They inspect every three to five years. For old buildings it would be identified by your insurance company if they saw something very dangerous.

Member Kellogg asked if this should be covered by this rule.

Member Allison replied they thought not. It is something that must be insured. This is for minimal health and safety. Some of these buildings are not up to seismic upgrades.

Chair Hayes acknowledged the concern. It is not a role for local public health. They don't have seismic experts. This would not be an appropriate requirement for local public health to try and inspect. It doesn't belong in the rule.

Member Daltoso agreed with Chair Hayes. In newer buildings, the building code has been updated for the seismic requirements of our region. It's going to take bond funds to upgrade schools, so it's up to the districts individually and out of scope for our purposes.

Member Hockaday commented that this is out of scope. They cannot inspect for seismic regulations. It's an important piece of advocacy, but it aligns more with the building department.

PM Kamali asked if there were any other comments.

Member Allison asked about funding and the fiscal analysis. If the legislation passes everything but doesn't fund it, do we have to do any of this?

PM Kamali replied that there will be more discussion about funding at the next meeting. There is a proviso in place that prevents implementation of new school environmental health and safety rules till they've been funded.

Action items

- Next meeting on March 19 to review fiscal analysis.
- Discussion of implementation.
- Committee approval of language to go to the Board.

5. Recap/Next Steps

PM Kamali reminded members that the next meeting on March 19, 2025, will look at the fiscal analysis again. We will discuss implementation and funding pieces, finalize, and get the committee's approval to move forward with this language to the Board. We may send a survey with data points for our fiscal analysis.

Chair Hayes thanked everybody. We have more pieces to wind up for the next meeting.

PM Kamali thanked the committee for their time and flexibility to attend this last-minute meeting, adding that we are truly grateful for the effort here.

ADJOURNMENT

Chair Hayes adjourned the meeting at 12:32 p.m.

WASHINGTON STATE BOARD OF HEALTH

Patty Hayes, Chair

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PO Box 47990 • Olympia, Washington • 98504-7990
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