



Immunizations Rulemaking

Chapter 246-105 WAC

Alexandra Montaña

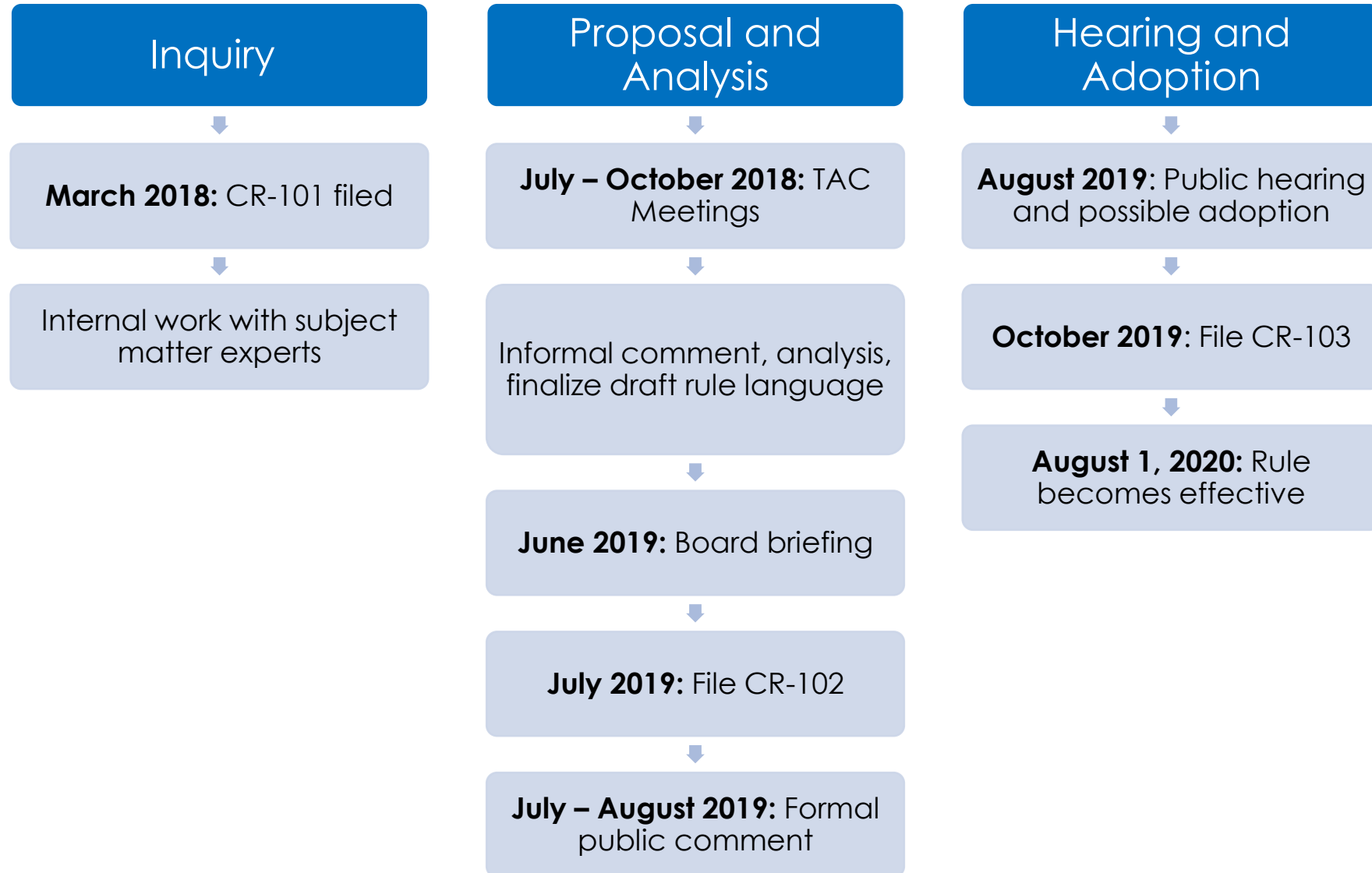
Director of Policy and Legislative Relations

Disease Control and Health Statistics

Washington State Department of Health



Timeline for Rule Making



Technical Advisory Committee (TAC)

- WA Association of School Administrators
 - Coalition for Safety and Health in Early Learning
 - Commission on Hispanic Affairs
 - Association of WA School Principals
 - WA State Association of Local Public Health Officials
 - WA Vaccine Advisory Committee
 - Parent Representatives
 - School Nurses of Washington
 - Treuman Katz Center for Pediatric Bioethics
 - WA Parent Teacher Association
 - School Health Consultants, Inc.
 - American Indian Health Commission
- WA Association of School Administrators
 - Coalition for Safety and Health in Early Learning
 - Commission on Hispanic Affairs
 - Association of WA School Principals
 - WA State Association of Local Public Health Officials
 - WA Vaccine Advisory Committee
 - Parent Representatives
 - School Nurses of Washington
 - Treuman Katz Center for Pediatric Bioethics
 - WA Parent Teacher Association
 - School Health Consultants, Inc.
 - American Indian Health Commission

CR-102: Proposed amendments, public comments, and Board staff recommendations



Comments in Support of the Proposed Rule

Summary of Comments

- 1. Ensuring as many students as possible are immunized supports the safety of students at school from serious diseases.**
- 2. The 30 day conditional status was a significant burden on schools and the new changes decrease the burden.**
- 3. Protects children from dangerous but vaccine-preventable diseases.**
- 4. Support the addition of requiring medically verified records.**
- 5. Support the elimination of the requirement for families to write the name of their church or religious affiliation on the Certificate of Exemption.**
- 6. Support the elimination of MMR from personal and philosophical exemptions.**
- 7. Vaccines are a safe and effective way to give lifetime protection from dangerous, infectious diseases.**
- 8. Support for clarification of conditional immunization status.**
- 9. Requiring students to complete as many immunizations as possible before starting school will help keep kids in school.**
- 10. Clarification of conditional status will be helpful to school nurses.**

Staff Recommendation

Recommendation: Adopt as proposed.

Comments are consistent with the significant analysis prepared by the State Board of Health (Board) and the Department of Health (Department).

Comments in Opposition of the Proposed Rule

Summary of Comments

- 1. Anyone should be able to opt out of any state medical procedure or test.**
- 2. We each own our own bodies and people should have their bodily integrity respected.**
- 3. It should not be a government choice to force vaccination.**
- 4. Our children have been perfectly healthy without any vaccines, we do not want to have to take the risk after hearing so many stories of the dangers they (vaccines) have caused.**
- 5. I strongly oppose the government mandating what type of medical care we receive and what pharmaceuticals (or any other substance) are put in our bodies.**
- 6. We should be able to consider our own medical history when making these decisions. There should be an opportunity for us to talk to our doctor, get educated, and make an informed decision. We cannot afford private school.**
- 7. Parenting my children is my job not the states. Government thinks this is a choice to take away from parents.**
- 8. Our children are being injected with other human cells (aborted fetal tissues). The state needs to make sure the vaccines are safer and cause the least problems.**

Staff Recommendation

Recommendation: Adopt as proposed.

Parents have the option to opt out of required immunizations by completing a Certificate of Exemption (COE) form (RCW 28A.210.090)

When getting an exemption, parents are required to get information about the benefits and risks of vaccination from a health care provider.

Private schools are required to comply with immunization laws under RCW 28A.210.080.

Comments in Opposition of the Proposed Rule with Recommended Revisions

Comment or Summary of Comment

Staff Recommendation

School Nurses are adding provider verified data to the WAIS when given parent permission. Could wording for adding vaccinations to WAIS be required by providers, and instead of asking permission by nurses to add these vaccination by each parent have an opt out vs. opt in rule?

“Providers shall record vaccinations in state data base, WAIS, School Nurses may add provider verified historical data to database unless parents have provided written request for exemption.”

And, or perhaps this should include additional funding for the WAIS database and fully funding the School Nurses.

Recommendation: Adopt as proposed.

Outside the scope of the current rulemaking.

Staff have not done any stakeholder work or analyses on this topic but will add it to a list of considerations for the next rule update.

Comments in Opposition of the Proposed Rule with Recommended Revisions

Comment or Summary of Comment

Concerns regarding removing the place to name the church or religious body for individuals claiming religious exemption on the COE form. Requested that, "...explicit guidance be provided -- from the State Board of Health to all appropriate stakeholders -- outlining a clear, consistent, and accountable process to evaluate religious exemption claims."

Staff Recommendation

Recommendation: Adopt as proposed

The Department does not collect this information from the schools and it is not being used in any way.

The Board does not have the explicit authority from the Legislature to create criteria for evaluating religious exemptions.

| THANK YOU