



Summary of Written Comments Rule Proposal to WAC 246-100-166

Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases
State Board of Health Hearing, October 10, 2007

TOPIC	COMMENTS/QUESTIONS	PROPOSED RESPONSE
<p>Parental documentation as proof of acquired immunity to varicella.</p>	<p>As a public health nurse and a school nurse, I am opposed to this WAC as it is proposed which will no longer accept documentation by a parent of a history of varicella as proof of immunization. Accepting this WAC as proposed will undoubtedly place a significant burden on physicians and school nurses not to mention parents. The toll in time and dollars of attempting to secure this history from a provider simply cannot be cost effective for families, employers, school personnel, or healthcare providers. We are simply asking for a higher noncompliance rate. Please consider leaving the situation as it stands now: accepting the parent report of varicella disease.</p>	<p>The varicella vaccine has been administered in Washington for more than 10 years. As use of this vaccine increases, the number of children getting the disease decreases. Similar to our experience with measles, as varicella becomes rarer, it is less likely to be accurately identified by parents and health care providers.</p> <p>Because the risk of complications from the disease is greater in children over 15 years of age, it's very important that immunity from having had the disease is proven at a younger age. The change in acceptable proof assures children are protected.</p>
<p>Parental documentation as proof of acquired immunity to varicella.</p>	<p>As a Public Health Nursing Director and Public Health Nurse who has worked in and with the schools on immunizations, I believe that the portion of the WAC requiring parents to have serologic proof and not just a history of varicella disease will be problematic, expensive and lead to a larger amount of non-compliance. I think it is an unnecessary burden to place on schools, parents and physicians.</p>	<p>It is still acceptable and safe for a child to receive both doses of this vaccine regardless of any question of acquired immunity. If parents do not wish to have their child receive a serology test, vaccination is available and purchased by the state for every child needing it.</p>
<p>Parental documentation as proof of acquired immunity to varicella. Serology testing.</p>	<p>I oppose this measure because of the burden and expense it will put on the families of these students. Varicella has such a low morbidity rate that it does not warrant such extreme measures as serology testing to prove immunity. This type of testing is very expensive and not often covered by insurance. I believe the portion of this bill that demands proof of immunity should be excluded.</p>	