

## **School Environmental Health and Safety Rule Draft Communication Plan February 29, 2008**

### **Introduction**

The Washington State Board of Health initiated a revision to Chapter 246-366 WAC, concerning environmental health and safety for primary and secondary schools, in October 2004. It asked the Department of Health (DOH) to develop language for its consideration. DOH considered recommendations made by its School Rule Development Committee (SRDC) in developing the first discussion draft, released in March 2006. The SRDC had representatives from public health, school agencies and organizations, parent/teacher associations, parents, students, school staff, and an architect. DOH and the Board received extensive comment on the first draft. The Board held a series of work sessions to better understand the overlapping authorities and policy issues related to school environmental health, then provided direction to the Department. DOH released a second discussion draft and briefed the Board in August 2007. It again briefed the Board in November 2007, this time about comments on the second draft.

The Department is collecting cost/benefit information and developing a final draft proposal for the Board's consideration. Because of concern about how the language in the second proposed draft is to be interpreted and the intent behind some of the proposed language, a small workgroup is being convened to refine the rule language prior to releasing a final draft for public comment. The goal will be to eliminate confusion and disagreement that stems from unclear language and to clearly identify remaining areas of substantive disagreement. The Board expects to be briefed on the final proposed language in June and hold a public hearing on the rule revision in August.

Communication efforts to date have been robust and discussion drafts have been extensively reviewed. Many of the policy directions and statements of intent from the Board, however, have not reached stakeholders. There is also some confusion about timelines and other procedural aspects of the rule making process, and stakeholders have wondered about responses to their comments. This suggests a need for more proactive communication by the Board and DOH. This need was reinforced at a recent meeting when a school official mentioned that she had not heard of the rule update when she was with a smaller district.

### **Communication Goals**

To assure that all interested parties across the state receive pertinent and accurate information about the development of the school environmental health and safety rule in a timely fashion.

### **Summary of Prior Communications**

- The rule revision was on the agenda and discussed at 14 Board meetings between July 2003 and November 2007. These meetings were held in locations throughout the state. Notices of these meetings were sent to the SBOH distribution list, posted to the SBOH Web site, and sent to the media.
- The Board and DOH have built an e-mail distribution list of more than 400 people representing public health, school agencies and organizations, parents, students, and

school staff and have used this list routinely to distribute information regarding the rule and the rule development process.

- The SRDC held six public meeting between November 2004 and July 2005. The three SRDC technical workgroups each met four to five times between January and April 2005. Technical workgroup participation was open to anybody and the meetings were extensively noticed. The DOH Fall 2004 School Environmental Health & Safety workshops around the state and e-mail distribution lists were used to notify constituents and to ask for participation.
- Staff presented the school rule revision at seven education association statewide conferences between May 2005 and November 2006 (SNOW, WAMOA, WASBO, WSEHA, WSSDA). Notices of these presentations were printed in the conference programs and posted to the association Web sites.
- Staff held 25 fall workshops in the nine educational service districts (ESDs) between 2005 and 2007 (seven in 2005, nine in 2006 and again in 2007). Notices were sent to ESD distribution lists, LHJs, and all related school associations.
- Staff held 13 workshops in 11 cities (nine daytime, four evening) in March and April 2006 to answer questions about the first discussion draft.
- Staff presented on the first discussion draft in March 2006 to Office of Superintendent of Public Instruction (OSPI) School Facilities Advisory Board and WASBO Risk Managers.
- Correspondence was sent to education-related associations and OSPI inviting their participation in the SRDC and inviting them to participate in the Board's Nov. 8, 2006 work session.
- E-mails were sent to the school rule interested parties list announcing release of the release of second draft of rule and the Board's August 8, 2007 meeting.
- Updates on the rule were shared by staff at multiple stakeholder meetings between 2004 and 2007, including Local Environmental Health Directors statewide meeting, OSPI School Facilities Citizen's Advisory Panel and Technical Advisory Committee, School Nurses K-12 video conference (all ESDs participated), School Safety Center Advisory Committee, WASBO Risk Managers' Committee.

### **Objectives for Future Communication**

- Provide formal, accurate, and timely communication to stakeholders regarding ongoing developments on the school environmental health and safety rule.
- Coordinate with DOH for consistency and accountability in agency response.
- Collaborate with DOH School Environmental Health and Safety. Program, to respond to questions and comments appropriately.
- Centralize efforts to coordinate with stakeholders and legislators.
- Inform interested legislators of communications with our stakeholders and rule progress.

### **Primary Audiences**

- School district superintendents and other school administrators
- Education service districts
- Members of interested organizations and associations
- Local health jurisdictions
- Other interested parties

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## Secondary Audiences

- Interested legislators and legislative staff
- Office of Financial Management policy and budget staff

## Primary Contacts by Audience

- District & ESD Superintendents, other administrators, local health jurisdictions and other interested parties: Nancy Bernard 360-236-3072 / Mark Soltman 360-236-3366
- Organization/association members and Legislature: Craig McLaughlin, 360-236-4106, [craig.mclaughlin@doh.wa.gov](mailto:craig.mclaughlin@doh.wa.gov)

## Communication Enhancement Strategies

- Office of Superintendent of Public Instruction (OSPI) will distribute informational document/email to all ESD and district superintendents. Document will provide instructions for being added to our interested parties' distribution list (DL).
- Washington Association of School Administrators (WASA) will distribute an email to its member distribution list with information about the rule status and directions on how to get added to the DL. It will also post information to its Web site and provide updates about the rule at monthly ESD meetings around the state and encourage people to keep up to date on the rule-making process.
- Washington Association of School Business Officials (WASBO) will distribute an email to its member distribution list with information about the rule status and directions on how to get added to the DL. It will also post information to its Web site.
- Washington State School Director's Association (WSSDA) will include information about the rule revision in its E-newsletter, *Boardcast*, which goes out to all of its members. It will also include information in its monthly print newsletter.
- Board will work with Washington Education Association to identify opportunities for distributing information about the rules process through existing WEA communications channels.
- Board will work with the Washington State PTA to identify opportunities for distributing information about the rules process through existing WSPTA communications channels.
- Board will send email update to school rule interested parties' DL every two weeks and will explore appropriate use of other DLs, such as environmental health directors list.
- Board will make school environmental health rule more prominent on its Web site, create new pages devoted to the school rule, and update related pages at least every two weeks.
- Board staff will be available for meetings with school districts and professional associations as requested by legislators, districts and associations, schedule permitting.

## Communication Approval Process

- Text for organization/association e-mails, newsletters, and Web sites will be approved by organization/association leadership and submitted by Board executive director in consultation with DOH project sponsor.
- Bi-weekly communication through DL and other channels will be approved by Board executive director in consultation with DOH project sponsor.

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