



School Rules WAC 246-366A

*Summary of Comments
Received Since Aug. 27*

PUBLIC HEALTH
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*Briefing of State Board of Health
September 10, 2008*

Ned Therien, State Board of Health



Summary of Comments Received Since August 27

- Rule would put a disproportionate financial burden on private schools, particularly regarding water sampling and construction standards. Many students are not from high income families and raising tuition would be a problem.
- The state should pay for health and safety requirements imposed on private schools.
- Mother is unhappy and outraged that her child and other children are not being protected by highest standards...approve proposed updates.



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- Add subsection to proposed WAC 246-366A-020 to clarify authority and responsibility for local health and school officials derives from RCW 43.20.050[5].
- Safety of children is utmost concern to all. Asking school districts to choose between improving safety and educating students is untenable. Allow legislature to explore additional funding before enacting rules.



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- School district board of directors has made changes to improve vigilance on behalf of students, but also has fiduciary responsibility to citizens in use of scarce tax dollars. Opposes adoption of proposed rules.
 - Proposed rule is not adequately coordinated with Legislature
 - Review of construction plans is redundant with building officials
 - School districts already use professional project managers
 - School district risk managers annually inspect schools



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- The rules do not need to contain provisions prohibiting the use of wood treated with chromated copper arsenate (CCA) where it is accessible to students or where students may play because EPA now requires labeling of CCA preservatives indicating they are not approved for such uses. Approved preservatives color wood similarly, which might cause confusion. Also the rule implies the presence of such products would be a health risk, which is disputed.
- There are no federal rules restricting the use of creosote treated wood. Minimal exposure could come from used railroad ties.
- Eliminate possible confusion whether CCA or creosote treated utility poles and posts are prohibited at schools.



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