



# Washington State Association of Local Public Health Officials

An Affiliate of  
Washington State Association of Counties

September 9, 2008

Treuman Katz, Chair  
Washington State Board of Health  
P.O. Box 47990  
Olympia WA 98504-7990

Dear Mr. Katz:

On behalf of the Washington State Association of Local Public Health Officials (WSALPHO), I am writing about Chapter 246-366A WAC - Primary and Secondary Schools, filed July 23, 2008.

We appreciate the effort the Board, your staff, the Department of Health, and others have spent working on this important issue. Providing a safe and healthy school environment for students in our state is an important public health role. We believe the new rules are an improvement over the current school regulations. If adopted we believe these rules will help protect public health if they can be properly implemented.

The draft rules place significant obligations on local public health jurisdictions. We can only fulfill these obligations if we have sufficient numbers of properly trained and equipped staff; and we can recover the costs associated with the work required by the new rules. Under current economic conditions, few if any health jurisdictions can marshal the resources needed to successfully implement the new rules. We realize it is beyond the authority of the State Board of Health to provide program funding, but we want to make you aware of this very real problem.

We understand that committees from both houses of the state Legislature have asked that you delay action on these rules until they have the opportunity to address their financial impact on schools. We support these requests and will ask these same committees to consider the needs of local public health along with the needs of schools. We ask that the Board consider the needs of local public health as you develop a response to the Legislature's request.

We appreciate that the effective date for the rule is two years after adoption and that many of its requirements are phased in over time. We believe two years is enough time for local health and schools to implement the rules if adequate resources are available. If you delay adoption of the rule, we ask that you adjust the implementation and compliance dates accordingly.

Thank you for considering our concerns. If you have questions or wish to discuss this matter further, please contact Art Starry, WSALPHO Legislative Committee Chair, Thurston County Public Health and Social Services, at (360) 786-5456 or [starrya@co.thurston.wa.us](mailto:starrya@co.thurston.wa.us).

Sincerely,

Rick Mockler  
Chair, Washington State Association of Local Public Health Officials  
RM/lp

c Craig McLaughlin  
Art Starry