

**State Board of Health Proposed School Environmental Health and Safety Rules, Chapters 246-366 WAC and 246-366A WAC
Summary of Comments Received on Supplemental CR-102 (WSR 09-14-136) Filed July 1, 2009 and Staff Recommendations**

Comment or Proposed change	Source of comment	Staff comments	Staff recommended changes
<p>General "I encourage you to pass the School Environmental Health and Safety Rules...our members continue to support passage of these rules to support better working and learning environments for the staff and students of Washington State...you will likely come up with a merged option...Amending CR103 annually until there is funding makes more sense than leaving a door open allowing for interpretation of the effective date of rules...we will continue to support passage of the rules and the funding to implement them in a timely manner."</p>	<p>Mary Lindquist President, Washington Education Assoc.</p>	<p>CR103 process to revise effective dates each year based on outcome of each legislative session is the process in Alternative A of the supplemental proposal and could be done on a section by section basis. Some rule language in Alternative B better clarifies that implementation is dependent on current and future legislative requirements, but needs amendment to fit with CR103 process for revising effective dates.</p>	<p>Adopt SBOH Environmental Health Committee recommended amendments to blend alternatives A and B, using CR103 process from A with rule language similar to B.</p>
<p>Alternative B: General "Everything is perfect. No comment."</p>	<p>"Offshore development center"</p>	<p>Unsure of standing because comment appears to be from foreign e-mail account.</p>	<p>None</p>
<p>Alternative B: General "...we remain concerned about the implementation of these regulations without sufficient funding."</p>	<p>Debra Fulton Executive Director, Support Services, Mukilteo School District</p>	<p>None</p>	<p>None</p>

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<p>Alternative B: 246-366A-003(3) "In Alternative B it is difficult to discern when the implementation of the rule would become effective under different sets of circumstances..."</p>	<p>Debra Fulton Executive Director, Support Services, Mukilteo School District</p>	<p>Using the CR103 process for establishing effective dates for implementation, as proposed in Alternative A, would eliminate the need for language in published Alternative B 246-366A-003(3) regarding interpretive statements. The CR103 amendment process for changing effective dates would be subject to future Board action after legislative actions are known.</p>	<p>Adopt SBOH Environmental Health Committee recommended amendments to blend alternatives A and B and follow CR103 process for effective dates and implementation of provisions.</p>
<p>Alternative B: 246-366A-003(2)(c) Suggested revision: "The office of superintendent of public instruction shall forward, <u>to the extent possible,</u> the notice of implementation electronically to school districts, school principals and <u>approved</u> private schools."</p>	<p>Martin Mueller Assistant Superintendent, Student Support, Office of Superintendent of Public Instruction</p>	<p>OSPI recommended changes reflect practical limits of OSPI electronic distribution lists.</p>	<p>Adopt SBOH Environmental Health Committee recommended amendments.</p>