



January 2022

Dear WA State Board of Health,

We appreciate the hard and tireless work of so many in WA State government over the last two years. The partnership with County DOH's has been particularly beneficial and fruitful, and we look forward to continuing these new relationships in the future as we work together for the health and safety of our school communities.

The following is a summary of the common threads from leaders of the 70 WA state ACSI affiliated schools with regards to the four questions Samantha Pskowski and Hannah Febach asked me to collect feedback on. We hope these responses will be helpful as the BOH considers adding the COVID vaccine to the Childhood Immunization Schedule (CIS).

1. How are your organizations involved with the implementation or tracking of school immunization requirements?

Answer: Independent schools (like our public-school colleagues) must monitor and collect immunization records for each student who attends school on our campuses. Because many records are incomplete or parents do not fully understand the CIS requirements, staff must take the time to follow through with many families to ensure documentation for all required shots is current.

2. What additional work would the implementation of a new immunization requirement for all school age children (5-18) entail for your organization?

*Answer: Currently we need to verify compliance with the CIS for all **new students** as well as with our students who are moving **into KG and 6th or 7th grade**. These groups generally represent 10-15% of a school's total population. If COVID is added to the CIS, our staff would have to go back and monitor/collect documentation for every student on our campus. This change to the CIS would increase office staff workload by 800-900%.*

3. How burdensome would this additional work be for your organization?

Answer: Adding COVID to the CIS would create an unsustainable burden for our school personnel. Increasing the workload by this degree simply cannot be done without hiring additional staff for which we do not have the financial nor human resources available. Schools do not have COVID related emergency funds such as EANS available for hiring new staff and our HR departments are already overloaded with trying to find faculty and other core business hires in the very tight employment market.

4. Additional Comments/Concerns?

*Answer: **Boosters?** If students would need stay up on boosters to be considered fully vaccinated, we would be required to do this sort of intense monitoring and data collection not just once at the beginning of the year but potentially many times throughout the school year.*

Mental Health? Being on the front lines with regards to families and students' mental health, adding an additional requirement to our communities is very concerning on three fronts. Family stress of having to manage getting students vaccinated, the anxiety some families will feel about having to force this vaccine on their children if they do not feel the risk is warranted, and the further division this will create in our school communities. These mental health burdens will assuredly negatively impact student learning.

Why Concerning? The two additional concerns mentioned above are particularly troublesome for school leadership because the data on COVID related serious illness and death for students in our schools does not warrant this drastic an action at this time. See page 12 in the most recent report from [Snohomish County DOH](#) as an example. This report records zero deaths over the course of the entire pandemic for the 0–19-year-old age group and very minimal hospitalizations for school aged children.

This pathology data is not lost on our families and adding COVID to the CIS will place our schools directly in the crosshairs of frustration for parents who cannot see the addition of COVID to the CIS as a cogent public health measure.

When? If and when the pathology for children resembles the childhood pathology for the current vaccines on the CIS, school leaders would fully support the BOH adding COVID to the schedule but until it does, allowing parents to choose to have their children vaccinated for COVID is the best way forward for WA schools, will allow parents to breathe a sigh of relief, and will help restore families' confidence in public health and other state officials.

Thank you again for your time and attention on this very critical issue. We appreciate your asking for our input and hope that what was shared will be helpful in your deliberations. Feel free to reach out if anything is either unclear or you would like more information.

Very warmly and gratefully yours,

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