

California Department of Education

Executive Office

SBE-003 (REV. 11/2017)

eab-eeed-nov19item01

# California State Board of Education November 2019 Agenda Item #14

## Subject

Vision Testing: Adopt Proposed Amendments to the *California Code of Regulations,* Title 5 sections 590, 591, 594, and 596 and Proposed Section 597.

## Type of Action

Action, Information

## Summary of the Issue(s)

At its September 2019 meeting, the State Board of Education (SBE) approved the changes to the proposed regulations regarding Vison Testing, *California Code of Regulations* Title 5 (5 *CCR*), sections 590, 591, 594, 596, and 597, and directed the California Department of Education (CDE) to issue a notice of these amended changes for a 15-day public comment period. One public comment was received during this public comment period. This comment is considered relevant because it addressed the changes noticed for the 15-day public comment period; however, the comment did not result in any substantive change to the regulations. Pursuant to California *Government Code* Section 11346.8(a), the CDE is submitting the public comments to the SBE so that it considers all relevant matter presented to it before adopting the Vision Testing regulations.

California *Education Code* (*EC*) Section 49455, enacted by Assembly Bill 1840 (Chapter 803, Statutes of 2014, hereafter AB 1840) and Senate Bill 1172 (Chapter 925, Statutes of 2014, hereafter SB 1172) requires the CDE to adopt guidelines to implement provisions of these two bills, including training requirements and a method of testing for near vision. Amendments to 5 *CCR* sections 590, 591, 594, and 596 and the proposed Section 597 are necessary to provide the specific guidance that is necessary to enable the CDE and school districts to implement the provisions of *EC* Section 49455.

## Recommendation

The CDE recommends the SBE take the following actions:

* Adopt the proposed regulations.
* Authorize the CDE to take any necessary ministerial action to respond to any direction or concern expressed by the Office of Administrative Law during its review of the final rulemaking file.

*“A Guide for Vision Screening in California Public Schools,”* provided as Attachment 6, is provided for information only.

## Brief History of Key Issues

In 2014, the Legislature passed AB 1840 and SB 1172, which amended *EC* Section 49455 to require schools to appraise the near, distant, and color vision of a child using an eye chart or scientifically validated photoscreening test and to require that this appraisal occur during kindergarten or upon first enrollment and in grades two, five, and eight. Prior to this legislation, schools were required to conduct appraisals for only distance and color vision and to conduct the appraisals upon first enrollment and at least every three years until the eighth grade.

To align the relevant regulations with *EC* Section 49455, the following substantive amendments were proposed and approved by the SBE at its January 2019 meeting:

* The amendment to 5 *CCR* Section 590 provides guidance on contracting with agencies to provide vision tests. This amendment also requires that such agencies provide evidence of training.
* The amendment to 5 *CCR* Section 594 changes testing criteria to align with recommendations of the International Council of Ophthalmology. Other amendments to the existing regulations reflect statutory changes since 1977.
* The addition of 5 *CCR* Section 597 addresses qualifications under which scientifically validated photoscreening tests may be performed.

## Summary of Previous State Board of Education Discussion and Action

At its January 2019 meeting, the SBE approved commencement of rulemaking to the Vision Testing regulations as Item #19 on its agenda at <https://www.cde.ca.gov/be/ag/ag/yr19/agenda201901.asp>.

At its September 2019 meeting, the SBE adopted the changes to the proposed regulations and directed the CDE to circulate the proposed changes for a 15-day comment period, which can be found as Item #8 on its agenda at <https://www.cde.ca.gov/be/ag/ag/yr19/agenda201909.asp.>

## Fiscal Analysis

An Economic and Fiscal Impact Statement is provided as Attachment 5.

## Attachment(s)

* **Attachment 1:** Proposed Regulations (4 pages)
* **Attachment 2:** Final Statement of Reasons (3 pages)
* **Attachment 3:** Copies of Public Comments Received During 15-Day Comment

Period (2 pages)

* **Attachment 4:** Vision Testing Rulemaking Public Comment and Response

Summary Chart Public Comment Period January 25, 2019, through March 11, 2019 (4 pages)

* **Attachment 4a:** Copies of Public Comments Received During 45-Day Comment

Period (21 pages)

* **Attachment 5:** Economic and Fiscal Impact Statement (STD. 399) (5 pages)
* **Attachment 6:** A Guide for Vision Screening in California Public Schools,

provided for information only (57 pages)

* The State Board of Education has illustrated changes to the original text in the following manner: text originally proposed to be added is underlined; text proposed to be deleted is displayed in ~~strikeout~~.
* The 15-day text proposed to be added is in “**bold underline**”, deleted text is displayed in “**~~bold strikeout~~**”.

# Title 5. Education

**Division 1. California Department of Education**

**Chapter 2. Pupils**

**Subchapter 3. Health and Safety of Pupils**

**Article 4. Vision Testing**

## § 590. Duly Authorized Agency.

1. Pursuant to Education Code ~~S~~section 49452, a county superintendent of schools may contract with and permit districts located within the county to contract with an agency duly authorized by the county superintendent of schools to provide vision tests**~~,~~**. ~~which includes~~ Such agencies may include, but are not limited to, a city or county health department, a local health district, or the State Department of Health Services.
2. Duly authorized agencies must provide evidence upon request to the California Department of Education and county superintendents that individuals giving vision tests have received comprehensive training on the latest evidence-based pupil’s vision screening techniques. This evidence requirement may be met by providing one of the following documents:
3. A statement from the authorized agency that the individuals have satisfactorily completed an acceptable course of in-service training in techniques and procedures in vision testing of at least six clock hours and that the individuals are qualified to administer vision tests to pupils.
4. A transcript from an accredited college or university evidencing that the individuals have successfully completed an acceptable course in vision testing.~~of at~~

**~~least one semester unit.~~**

NOTE: Authority cited: Section 33031, Education Code. Reference: Sections 44873, 44877, 44878**~~,~~** and 49452, Education Code.

## § 591. Employees Authorized to Give Vision Tests.

(a) An employee of a school district or of a county superintendent of schools may be authorized to give vision tests pursuant to Education Code ~~S~~section 49452 and may be designated a “duly qualified supervisor of health” within the meaning of that section if the employee is:

(1) A physician and surgeon or osteopath employed pursuant to Education Code ~~S~~section 44873.

(2) A school nurse employed pursuant to Education Code ~~S~~section 44877.

(3) An optometrist employed pursuant to Education Code ~~S~~section 44878.

(b) Any other certificated employee of the school district or of the county superintendent of schools may be authorized to give vision tests pursuant to Education Code ~~S~~section 49452 if the employee has one of the following documents:

(1) A statement from a qualified supervisor of health that the employee has satisfactorily completed an acceptable course of in-service training in techniques and procedures in vision testing of at least six clock hours given by the qualified supervisor of health making the statement and that the employee is qualified to administer vision tests to pupils.

(2) A transcript from an accredited college or university evidencing that the employee has successfully completed an acceptable course in vision testing **~~of at least one semester unit~~**.

NOTE: Authority cited: Section 33031, Education Code. Reference: Sections 44873, 44877, 44878, ~~and~~ 49452**~~,~~** and 49455, Education Code.

## § 594. Test of Visual Acuity.

(a) The test of visual acuity administered pursuant to Education Code sections 49452 and 49455 shall mean a test for visual acuity at both the far point and near point. This shall be conducted by means of an optotype test or any other scientifically validated photoscreening test that measures visual acuity. ~~Test failure for the visual acuity test shall be defined as follows:~~

1. **~~Test failure~~ Definition of failure** for the far point visual acuity test shall be

defined as follows:

(1) For ~~children under six~~ pupils **~~five~~ four** years of age: Visual acuity of ~~20/50~~ **~~20/40~~ 20/50** or worse. The designation ~~20/50~~ **~~20/40~~ 20/50** or worse indicates the inability to identify accurately the majority of letters or symbols on the 20-foot line of the test chart at a distance of 10 feet.

(2) For ~~children~~ pupils **~~six~~ five** years of age or older: Visual acuity of ~~20/40~~ **~~20/32~~ 20/40** or worse. **~~This means~~ The designation 20/40 or worse indicates** the inability to identify the majority of letters or symbols on **~~15~~-20-**foot line of the chart at a distance of 10 feet.

(3) For all ~~children~~ pupils: A difference of visual acuity between the two eyes of two lines or more on the optotype chart.

(c) Test failure for the near point visual acuity test shall be defined as follows:

(1) For all pupils: Visual acuity of **~~20/32~~ 20/40** or worse. The designation **~~20/32~~ 20/40** or worse indicates the inability to identify accurately the majority of letters or symbols on the test chart at a distance of 16 inches with both eyes open.

~~(b)~~ (d) For pupils who, because of age or special needs are not able to be tested with an optotype test, other types of vision testing, such as a functional vision ~~test~~ screening or instrument-based screening, may be utilized, using procedures and criteria of failure as described by the manufacturer.

~~(c)~~ (e) If a pupil fails a vision test that is conducted by an employee authorized to give vision tests pursuant to subdivision (b) of ~~S~~section 591 or subdivision (a) of section 597, a reevaluation shall be conducted prior to a report being made to the pupil's parent or guardian. This reevaluation shall be conducted by an employee authorized to give vision tests pursuant to subdivision (a) of ~~S~~section 591.

~~(d)~~ (f) If a pupil fails a vision test conducted by an employee authorized to give vision tests pursuant to subdivision (a) of ~~S~~section 591, a report shall be made to the pupil's parent or guardian as required by Education Code ~~S~~section 49456.

NOTE: Authority cited: Section 33031, Education Code. Reference: Sections 3308.5, 49452, 49455 and 49456, Education Code.

## § 596. Gross External Observation of the ~~Children's~~ Pupils’ Eyes, Visual Performance and Perception.

Gross external observation of the ~~children's~~ pupils’ eyes, visual performance and perception, pursuant to Education Code sections 49452 and 49455, shall mean continuous observation by teachers of the appearance, behavior and complaints of pupils that might indicate vision problems. ~~Also, periodic investigation~~ Continual and regular observation by the teacherwhere a pupil’s ~~pupils'~~ school performance begins to give evidence that existence of the problem might be caused by a visual difficulty**.**~~. Such an evaluation~~ **Such an evaluation** shall be done in consultation with the school nurse.

NOTE: Authority cited: Section 33031, Education Code. Reference: Sections 49452 and 49455, Education Code.

## § 597. Appraisals Using Scientifically Validated Photoscreening Tests

(a) Employees, or trained individuals, as defined in section 591, are permitted to conduct vision screenings using photoscreening tests only under an agreement with, or supervision of, an optometrist or ophthalmologist pursuant to Education Code section 49455.

(1) Employees and individuals conducting vision screenings using photoscreening equipment must be trained in the proper use of such equipment.

(b) Acceptable scientifically validated photoscreening tests shall be limited to those tests recognized as best practice or acceptable practice as determined by the California Department of Education.

NOTE: Authority cited: Section 33031, Education Code. Reference: Section**~~s~~** 49455, Education Code.

08-02-19 [California Department of Education]

# FINAL STATEMENT OF REASONS

Vision Testing

## UPDATE OF INITIAL STATEMENT OF REASONS

The original proposed regulation text was made available for public comment for at least 45 days from January 25, 2019, through March 11, 2019. Eight individuals provided written comments during the 45-day comment period.

A public hearing was held at 1:30 p.m. on March 11, 2019, at the California Department of Education (CDE)*.* Two individuals attended the public hearing and no individuals provided public comments.

## SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING THE 45-DAY INITIAL NOTICE PERIOD OF JANUARY 25 THROUGH MARCH 11, 2019

Summaries of the written public comments received by the CDE and its responses are represented in the attached chart.

***After the 45-day comment period, the following changes were made to the proposed text of the regulations and sent out for a 15-day comment period from September 16, 2019, through October 1, 2019:***

General changes, including grammatical edits, were made to the regulations.

**Section 590(b)(2)** is amended to delete “of at least one semester unit” as it is unnecessary in further describing an acceptable course in vision testing from an accredited college or university.

**Section 591(b)(2)** is amended to delete “of at least one semester unit” as it is unnecessary in further describing an acceptable course in vision testing from an accredited college or university.

**Section 594(b)** is amended to change the words “test failure” to “definition of failure” to clarify the purpose of Section 594(b). Subsections 594(b)(1) and (2) are also amended to change the definition of test failure for far point visual acuity for specific age ranges. Specifically, test failure is defined as visual acuity of: 20/50 or worse for pupils four years of age; and 20/40 or worse for pupils five years of age or older and is consistent with the guidelines, “A Guide for Vision Screening in California Public Schools (2018 edition).**”** These guidelines are aligned with Education Code section 49455 and are a result of collaborative efforts among representatives from the California School Nurses Association and the California Optometric Association. Subsection 594(b)(2) is further amended  to change “15-foot line” to “20-foot line” on the test chart for testing far point visual acuity to correct an error because a 15-foot line does not exist.

**Section 594(c)** is amended to change the definition of test failure for near point acuity for all pupils to 20/40 or worse and is consistent with the guidelines, “A Guide for Vision Screening in California Public Schools (2018 edition).” These guidelines are aligned with Education Code section 49455 and are a result of collaborative efforts among representatives from the California School Nurses Association and the California Optometric Association.

## SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING THE 15-DAY COMMENT PERIOD OF SEPTEMBER 16, 2019, THROUGH OCTOBER 1, 2019

The CDE received one written comment during the 15-day comment period. The comment and the CDE’s responses are as follows:

**Candace Hilvers,** **MSN, PHP, PHN, RN, Faculty, California State University, Fresno (CSUF) Comment #1:** The current document is in contradiction with the American Academy of Pediatrics document.

**Reject:** One of the contradictions to which the commenter refers is that the American Academy of Pediatrics (AAP) categorizes the age groups as 3-5 years of age and 6 years of age and older, while the CDE uses age groups of 4 years of age and 5 years of age and older. The commenter also disagrees with the test failure points for far vision acuity that CDE has included in section 594.

The CDE rejects these comments because these regulations are consistent with the guidelines, “A Guide for Vision Screening in California Public Schools.” These guidelines are aligned with statute and are the result of current collaborative efforts among credible and reliable representatives from the ophthalmology and optometry professions, credentialed school nurses, educational leaders, and community-based organizations specializing in vision screening.

Another contradiction to which the commenter refers is the referral criteria, which is included in “A Guide for Vision Screening in California Public Schools.”

The CDE rejects this comment because the guideline document, “A Guide for Vision Screening in California Public Schools,” and the referral criteria were not included in the changes that were part of the notice for this 15-day comment period.

The commenter also asked a question regarding “acceptable scientifically validated photoscreening tests.” This question does not require a response because this term was not included in the changes that were part of the notice for this 15-day comment period.

## UPDATE TO STUDIES, REPORTS OR DOCUMENTS RELIED UPON – GOV. CODE SECTION 11346.2(b)(3):

In addition to the American Academy of Pediatrics Policy Statement, which was listed in the Initial Statement of Reason, the SBE also relied upon the “Guide for Vision Screening in California Schools (April 2019)” in proposing the adoption, amendment, or repeal of these regulations.

This document replaces the 2018 draft version of the “Guide for Vision Screening in California Schools,” which was listed in the Initial Statement of Reasons. During the course of rulemaking, the 2018 draft version was updated in April 2019. This update is the basis for the visual acuity thresholds in the amended regulation section 594. A copy of this guide can be requested by contacting the CDE’s regulation coordinator, Patricia Alverson, by email ([palverson@cde.ca.gov](mailto:palverson@cde.ca.gov)) or phone (916-319-0860).

## ALTERNATIVES DETERMINATION

The State Board of Education has determined that no alternative would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law. All alternatives considered by the State Board of Education were in the form of public comments.

## LOCAL MANDATE DETERMINATION

The proposed regulations do not impose any mandate on local agencies or school districts.

10-04-19 [California Department of Education]

# Copies of Public Comments Received During 15-Day Comment

Period **From:** Candy Hilvers <[chilvers1950@outlook.com](mailto:chilvers1950@outlook.com)>

**Sent:** Thursday, September 26, 2019 9:32 AM

**To:** REGCOMMENTS

Subject: Comments Regarding Vision Testing Guidelines Attachments: Comments Regarding Revisions to Guidelines.docx

I have attached my comments regarding the guidelines.

Candace Hilvers

2339 S. Woodland St. Visalia, CA 93277

Cell # 559-731-8082

Sent from [Mail](https://urldefense.proofpoint.com/v2/url?u=https-3A__go.microsoft.com_fwlink_-3FLinkId-3D550986&amp;d=DwMFAg&amp;c=SIStQSL0VMIUJoLS-Q8giiFlA-AKdP7tpJHyQh8DeXk&amp;r=bYS-hcZ7epOxbnBpKQEA8XYQ3_FyGWBUtKxZQy2N1tA&amp;m=BKfqZgmxwYHiEdYs2X6IBkf8yyJYY1FzX3JZAfTqdwE&amp;s=Nkc4gIYDgG5JoQi34EqbuyfYQnpqvMpzOPqWqUTNW2g&amp;e) for Windows 10

Comments Regarding Revisions to Guidelines

The current document is in contradiction with the American Academy of Pediatrics document.

Page 2 lines 29-31

(b)Test failure for the far point visual acuity test shall be defined as follows:

(1) For children under six pupils five years of age: Visual acuity of 20/40 or worse. The designation 20/50 20/40 or worse indicates the inability to identify

Page 3 lines 1-5

accurately the majority of letters or symbols on the 20-foot line of the test chart at a distance of 10 feet.

(2) For children pupils six years of age or older: Visual acuity of 20/32 or worse. This means the inability to identify the majority of letters or symbols on 15-foot line of the chart at a distance of 10 feet.

The initial document refers to:

American Academy of Pediatrics Policy Statement,

Eye Examination in Infants, Children, and Young Adults by Pediatricians PEDIATRICS Vol. 111 No. 4 April 2003

<http://pediatrics.aappublications.org/content/pediatrics/111/4/902.full.pdf>

See page 2.

Ages 3-5 Referral Criteria

1. Fewer than 4 of 6 correct on 20-ft line with either eye tested at 10 ft monocularly (ie, less than 10/20 or 20/40)

Ages 6 and up

1. Fewer than 4 of 6 correct on 15-ft line with either eye tested at 10 ft monocularly (ie, less than 10/15 or 20/30)

Page 4 lines 12-16

Where do you find the “Acceptable scientifically validated photoscreening tests”?

# Attachment 4: Vision Testing Rulemaking

**Public Comment and Response Summary Chart**

**Public Comment Period: January 25, 2019, through March 11, 2019**

| **Proposed Section** | **Commenter** | **Comment/Recommendation** | **Agency Response** |
| --- | --- | --- | --- |
| N/A | Donna Bassett, RN, PHN, Credentialed School Nurse (Letter 1); Caroline Thibodeau, MHS, FPN, RN, Credentialed School Nurse (Letter #2); Sheri Coburn (Letter #3);  Sylvia Fischer (Letter #4) | These commenters request that the California Department of Education (CDE) hire a school nurse. | **Reject**: These comments are not within the scope of the subject matter of the proposed Vision Testing Regulations. |
| All | Lydia Bourne, California School Nurses Association (CSNO) (Letter #7) | Change all references of pupils to children. | **Reject:** California *Education Code* *(EC)* Section 49455 refers only to pupils. |
| All | Candace Hilvers, MSN, PHP, PHN, RN, Faculty, California State University, Fresno (CSUF) (Letter #6) | There is confusion in *EC* Section 49452 about the requirements to perform vision screening in schools. | **Reject:** This comment is not within the scope or subject matter of these proposed regulations. |
| 590 | Lydia Bourne, CSNO (Letter #7) | Add school district superintendent to the list of agencies authorized to provide vision screenings. | **Reject:** A school district superintendent is typically not authorized to provide vision screenings. |
| 590(a), 594(c) | Candace Hilvers, MSN, PHP, PHN, RN, Faculty, CSUF (Letter #6) | Include methods or criteria for near vision. | **Reject:** Section 590(a0 includes methods for testing near point vision. Section 594(c) states 20/40 or worse is test failure for all students. |
| 590, 591, 594, 597 | Lydia Bourne, CSNO (Letter #7) | Change to all references of vision testing to vision screening. | **Reject:** To be consistent with the terminology in the statute, these proposed regulations refers only to vision “testing.” |
| 590(b)(2) | David Redman, OD. COA, Kristine Shultz, COA, (Letter #8) | College hours. Section 590(2) of the proposed regulations requires agencies to show that individuals administering vision screening have: “A transcript from an accredited college or university evidencing that the individuals have successfully completed an acceptable course in vision testing of at least one semester unit.”  The commenter recommends deleting the phrase “at least one semester unit” because a semester unit is equivalent to about 15 contact hours. This is not consistent with the hours required in Section 590(b)(1), which requires only six hours. The amount of time could be silent and hold college responsible to provide adequate training. Alternatively we could replace the existing proposed language with “at least six clock hours” to be consistent with Section 590(b)(1). | **Accept:** Section 590(b) (1)(2) states that evidence of comprehensive training may be acquired through six hours of training or an accredited college or university evidencing that the individuals have successfully completed an acceptable course in vision testing of at least one semester unit. The CDE agrees with the commenter that the phrase “of at least one semester unit” can be deleted as it is unnecessary in further describing an acceptable course in vision testing from an accredited college or university. |
| 594 | Candace Hilvers, MSN,PNP, PHN, RN. CSUF Staff (Letter #6) | Use of photoscreening in lieu of visual acuity. | **Reject:** The scope of the proposed regulations do not address the use of photoscreening as an alternative to visual acuity screening. |
| 594 | Lydia Bourne, CSNO (Letter #7) | Commenter wants to add vision screening criteria for pupils under four years of age. | **Reject:** These regulations apply only to pupils four years of age or older. |
| 594(b)(1)(2)  594(c) | Kristen Munk, MSN, RN, NCSN. CSUS Faculty (Letter #5)  Lydia Bourne, CSNO (Letter #7)  David Redman, OD. COA, Kristine Shultz, COA, (Letter #8)  Susan Chaides, Med, RN, CPNP Project Director III, Community Health & Safe Schools, Los Angeles County Office of Education  (Letter #9) | These commenters noted discrepancies between the recently adopted guidelines and the proposed regulations with regard to the exact language for the failure threshold for visual acuity, and the ages of pupils for such thresholds. | **Accept:** The CDE agrees the regulations should be consistent with the guidelines “A Guide for Vision Screening in California Public Schools (2018 edition). The Guidelines are aligned with statute and are a result of collaborative efforts among representatives from the ophthalmology and optometry professions, credentialed school nurses, educational leaders, and community-based organizations specializing in vision screening. |
| 594(c) | David Redman, OD. COA, Kristine Shultz, COA, (Letter #8) | The commenter believes the regulations should be revised to separate the referral criteria for near visual acuity by age and have it match the referral criteria for far vision. | **Reject:** The CDE believes that the regulations should be consistent with the guidelines “A Guide for Vision Screening in California Public Schools (2018 edition). |
| 594(d) | Lydia Bourne, CSNO (Letter #7) | Add “instrument-based screening in accordance with device’s instruction manual.” | **Reject:** Section 594(d) states that instrument-based screening may be used as described by the manufacturer. |
| 594(f) | Candace Hilvers, MSN,PNP, PHN, RN. CSUF Staff (Letter #6) | If a student fails a vision screening that is conducted by a credentialed school nurse, physician or surgeon, osteopath, or optometrist, a rescreen is not required. | **Reject:** Section 594(f) does not require reevaluation after a pupil fails a vision test conducted by a credentialed school nurse, physician or surgeon, osteopath, or optometrist. |
| 596 | Lydia Bourne, CSNO (Letter #7) | The commenter recommends deleting the word “continual.” | **Accepted:** The CDE agrees that the word “continual” should be deleted because it is redundant. |
| 597 | Lydia Bourne, CSNO (Letter #7) | Change “photoscreening tests” to “instrument based screening. | **Reject:** To be consistent with the terminology in *EC* Section 49455, these proposed regulations use “photoscreening tests.” |

# Attachment 4a: Copies of Public Comments Received During 45-Day Comment Period

The following copies of public comments received by the California Department of Education (CDE) are provided in their original format and may contain underline, ~~strikeout~~, *italics*, or other formatting to illustrate proposed changes to the original Vision Testing Rulemaking.

For more information regarding the content of this material, please contact the Educator Excellence and Equity Division by phone at 916-323-6440.

**From:** Rick/Donna Bassett <[rdbassett@att.net](mailto:rdbassett@att.net)>

**Sent:** Saturday, February 16, 2019 11 01 AM

**To:** REGCOMMENTS

**Subject:** School Nurse consultant please!

It has taken over three years to try to accomplish obtaining Vision Guidelines from the CDE!

We need a State School Nurse consultant, now, please!!

Donna Bassett, RN, PHN

Sonoma County Office of Education

Credentialed School Nurse

**From:** Caroline Thibodeau <[airedog3@gmail.com](mailto:airedog3@gmail.com)>

**Sent:** Saturday, February 16, 2019 3:54 PM

**To:** REGCOMMENTS

**Subject:** Recommendations

As a School Nurse for more than 25 years, l am writing to strongly encourage you to reinstate the position of State School Nurse Consultant. Over the years Linda Davis Alldritt was an invaluable resource which has been sorely missed.

l also am looking forward to the Vision Guidelines being approved.

I believe the State needs to provide more knowledgeable, proactive, and timely support. The years without a State Nursing Consultant have been difficult.

Thank you for taking the time to consider this request

Caroline Thibodeau MHS, FNP, RN

Credentialed School Nurse

Sent from my iPhone

**From:** Sheri Coburn <[sheri.coburn@csno.org>](mailto:sheri.coburn@csno.org%3e%20)

**Sent:** Saturday, February 16, 2019 3:55 PM

**To:** Caroline Thibodeau

**Cc:** REGCOMMENTS

**Subject:** Re: Recommendations

Thank you!

On Sat, Feb 16, 2019 at 3:54 PM Caroline Thibodeau <[airedog3@gmail.com](mailto:airedog3@gmail.com)> wrote:

As a School Nurse for more than 25 years, I am writing to strongly encourage you to reinstate the position of State School Nurse Consultant. Over the years Linda Davis Alldritt was an invaluable resource which· has been sorely missed.

I also am looking forward to the Vision Guidelines being approved.

I believe the State needs to provide more knowledgeable, proactive, and timely support. The years without a State Nursing Consultant have been difficult.

Thank you for taking the time to consider this request

Caroline Thibodeau MHS, FNP, RN

Credentialed School Nurse

Sent from my iPhone

**From:** Sylvia Fischer <[SFischer29@msn.com](mailto:SFischer29@msn.com)>

**Sent:** Wednesday, February 27, 2019 9:56 AM

**To:** REGCOMMENTS

**Subject:** Vision Screening Handbook

It has taken three years to push The Vision Screening Handbook through. We need a Nurse Consultant now!

**From:** Munk, Kirsten L <[kirsten.munk@csus.edu](mailto:kirsten.munk@csus.edu)>

**Sent:** Monday, March 4, 2019 7:26 PM

**To:** REGCOMMENTS

**Subject:** Public Comment re: California Code of Regulations, Title 5 section 590, 591, 594 and 596 and Adoption of Proposed Section 597

To Whom It May Concern,

In reviewing the revised guidelines for vision screening in schools *(California Code of Regulations,* Title 5 section 590, 591, 594 and 596 and Adoption of Proposed Section 597), I am concerned about an apparent discrepancy in referral criteria.

Section 594--Test of Visual Acuity subsection b2 states that test failure for pupils 6 years or older is visual acuity of 20/32 or worse (which I read to mean that if the student is able to read the 20/32 line, but no further, this is considered a "fail").

However, Table 7: Developmentally Appropriate Referral Criteria indicates test failure for grades one and up as the inability to read the 20/32 critical line (which I read to mean that ability to read the 20/32 line is a "pass").

I hope this issue will be clarified in the final wording of the guidelines so that there will be no confusion for school nurses about what constitutes a passed screening and when students should be referred to a vision provider.

Respectfully,

Kirsten Munk MSN, RN, NCSN

Adjunct Faculty

College of Continuing Education

California State University, Sacramento

**From:** Candace D Hilvers <[chilvers@mail.fresnostate.edu](mailto:chilvers@mail.fresnostate.edu)>

**Sent:** Tuesday, March 5, 2019 7:32 AM

**To:** REGCOMMENTS

**Subject:** Comments Vision Screening Guidelines

**Attachments:** Comments to Guidelines.docx

I attached my comments.

Please let me know if you have any questions.

Thank you.

Candace Hilvers, MSN, PNP, PHN, RN

CSUF Faculty

Cell # 559-731-8082

Comments

Page 8

5. Rescreening all students who fail the vision screening.

Page 21

Rescreening

Suggest add to page 8

If a student fails a vision screening that is conducted by a credentialed school nurse, physician or surgeon, osteopath, or optometrist, a rescreen is not required.

Page 11

Does not include the methods or criteria for near vision screening.

Page 12

There is confusion in the school nursing community regarding requirements to perform vision screening. The CCR clearly states that a Credentialed school nurse is qualified to perform vision screening.

The additional training is required for other certificated employees.

California Education Code

49452. The governing board of any school district shall, subject to Section 49451, provide for the testing of the sight and hearing of each pupil enrolled in the schools of the district. The test shall be adequate in nature and shall be given only by duly qualified supervisors of health employed by the district; or by certificated employees of the district or of the county superintendent of schools who possess the qualifications prescribed by the Commission for Teacher Preparation and Licensing; or by contract with an agency duly authorized to perform those services by the county superintendent of schools of the county in which the district is located, under guidelines established by the State Board of Education; or accredited schools or colleges of optometry, osteopathic medicine, or medicine. The records of the tests shall serve as evidence of the need of the pupils for the educational facilities provided physically handicapped individuals. The equipment necessary to conduct the tests may be purchased or rented by governing boards of school districts. The state, any agency, or political subdivision thereof may sell or rent any such equipment owned by it to the governing board of any school district upon terms as may be mutually agreeable.

5 CCR§ 591

§ 591. Employees Authorized to Give Tests.

(a) An employee of a school district or of a county superintendent of schools may be authorized to give vision tests pursuant to Education Code Section 49452 and may be designated a “duly qualified supervisor of health” within the meaning of that section if the employee is:

(1) A physician and surgeon or osteopath employed pursuant to Education Code Section 44873.

(2) A school nurse employed pursuant to Education Code Section 44877.

(3) An optometrist employed pursuant to Education Code Section 44878.

(b) Any other certificated employee of the school district or of the county superintendent of schools may be authorized to give vision tests pursuant to Education Code Section 49452 if the employee has one of the following documents:

(1) A statement from a qualified supervisor of health that the employee has satisfactorily completed an acceptable course of in-service training in techniques and procedures in vision testing of at least six clock hours given by the qualified supervisor of health making the statement and that the employee is qualified to administer vision tests to pupils.

(2) A transcript from an accredited college or university evidencing that the employee has successfully completed an acceptable course in vision testing of at least one semester unit.

Note: Authority cited: Section 33031, Education Code. Reference: Sections 44873, 44877, 44878 and 49452, Education Code.

Instrument-Based Screening

Need clarification of the use of photoscreening.

May it be done in lieu of visual acuity?

Visual acuity is primarily a subjective screening. It assesses the student's ability to see at a near and far distance.

The unfunded mandate of screening students for near vision added another task to the challenging job of meeting the needs of students. Many districts have purchased photoscreeners to assist nurses with completing this mandate. These expensive purchases were made in good faith. Photoscreeners are able to quickly and accurately screen for myopia, hyperopia, astigmatism, anisometropia, strabismus and anisocoria. I do no not know of any nurses with the time to add acuities to the process of photoscreening. It would most likely be an either/or decision.

There are several references to scientific validation and evolving technology of screening methods (pages 12 and 17). The research that has been competed suggests that photoscreening is more effective than screening for visual acuity. Numerous studies have indicated the use of a photoscreener has increased ability to find vision problems as compared to the use of visual acuity for screening. The studies have primarily been done on pre school aged children. The limited research completed on school age children has demonstrated the same findings.

References are available on request.

**From:** Lydia Bourne <[lydiabourne@sbcglobaI.net](mailto:lydiabourne@sbcglobaI.net)>

**Sent:** Thursday, March 7, 2019 7:24 AM

**To:** REGCOMMENTS

**Cc:** Daniela Torres; Sheri Coburn; Pam Kahn

**Subject:** Comments on CA Code of Regulations, Title 5, Regarding Vision Testing

**Attachments:** Comments on Title 5, Vision Testing.pdf

Attached are comments relating to the proposed rulemaking on Title 5 Vision Testing

The comments are being submitted by the California School Nurses Organization (CSNO) should there be any questions, please contact me thank you for considering our proposed changes

Lydia C. Bourne

Legislative Advocate

Bourne & Associates

[lydiabourne@sbcglobaI.net](mailto:lydiabourne@sbcglobaI.net)

916 801-0312 -cell

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“Never, 'for the sake of peace and quiet,' deny your own experience or convictions."

--Dag Hammarskjold,

Swedish diplomat

California School Nurses Organization, Optimizing Student Health and Enhancing Learning logo

Patricia Alverson, Regulations Coordinator

Administrative Support and Regulations Adoption Unit

California Department of Education

1430 N Street, Room 5319

Sacramento, CA 95814

**RE: AMENDMENT TO CALIFORNIA CODE OF REGULATIONS, TITLE 5, REGARDING VISION TESTING - Sections 590, 591, 594, 596 and 597**

**Submitted via email** - [regcomments@cde.ca.gov.](mailto:regcomments@cde.ca.gov)

Dear Ms. Alverson:

The California School Nurses Organization is submitting for your review language changes to the proposed regulations relating to the above referenced Title 5 - regarding Vision Testing.

The California School Nurses Organization (CSNO) is the professional organization for credentialed school nurses. We are the primary health professional within California's educational system and as such we strive to assure all children in school are healthy, ready and able to learn.

One of our key responsibilities is providing vision screening for K-12 students as mandated and referred, we also train credentialed K-12 personnel to provide vision screening when necessary. Additionally, CSNO offers a vision training program for school nurses throughout the state which meets the certification requirements for credentialed school nurses and credentialed teachers (under our supervision ) to conduct vision screening.

In the statement of reasons, it is mentioned the convening of the "work group to address EC Section 49455". We were the impetus behind the effort to update the 2005 Vision Manual that is posted on the CDE web site. Thank you for recognizing our efforts to update and provide to California's LEA the latest scientifically based information on vision screening.

However, we are dismayed that the document we submitted in September 2016 has not yet been posted to the CDE web site. It should be noted that the manual was used as a reference in making the proposed regulatory language.

Attached you will find our changes to the proposed regulations for AB 18 40 and SB 117 2 - as found in:

Title 5. Education.

Division 1. California Education of Education

Chapter 2. Pupils

Subchapter 3. Health and Safety of Pupils

Article 4. Vision Testing

Our comments cover all the sections noted and are illustrated in ***red, bold and italics.***

Thank you for considering our comments.

Respectfully,



Lydia C. Bourne  
Legislative Advocate

3511 Del Paso Road, Suite 160, PMB 230

Sacramento, CA 95835

(916) 448-5752, Fax: (844) 273-0846

Email: [csno@csno.org](mailto:csno@csno.org%20) Website: [www.csno.org](http://www.csno.org/)



Language we are proposing is in red - *italics* and **bold.**

**§ 590. Duly Authorized Agency.**

1. Pursuant to Education Code ~~S~~section 49452, a county superintendent of schools may contract with and permit districts located within the county to contract with an agency duly authorized by the county superintendent of schools to provide vision ***screenings.*** *~~which includes~~* Such agencies may include, but are not limited to, a city or county health department, a local health district, ***school district superintendent or designee*** or the State Department of Health Services.
2. Duly authorized agencies must provide evidence upon request to the California Department of Education and county superintendents that individuals giving vision tests ***screenings*** have received comprehensive training on the latest evidence-based pupil's vision screening techniques. This evidence requirement may be met by providing one of the following documents:
   1. A statement from the authorized agency that the individuals have satisfactorily completed an acceptable course of in-service training in techniques and procedures in vision ~~testing~~ ***screening*** of at least six clock hours and that the individuals are qualified to administer vision ~~tests~~ screenings to pupils.

(2) A transcript from an accredited college or university evidencing that the individuals have successfully completed an acceptable course in vision ~~testing~~ ***screening*** of at least one semester unit.

**Rationale** for suggested language:

590 (a) - will allow for variance by county and school district

Vision screenings is the preferred clinical language, not "vision tests"

**American Association for Pediatric Ophthalmology and Strabismus:** Vision screening is an efficient and cost-effective method to identify children with visual impairment or eye conditions that are likely to lead to vision loss so that a referral can be made to an appropriate eye care professional for further evaluation and treatment - <https://engage.aapos.org/browse/glossary/>

§ **591. Employees Authorized to ~~Give~~ *Perform* Vision ~~Tests~~ *Screenings.***

1. An employee of a school district or of a county superintendent of schools may be authorized to give vision ~~tests~~ ***screenings*** pursuant to Education Code ~~S~~section 49452 and may be designated a "duly qualified supervisor of health" within the meaning of that section if the employee is:
   1. A physician and surgeon or osteopath employed pursuant to Education Code ~~S~~section 44873.
   2. A school nurse employed pursuant to Education Code ~~S~~section 44877.
2. Any other certificated employee of the school district or of the county superintendent of schools may be authorized to give vision *~~tests~~* ***screenings*** pursuant to Education Code ~~S~~section 49452 if the employee has one of the following documents
3. A statement from a qualified supervisor of health that the employee has satisfactorily completed an acceptable course of in-service training in techniques and procedures in vision ~~testing~~ ***screening*** of at least six clock hours given by the qualified supervisor of health making the statement and that the employee is qualified to administer vision ~~tests~~ ***screenings*** to pupils.
4. A transcript from an accredited college or university evidencing that the employee has successfully completed an acceptable course in vision ~~testing~~ ***screening*** of at least one semester unit.

**Rationale** for changes: consistency within the document and adhering to accepted clinical definitions:

U.S. National Library of Medicine - Application of tests and examinations to identify visual defects or vision disorders occurring in specific populations, as in school children, the elderly, etc. It is differentiated from VISION TESTS, which are given to evaluate/measure individual visual performance not related to a specific population - <https://www.definitions.net/definition/vision%20screening>

§ **594. ~~Test of Visual Acuity.~~ *Screening* for *Visual Acuity***

(a) ~~The test of~~ ***The screening*** ~~of visual acuity~~ ***for visual acuity*** administered pursuant to Education Code sections 49452 and 49455 shall mean a ~~test~~ ***screening*** for visual acuity at both the far point and near point. This shall be conducted by means of an optotype test ***screening*** or any other scientifically validated ~~photoscreening test~~ ***instrument based screening.***

(b) ~~Test failure~~ ***Definition of failure*** for the far point visual acuity test shall be defined as follows:

1. ***Instrument-based screening in accordance with the device's instruction manual***
2. ***Acuity screening with optotypes:***
   1. For ~~children~~~~pupils~~ **children** ~~under six~~ pupils ~~five-years of age~~ ***36-47 months of age and under:*** ~~Visual acuity of 20/50 20/40 indicates the inability to identify accurately the majority of letters on the 20- foot line of the test chart at a distance of 10 feet.~~ ***The designation 20/60 or worse indicates the inability to identify accurately the majority of letters or symbols on the 20- foot line of the test chart at* a *distance* of *10 feet.***

(2) For ~~children~~ ~~pupils~~ ***children***~~six years of age or older~~*~~:~~* ***48-50 months* of *age and under:***Visual acuity of ~~20/40~~ ~~20/32~~ ***20/50***or worse. ~~This means the ability to identify accurately~~ *~~the m~~*ajority of letters or symbols on the 20-foot line of the screening chart at a distance of 10 feet. The designation of 20/50 or worse indicates the inability to identify accurately the majority of letters or symbols on the 20-foot line of the screening chart at a distance of 10 feet.

(3) For children ~~under six~~ ***pupils five*** years of age and over: Visual acuity of ~~20/50~~ ***20/40*** or worse. The designation ~~20/50~~ ***20/40***or worse indicates the inability to identify accurately the majority of letters or symbols on the 20-foot line of the screen chart at a distance of 10 feet.

*(4)* For all ~~children~~ ***pupils****:* A difference of visual acuity between the two eyes of two lines or more on the optotype chart.

(c) ~~Test~~ ***Screening***failure for the near point visual ~~acuity test~~ ***screening***shall be defined as follows:

(1) For all pupils: Visual acuity of ~~20/32~~ ***20/40***or worse. The designation ~~20/32~~ ***20/40***or worse indicates the inability to identify accurately the majority of letters or symbols on the ~~screen~~ *screening* chart at a distance of 16 inches with both eyes open.

~~(b)~~ (d) For pupils who, because of age or special needs are not able to be screened with an optotype ~~test~~*-****screenings****,* other types of vision screening, such as a functional vision ~~test~~ ***screening***or instrument-based screening, may be utilized, using procedures and criteria of failure as described by the manufacturer.

~~(c)~~ (e) If a pupil fails a vision ~~test~~ ***screening***that is conducted by an employee authorized to give vision ~~tests~~ ***screenings***pursuant to subdivision (b) of ~~S~~section 591 or subdivision (a) of section 597, a reevaluation shall be conducted prior to a report being made to the pupil's parent or guardian. This reevaluation shall be conducted by an employee authorized to give vision ~~tests~~ ***screenings***pursuant to subdivision (a) of ~~S~~section 591.

~~(d)~~ (f) If a pupil fails a vision ~~test~~ ***screening***conducted by an employee authorized to give vision ~~tests~~ ***screenings***pursuant to subdivision (a) of ~~S~~section 591, a report shall be made to the pupil's parent or guardian as required by Education Code ~~S~~section 49456.

Rationale for suggested changes: suggested language covers all age groups of children and pupils in California schools -Vision Screening Recommendations: <https://aapos.connectedcommunity.org/syndicated/vision-screening>

§ **596. Gross External Observation of the Children's Pupils' Eyes, Visual Performance and Perception.**

Gross external observation of the ~~children's~~ pupils' eyes, visual performance and perception, pursuant to Education Code sections 49452 and 49455, shall mean ~~continuous~~ observation by teachers of the appearance, behavior and complaints of pupils that might indicate vision problems. ~~Also periodic investigation Continual and r~~ ***Regular*** observation by the teacher where a pupil's ~~pupils’~~ school performance begins to give evidence that existence of the problem might be caused by a visual difficulty. ***Such an evaluation*** shall be done in consultation with the school nurse.

**Rationale for suggested changes:** regular observation -defined as "an act or instance of regarding attentively or watching". A teacher or any other staff interacting with the student over a period of time would likely notice if the child is having difficulty with their vision. If you use "Continual observation" how is this defined? The school nurse should be referred and the school nurse consulted when a child exhibits visions problems.

§ **597. Appraisals Using Scientifically Validated ~~Photoscreening Tests~~ *Instrument based screening***

(a) Employees, or trained individuals, as defined in section 591, are permitted to conduct vision screenings using ~~photoscreening tests~~ ***instrument based screening*** only under an agreement with, or supervision of, an optometrist or ophthalmologist pursuant to Education Code section 49455.

(1) Employees and individuals conducting vision screenings using ~~photoscreening equipment~~ ***instrument based screening equipment*** must be trained in the proper use of such equipment.

(b) Acceptable scientifically validated ~~photoscreening tests~~ ***instrument based screenings*** shall be limited to those screenings recognized as best practice or acceptable practice as determined by the California Department of Education.

**Rationale** for suggested changes: the use of the term photo screeners while currently in use, it is conceivable other types of technology could and will emerge which are automated and may use another name or designation. The American Academy of Pediatrics, along with the following eye professionals -American Academy of Ophthalmology, American Association for Pediatric Ophthalmology and Strabismus and the American Association of Certified Orthoptists use "instrument based vision screening" - <https://pediatrics.aappublications.org/contentl130/5/983>; consistency in the use of the term -instrument based screening as noted under Section 594 (9) ~~(b)~~ (d).

**From:** Kristine Shultz <[kshultz@coavision.org](mailto:kshultz@coavision.org)>

**Sent:** Monday, March 11, 2019 850 AM

**To:** REGCOMMENTS

**Subject:** Comments to CCR, TITLE 5, REGARDING VISION TESTING

**Attachments:** DOE reg comments.pdf

Dear Ms. Alverson,

Attached are comments to the proposed regulations related to vision testing. Please let me know if you received this document.

Kristine Shultz   
California Optometric Association



March 11, 2019

Patricia Alverson, Regulations Coordinator

Administrative Support and Regulations Adoption Unit

California Department of Education

1430 N Street, Room 5319

Sacramento, CA 95814

RE: VISION TESTING PROPOSED REGULATIONS -CCR TITLE 5

The California Optometric Association (COA) is submitting comments in response to the proposed changes to the California Code of Regulations, Title 5 sections 590, 691, 594, and 696. We provide the following comments based on our experience and analysis of what efforts are necessary in order to effectively appraise the near, distant and color vision of children through screenings.

**Near vision acuity referral criteria.** COA is concerned there is an inconsistency between the proposed regulations and the guidelines when it comes to the referral criteria for near visual acuity. In the guideline, passing is being able to read the 20/32 line. However in the regulations require a referral at "20/32 or worse.'' COA agrees with the guidelines. Being able to read the 20/32 line (and not smaller) is appropriate, especially for 6 year olds. COA believes the regulations should be revised to separate the referral criteria for near visual acuity by age and have it match the referral criteria for far vision.

**Far. point referral criteria.** § 594(b)(1) of the proposed regulations changes to the referral criteria for pupils five years of age. It currently reads: "For ~~children under six~~ pupils five years of age: Visual acuity of ~~20/50~~ 20/40 or worse. The designation ~~20/50~~ 20/40 or worse indicates the inability to identify accurately the majority of letters or symbols on the 20-foot line of the test chart at a distance of 1 O feet."

COA recommends that the second sentence be deleted. It is no longer true with the change of referral criteria to 20/40 or worse. The 20-foot line off the test chart at a distance of 10 feet is the 20/40 line. The new criteria is the inability to identify the 20/30 or 20/32 line depending on chart type.

If COE elects to keep the second sentence, COA suggests that it read: "The designation 20/40 or worse indicates the inability to identify accurately the majority of letters or symbols smaller than those on the 20-foot line of the test chart at a distance of 10 feet."

Similarly, § 694(b)(2) of the proposed regulations changes to the referral criteria for pupils six years of age without changing the second sentence to match the new guideline. The proposed regulation currently reads: "For ~~children~~ pupils years of age or older: Visual acuity of ~~20/40~~ 20/32 or worse. This means the inability to identify the majority of letters or symbols on 15-foot line of the chart at a distance of 10 feet."

To be accurate, the second sentence should be deleted or revised to read: ''This means the inability to identify the majority of letters or symbols smaller than those on the 15- foot line of the chart at a distance of 10 feet."

**College hours.** § 590(2) of the proposed regulations requires agencies to show that individuals administering vision screening have: "A transcript from an accredited college or university evidencing that the individuals have successfully completed an acceptable course In vision testing of at least one semester unit."

GOA recommends deleting the phrase "at least one semester unit" because a semester unit is equivalent to about 15 contact hours. This is not consistent with the hours required in § 690 (b )( 1 ), which requires only 6 hours. The amount of time could be silent and hold college responsible to provide adequate training. Alternatively we could replace the existing proposed language with "at least six clock hours~ to be consistent with§ 590 (b)(1).

Thank you for your consideration of our comments. If you have any questions, please contact Kristine Shultz, COA Governmental Affairs Director at (916) 266-5027.

Sincerely,

Signature of David Redman

David Redman, OD  
Legislation and Regulation Chair

**From:** Chaides\_Susan <[Chaides\_Susan@lacoe.edu](mailto:Chaides_Susan@lacoe.edu)>

**Sent:** Monday, March 11, 2019 4:24 PM

**To:** REGCOMMENTS

**Subject:** Vision Testing

Comments on §594 Test of Visual Acuity:

(b)(1) Test failure for pupils five years of age: Visual acuity of 20/40 or worse -is not correct. This would be correct if changed to: "Visual acuity worse than 20/40."

* If a 5 year old student has visual acuity of 20/ 40 -this is passing.
* Change 2nd sentence of (b)(1) to: This means the inability to identify the majority of letters or symbols of the test chart at 20/40.

(b)(2) Pupils six years of age or older: Visual acuity of 20/32 or worse -is not correct. This would be correct if changed to: "visual acuity worse than 20/32."

* If a 6 year old student has visual acuity of 20/32 -this is passing.
* Change 2nd sentence of (b)(2) to: This means the inability to identify the majority of letters or symbols of the test chart at 20/32.

(c)(1) For all pupils: there is a difference for students 5 years old vs. 6 years or older. This should be separated similar to above designations for 5 years and 6 years and older:

* Test failure for pupils five years of age: visual acuity of worse than 20/40. This means the inability to identify the majority of letters or symbols of the near test chart at 20/40.
* Test failure for pupils six years of age or older: visual acuity of worse than 20/32. This means the inability to identify the majority of letters or symbols of the near test chart at 20/32.

Susan Chaides, MEd, RN, CPNP

Project Director Ill, Community Health & Safe Schools

Student Support Services

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