
Confidentiality, Privacy and School Access to the Washington State Immunization Information System

Background

The Washington State Immunization Information System (the system) operates under the Washington State Health Care Information Act (RCW 70.02), as well as other state and federal laws that govern the use of and sharing of health information. RCW 70.02 allows licensed health care professionals to exchange patient-specific health care information without patient/parental consent for the purpose of providing, coordinating, or facilitating health care, and for the purpose of preventing and controlling disease.

Key Points for School Nurses

- 1) Since school nurses are licensed healthcare providers, as described in RCW 70.02, and have a bona fide need-to-know the immunization status of students for the purpose of preventing or controlling disease, they are authorized to participate in the system. An Information Sharing Agreement for Schools with a Licensed Healthcare Provider on Staff must first be signed by the district and filed with the Washington State Department of Health's Office of Immunization and Child Profile.
- 2) Non-licensed school staff that are assigned by the school nurse and have signed a Confidentiality Agreement on file may utilize the system to obtain information for immunization documentation and verification.
- 3) In accordance with RCW 28A.210.100 and 28A.210.110, it is the parent's responsibility to submit immunization information to the school. In utilizing the system, the school nurse or assignee is facilitating parent report. As such, the school nurse will provide information from the system **to the parent** of the child for which the information was obtained. The parent will be directed to review, amend if needed, sign, and submit to the school.
- 4) The school nurse or any assignee may get information from the system to update the Certificate of Immunization Status (CIS) without parent consent.

Currently, school personnel have "view-access" to the system. Parent signature is **NOT** required to **view data** in the system.

FERPA guides the school's authority to disclose information. According to FERPA, a school nurse or assignee should have written parent consent to add immunization information to a child's record in the system. In the future, the ability to enter data may be a function that becomes available to schools.

Note: This document is not intended to provide legal advice, and you are encouraged to seek your own counsel regarding HIPAA, FERPA and Washington State laws.

Questions about the contracts with the Washington State Immunization Information System should be directed to:

Washington State Department of Health
Office of Immunization and Child Profile
360-236-3595 or 1-866-397-0337

If you have a disability and need this document in another format, please call 1-800-525-0127 (711-TTY relay)

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