



Policy and Procedures: School Use of the WA Immunization Information System School Module

The Department of Health Office of Immunization and Child Profile developed the WA Immunization Information System (IIS) School Module (SM). This Module may be used by schools in Washington State as a school immunization tracking and reporting system. The goal of this system is to improve student compliance with immunization requirements and promote healthy students free from diseases prevented by vaccines.

Starting January, 2014, the Department of Health (DOH) allows certain schools involved in a pilot project to use the SM to determine which students are out of compliance with the required school immunizations and to track and follow-up with these students to get them in compliance.

The objectives of the pilot project include:

1. Schools test the Immunization Information System (IIS) School Module (SM) to determine whether it has the correct functionality to allow them to track student immunizations and follow up with students out-of-compliance with the requirements.
2. School nurses identify provider-verified student immunization records and enter provider-verified student immunization records in the SM.
3. DOH staff assists schools as they develop policies and procedures to use the School Module within FERPA guidelines to protect student information (for example, getting parental consent before entering student immunization records into the system).

This policy and procedures will assist schools to appropriately use the SM to improve student immunization compliance.

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Background

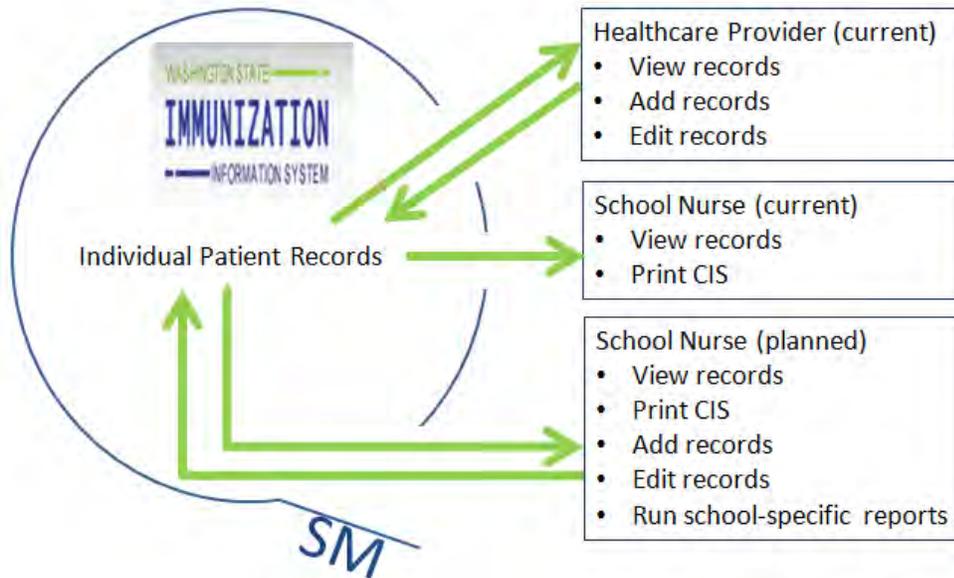
The School Module (SM) is a portal into the statewide IIS currently used by healthcare providers. The Module allows schools to: 1) look up students' immunizations already entered by healthcare providers rather than spending many hours entering student immunizations in a school specific student information system, 2) use student-specific reports and letters to track required immunizations, and 3) report the required annual immunization status report.

Students attending kindergarten through 12th grade in WA State must meet school entry requirements for specific vaccinations. Parents are required to submit a Certificate of Immunization Status (CIS) to show proof of immunization. Schools are responsible for reviewing the CIS to make sure students are fully immunized and meet state immunization requirements. Schools also have the responsibility to follow-up with and track students who are not in compliance with school requirements.

The IIS contains immunizations that healthcare providers enter after they administer vaccines. Schools may currently access the IIS to look up immunizations that may be missing from the school's Student Information Systems (SIS) to help determine if students are out of compliance with the immunization requirements. Schools can also print a Certificate of Immunization Status that is automatically populated with provider-verified immunization data contained in the IIS. The IIS and SIS do not exchange data. Also, the SIS often does not program school immunization requirements accurately, so the SIS is often incongruent with the IIS programming.

The SM is a part of the IIS. All of the immunizations entered in the IIS can be accessed in the SM. The main reason for using the SM is to access school and student-specific immunization tracking tools and the required reporting form. A great way to understand the SM in relation to the IIS is to think of the analogy of looking through the SM window. When school personnel look through the SM window, they see school-specific information and reports that is not currently available in the IIS.

Relationship of the School Module (SM) to the Immunization Information System (IIS) (formerly the Child Profile Immunization Registry)



Benefits of Using the School Module:

- Access to a comprehensive statewide immunization registry that contains millions of immunization records
- Reduces immunization data entry by schools into a school-specific Student Information System since immunizations are already entered in the IIS by healthcare providers
- Saves money and staff time
- Ability to link students with a school
- Print a completed Certificate of Immunization Status
- Determine accurately why a student is out of compliance and which vaccine is needed to make the student in compliance
- Run reports showing students who are out of compliance due to missing or incomplete immunizations
- Generate personalized letters and mailing labels to remind parents about missing immunizations
- Enter missing immunizations using healthcare provider-verified records
- Reduces number of unnecessary immunizations
- Supports healthy, well-vaccinated students

HIPAA and FERPA Considerations

The following information is not intended to provide legal advice, and schools are encouraged to seek their own counsel regarding HIPAA, FERPA, and Washington State laws.

Schools need to understand the legal framework for access to the IIS and to understand the [Health Insurance Portability and Accountability Act \(HIPAA\) and the Family Education Rights and Privacy Act \(FERPA\)](#).

The HIPAA Privacy Rule recognizes the legitimate need for public health authorities and others responsible for ensuring public health and safety to have access to protected health information to carry out their public health mission. The rule permits a covered entity, such as a health care provider, to disclose protected health information for public health activities and purposes without individual authorization ([Section 164.512\(b\)\(1\)\(i\)](#)).

These activities include, "...for the purpose of preventing or controlling disease, injury, or disability, including, but not limited to, the reporting of disease, injury, vital events such as birth or death, and the conduct of public health surveillance, public health investigations, and public health interventions; or..." The U.S. Department of Health and Human Services, Office for Civil Rights, issued guidance on December 4, 2002 that says the public health purpose does not need to be mandated by law (pp. 4-5).

In the past, only healthcare providers had access to the IIS. In response to more interest in broadening access, the state Attorney General's Office reviewed the matter. It determined that school nurses and staff assigned by a school nurse could use the IIS under the Washington State Health Care Information Act ([RCW 70.02](#)). Before the School Module was available, schools were accessing the IIS only to look up students' immunizations, and to print and update the CIS after obtaining parental consent.

The School Module pilot project allows even more expanded access to the IIS. School nurses will have the ability to enter provider-verified immunizations that are missing in the IIS in addition to seeing all the immunizations already entered in the IIS by healthcare providers. During the pilot project, DOH will allow non-healthcare personnel to access the SM, but not to enter immunizations. School nurses can delegate authority to non-healthcare personnel to access the Module to assist the school nurse with student immunization compliance. School nurses are operating under their healthcare license when they allow non-healthcare personnel to access the Module. DOH will work with schools to ensure data quality as authorized school nurses enter missing immunizations in the Module.

During the pilot project, school nurses can:

1. Enter provider-verified immunizations
2. Update an existing patient record to add the student's school, school entry date, grade, and State Student Identification Number

3. Add a new patient record
4. Run school reports and letters
5. Create new patient records
6. Update demographic records

An Information Sharing Agreement must be signed by the superintendent and district school nurse supervisor, and filed with the Washington State Department of Health. In using the School Module, schools must follow these rules:

- Maintain the confidentiality of information as described in the IIS [Confidentiality, Privacy, and School Access \(PDF\)](#) document.
- The nurse will only enter provider-verified immunization records into the system. The nurse will need to follow DOH guidelines and use their best clinical judgment to determine a valid provider-verified record. The department will provide examples of valid provider-verified records and the school nurse can consult with the department's School and Child Care Coordinator to discuss records, but the department is not responsible for independently confirming a record is provider-verified.
- Follow all district FERPA protocols to protect student health records if they electronically download, copy, print or otherwise extract records from the School Module. Schools are responsible for all data, in any format, that has been extracted from the Module.
- Not share their unique secure login information with anyone or allow anyone to access the system using their secure login.

Schools are required, under the federal Family Educational Rights and Privacy Act (FERPA), to obtain parental consent before school immunization records can be released or entered in the IIS. Parental consent is only required if a student is missing immunizations in the IIS or the student is not in the IIS. Each school district is responsible for developing a parental consent for release of information. Here are sample forms from other states:

- Consent to Release Information to Children and Hoosier Immunization Registry Program: www.fwcs.k12.in.us/HealthServices/forms/HS37.pdf
- Indiana Release Form: www.doh.wa.gov/CommunityandEnvironment/Schools/Immunization/SchoolModuleWorkgroup.aspx
- Minnesota FERPA consent templates: www.health.state.mn.us/divs/idepc/immunize/registry/ferpaconsent.doc
- Minnesota FERPA and Immunization Data fact sheet: www.health.state.mn.us/divs/idepc/immunize/registry/ferpa.pdf
- Wisconsin Student Immunization Record: www.dhs.wisconsin.gov/forms/F0/F04020L.pdf

Procedure for Reviewing Immunization Compliance

1. Review the student roster for accuracy.
2. If you know a student is missing from the roster, search for the student.
3. Link the student with your school and grade level. Enter the OSPI State Student ID, address, phone number, and schol entry date.
 - a. Note: the school entry date must be the current school year for the student's status to show up correctly.
4. If you see the student's name in the SM is different than your school record, please DO NOT change the name, but put your student's name in the "Alias" field on the Demographic page.
5. If you see the date of birth is different, please DO NOT change the information. Ask the parent to let the provider know that the provider needs to update the information in the registry.
6. If you get a Certificate of Exemption (COE), enter the exemption information in the SM.
7. If a student is missing immunizations and a parent has a valid immunization record from a healthcare provider, the **school nurse** enters the immunizations in the Module **after** obtaining parent consent. See instructions for [adding a new patient](#) and [updating immunizations](#).
8. If the parent provides a Certificate of Immunization Status (CIS) but no valid immunization record from a healthcare provider, pursue these options:
 - a. The school nurse contacts the healthcare provider directly and asks the provider to enter the immunizations or fax the school an immunization record
 - b. Ask the parent to request the provider enter the immunizations in the IIS
 - c. Ask the parent to obtain a valid immunization record from a healthcare provider and the school nurse enters the immunizations in the IIS
9. If no valid immunization record from a healthcare provider, do NOT enter the immunizations. Use another method to track these students.
10. If the student's demographic information is different in the school records compared to the SM, update the information.
11. Print the Action Report (out of compliance report) from the Module.
 - a. Check the report for accuracy.
 - b. If a provider added lab evidence of immunity to a certain disease in the IIS, the forecast will NOT show the vaccine as needed. The Action Report will NOT show the vaccine as missing.
12. Print and mail the missing immunizations letter in the spring, and a missing immunizations letter, conditional letter, or exclusion letter in the fall
 - a. Check the letters for accuracy.
 - b. If a provider added lab evidence of immunity to a certain disease in the IIS, the forecast will NOT show the vaccine as needed. The letter will NOT show the vaccine as missing.

13. Make notes on the Action Report or use another method (e.g., Word document) to document interactions with parents.

Procedure for Students Not in the School Module or Missing Immunizations

1. Search for a student in the SM. **Please make sure to thoroughly search before adding a student.** Try the following search options (in the following order) before entering a new student:
 - a. Type the first name, last name, and date of birth.
 - b. Type the first and last initials and date of birth. This is a really helpful way to search for a student whose last name has changed, who sometimes goes by a nickname, or if the last name is sometimes hyphenated.
 - c. Type the first name and last name only, WITHOUT a date of birth.
2. If you find duplicate students, please email the SIIS Patient ID to oi cpschools@doh.wa.gov. **Please DO NOT include any confidential names or DOB in the email.**
3. If the student is NOT in the SM and a parent has a valid immunization record, the school nurse adds the student (including demographic information, state student ID, and school entry date) and enters the immunizations in the Module **after** obtaining parent consent. See instructions for [adding a new patient](#) and [updating immunizations](#).
4. If the parent provides a Certificate of Immunization Status (CIS) but no valid immunization record from a healthcare provider, pursue these options:
 - a. The school nurse contacts the healthcare provider directly and asks the provider to enter the immunizations or fax the school an immunization record.
 - b. Ask the parent to request the provider enter the immunizations in the IIS.
 - c. Ask the parent to obtain a valid immunization record from a healthcare provider and the school nurse enters the immunizations in the IIS.
5. If no valid immunization record from a healthcare provider, do NOT enter the immunizations. Use another method to track these students.

Valid Immunization Records

The Department of Health allows school nurses to enter only provider verified immunization records in the School Module. The goal of these guidelines is to ensure data quality. School nurses are responsible to ensure that only provider verified data is entered into the IIS. The following immunization records can be entered by school nurses, only after obtaining parent consent:

- Immunization records from a clinic or hospital Electronic Health Record with a unique healthcare provider, clinic, hospital stamp, or another form of written healthcare provider documentation, such as a provider signature.
- Official lifetime immunization record from WA or another state with a unique healthcare provider or clinic stamp, or another form of written healthcare provider documentation, such as a provider signature.
- For foreign students: translated official immunization record such as an immigration form or lifetime immunization record from another country with a clinic or healthcare provider stamp.
- Certificate of Immunization Status: enter handwritten immunizations if verified with a unique healthcare provider or clinic stamp, or another form of written healthcare provider documentation, such as a provider signature.

Follow the above guidelines to determine if an immunization record is a valid healthcare provider verified record. The ultimate decision to enter an immunization record is based on the school nurse's best clinical judgment.

If you have any questions about the validity of an immunization record, please black out the student's name, scan the record, and email it to oi cpschools@doh.wa.gov.

Immunization Data Entry Guides

Resources

- **Basic IIS Training Video:**
<ftp://ftp.doh.wa.gov/Public/PCH/Media/IISSchoolTrainingPart1.pdf>
- **IIS Patient Search Quick Reference Guide:**
<https://fortress.wa.gov/doh/cpir/iweb/homepage/patient.pdf>
- **IIS Vaccinations View/Add Quick Reference Guide:**
<https://fortress.wa.gov/doh/cpir/iweb/homepage/vaccination.pdf>
- **IIS Vaccine Choices**
 - Best Vaccine Choices in the Immunization Information System for Pediatric/Adolescent Vaccines:
<https://fortress.wa.gov/doh/cpir/iweb/homepage/bestchoicesguidepeds.pdf>
 - Complete List of Vaccine Names:
<https://fortress.wa.gov/doh/cpir/iweb/homepage/completelistofvaccinenames.pdf>
- **CDC Foreign Language Terms for Vaccines:**
www.cdc.gov/vaccines/pubs/pinkbook/downloads/appendices/B/foreign-products-tables.pdf
- **Quick Chart of Foreign Language Terms from the Immunization Action Coalition:**
www.immunize.org/catg.d/p5122.pdf

Immunization data entry

The ultimate goal of immunization data entry in the IIS is to assure that all persons in the system have a complete record of their immunizations. It is good public health practice to enter all immunizations, even if the immunizations are not required for child care/preschool, or school (e.g., HPV or meningococcal vaccines). Entering all immunizations is encouraged, however, not required, due to lack of time and resources.

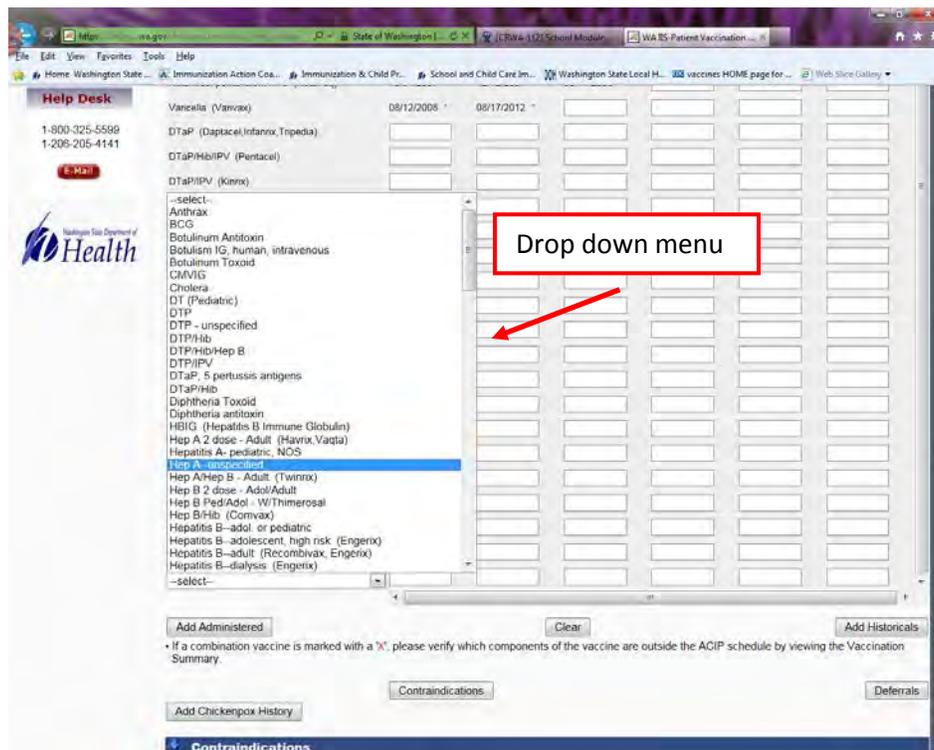
Make sure to thoroughly search for a student before entering a new student in the IIS. Here are three ways to search for a student (follow these search options in the following order):

1. First name, last name, DOB
2. First and last name, no DOB
3. Guardian name, phone number or address

Schools may not get vaccine-specific brand name information on an immunization record for a student. Enter vaccine doses shown in the default list of vaccines in the IIS under the Vaccinations, View/Add screen. The following are the default vaccines to enter if no brand names are available:

Vaccine	Default vaccine to enter
DTaP	DTaP unspecified
DT	DT (pediatric)
Hep A	Hep A 2 dose – Ped/Adol (Havrix, Vaqta)
Hep B	Hep B Ped/Adol – Preserv Free (Engerix, Recombivax)
Hib	Hib--PRP-OMP (PedvaxHib) PRP-T (ActHib, Hiberix, OmniHib)
Flu	Influ split 6-35 mos pres free (Fluzone PF.25mL syringe) Influ split 36+ mos (Fluzone)
MMR	MMR (MMRII) MMR/Varicella (ProQuad)
Pneumococcal	Pneumococcal(PCV) Pneumococcal, PCV-13 (Prevnar13)
Td	Td Adult, Preserv Free (Tenivac, Td-Merck, Td-MassBio)
Tdap	Tdap (Boostrix,Adacel)
Varicella	Varicella (Varivax) MMR/Varicella (ProQuad)

If the above default vaccines are not showing on the Vaccination View/Add screen, choose them from the drop down menu at the bottom of the screen.



The document "*Best*" Vaccine Choices in WA State Immunization Information System may also be helpful to determine which vaccines to enter:

<https://fortress.wa.gov/doh/cpir/iweb/homepage/bestchoicesguidepeds.pdf>

Please send an email to picpschools@doh.wa.gov with any data entry questions or call Trang Kuss (360-236-3760). **DO NOT** call the IIS HelpDesk.

Data Entry Quality Checks

During the pilot project, DOH is closely monitoring data entry in the School Module. This includes reviewing new immunizations as well as new students added to the system. The data that we collect will be useful in our evaluation of the pilot project.

When a new student or new immunization is added to the School Module, please fax a copy of the student's immunization record to DOH: 360-236-3590. It is NOT necessary to send all the records, but please fax up to 10 records per month.

Vaccine Series

In the School Module, each vaccine series is set up based on WA school requirements by grade. Look at the table to find out the number of vaccine doses set up for each vaccine series.

Vaccine Series	Number of Doses					
	DTaP	Tdap	IPV	MMR	Hep B	Varicella
ACIP RECOMMENDED VACCINATIONS	5	1	4	2	3	2
PRESCHOOL (also includes Hib and PCV)	4	0	3	1	3	1
Vaccines spanning multiple grades						
DTAP GRADE K-12	5	0	0	0	0	0
MMR GRADE K-12	0	0	0	2	0	0
TDAP GRADE 6-12	0	1	0	0	0	0
SY 2014-15						
SY2014-15 GRADE 4-5	5	0	4	2	3	2
SY2014-15 GRADE 6	5	1	4	2	3	2
SY2014-15 GRADE 7	5	1	4	2	3	0
SY2014-15 GRADE 8-12	5	1	4	2	3	0
SY2014-15 GRADE K-3	5	0	4	2	3	2
SY2014-15 VARICELLA GRADE K-6	0	0	0	0	0	2

Exemptions

For students who have submitted a Certificate of Exemption, enter exemption types by disease in the SM on the Patient Demographics Edit screen.

- Address				
Address 1:				
Address 2:		City: ODESSA		
Country:	United States	State:	--select--	Zip Code: 99159
County/Parish:	--select--	Phone:	(509)760-2108	
Email:				
- Family & Contact				
First Name:		Middle Name:	Last Name:	
Contact Type:	--select--	Guardian?		<input type="checkbox"/>
Address 1:				
Address 2:		City:		
Country:	United States	State:	--select--	Zip Code:
Phone:	Email:			
<input type="button" value="Add"/>				
First	Last	Type	Phone	Guardian?
+ Alias				
+ School				
School Exemptions by Disease				
Medical Exemptions:				
Vaccine:	--select--	Temporary Until:		
Parent Signature Date:		Permanent:	<input type="checkbox"/>	
<input type="button" value="Add"/>				
Vaccine:	Parent Signature Date:	Temporary Until:	Permanent:	
Personal Exemptions:				
Vaccine:	--select--	Parent Signature Date:		
<input type="button" value="Add"/>				
Vaccine:	Parent Signature Date:			
Religious Exemptions:				
Vaccine:	--select--	Parent Signature Date:		
<input type="button" value="Add"/>				
Vaccine:	Parent Signature Date:			
Religious Membership Exemptions::				
Vaccine:	--select--	Parent Signature Date:		

There is currently a bug in the School Module, so students with an exemption still shows up on the Action Report and letter as missing a vaccine. This should be fixed in 2015.

Resources

Web pages:

- Pilot project materials:
www.doh.wa.gov/CommunityandEnvironment/Schools/Immunization/SchoolModuleWorkgroup.aspx
- School and child care web page:
www.doh.wa.gov/CommunityandEnvironment/Schools/Immunization.aspx

WA Immunization Information System: www.waiis.wa.gov

For persons with disabilities, this document is available on request in other formats. To submit a request, please call 1-800-525-0127 (TDD/TTY call 711) DOH 348-430 October 2014