

The Department of Health - Office of Immunization and Child Profile developed the Washington State Immunization Information System (IIS) School Module for schools, preschools, and child care centers to use for immunization tracking and reporting. The goal of this system is to improve compliance rates with immunization requirements and to keep children free from vaccine-preventable diseases.

This guidance document will assist schools, preschools, and child care centers in implementing and using the School Module. If you need additional assistance or have any questions please visit our website at www.doh.wa.gov/schoolmodule or email us at schoolmodule@doh.wa.gov.

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Legal Framework and Considerations

NOTE: 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 should understand the legal framework for access to the IIS and the impact that the Health Insurance Portability and Accountability Act (HIPAA) and the Family Education Rights and Privacy Act (FERPA) have on school immunization management in the IIS.

The HIPAA Privacy Rule recognizes the 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\(b\)](#)).

In the past, only healthcare providers had access to the IIS under the Washington State Health Care Information Act. In response to more interest in broadening access, the Washington State Attorney General's Office reviewed the matter and determined that school nurses and staff assigned by a school nurse could use the IIS under the Act ([RCW 70.02](#)).

The School Module allows expanded access to the IIS. School nurses can delegate authority to non-healthcare personnel to access the School Module to assist with student immunization compliance work. School nurses operate under their healthcare license when they allow non-healthcare personnel to access the School Module.

The [Family Educational Rights and Privacy Act \(FERPA\)](#) guides the school's authority to disclose information. According to the act, a school nurse or assignee should have written parent consent to add immunization information to a child's record in the Washington State Immunization Information System.

When using the School Module, schools must:

- Maintain the confidentiality of information as described in the [IIS Confidentiality, Privacy, and School Access](#) document.
- Only enter [medically verified records](#) into the School Module. School nurses should use their best clinical judgment to determine a valid medically verified record.
 - The Department of Health will provide consultation to discuss records, but is not responsible for independently confirming if a record is medically verified.
- Follow 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 School Module.
- Not share their unique secure login information with anyone or allow anyone to access the system using their secure login.

Collecting Parent Consent

Schools are required by FERPA to obtain parental consent before school immunization records can be released or entered in the School Module. Parental consent is only required if a student is missing immunization dates or is not in the IIS. Schools are responsible for developing policies and procedures for collecting parental consent for the release of immunization information into the School Module.

The [Certificate of Immunization Status \(CIS\)](#) form includes a space to collect parental consent to share immunization information with the IIS. This additional signature on the CIS allows schools to input immunization information into the IIS and another consent form is not needed. Schools may use their own forms to collect parental consent, if they wish to do so.

Sample parental consent forms from other states:

- [Consent to Release Information to Children and Hoosier Immunization Registry Program](#)
- [Minnesota FERPA consent template](#)
- [Wisconsin Student Immunization Record](#)

Getting Started with the School Module

After you transition to the School Module, you may notice a higher number of students listing as out of compliant than there were in your student information system (SIS). This is most likely due to missing historical immunization dates in the Immunization Information System (IIS). In addition to missing immunization dates, the IIS will not have your student exemptions in the system. DOH understands that it may take time to enter this missing data into the School Module.

Strategies for getting started:

- Be sure you have parent consent on the CIS or on your own form before entering any information such as immunization dates or exemptions into the School Module.
- Print an out of compliance report and a list of students with exemptions from your school's SIS to use as a reference during the transition to the School Module.
- Use the exemption list from your SIS to determine which students need exemptions entered into the School Module.
- Compare your out of compliance list from your SIS to the Action Report from the School Module to determine which students are actually out of compliance versus missing historical immunization dates.
 - The Roster, Action Report, and Forecast will not show a vaccine is needed if a provider added lab evidence of immunity to that disease in the IIS.
- For students missing historical immunization dates, check your records for any medically verified immunizations you can enter.

- For the students who do not have medically verified records, contact parents/guardians or healthcare providers to [obtain medically verified records](#) for the missing immunization dates in the IIS.
- If you have a large number of students with missing records, we recommend starting with the lowest grade at your school and working your way up the grades.
- Only school nurses may enter immunization dates into the School Module, however DOH is conducting a school nurse delegation pilot project. If you are interested in participating in delegation to unlicensed assistive personnel (UAP) please send an email to schoolmodule@doh.wa.gov.
- Continue your current work with students who are out of compliance.

Medically Verified Records

The goal of these guidelines is to ensure data quality in the School Module. School nurses must ensure that only medically verified data is entered into the School Module. Parent reported immunization dates may not be entered into the School Module.

The following are considered medically verified immunization records and may be entered into the School Module:

- A Certificate of Immunization Status (CIS) printed from the IIS or a CIS verified with a unique healthcare provider or clinic stamp, or handwritten provider signature
- Immunization records from a clinic or hospital electronic health record (EHR) with a unique healthcare provider, clinic, hospital stamp, or handwritten provider signature
- Official certificate of immunization or immunization record from another state's immunization registry
- Official lifetime immunization record from Washington or another state with a unique healthcare provider or clinic stamp, or handwritten provider signature
- An immigration form or lifetime immunization record from another country with a clinic or healthcare provider stamp, or handwritten provider signature

The ultimate decision to enter an immunization record is based on the school nurse's best clinical judgment. If you have any questions about a medically verified record, please send an email to schoolmodule@doh.wa.gov.

Strategies for obtaining medically verified records:

- If the student is missing immunization dates and the parent provides a Certificate of Immunization Status (CIS) but not a medically verified immunization record, pursue these options:
 - Contact the healthcare provider directly and ask the provider to enter the immunizations into IIS or fax an immunization record to the school.
 - Ask the parent to request the provider enter the immunizations in the IIS.

- Ask the parent to obtain a medically verified record from a healthcare provider and the school nurse can enter the immunizations into the School Module.
- If a student is missing laboratory evidence of immunity contact the healthcare provider and ask them to enter it into the IIS and send you a copy of the lab report, if you do not have one.
- If you are unable to obtain a medically verified record, **do NOT enter the immunization dates into the School Module**. Use another method to track students who only have parent reported immunization records.

Immunization Data Entry

The ultimate goal of immunization data entry in the IIS is to ensure that students in the system have a complete immunization record. It is good public health practice to enter all immunization dates, even if the immunizations are not required for school, preschool, or child care (e.g., HPV or meningococcal vaccines). Entering all missing immunization dates is highly encouraged, but not required if time and resources do not permit.

If the medically verified record lists the vaccine-specific brand name (e.g. Kinrix or Proquad) enter the vaccine accordingly. If the brand name is not specified use the default in the table below. DO NOT enter a brand name unless it is specified. 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)

Managing the School Roster

- Review your student roster for accuracy as needed
- To keep your school roster up to date, add and remove students from the roster as they enroll and withdraw from your school
- Update address and phone numbers for students as needed
- Change the grades of the students on your school roster at the end of each school year
- If the student's name in the School Module is different than the school record, **DO NOT change the name**. Put the student's name from the school record in the "alias" field on the Demographic page
- If the date of birth is different, **DO NOT change the information**. Ask the parent to let the provider know that the provider needs to update the information in the IIS

Additional Resources

- Washington Department of Health School Module web page: www.doh.wa.gov/SchoolModule
- Washington State Immunization Information System: www.waiis.wa.gov
- Washington Department of Health School and Child Care web page: www.doh.wa.gov/CommunityandEnvironment/Schools/Immunization
- School Module Training Guide: www.doh.wa.gov/Portals/1/Documents/Pubs/348-578-WAIIIS-SchoolModuleTrainingGuide.pdf
- School Module Training Video: www.youtube.com/embed/FwmggiQIMXg
- Letter to Parents - School Module Implementation: www.doh.wa.gov/Portals/1/Documents/8200/348-605-SchoolModuleParentLetter17.docx