Definitions

1. **Q: What does conditional status mean?**
   **A:** When a child is missing one or more immunizations required for school or child care entry, their immunization status is conditional. Children in conditional status are allowed to attend school or child care on the “condition” they make satisfactory progress to getting completely immunized.

2. **Q: What does satisfactory progress mean?**
   **A:** Satisfactory progress means starting or continuing to get all required immunizations based on national immunization guidelines and within certain time frames:
   (a) A student must get any missing immunizations within thirty days after the first day of attendance or after a temporary medical exemption expires.
   (b) When the immunizations are part of a series with recommended intervals between doses, the student must get the missing immunization no later than thirty days past the recommended date of the next dose.

3. **Q: When does a child enter conditional status and for how long?**
   **A:** The most common scenario occurs when a child arrives on their first day of school missing a required immunization(s). The child then has 30 days from their first day of attendance to get immunized or to get an exemption. A child also enters conditional status whenever a temporary medical exemption expires. In these rarer cases, the child has 30 days from the date the medical exemption expired to get the missing immunization(s).

4. **Q: Can students start conditional status after they enroll in school?**
   **A:** The WAC refers to the first day of attendance, not enrollment.

5. **Q: Does conditional status only apply to students attending a new school or district?**
   **A:** No, conditional status applies to any student missing immunizations, making satisfactory progress toward full immunization, and does not have an exemption on file. The first day of attendance starts when a student enters a new school.

6. **Q: Does conditional status apply to children in child care?**
   **A:** Yes, Department of Early Learning’s (DEL) rule, WAC 170-296A-3275, discusses conditional status for children in licensed child care. The rule is slightly different and requires immunizations to be initiated before or on enrollment. If you have questions about children in child care, please talk with the DEL licensor.

**Questions related to the WAC**

1. **Q: What is the WA Administrative Code (WAC) that talks about conditional status?**
   **A:** It is WAC 246-105-020.
2. **Q:** When did this law take effect?  
**A:** January 26, 2009.

**Q:** Why did the WAC get updated in 2009?  
**A:** The State Board of Health replaced WAC 246-100-166 with Chapter 246-105 Sections 010 to 090. In addition to reorganizing the WAC, the Department of Defense, Office of Superintendent of Public Instruction, State Board of Health, and Department of Health (DOH) met in 2008 to discuss the military compact. The military compact allows military students 30 days from the date of school enrollment to get required immunizations or to initiate the immunization series. A conflict existed between military students and non-military students not allowed to be in conditional status after the first day of attendance. These organizations made the decision to update WAC 246-105-020.

3. **Q:** I’m familiar with the term conditional status because it has been around for a long time. What changed in 2009?  
**A:** WAC 246-105-020 allows students with any missing immunizations to be in conditional status for thirty days AFTER the first day of attendance. Before 2009, the attendance of every student was conditioned upon the presentation of proof of full immunization before or on the first day of attendance.

4. **Q:** Many school nurses are concerned about the changes in the WAC. Is there an opportunity for the State Board of Health to open this rule in the future?  
**A:** In 2016, the State Board of Health (Board) received a petition for rulemaking to change its rule to require students to be fully immunized before school entry. The Board decided at that time not to engage in rulemaking, and suggested that Board and Department of Health (Department) staff continue the discussion with stakeholders about strategies to reduce the administrative burden to schools while decreasing the number of children who are out of compliance with school immunization requirements. In March 2016 the Board opened the rule to consider updates and will continue these conversations and include additional stakeholders to discuss topics and issues related to conditional status. To be included on the Board's Immunizations distribution list, email Alexandra Montaño Montano: Alexandra.Montano@sboh.wa.gov with the subject "Immunizations - Subscribe."

5. **Q:** Are schools required to implement the changes with conditional status if they haven’t already?  
**A:** The WAC was effective in 2009. Schools should follow their usual process to review school policies and discuss applicable state and federal regulations with their risk managers.

6. **Q:** Is there a requirement to make more than one parent contact by letter or phone to let them know their child is in conditional status, or just the notice of exclusion noted in WAC 392-400-300?
A: No additional requirements exist beyond the WAC procedures for excluding students. Even though not specified in WAC, it is best practice to send a written notice to parents about the student’s conditional status.

Specific scenarios

1. Q: What if the child needs more than one dose to complete a vaccination series?
   A: The child has 30 days from their first day of attendance to get the first needed dose. The child stays in school under conditional status for up to 30 days after the next dose is due. The child remains under conditional status for the entire time they are in the process of completing the series.

   EXAMPLE: A Kindergartener on their first day of school has never been vaccinated against varicella. According to state requirements, the child needs two doses separated by the recommended minimum interval of three months. If the child got the first dose on October 1st they cannot get a second dose until January 1st (three-month minimum interval). The child would then have 30 days after January 1st to get the second dose.

2. Q: A 4th grade student who transferred from another state needs hepatitis B vaccine dose #3. When is this student out of compliance with the school requirements?
   A: Students in the process of getting vaccinated stay in conditional status after the first day of attendance for up to 30 days after the next dose is due, based on the recommended interval. Students who can’t show satisfactory progress 30 days past the usual recommended interval for a dose are out of compliance.

3. Q: If I notified the parents of a 2nd grader multiple times during the school year and the student does not show satisfactory progress toward full immunization status, can I exclude the student?
   A: If you are in a situation where you need to send a conditional letter during the school year rather than on the first day of attendance, the student is in conditional status beginning on the day you send the letter. If the student fails to make satisfactory progress to get fully immunized or get an exemption during the following 30 day period, follow your policy and procedures to determine if a student should be excluded. If a student has received a conditional letter in one school year and has not met the requirements to come into compliance by the beginning of the next school year, he or she can be excluded at any time.

4. Q: I notified parents of 5th graders that the students need a Tdap by 6th grade. I notified parents in the spring before the students started 6th grade. Is the student out of compliance on the first day of attendance if they show up without a Tdap?
   A: Since Tdap is not required until 6th grade, students can attend school in conditional status for 30 days as long as they make satisfactory progress to get their required Tdap or they get an exemption.
5. **Q:** How about a student entering kindergarten? If I notified parents about the kindergarten requirements the previous year and worked with parents to get their child in compliance in the spring, is the student out of compliance on the first day of school?  
**A:** No, the requirement doesn’t apply until kindergarten. A kindergartner gets 30 days after the first day of attendance to be in compliance, or they can get an exemption.

6. **Q:** Can homeless students under the McKinney Vento Act be considered in conditional status? How long can we consider these students in conditional status?  
**A:** Homeless students who lack immunizations or immunization records should be placed in conditional status until they get immunizations or until their immunization records have been received at the enrolling school. If, after 30 days, the students are not showing satisfactory progress toward getting immunized, or the school has not made progress in getting immunization records, then the student will be marked out of compliance. Homeless students cannot be excluded from school while they are marked out of compliance and the homeless liaison should continue to help homeless students get immunizations, their immunization records, or an exemption.

7. **Q:** Can students trying to get an exemption be placed in conditional status until they get their Certificate of Exemption signed by a healthcare provider?  
**A:** Students are in conditional status if they do not get one or more required vaccines on their first day of attendance or, in some cases, after they began school or child care. From the time they get notified that their child is in conditional status, parents or guardians have 30 days to get the child vaccinated, show a record of past vaccination, or exempt their child for the missing vaccine.

8. **Q:** Can students who have a signed CIS but didn’t list any immunizations be placed in conditional status?  
**A:** Yes. WAC 246-105-050 requires a signed CIS with vaccines that the student received as a condition of attendance in school or child care. Conditional status allows a student to have time to get fully immunized, finish their paperwork, or get an exemption.

9. **Does DOH have sample letters for students in conditional status or need to be excluded?**  
**A:** Yes, DOH developed sample letters. You can access them here:  