Frequently Asked Questions About Conditional Immunization Status

Effective August 1st 2020 the rules regarding conditional status will change. This document contains information about the rules for the 2019-2020 school year and the rules for the 2020-2021 and beyond in two separate sections.

SECTION A: Conditional Status Rules for the 2019-2020 School Year

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.

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 remaining doses within 30 calendar days following the recommended date of the next dose needed according to the national immunization catch-up schedule.

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).

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

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.

Q: Does conditional status apply to children in child care?
A: Licensed child day care centers must follow the immunization requirement laws and rules. This includes all public and private child cares licensed by the Department of Children, Youth, and Families to provide early childhood education and early learning services for a group of children for periods of less than twenty-four hours.

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 348-679 December 2019
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: Students considered homeless under the McKinney-Vento Act 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 considered out of compliance. Homeless students cannot be excluded from school for being out of compliance with the immunization requirements. The homeless liaison should continue to help homeless students get immunizations, their immunization records, or an exemption. For more information see the Immunization Manual for Schools, Preschools, and Child Care Facilities (PDF).

Q: How do the rules apply to foster children?
A: Foster children must be allowed to enroll in school, even if they are missing paperwork, per the Every Student Succeeds Act. For more information see the Immunization Manual for Schools, Preschools, and Child Care Facilities (PDF).

Q: How do the new rules apply to international students?
A: International students must comply with immunization requirements. The host parent may sign the Certificate of Immunization Status if needed.

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 required in RCW 28A.210.120?
A: No additional requirements exist beyond the RCW and WAC procedures for excluding students. Even though not specified in law, it is best practice to send a written notice to parents about the student’s conditional status.

Q: Does DOH have sample letters for students in conditional status or who need to be excluded?
A: Yes, DOH has sample letters. You can access them at www.doh.wa.gov/SCCI
Q: What does conditional status mean?
A: On or before the first day of school or child care attendance parents/guardians are required to provide proof of either, full immunization, a certificate of exemption, or the initiation of and compliance with a schedule of immunization for their child, RCW 28A.210.080. Children can enter and stay in school or child care in conditional status if they are catching up on required vaccines for school or child care entry. Vaccine series doses are spread out among minimum intervals, so some children may have to wait a period of time before finishing their vaccinations. This means they may attend school or child care while waiting for their next required vaccine dose. To enter school or child care any the vaccine doses they are eligible to receive must be administered on or before starting the school or child care.

Students in conditional status may remain in school or child care while waiting for the recommended date of the next dose needed according to the national immunization catch-up schedule plus another 30 calendar days’ time to turn in documentation of vaccination. If a student is catching up on multiple vaccines, conditional status continues in a similar manner until all of the required vaccines are complete.

If the 30 day conditional period expires and documentation has not been given to the school or child care, then the student must be excluded from further attendance, per RCW 28A.210.120. Valid documentation includes medical records showing vaccination, evidence of immunity to the disease in question, or a completed certificate of exemption (COE) form.

Q: What does “any the vaccine doses they are eligible to receive” mean?
A: Children are due for different vaccines depending on their age. “Any doses the child is eligible to receive” means all of the required vaccine doses the child is old enough to receive and the time interval from the previous dose of that vaccine has been met according to the national immunization catch-up schedule.

For example:
- A child entering kindergarten has had no vaccines:
  o The child must get one dose of each of the required vaccines (Hepatitis B, DTaP, IPV, MMR and Varicella) before starting school. They are then in conditional status until the next vaccine is due plus 30 calendar days to turn in documentation that they have gotten the vaccine. When they get the vaccine conditional status continues as described until all of the vaccine series are complete.
- A child entering kindergarten has had all vaccines except MMR dose 2. MMR dose one was administered 1 week before the start of school:
  o The child can start school in conditional status for 3 weeks (waiting for MMR dose 2 minimum valid date) plus an additional 30 calendar days in which to get the dose and turn in documentation to the school.
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• A child entering kindergarten has all of the early childhood vaccines but is missing their age 4 - 6yr vaccines required for kindergarten entry:
  o The child must get the missing DTaP, IPV, MMR and varicella before starting school.
• A student entering 7th grade has not had their required Tdap booster:
  o The student must get the Tdap vaccine before starting school.

Q: What has changed regarding conditional status?
A: In the past, conditional status was interpreted to mean children had 30 days from the first day of attendance to provide the school or child care with the required immunization documentation. The revised rule language clarifies that documentation is required on or before the first day of attendance as stated in RCW 28A.210.080.

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 required immunizations. The child must get any of the doses they are eligible to receive before starting school. If additional doses are needed to complete the vaccine series then they can start school on the condition that they continue to get the remaining doses based on the schedule. They must get remaining doses within 30 calendar days following the minimum valid date of the next dose needed. A child also enters conditional status when a temporary medical exemption expires. In this case, the child has 30 calendar days from the date the medical exemption expired to get the missing immunization(s) or another exemption.

Q: Who grants conditional status?
A: The school or child care staff determine if the conditions for conditional status have been met.

Q: Does conditional status only apply to students attending a new school or district?
A: No, conditional status applies to any child without an exemption attending school or child care who is missing immunizations and waiting for the minimum valid date of the next vaccine dose needed.

Q: How do the new rules apply to children in military families?
A: Children of active-duty military parents or guardians must turn in documentation of immunization status on or before the first day of attendance. If they need additional vaccine doses to meet state requirements, they have 30 days from enrollment to do so.

Q: Does conditional status apply to children in child care?
A: Licensed child day care centers must follow the immunization requirement laws and rules. This includes all public and private child cares licensed by the Department of Children, Youth, and Families to provide early childhood education and early learning services for a group of children for periods of less than twenty-four hours.
Q: How are homeless students under the McKinney Vento Act impacted by these rules?
A: Students considered homeless according to the McKinney-Vento Act (which may include migratory and refugee children and children in foster care) must be allowed to enroll, attend classes, and participate fully. These students cannot be excluded for being out of compliance with immunization requirements. The homeless liaison should continue to help homeless students get immunizations, their immunization records, or an exemption. For more information see the Immunization Manual for Schools, Preschools, and Child Care Facilities (PDF).

Q: How do the rules apply to foster children?
A: Foster children must be allowed to enroll in school, even if they are missing paperwork, per the Every Student Succeeds Act. For more information see the Immunization Manual for Schools, Preschools, and Child Care Facilities (PDF).

Q: How do the new rules apply to international students?
A: International students must comply with immunization requirements. The host parent may sign the Certificate of Immunization Status if needed.

Q: What is the WA Administrative Code (WAC) that talks about conditional status?
A: It is: WAC 246-105-020, WAC 246-105-050 and WAC 246-105-060.

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 required in RCW 28A.210.120?
A: No additional requirements exist beyond the RCW and WAC procedures for excluding students. Even though not specified in the law, it is best practice to send a written notice to parents about the student’s conditional status.

Q: Does DOH have sample letters for students in conditional status or who need to be excluded?
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