

## School and Child Care Audits Questions and Answers 2016 - 2017 School Year

**Q. What proof of immunization is required for enrollment in Iowa schools?**

**A.** In order to attend school or licensed child care, the child needs one of the following; an Iowa Department of Public Health-Certificate of Immunization, Provisional Certificate of Immunization, or Certificate of Immunization Exemption. The Medical Exemption and Religious Exemption certificates were changed as of June 2015. A brief explanation of each certificate is included below.

- **Certificate of Immunization** - Issued when applicant has a record of age-appropriate immunizations that meet the requirement for licensed child care or school enrollment.
- **Provisional Certificate of Immunization** - Issued when the applicant has received at least one dose of each of the required vaccines but has not completed all the required immunizations or is a transfer student from another U.S. school system.
- **Certificate of Immunization Exemption-Medical** - Iowa law allows for medical exemption to immunization. More information on exemption certificate changes is available on the [Immunization Program webpage](#).
- **Certificate of Immunization Exemption-Religious** - Iowa law allows for religious exemption to immunization. More information on exemption certificate changes is available on the [Immunization Program webpage](#).

**Q: When should school audits begin?**

**A:** School audits can begin after school enrollment data is finalized, generally after October 1<sup>st</sup> of each year.

**Q: When conducting school immunization audits, do all student records need to be reviewed every year?**

**A:** No, previously reviewed records do not need to be reviewed again. Routinely, when Local Public Health Agencies (LPHAs) audit student records, the certificate is marked to indicate the record has been reviewed and meets immunization requirements. When this has occurred, the reviewer only needs to evaluate the record for compliance with the Tdap vaccine requirement.

**Q: If a child transfers from an Iowa school to another Iowa school, does their immunization record need to be re-audited?**

**A:** If a student transfers from one Iowa school to another, even if the schools are in different counties, previously audited records do not need to be audited again. The reviewer only needs to evaluate the record for compliance with the Tdap vaccine requirement when a student who was born on or after September 15, 2000 is attempting to enter 7<sup>th</sup> grade or higher. If the student is transferring from another U.S. school, the student must obtain a valid Iowa Department of Public Health Certificate of Immunization or Provisional Certificate of Immunization. For transfer students from another U.S. school, a provisional may be issued for 60 days to allow time to obtain immunization records. Transfer student records must be reviewed during the school audit.

**Q: Is the school nurse allowed to sign the Certificate of Immunization for students?**

**A:** Yes, nurses are allowed to sign the Certificate of Immunization if the record indicates a child is up-to-date on all school entry immunization requirements.

**Q: Is a Certificate of Immunization Exemption-for medical purposes valid when signed by a doctor of chiropractic?**

**A:** No, a Certificate of Immunization Exemption for medical reasons is valid only when signed by an Iowa licensed physician (M.D. or D.O.), physician assistant or nurse practitioner. The new Certificate of Immunization Exemption includes fields for the health care professional to print their name and include their Iowa medical license number.

**Q: A family has established care with a health care provider outside of Iowa. Are immunization certificates valid when signed by a health care provider who does not hold an Iowa license?**

**A:** No, immunization certificates must be signed by the appropriate Iowa licensed health care provider. Instead of the family incurring the cost of establishing care with an Iowa physician or making another appointment, the family may have a certificate signed by an Iowa licensed health care provider in their current health system or have an appropriate health care provider in a Iowa local public health agency sign the certificate.

**Q: What religions are acceptable for a religious exemption?**

**A:** The Iowa administrative code does not specify religious denominations eligible for a religious immunization exemption. A Certificate of Immunization Exemption – Religious is valid when completed appropriately and notarized. A religious exemption may be granted to a student if the immunization conflicts with a genuine and sincere religious belief and the belief is in fact religious and not based merely on philosophical, scientific, moral, personal, or medical opposition to immunizations.

**Q: Can a Provisional Certificate of Immunization be completed at the time of the audit?**

**A:** During the audit, a school nurse or local public health nurse may sign a Certificate of Immunization or issue a Provisional Certificate of Immunization. However, for audit purposes, certificates signed during the audit should not be counted as a valid immunization certificate.

**Q: Can a provisional enrollment be extended beyond 60 days?**

**A:** The time allowed for provisional enrollment is as rapidly as medically feasible to complete the immunization requirements but shall not exceed 60 calendar days. Additional Provisional Certificates may be issued at the end of the 60-day provisional enrollment only if the applicant has not completed the required immunizations due to minimum interval requirements. The longest minimum interval between 2 doses of required vaccines for school enrollment is 6 months; therefore it is generally unnecessary to have more than 3 provisional certificates issued for a single student. If a Certificate of Immunization is not submitted at the end of the 60-day provisional period, the child shall be excluded from the benefits, activities, and opportunities of the school or licensed child care center until a valid Certificate of Immunization is submitted.

**Q: Can a Provisional Certificate of Immunization be issued for immigrants, refugees, or foreign exchange students who have not received all of the required immunizations to attend school or licensed child care centers?**

**A:** A Provisional Certificate of Immunization may be issued to a transfer student from another country if the student has received at least one dose of each required vaccines. If at least one

dose of each vaccine is not on file for the applicant, the record shall be counted as invalid for auditing purposes.

**Q: Where do I find a list of the licensed child care and preschool providers in my county?**

**A:** A list of licensed childcare and preschool providers by county is available on the Iowa Department of Human Services webpage at <http://ccmis.dhs.state.ia.us/ClientPortal/ProviderSearch.aspx>.

**Q: Which immunization requirements are used to audit a child's record who is attending a preschool program in a public or private school?**

**A:** Children in preschool, regardless of their age, should be audited according to the Licensed Child Care Center requirements. The K – 12 requirements do not apply until the child enters kindergarten.

**Q: Which immunization requirements are used to audit a child's record who is enrolled in a transitional, developmental or junior kindergarten program in a public or private school?**

**A:** Children in transitional, developmental or junior kindergarten should be audited according to Licensed Child Care Center requirements. The Iowa Immunization Administrative Code defines "elementary school" as kindergarten through grade 8. Other types of kindergarten programs such as transitional, developmental or junior kindergarten are not defined in administrative code by the Immunization Program or the Department of Education. These programs may include 4 year old children who would not have adequate time to receive the required kindergarten vaccines prior to attending school.

**Q: If school-age children attend an after school licensed child care program, does the licensed child care center need to have an immunization record on file?**

**A:** Yes, the Iowa Immunization Administrative Code requires a Certificate of Immunization be submitted to the licensed child care center in which the child wishes to enroll. An after school licensed child care center is required to have immunization records on file. The records should be audited according to the Licensed Child Care Center requirements.

**Q: Do children less than 12 months of age enrolled in a licensed child care center need a Certificate of Immunization on file if they have not completed the primary series of vaccines?**

**A:** Yes, the Iowa Immunization Administrative Code requires a Certificate of Immunization be submitted to the licensed child care center in which the child wishes to enroll. The Certificate of Immunization should be updated to meet the age-appropriate immunization requirements and as children receive additional immunizations.

**Q: Does the immunization law allow for the 4-day "grace period"?**

**A:** Since 2009, the law allows vaccine doses administered up to 4 days before the minimum interval or age to be counted as valid. The 4-day "grace period" should not be applied to the 28-day interval between two live virus vaccines (e.g., MMR and Varicella) if not administered at the same visit.

**Q: Do immunization records of a child that receives Competent Private Instruction (CPI) need to be audited?**

**A:** The CPI category includes home schooled children who are not enrolled in independent private instruction and those in non-accredited nonpublic schools. There are two options for a child to enroll in CPI, **Option 1** and **Option 2**. The CPI enrollment option is provided by the school district. All **Option 1** children and **Option 2** children **dually enrolled** with the school district must provide evidence of immunization or exemption. Immunization records for these children must be audited and counted on the Immunization Record Review. Immunization

records for CPI/home schooled children are often maintained in the school district office. Children enrolled under **Option 2** that are **not dually enrolled** with the school district are not required to submit evidence of immunization. Immunization records for these children are not included in the audit and the children are not counted in the Total Enrollment on the Immunization Record Review.

A new class of private instruction, **Independent Private Instruction (IPI)**, became effective on July 1, 2013. Children who are home schooled under IPI are exempt from the immunization requirements. Immunization records for these children are not included in the audit, and the children are not counted in the Total Enrollment on the Immunization Record Review.

For additional information see [Iowa Department of Education, Private Instruction](#) webpage or contact Elizabeth Calhoun at the Department of Education, 515-281-8170.

**Q: During a school audit, where should records of home school children be documented?**

**A.** Home school student records may be documented in the school where the immunization record is maintained (e.g., elementary school). If home school student records are maintained at the school district office, an audit may be submitted for the school district office and would include records for home school children only. IRIS includes a school district office for each public school district in Iowa which allows Local Public Health Agencies to select where home school children are documented. Regardless of where home school student records are documented for the audit, student records should only be counted in one location (e.g., school or school district office).

As of the 2013-14 school year, the Immunization Program began releasing individual school-level immunization audit data. The location of home school children's records and where they are documented during the immunization audit may impact individual school data. Rates for each type of certificate can impact individual school data. For example, if all home school children for the school district are reported in one elementary school rather than throughout various schools within the district or in the school district office, and the majority of these students have an Immunization Exemption, the percentage of students with an immunization exemption will appear higher for this school and is a misrepresentation of audit data for the school.

**Q. If a student already has a valid Medical or Religious Certificate of Immunization Exemption on file, will an updated certificate of exemption need to be completed for the 7<sup>th</sup> grade Tdap vaccine requirement?**

**A:** If a medical exemption form has no specific vaccines listed, it is valid for all vaccines and remains in effect until the expiration date noted on the form. If no expiration date is included, the medical exemption remains in effect for the student's entire enrollment period in an Iowa licensed child care center, elementary and secondary school. If a medical exemption does not include diphtheria, tetanus and pertussis, a new Certificate of Immunization Exemption form is required to include those antigens. The current version (June 2015) of the Medical Certificate of Immunization Exemption includes a section for the health care provider to select which required vaccine(s) the child is exempt from receiving.

A previously completed certificate for religious exemption is valid for all vaccines including Tdap. The religious exemption remains in effect for the student's entire enrollment period in an Iowa licensed child care center, elementary and secondary school.

**Q: What is the Tdap vaccine requirement?**

**A:** Beginning with the 2013-2014 school year, all students entering, advancing or transferring into 7th grade or above, and born on or after September 15, 2000, will need proof of an adolescent tetanus, diphtheria, and pertussis (whooping cough) booster immunization (“Tdap”) for school enrollment. This dose must contain the pertussis component to be considered compliant with school entry requirements.

**Q: Will all students born after September 15, 2000 need proof of Tdap vaccine or just 7<sup>th</sup> grade students?**

**A:** For the 2016-17 school year, students entering 7<sup>th</sup> grade and above who were born on or after September 15, 2000, are required to have Tdap vaccine. Students entering 11<sup>th</sup> through 12<sup>th</sup> grades were generally born prior to September 15, 2000, and therefore are not required to have Tdap vaccine. However, if students entering 11<sup>th</sup> through 12<sup>th</sup> grades during the 2016-2017 school year were born on or after September 15, 2000, Tdap vaccine is required.

**Q: What if a child does not have proof of Tdap vaccine before school starts?**

**A:** Children who have received one dose of pediatric diphtheria, tetanus, and pertussis (DTaP) vaccine may attend school by submitting a Provisional Certificate of Immunization. The Provisional Certificate of Immunization is valid for a maximum of 60 days which allows time for the child to receive the adolescent Tdap vaccine. If the child does not receive the vaccine by the end of the provisional enrollment period (60 days), the child shall be excluded from school.

**Q: Is there a grace period/extension to receive Tdap vaccine after school starts?**

**A:** No, there is no grace period/extension for the Tdap vaccine requirement. All students entering 7<sup>th</sup> grade and above who were born on or after September 15, 2000, need to submit a completed Certificate of Immunization with the Tdap immunization, a Certificate of Immunization Exemption or a Provisional Certificate of Immunization when enrolling in school.

**Q: Are old versions of the Certificate of Immunization or Certificate of Immunization Exemption valid or do students need to be updated with the most current version of the certificate?**

**A:** Previous versions of the Certificate of Immunization or Certificate of Immunization Exemption already on file remain valid and can be accepted for upcoming school years. Student records do not need to be updated to the most current version. .

**Q: If a child received a dose of DTaP or Tdap on or after their 7<sup>th</sup> birthday, does this count toward the 7<sup>th</sup> grade school entry Tdap requirement?**

**A:** Yes, any dose of Tdap or DTaP received on or after 7 years of age counts toward the adolescent booster dose requirement for Tdap.

**Q: When are school and child care audit reports due to the Iowa Department of Public Health?**

**A:** School and licensed child care audit reports in IRIS are due by January 31, 2017.