

# Immunization Records

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Indiana Department of Education

# Main Issues

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1. Schools are responsible for monitoring the immunization status of their students and entering student immunization records into the SIS (Student Information System)
2. ISDH (Indiana State Department of Health) needs school immunization information to send to CDC
3. Immunizations administered need to be entered into CHIRP (Children and Hoosier Immunization Registry Program)

Schools are Responsible for Monitoring  
the Immunization Status of their  
Students and Entering Student  
Immunization Records into the SIS

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Issue One

# Background Information – School Role Regarding Immunizations

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- Immunization Process Completed by the School Nurse:
  - School receives an immunization record
  - School nurse checks the record for completeness (multiple records from various providers, handwritten, in a foreign language)
  - School nurse contacts parent regarding missing or incomplete information and recommends referral to health care provider (LHD, primary care provider, pharmacist)
  - School nurse enters record into SIS
  - School nurse runs a report
  - School nurse contacts parent a second time

# Background Information – How are Schools Doing Monitoring the Immunization Status of Students?

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Data from the IDOE School Health Report for the 2015 School Year:

- 95.6 % students are completely vaccinated
- 2.7% are in the process of completing the required vaccines
- 1.2% have a religious objections
- 0.3% have a medical exemption
- All records are entered into the SIS

# ISDH Needs School Immunization Information to Send to CDC

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Issue Two

# Background Information – ISDH Needs School Information to Send to CDC

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- Schools have historically kept an immunization record for students and submitted a paper report to ISDH regarding the number of students in grades K, 1, and 6 with complete and incomplete immunizations as well as the number of students with religious objections and medical exemptions (see page 8 of handout)
- This report compiled the information required by CDC and was not time-consuming or burdensome for schools to complete



**SUMMARY REPORT ON THE IMMUNIZATION STATUS OF  
FIRST GRADE STUDENTS ENROLLED IN SCHOOL  
SCHOOL YEAR 2005-2006**  
State Form 49455 (R7/3-05)  
IC 20-8.1-7-11

Name of School Corporation		CODES	
Name of School		County #	
Address of School		Corporation #	
City	County	School #	
Zip Code	School Telephone No.		

1

If school has their own school number listed in the Indiana School Directory, published by the Department of Education, submit a separate report. The answer for each box below must be a number (No Check Marks, etc.)

Enter in box the number of first grade students in your school: A.

Number of students from Box "A" above having completed immunizations: B.

Use the work sheet for the minimum complete immunizations. Students listed in this category need no further follow-up.

**EXEMPTIONS:**

Number of students from Box "A" above who have a medical contraindication on file: C.   
Physician's signed statement, verified annually and kept in your school immunization records, is required.

Number of students from Box "A" above who have a religious objection on file: D.   
Statement, signed and verified annually by a parent/guardian stating the objection, must be on file in your school immunization records.

Number of students from Box "A" above NOT complete and having no exemption on file: E.

If there is a number (other than 0 in Box "E") then Boxes "F" thru "N" must be completed.  
List Students that fall into these categories (Not Doses):

NUMBER OF STUDENTS	Record not on file	Need DTP/DTap/DTd	Need Polio	Need Hepatitis B	Need 1 <sup>st</sup> Measles	Need 2 <sup>nd</sup> Measles	Need Rubella	Need Mumps	Need Varicella
	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)

Return this form to:  
Indiana State Department of Health  
Immunization Program, 6A  
2 North Meridian Street  
Indianapolis, IN 46204-3003

Signatures: \_\_\_\_\_  
Superintendent

Prepared By \_\_\_\_\_

# Background Information – ISDH Needs School Information to Send to CDC

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- In 2009, ISDH no longer accepted the paper report and instead requested that schools enter the immunization record for each student into CHIRP (Children and Hoosier Immunization Registry Program) so that ISDH could pull their School Immunization Report from CHIRP

# Immunizations Administered Need to be Entered Into CHIRP

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Issue Three

# Background Information

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- Schools cannot enter immunization records for students into CHIRP without parent written permission per FERPA Rules (see page 10 of handout)
- CHIRP issues include: it “times out”, does not roll up to the next school, school data is deleted if a provider enters the same vaccine, and translating immunization records into CHIRP requires technical expertise and training

### ***U.S. DOE Presentation Regarding Immunization Records and FERPA (January 2015)***

- At the elementary or secondary school level, students' immunization and other health records that are maintained by a school district or individual school, including a school-operated health clinic, that receives funds under any program administered by the U.S. Department of Education are "education records" subject to FERPA, including health and medical records maintained by a school nurse who is employed by or under contract with a school or school district.
- School Nurse Records –
  - Vaccination records that are directly related to a student and maintained by a school nurse who is employed by, or under contract to, the school are considered "education records."
  - Vaccination information from education records may not be shared with outside parties without parental consent, unless an exception applies.
- Signed and dated consent is generally needed for a school to share vaccination records to public health authorities (e.g., for entry into an immunization registry) or to the child's health care provider (e.g., for inclusion in the child's health care record).
- Schools, in collaboration with their health departments and local health providers, must carefully consider how to obtain consent from parents for potential information sharing.
- Obtaining consent to share vaccination information on certain populations can be challenging, such as
  - Children in foster care
  - Children not in the physical custody of a parent or guardian

***If public health department officials provide vaccines at the school site to students, are any records generated by the vaccine campaign subject to FERPA or to the HIPAA Privacy Rule?***

- If health officials, such as individuals from the local health department, come on campus and oversee the vaccine administration, any records that the health officials create and maintain would not be subject to FERPA. However, any records or recorded information (or copies of records) provided by health officials to school officials that directly relate to a student and are maintained by the school would be "education records" subject to FERPA.

***If a student is vaccinated by a personal physician and brings the vaccination record to the school, does that become part of the student's education records and, if so, can that record be shared with the health department to allow the student to be counted as "vaccinated"?***

- If the parent (or the physician) provides the information to the school, and it is maintained by the school, it is an "education record" under FERPA. As such, it can only be shared with the health department either with consent or under one of the exceptions to the general consent requirement in FERPA, such as under the health or safety emergency exception.

# Additional Notes

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- As of July 1, 2015, per Indiana Code, any provider who administers a vaccine is required to enter the vaccine into CHIRP
- Attempts have been made to share data between CHIRP and school SIS's, but this was discontinued by ISDH as of December 2015 due to errors and incompatibility

# Issue

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School nurses are being asked to enter immunization information twice

- Into the SIS per IC 20-33-2-12 (see page 3 of handout)
- Into CHIRP per IC 20-34-4-6 (see page 7 of handout)

Requires approximately 10 minutes per student to enter the data into each data base

- 700 students, 10 minutes each = 116 hours or 15 full school days for SIS
- 700 students, 10 minutes each = 116 hours or 15 full school days for CHIRP

**IC 20-33-2-12**

**Nonpublic, nonaccredited, and nonapproved schools; curriculum or content requirements; student enrollment or participation**

Sec. 12. (a) A school that is:

- (1) nonpublic;
- (2) nonaccredited; and
- (3) not otherwise approved by the state board;

is not bound by any requirements set forth in IC 20 or IC 21 with regard to curriculum or the content of educational programs offered by the school.

(b) This section may not be construed to prohibit a student who attends a school described in subsection (a) from enrolling in a particular educational program or participating in a particular educational initiative offered by an accredited public, nonpublic, or state board approved nonpublic school if:

- (1) the governing body or superintendent, in the case of the accredited public school; or
- (2) the administrative authority, in the case of the accredited or state board approved nonpublic school;

approves the enrollment or participation by the student.

*As added by P.L.1-2005, SEC.17.*

**IC 20-33-2-13**

**High school transcripts; required contents**

Sec. 13. (a) A school corporation shall record or include the following information in the official high school transcript for a student in high school:

- (1) Attendance records.
- (2) The student's latest ISTEP program test results under IC 20-32-5.
- (3) Any secondary level and postsecondary level certificates of achievement earned by the student.
- (4) Immunization information from the immunization record the student's school keeps under IC 20-34-4-1.
- (5) Any dual credit courses taken that are included in the core transfer library under IC 21-42-5-4.

(b) A school corporation may include information on a student's high school transcript that is in addition to the requirements of subsection (a).

*As added by P.L.1-2005, SEC.17. Amended by P.L.140-2008, SEC.8; P.L.43-2014, SEC.7; P.L.222-2015, SEC.15.*

**IC 20-33-2-14**

**Compulsory attendance; school corporation policy; exceptions; service as page or honoree of general assembly**

Sec. 14. (a) This section and sections 15 through 17.5 of this chapter apply to a student who attends either a public school or a nonpublic school.

(b) The governing body of each school corporation shall have a

(e) Neither a religious objection under IC 20-34-3-2 nor an exception for the student's health under IC 20-34-3-3 relieves a parent from the reporting requirements under this section.

(f) The state department of health shall adopt rules under IC 4-22-2 to implement this section.

*As added by P.L.1-2005, SEC.18. Amended by P.L.208-2015, SEC.15.*

**IC 20-34-4-5.5**

**Repealed**

*(As added by P.L.80-2007, SEC.2. Repealed by P.L.208-2015, SEC.16.)*

**IC 20-34-4-6**

**Collection of immunization data; onsite review or examination**

Sec. 6. (a) The state department of health shall collect immunization data on school age children using the state immunization data registry. Each school corporation shall ensure that all applicable immunization information is complete in the state immunization data registry not later than the first Friday in February each year. The state department of health shall use the data to create aggregate reports.

(b) The state department of health and the local health department shall, for good cause shown that there exists a substantial threat to the health and safety of a student or the school community, be able to validate immunization reports by onsite reviews or examinations of nonidentifying immunization record data. This section does not independently authorize the state department of health, a local department of health, or an agent of the state department of health or local department of health to have access to identifying medical or academic record data of individual students attending nonaccredited nonpublic schools.

(c) The state department of health has exclusive power to adopt rules for the administration of this section.

*As added by P.L.1-2005, SEC.18. Amended by P.L.231-2005, SEC.45; P.L.80-2007, SEC.3; P.L.208-2015, SEC.17.*

**IC 20-34-4-7**

**Repealed**

*(As added by P.L.1-2005, SEC.18. Repealed by P.L.1-2009, SEC.174.)*

# Dilemma

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- Not a public health issue or an issue of students being allowed to attend school without being properly vaccinated as over 97% of our students meet the immunization requirements (completely vaccinated or have an exemption on file)
- The dilemma occurs because we have two laws that require the same data be maintained in two separate systems and there appears to be no way for the two systems to share information

# Possible Solutions to this Dilemma

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Three Options

# OPTION ONE

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Schools Enter Immunization Data into SIS System Only

# Proposed Plan – Option 1

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- IDOE could add any additional information required by CDC to the School Health Report (see page 9 of handout)
  - Report already exists and collects most of the data needed by ISDH
  - Schools are used to completing this Report
  - Report takes 15 minutes at most to complete
- IDOE would share this information with ISDH

**School Health Report for 2014 - 2015 for the State of Indiana (All)**

	K	1	2	3	4	5	6	7	8	9	10	11	12	TOTAL
# Total Students	79210	84003	81699	82452	77606	80578	75347	77397	81963	80529	77783	74105	72057	1024739
# Vision Tested	31485	71698	6044	80160	5344	78663	3135	3815	76865	1388	2250	1697	418	382962
# Passed Vision	26843	58651	5037	66724	4466	65684	2534	3331	63653	991	1939	1438	263	301554
# Failed Vision	4348	12063	958	12717	973	12029	674	588	12134	323	288	212	105	57413
# Borderline Vision	363	905	76	758	129	725	52	234	1067	14	21	9	2	4355
# Hearing Tested	41463	80670	7067	5579	76227	4996	3737	72949	5936	2980	72034	2579	1014	377231
# Passed Hearing	39846	77323	6917	5357	72869	4703	3548	68938	4934	2700	69253	2482	926	359796
# Failed Hearing	1281	1972	252	263	2085	190	199	1815	335	127	1395	101	78	10093
# Completed Immunizations	73840	81308	79423	79473	76231	76737	72191	73661	77760	78523	77099	71035	62874	980155
# In-Process Immunizations	5004	1663	1084	960	862	1427	2824	2120	2040	1577	1427	1710	5230	27928
# Religious Objection	1345	1144	1073	912	865	787	1024	916	970	846	801	709	1086	12478
# Medical Exemption	214	170	182	142	185	166	244	250	382	341	387	452	669	3784

Total Schools Submitted:	1949
Total Kindergarten Students tested for MCT:	21333
Total 1st Grade Students tested for MCT:	49601
Total Kindergarten Waiver granted for MCT:	36
Total 1st Grade Waiver granted for MCT:	130



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Enter in box the number of first grade students in your school: **A.**

Number of students from Box "A" above having completed immunizations: **B.**

Use the work sheet for the minimum complete immunizations. Students listed in this category need no further follow-up.

**EXEMPTIONS:**

Number of students from Box "A" above who have a medical contraindication on file: **C.**   
Physician's signed statement, verified annually and kept in your school immunization records, is required.

Number of students from Box "A" above who have a religious objection on file: **D.**   
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If there is a number (other than 0 in Box "E") then Boxes "F" thru "N" must be completed.  
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	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)

Return this form to:  
Indiana State Department of Health  
Immunization Program, 6A  
2 North Meridian Street  
Indianapolis, IN 46204-3003

Signatures: \_\_\_\_\_  
Superintendent

Prepared By \_\_\_\_\_

# Proposed Plan – Option 1

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- Providers would enter vaccines given into CHIRP
  - Complete medical record of all immunizations given
  - All ages – infants, toddlers, children (in public schools and others), adults
- School nurses would enter immunization records into SIS
  - Required as part of the high school transcript
  - Complete immunization database per school roster for outbreaks or to run reports

# How Does This Address the Main Issues?

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1. Schools are responsible for monitoring the immunization status of their students and entering student immunization records into the SIS – **no change**
2. ISDH (Indiana State Department of Health) needs school immunization information to send to CDC – **information obtained from IDOE School Health Report instead of via school nurses entering each immunization record into CHIRP**
3. Immunizations administered need to be entered into CHIRP (Children and Hoosier Immunization Registry Program) – **immunizations are entered by providers as they are given**

# Proposed Plan – Option 1

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## What Would this Option Require?

- Legislative changes to the Immunization Law requiring DOE to collect data via the School Health Report
- Changes to the School Health Report by IDOE IT Team

**Outcome** - Instead of entering immunizations into CHIRP, schools would report immunization data via the School Health Report – more accurate data for ISDH as it is not impacted by FERPA, it would save schools time and money, and the three main issues would be addressed

# OPTION TWO

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Schools maintain SIS and all partners assist entering into CHIRP  
over a 5 year period

# Proposed Plan – Option 2

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- IDOE and ISDH could work together to develop guidance materials that were reasonable for schools to accomplish (see page 11 of handout)
- Health Department (local and state) would assist schools as requested
  - Schools would enter immunization if school nurse ratio 1:750
  - Local health department would assist with entry if school nurse ratio 1:1,500
  - ISDH would assist with data entry if school nurse ratio greater than 1:1,500

### Immunization Guidelines for School Nurses

The guidelines below are provided as a reasonable time frame for schools to use to ensure each school is meeting the same baseline expectations and are intended to be the minimum expectations for schools to meet the requirements of IC 20-34-4. If schools reach the goals listed below ahead of the proposed time line, and/or are able to enter more grade levels than are listed below into the CHIRP database, schools are encouraged to do so.

#### **AUGUST – OCTOBER**

- Verify the immunization status of all enrolled students by reviewing the records in the CHIRP data base and records provided by parents – concentrating on the following groups:
  - Students in grades K and 6
  - Students newly enrolled in any grade
  - All other students, in all other grades
- Make a list (spreadsheet) of those students in each of the following categories:
  - Incomplete (IC)
  - Religious Objection (RO)
  - Medical Exemption (ME)
- Contact the parents of those students that are incomplete to obtain updated records or a written appointment schedule from a health care provider stating the dates the child will receive the missing vaccinations
- Contact the parents of those students who have a religious objection or a medical exemption to ensure these waivers have been updated and signed on an annual basis

#### **OCTOBER – NOVEMBER**

- Enter all student immunizations into the school data base
- Run a report showing all those students who are not complete
- Update your lists of those that are IC or have an expired RO or ME

#### **DECEMBER**

- Send a second notice to parents of students that are IC or have not filed an annual RO or ME
- Log into CHIRP and select those students, that you have parental permission for, to add these students to your school so that they can be included in your CHIRP school report

#### **JANUARY**

- Run a CHIRP report for all students in grades K and 6
- Compare your school list of IC to those listed in CHIRP as IC
- Enter into CHIRP any immunizations, with parent written permission, that the school has that are missing in CHIRP (a sample permission form can be found by clicking [here](#))
- Enter any immunization found in CHIRP that is missing from the school data base
- Ensure you have entered each student, concentrating first on students in grades K and 6, that the school has written permission from parents for into the CHIRP data base by February 1

#### **APRIL**

- Send a note home to parents stating that their students (who are still not in compliance) will not be allowed to attend the first day of school next year or will be excluded after 20 school days without proper proof of immunizations – whichever is the school policy

#### **MAY**

- Complete the School Health Report by June 15 (instructions for completing the report can be found [here](#))

# How Does This Address the Main Issues?

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1. Schools are responsible for monitoring the immunization status of their students and entering student immunization records into the SIS – **no change**
2. ISDH (Indiana State Department of Health) needs school immunization information to send to CDC – **all partners (providers, ISDH and schools) would work together to complete immunization entry into CHIRP for grades K, 1, and 6 so that ISDH could pull the needed data for their CDC Report**
3. Immunizations administered need to be entered into CHIRP (Children and Hoosier Immunization Registry Program) – **immunizations are entered by providers as they are given**

# Proposed Plan – Option 2

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## What Would this Option Require?

- Compromise and agreement between ISDH and IDOE regarding the procedures and legal interpretation of the current Immunization Law
- Assistance for schools from the LHD and ISDH

**Outcome** – Strengthened partnerships between schools, HD and providers as all are concentrating each year on completing CHIRP entry for students in grades K, 1, and 6; all partners share the cost of accomplishing this goal

# OPTION THREE

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Schools enter immunization records into CHIRP only

## Proposed Plan – Option 3

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- Schools do not enter immunization records into SIS and instead enter records only into CHIRP

# How Does This Address the Main Issues?

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1. Schools are responsible for monitoring the immunization status of their students and entering student immunization records into the SIS – schools would no longer enter immunizations into the SIS, but would need to track FERPA consent, tag each student in CHIRP to their school, and keep a separate log of all students without a FERPA consent
2. ISDH (Indiana State Department of Health) needs school immunization information to send to CDC – ISDH would pull their CDC data from CHIRP
3. Immunizations administered need to be entered into CHIRP (Children and Hoosier Immunization Registry Program) – immunizations would be entered by school nurses and by providers

# Proposed Plan – Option 3

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## What Would this Option Require?

- Legislative change to the high school transcript law to remove immunizations as a requirement

**Outcome** – Schools would not be able to easily run a report for compliance, schools would need to carefully sort and document FERPA consent, school nurses would still have two databases to learn, running reports during an outbreak would take longer and be more labor intensive, there would not be one database where 100% of the students could be entered, and the provider and the school are both responsible for entering the same data

# Conclusion

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Review of all three options

# Final Results – How Does ISDH Obtain School Immunization Information for the CDC?

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## **Option 1: (Schools enter immunization records into SIS only)**

- DOE would send ISDH the required information for reporting to CDC

## **Option 2: (Schools maintain SIS and all partners assist entering into CHIRP over a 5 year period)**

- Student immunization records would be completed by February 2017 for students in grades K, 1, and 6 by all partners working together to concentrate on these grade levels in order for ISDH to pull the information needed for their report to CDC
- All student immunization records would be entered into CHIRP within 5 years

## **Option 3: (Schools enter immunization records into CHIRP only)**

- Additional training and education would be required for schools regarding the CHIRP system
- Accuracy of CHIRP database would depend on number of FERPA consents; timing of entering all of the allowable data into CHIRP would depend on the number of students not already entered into CHIRP by the school and if assistance was given to schools as outlined in Option 2

# Conclusion

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- Thank you for inviting me to speak today
- Questions?

