

The Department of Health - Office of Immunization offers 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, 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 student 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, users must:

- Maintain the confidentiality of information as described in the [WA IIS Information Sharing Agreement Exchange Of Immunization Data \(PDF\)](#) 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.
- Only look up school employee records with written permission from the employee.
- Not share their unique secure login information with anyone or allow anyone else to access the system using their secure login.

Parent Consent

An immunization record given to a school becomes a school record. 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 not required if a student's record is complete in the IIS, and nothing needs to be added. 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 place where a parent/guardian can sign to give consent to share their child's immunization information with the IIS. Schools may use their own forms to collect parental consent, if they wish to do so. Some districts have added this consent as part of their district enrollment forms. The signature can be gathered electronically as long as it "(1) Identifies and authenticates a particular person as the source of the electronic consent; and (2) Indicates such person's approval of the information contained in the electronic consent," <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Getting Started with the School Module

After you transition to the School Module, you may notice a larger 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). 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.
- 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.
- 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.

Medically Verified Records

The goal of these guidelines is to ensure data quality in the School Module. 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 which may be entered into the School Module:

- A hardcopy Certificate of Immunization Status verified for accuracy with a unique healthcare provider or clinic stamp, or handwritten provider signature
- Immunization records from a provider, clinic or hospital electronic health record (EHR) with a unique healthcare provider, clinic or hospital logo, header, 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 decision to enter an immunization record is based on the 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:

- 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 you are unable to obtain a medically verified record, **do NOT enter parent reported 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 childcare (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-unspecified formulation
Flu	Influenza, unspecified
MMR	MMR (MMRII)
Pneumococcal	Pneumococcal, unspecified formulation
Td	Td Adult, Preserv Free (Tenivac, Td-Merck, Td-MassBio)
Tdap	Tdap (Boostrix, Adacel)
Varicella	Varicella (Varivax)

Types of School Module Accounts

A School Module account can be limited to one school or have access to all of the schools in the district. School Module accounts can be full access or limited. A full access account allows nurses to enter immunization dates into the IIS. Unlicensed staff are given a limited account which restricts their access to the vaccinations section. An RN may delegate immunization date entry to an unlicensed staff person, like a health room aide, secretary, or registrar if they provide additional training and oversight. If you are interested in delegation to unlicensed assistive personnel (UAP) please send an email to schoolmodule@doh.wa.gov.

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 or contact SchoolModule@doh.wa.gov.

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/SCCI
- 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