

**School and Child Care Audits
Questions and Answers
2018-19 School Year
September 11, 2018**

Q1: 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. 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](#).

Q2: When should school audits begin?

A: School audits should begin after school enrollment data is finalized, generally after October 1st of each year.

Q3: 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 occurs, the reviewer only needs to evaluate a record for compliance with immunization requirements for additional grades (e.g., Tdap and Meningococcal vaccine).

Q4: 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 would only need to evaluate the record for compliance with immunization requirements for additional grades as necessary (e.g., Tdap and Meningococcal vaccine). 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 outside of Iowa must be reviewed during the school audit.

- Q5: 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.
- Q6: 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.
- Q7: 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 an Iowa local public health agency sign the certificate.
- Q8: 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.
- Q9: 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.
- Q10: 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.

Q11: 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. If the child does not have a valid certificate, they shall be excluded from the benefits, activities, and opportunities of the school until a valid Certificate of Immunization is submitted.

Q12: Is a foreign exchange student's host family able to sign a Certificate of Immunization Exemption-Religious?

A: Many host parents will have the authority to make decisions for treatment in a medical emergency. This does not allow authority to sign or request a Certificate of Immunization Exemption-Religious. The following is a Q&A from the [US Bureau of Educational and Cultural Affairs Exchange Program](#).

***Am I the exchange student's legal guardian?**

No. The exchange student's natural parents remain legal guardians. The student's program takes legal responsibility during the course of the program. Each exchange student's Certificate of Health contains a medical release form so that host parents may secure medical treatment in the case of an emergency.

Q13: 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>.

Q14: 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.

Q15: 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.

Q16: 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.

Q17: 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.

Q18: 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.

Q19: 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 in the Home School row of the corresponding school. 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 [the Iowa Department of Education, Private Instruction](#) webpage or contact Buffy Campbell at the Department of Education, 515-954-8651.

Q20: During a school audit, where should records of home school children be documented?

A. Home school student records should be documented in the Home School row of the corresponding 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 for each district in Iowa in the School Name drop down menu. School districts should not be used to report audit data with the exception of home school student records maintained at the school district office. 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.

Q21: 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 Tdap or meningococcal vaccine requirements?

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, or meningococcal vaccine a new Certificate of Immunization Exemption form is required to include those antigens. The current version (January 2017) 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 and Meningococcal. The religious exemption remains in effect for the student's entire enrollment period in an Iowa licensed child care center, elementary and secondary school.

Q22: 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 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.

Q23: Will all students born after September 15, 2000 need proof of Tdap vaccine or just 7th grade students?

A: For the 2018-19 school year, students entering 7th grade and above who were born after September 15, 2000, are required to have Tdap vaccine. For the 2018-19 school year, this will generally include grades 7-12. However, if a student was born on or before September 15, 2000 they are not required to have Tdap vaccine.

Q24: 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.

Q25: 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 7th grade and above who were born 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.

Q26: If a child received a dose of DTaP or Tdap on or after their 7th birthday, does this count toward the 7th 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.

Q27: What grades are included in the meningococcal vaccine requirement?

A: All students entering, advancing or transferring into 7th grade and above and born after September 15, 2004, will need proof of one dose of meningococcal conjugate vaccine (MenACWY). For the 2018-2019 school year, this will include students in 7th and 8th grade if born after September 15, 2004. Students entering 9th, 10th, and 11th grades were generally born prior to September 15, 2004 and therefore are not required to have MenACWY vaccine. However, if a student entering 9th, 10th, or 11th grade during the 2018-19 school year was born after September 15, 2004, MenACWY vaccine will be required. All students entering, advancing, or transferring into 12th grade and born after September 15, 1999, will need proof of two doses of meningococcal (A, C W, Y) vaccine (1 dose received on or after 16 years of age); or 1 dose if received when the student was 16 years of age or older.

Q28: Do all students in 7th grade and above born after September 15, 2004, need to receive the meningitis (A, C W, Y) vaccine?

A: Yes, students will need one dose of meningococcal conjugate vaccine unless the student has a Certificate of Immunization Exemption. This includes current students, new students and transfer students in both public and private schools. Many students have already received the vaccine and simply need to submit a new Certificate of Immunization to the school documenting the meningococcal vaccine has been received.

Q29: Do all 12th grade students born after September 15, 1999, need to receive two-doses the meningococcal conjugate vaccine (MenACWY)?

A: Yes, students will need two doses of vaccine. The second dose must have been received on or after 16 years of age. If the student received the first dose of meningococcal conjugate vaccine (MenACWY) at 16 years of age or older, only one dose is required. This includes current students, new students and transfer students in both public and private schools. Many students have already received the vaccine and simply need to submit a new Certificate of Immunization to the school documenting the meningococcal vaccine has been received.

Q30: Does the meningococcal requirement include meningitis B (MenB) vaccine?

A: No. The meningococcal vaccine requirement is only for meningococcal conjugate vaccine (MenACWY). Meningococcal serogroup B vaccines (MenB) do not provide protection against serogroup A, C, W, or Y disease. MenB vaccine does not meet the meningococcal vaccine requirement.

Q31: Will all students born after September 15, 2004, need to have proof of meningococcal conjugate vaccine (MenACWY) or just 7th graders; the wording makes it sound as if perhaps it will be for grades 7-12?

A: The meningococcal requirement will be phased in and includes two parts.

- For the 2018-19 school year, students entering grades 7 and above, who were born after September 15, 2004, will be required to receive meningococcal vaccine. This will generally apply to 7th and 8th graders for the 2018-19 school year. If a student is entering 9th through 11th grades during the 2018-19 school year, they were generally born prior to September 15, 2004, therefore would not be affected by this requirement. Likewise, if a student entering 7th grade or above in 2018-19 was born before September 15, 2004, s/he will not be affected by this requirement. Looking ahead, an additional grade level will meet this requirement each school year, based on the student's date of birth, until all grades 7-11 will be included.
2019-20: grades 7, 8, 9
2020-21: grades 7, 8, 9, 10
2021-22: grades 7, 8, 9, 10, 11
- Students entering 12th grade, who were born after September 15, 1999, will need proof of two doses of meningococcal (A, C W, Y) vaccine (1 dose received on or after 16 years of age); or 1 dose if received when the student was 16 years of age or older.

Q32: Should all adolescents receive a routine booster dose of meningococcal conjugate vaccine (MenACWY)?

A: Adolescents who receive the first dose of meningococcal between 10 and 16 years of age should receive a one-time booster dose, on or after 16 years of age. Teens who receive their first dose of meningococcal conjugate vaccine on or after age 16 years of age do not need a booster dose of vaccine.

Q33: If a student received meningococcal polysaccharide vaccine (MPSV4) at age 5 years (such as for international travel) and a dose of meningococcal conjugate vaccine (MenACWY) at age 11 or 12 years, will they still need a booster dose of MenACWY vaccine at age 16 years?

A: Yes. Any meningococcal vaccination given prior to the tenth birthday (either with MenACWY or MPSV4) does NOT meet the meningococcal vaccine requirement. To comply with the 12th grade requirement, students will need to receive the second dose of meningococcal vaccine on or after 16 years of age.

Q34: What if my child does not have proof of the meningitis vaccine before school starts?

A: A Certificate of Immunization that includes the meningococcal conjugate vaccine (MenACWY) must be submitted to the school the child is enrolled or attempting to enroll. Children that have received one dose of meningococcal conjugate vaccine (MenACWY) 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 meningococcal conjugate vaccine (MenACWY). If the child does not receive the vaccine by the end of the provisional enrollment period (60 days), the child will be excluded from school.

Q35: Can students who have not received a meningococcal conjugate vaccine (MenACWY), be placed on a Provisional Certificate of Immunization?

A: No, there is no grace/extension period for the implementation of this requirement. All 7th grade students and above born after September 15, 2004, and 12th grade students born after September 15, 1999 will need to submit a completed Certificate of Immunization with the meningococcal conjugate vaccination (MenACWY). A Provisional Certificate of Immunization can only be issued when the applicant has received at least one dose of the required vaccine.

Q36: Is there a grace period/extension to receive the meningococcal vaccine after school starts?

A: No, there is no grace/extension period for the implementation of this requirement. All 7th grade students and above born after September 15, 2004, will need to submit a completed Certificate of Immunization with the meningococcal conjugate vaccination (MenACWY), or a Certificate of Immunization Exemption before enrolling in school.

All 12th grade students born after September 15, 1999, will need to submit a completed Certificate of Immunization with the meningococcal conjugate vaccination (MenACWY), a Certificate of Provisional Enrollment or a Certificate of Immunization Exemption before enrolling in school.

Q37: Will the Certificate of Immunization be updated to reflect the new requirement?

A: The second page of the Certificate of Immunization, Immunization requirements section, has been updated to include the new requirements. The new version of the Certificate of Immunization is available to order from the Iowa Department of Public Health, Immunization Program webpage. Certificates can be ordered on the Immunization Program webpage at <https://www.idph.iowa.gov/immtdb/immunization/forms>. The Certificate of Immunization has also been updated in the Immunization Registry Information System (IRIS).

Q38: Are old versions of the Certificate of Immunization valid or do students need to be updated with the most current version of the certificate?

A: Previous versions of the Certificate of Immunization remain valid and student records do not need to be updated to the current version. Healthcare providers may continue to use existing supplies of the Certificate of Immunization and then reorder the new document once supplies are depleted. Previous versions of the Certificate of Immunization included space to document meningococcal vaccine.

Q39: Which vaccines meet the meningococcal vaccine requirement?

A: The Iowa school entry requirement for immunizations follows the ACIP recommendations. The ACIP recommends meningococcal (A, C, W, Y) vaccination for adolescents at age 11-12 years. The youngest age a dose of meningococcal vaccine may be given to satisfy Iowa school entry requirements is 10 years of age. The CDC recommends the booster dose of meningococcal (A, C, W, Y) vaccine to be administered on or after 16 years of age.

The brand names of meningococcal conjugate vaccine available in the U.S. and contain all 4 serogroups are Menactra and Menveo. Any meningococcal vaccine administered that contained less than the four required serogroups (A, C, W, Y) do not count toward the school entry requirement.

Meningococcal B vaccines are recommended by the CDC for people 16-23 years of age with a preferred age of vaccination of 16-18 years as a category B recommendation. This recommendation allows the clinician to make a MenB vaccine recommendation based on the risk and benefit for the individual patient. These do not count toward the school entry requirement. Brand names of meningococcal B vaccines licensed in the U.S. are Bexsero and Trumenba.

Q40: When looking at patient records in IRIS, some records include Meningococcal NOS vaccine. Does Meningococcal NOS vaccine meet the meningococcal vaccine school requirement?

A: Meningococcal, NOS is the default name for meningococcal A, C, W, Y vaccines in IRIS if no trade name is selected. If no trade name was entered into IRIS and only Meningococcal NOS is displayed, a health care provider can assume this was a dose of meningococcal A, C, W, Y vaccine and would meet the meningococcal vaccine school requirement.

Q41: 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, 2019.