



# Audit Guide for Schools & Child Care 2022



Scott County Health Department

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## **Introduction**

The purpose of the immunization audit is to evaluate the immunization status of all individuals enrolled in a licensed child care/preschool, public/non-public elementary and secondary school in Scott County. This guide has been revised to reflect updated state requirements. Former versions of this guide should be discarded upon receipt of this information.

### **1.) Why is the Immunization Audit done?**

The immunization audit is conducted in accordance with the [Iowa Administrative Code](#), Iowa Department of Public Health (IDPH) 641, Chapter 7.

It is the law, and is done to evaluate the immunization status of all individuals enrolled in a licensed child care center, preschool, public/non-public elementary and secondary school in Scott County. A [Certificate of Immunization](#), [Certificate of Provisional Enrollment](#), [Religious Exemption](#) or [Medical Exemption](#), is required for each student enrolled. The Certificate of Immunization is used to identify the immunization level of each child, to identify the students who would be at risk if there was a disease outbreak, and to help in disease control in the event of a disease outbreak.

### **2.) Who is responsible to prepare the Certificate of Immunization, Certificate of Provisional Enrollment, or the Certificate of Immunization Exemption-Religious or Medical Exemption Certificate for audit?**

Licensed child care centers and public/non-public elementary and secondary schools in Iowa, including those providing competent private instruction, are required to have immunization certificates and/or certificates of exemption for all persons enrolled or attempting to enroll. The Scott County Health Department staff member auditing the immunization records is *NOT* to fill out Certificates, Religious or Medical Exemptions, or Provisional Certificates. These must be completed prior to the audit or will be counted as an invalid (not acceptable) certificate.

### **3.) Who conducts the audit and when?**

IDPH delegates the responsibility of auditing the Scott County immunization records each year to the Scott County Health Department (SCHD). The [Iowa Administrative Code](#) mandates that audits be completed within 60 days of the first official day of school. IDPH determines each year when the auditing process can begin. IDPH shall also establish a date for completion of the audit process.

During the month of August, SCHD sends a pre-audit information letter to each child care center, preschool, public/non-public elementary and secondary school. This letter is notification of any changes in the immunization law, information that will be required to complete the audit, and items to carefully check for when reviewing immunization certificates. SCHD audit staff will coordinate the date in which the school/facility will be audited with the child care center/preschool director, school nurse, and/or principal/administrator.

**4.) When conducting school immunization audits, do all student records need to be reviewed every year?**

No, previously reviewed records do not need to be reviewed again unless there is a change in the immunization law that requires additional immunizations. 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.

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

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. If the student is transferring from an out of state school, the student must obtain a valid IDPH Certificate of Immunization or Provisional Certificate of Immunization. Transfer student records shall be reviewed during the school audit.

**6.) What does the auditor need from you?**

Child Care Centers and Preschools	Elementary and Secondary Schools
<p>Enrollment numbers and list, grouped by age alphabetically:</p> <ul style="list-style-type: none"> <li>4-5 months</li> <li>6-11 months</li> <li>12-18 months</li> <li>19-23 months</li> <li>24 months and older</li> </ul> <p>Audit will only include the before and after school programs that meet one of the two criteria found in Iowa Law Chapter 7, 641-7.1:</p> <ul style="list-style-type: none"> <li>● Pre-K or preschool</li> <li>● Licensed child care center that is regulated by the Department of Human Services.</li> </ul>	<p>Enrollment numbers and list, grouped by grade/section alphabetically.</p> <p>Audit will only include the before and after school programs that meet one of the two criteria found in Iowa Law Chapter 7, 641-7.1:</p> <ul style="list-style-type: none"> <li>● Pre-K or preschool</li> <li>● Licensed child care center that is regulated by the Department of Human Services.</li> </ul>
<p>Immunization certificates, grouped by age alphabetically:</p> <ul style="list-style-type: none"> <li>4-5 months</li> <li>6-11 months</li> <li>12-18 months</li> <li>19-23 months</li> <li>24 months and older</li> </ul> <p>Certificates are not allowed in plastic sleeves.</p>	<p>Immunization certificates, for each student, by grade or class in alphabetical order in groups of 25 or less.</p> <p>Certificates are not allowed in plastic sleeves.</p>
<p>Total facility enrollment number.</p>	<p>Total school enrollment numbers by grade and class. District and school number.</p>
<p>To promote efficiency and accuracy, SCHD may request immunization records be made available at an off-site location (e.g. Administrative Center, district office, etc.) prior to the audit date.</p>	

**7.) What happens on the day of the audit?**

Upon arrival, SCHED auditors will provide identification and explain the reason for the visit. The auditors will need to work somewhere where it is quiet and auditors are able to concentrate to review the immunization records. The auditors will not sign certificates that are not in compliance or not complete. *If the certificate is not complete for age appropriate vaccines, and is not on a Provisional Certificate, the certificate is counted as invalid (not acceptable).* A [Child Care Immunization Record Review Form](#) or [School Immunization Record Review Form](#) will be provided at the completion of the audit. The worksheet states how many completed Certificates of Immunization, Provisional Certificates, Religious Exceptions, Medical Exemptions, and incomplete Certificates of Immunization were reviewed.

### **8.) What happens after the audit?**

SCHED will furnish IDPH with copies of the audit reports. At the end of the audit season, when all audits for child care centers, preschools, and public/non-public elementary and secondary schools have been completed, a post-audit letter will be sent to each child care center, preschool, or school administrator with the results of the year's audit. If a child care center or preschool has 5% or more (invalid) unacceptable immunization certificates, SCHED will follow-up with the centers/preschools to ensure compliance.

### **9.) What is a Certificate of Immunization required to have on it?**

A [Certificate of Immunization](#) is issued when the applicant has a record of age-appropriate immunizations that meet the requirement for licensed child care or school enrollment.

The Certificate of Immunization must contain the following completed items:

- Child's first and last name
- Date of birth
- Signature by one of the following: Physician (MD or DO), Physician's Assistant (PA), Advanced Registered Nurse Practitioner (ARNP), Registered Nurse (RN), Licensed Practical Nurse (LPN), or *Certified* Medical Assistant (CMA)
- The certificate can only be signed if it is age-appropriate for immunizations and meets the requirement for licensed child care or school enrollment
  - NOTE: A Chiropractor (DC), or non-certified Medical Assistant (MA), CANNOT sign the certificate
- Under the column marked "Vaccine," the type of vaccine is noted or circled, i.e. DTaP, Pediatric DT, Pediarix, MMR, and IPV
- In the column marked "Date Given," the date (month/day/year) the vaccination was given

Previous versions of the Certificate of Immunization form remain valid and student records do not need to be updated to the current form. School nurses are allowed to sign the Certificate of Immunization if the record indicates a child is up-to-date on all school entry requirements.

### **10.) What is a Provisional Certificate required to have on it?**

A [Provisional Certificate of Immunization](#) is 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 United States of America (USA) school system.

Provisional enrollment may be granted when a child is transferring from another elementary or secondary school within the USA or has received one dose of each of the required minimum age appropriate vaccines. The Provisional Certificate is valid for 60 days only and must have an expiration date. If the immunization is not received in that 60-day period, the student should be excluded from the school, preschool, or child care center.

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, but only if the applicant has not completed the required immunizations due to minimum interval requirements. The longest minimum interval between two doses of required vaccines for school enrollment is six months; therefore, it is generally unnecessary to have more than three provisional certificates issued for a single student. The admitting official of the school or licensed child care center must maintain all Provisional Certificates for that student until able to present a completed Certificate of Immunization.

The Provisional Certificate must be filled out completely to be accepted by the auditor. The original Provisional Certificate is kept in the file with the incomplete certificate and a photocopy is given to the parent/guardian. The Provisional Certificate must be completed *prior* to the audit and will not be filled out by the auditor. If the Provisional Certificate is completely filled out and only lacks a medical provider signature, the auditor may sign and date this document at the time of the audit. A kindergarten child who enrolled at the beginning of the school year *does not* qualify for a Provisional Certificate as a transfer into the district. The student must have a minimum of one of every required immunization to qualify for a Provisional Certificate.

A Provisional Certificate 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 is counted as invalid for auditing purposes.

### **11.) What is a Religious Exemption required to have on it?**

A [Religious Exemption](#) is required to have all of the fields completed for the certificate to be valid. The Iowa Administrative Code does not specify religious denominations eligible for religious immunization exemptions. A Religious Exemption 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. The Religious Exemption must be notarized by a Notary Public; otherwise it will be counted as not acceptable. The certificate must have a parent's signature and date. The certificate is valid until cancelled by the parent.

## **12.) What is a Medical Exemption required to have on it?**

A [Medical Exemption](#) is required to have all of the fields completed for the certificate to be valid, with the exception of the expiration date. If, in the opinion of the physician, nurse practitioner, or physician assistant issuing the medical exemption, the exemption should be terminated or reviewed at a future date, an expiration date shall be recorded on the Medical Exemption. The expiration date can be left blank. An expired Medical Exemption is invalid. The child must obtain another Medical Exemption from an approved healthcare provider or receive the vaccine(s).

A Medical Exemption must be signed by an MD, DO, PA, NP or ARNP. A signature by a Chiropractor (DC), RN, LPN or CMA is NOT acceptable.

A Medical Exemption may be granted when, in the healthcare provider's opinion, one or more of the required immunizations would be injurious to the health and well-being of the child or any member of the child's family or household.

A Medical Exemption may also be granted when administering a dose of live vaccine (e.g., Varicella or MMR vaccine) would violate minimum interval spacing as recommended by the Advisory Council on Immunization Practices (ACIP). In this circumstance, an exemption shall apply only to an applicant who has not received prior doses of the exempted vaccines. For example: a child needs first dose of both Varicella and MMR. Inadvertently, only Varicella is given at the visit. The MMR must be given at least 28 days from the Varicella (required minimum interval for two live vaccines) and a Provisional Certificate cannot be issued because the child does not have one dose of each of the required vaccines. Therefore, in this example, a medical exemption can be provided for the 28-day minimum interval between the Varicella and MMR.

If a medical exemption form has no specific vaccines listed, then it is a valid certificate of exemption for all vaccines and remains valid for the student's entire enrollment period in an Iowa licensed child care, elementary or secondary school.

The Medical Exemption dated June 2015, on the lower right corner, is being implemented in a phased-in approach. Previous versions of the Medical Exemption already on file remain valid, and student records do not need to be updated to the current version. Versions of the Medical Exemption completed prior to June 2015 can be accepted.

## **13.) Is a Medical Waiver acceptable?**

No, a Medical Waiver is no longer acceptable. Only Medical Waivers signed prior to September 7, 2005 will be honored.

**14.) What happens during a disease outbreak? (i.e. Pertussis, Mumps, etc.)**

Children enrolled under a Provisional Certificate, Religious Exemption or Medical Exemption status may be subject to exclusion from the facility/school until such time as the outbreak is no longer deemed a risk to the child/student. This decision is made in consultation with the school administration, SCHD's medical director, and IDPH's medical director and/or epidemiologist.

**15.) What about Homeless Children?**

The intent of the federal and state laws for the education of homeless children and youth is to "ensure that homeless children have the same opportunities to meet the same challenging student academic achievement standards to which all students are held". [The Iowa Department of Education](#) states that a school district must immediately enroll a homeless child in school, allowing him/her to attend classes and participate fully in school activities. These students are able to enroll even if they do not have records or other items that are required for non-homeless students, such as: immunization records, physical examinations, academic records, proof of residency, or a parent or legal guardian. While students are enrolled and attending classes, schools shall try to get required records. These students will be placed on a Provisional Certificate while waiting for their immunization records. The McKinney-Vento Act (42U.S.C. 11431) Statement Policy provides further guidance regarding a homeless student: [www.ed.gov/programs/homeless/legislation.html](http://www.ed.gov/programs/homeless/legislation.html).

**16.) Do immunization records of a child that receives Competent Private Instruction (CPI) or Independent Private Instruction (IPI) need to be audited?**

The competent private instruction (CPI) category includes home schooled children who are not enrolled in independent private instruction and those in non-accredited non-public 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 in the home school row of the corresponding school. A Certificate of Immunization for CPI/home schooled children is maintained in the administrative office at the child's district of residence.

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.

Children who are home schooled under **independent private instruction (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.

**17.) What are the required immunizations for a Child Care Center, Preschool or Pre-Kindergarten?**

The required immunizations can be found in the Child Care Center Required Immunizations section on the [Immunization Requirements Chart](#). Schedules can be found at: <https://www.idph.iowa.gov/immtdb/immunization/schedule>.

Children attending preschool in a private or public school, 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.

**18.) What are the required immunizations for children enrolled in K-12<sup>th</sup> grades?**

The required immunizations can be found in the Elementary School or Secondary School Required Immunizations section on the [Immunization Requirements Chart](#). Schedules can be found at: <https://www.idph.iowa.gov/immtdb/immunization/schedule>.

**19.) If school-age children attend an after-school daycare/child care program, does the daycare need to have an immunization record on file?**

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. A licensed after-school daycare program is required to have immunization records on file. The records should be audited according to the Licensed Child Care Center requirements.

**20.) What if a vaccine is given too early? (For example, MMR/Varicella given prior to 12 months of age)**

Iowa law allows vaccine doses administered up to four days before the minimum interval or age to be counted as valid. The four-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. Vaccines administered up to four days early are acceptable. Vaccines administered five or more days early are *NOT* acceptable and will need to be repeated at the appropriate age and/or appropriate vaccine spacing.

**21.) If a student already has a valid Medical or Religious Exemption on file, will an updated Exemption Certificate need to be completed for the 7<sup>th</sup> grade Tdap and 7<sup>th</sup> and 12<sup>th</sup> grade meningococcal vaccine requirements?**

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 or secondary school. If a Medical Exemption does not include diphtheria, tetanus, pertussis, or meningitis, a new Medical Exemption form is required to include those antigens.

If a Religious Exemption is already completed, it is valid for all vaccines. The Religious



Exemption remains in effect for the student's entire enrollment period in an Iowa licensed child care center, elementary or secondary school.

**22.) What is the Tdap vaccine requirement?**

All students entering, advancing, or transferring into 7<sup>th</sup> grade or above, and born on or after September 15, 2000, need proof of an adolescent tetanus, diphtheria, and pertussis (whooping cough) booster immunization (called "Tdap") for school enrollment.

**23.) Will all students born after Sept 15, 2000, need proof of Tdap vaccine or just 7<sup>th</sup> grade students?**

Students entering 7<sup>th</sup> through 12<sup>th</sup> grade, who were born on or after September 15, 2000, are required to have Tdap vaccine.

**24.) What if a child does not have proof of Tdap vaccine before school starts?**

Children who have received one dose of pediatric diphtheria, tetanus, and pertussis (DTaP) vaccine may attend school by submitting a Provisional Certificate. The Provisional Certificate 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.

**25.) 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?**

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

**26.) What is the meningococcal vaccine requirement for secondary school?**

All students entering, advancing or transferring into 7<sup>th</sup> grade and above and born after September 15, 2004 need proof of one dose of meningococcal (A, C, W, Y) vaccine received on or after 10 years of age.

All students entering, advancing or transferring into 12<sup>th</sup> grade and born after September 15, 1999 need proof of two doses of meningococcal (A, C, W, Y) vaccine (1 dose must be received on or after age 16); or one dose if received when the student was 16 years of age or older.

**27.) What are examples of certificates that are invalid/incomplete/not acceptable?**

- Religious Exemption that is not notarized and/or not signed by a parent.
- Vaccines given at less than minimum intervals are not considered valid and the record would be considered invalid (not acceptable).
- Certificates without birthdates.

- Examples of unacceptable notation of the dates are:
  - a. "Series 2010"
  - b. "MR date – 2010"
  - c. "Booster dates – 2010"
  - d. "Same as above in Polio space"

**28.) Where do I find copies of the Certificates of Immunization, Religious or Medical Exemptions, and Provisional Certificates?**

- The Scott County Health Department website <http://www.scottcountyiowa.gov/health/immunization> has copies of these certificates that may be downloaded and copied.
- The Iowa Department of Public Health website <http://www.idph.iowa.gov/imm/tb/immunization/laws> has copies of these certificates that may be downloaded and copied.

**29.) What does the stamp on the Certificate of Immunization mean?**

There are five different stamps that are used in Scott County only, by the auditors, to indicate an acceptable immunization record. [Attachment 1](#) shows examples of the different stamps.

**30.) Who can share immunization information?**

Immunization records can be shared between a medical clinician and:

- Another medical clinician;
- A school that the individual attends;
- A licensed child care center that the individual attends;
- A parent or legal guardian;
- Immunization records can also be shared between the school and licensed child care center that the child attends and vice versa.

Written or verbal permission from the parent or guardian is not required to release this information.

Immunization information that shall be disclosed includes:

- Individual's name
- Date of birth
- Demographic information
- Month, day, year vaccine administered
- Vaccine administered
- Clinic source and location

**31.) What is IRIS?**

The Immunization Registry Information System (IRIS) was developed by IDPH to enable public and private providers to consolidate and maintain a computerized immunization record for each person that receives vaccinations in Iowa. School Nurses are able to access IRIS and print

certificates.

For more information on IRIS, go to <https://iris.iowa.gov>



**32.) What are some other resources I might use/need?**

Acronyms & Vaccine Brand Names	( <a href="#">Attachment 2</a> ) - Acronyms and Vaccine Brand Names
Foreign Language Translation	<a href="http://www.cdc.gov/vaccines/pubs/pinkbook/downloads/appendices/B/foreign-products-tables.pdf">http://www.cdc.gov/vaccines/pubs/pinkbook/downloads/appendices/B/foreign-products-tables.pdf</a>
Child's Age in Months	( <a href="#">Attachment 3</a> ) Spreadsheet for Determining Child's Age in Months (Ages 0-6 years)
IDPH Audit Information	<a href="#">School and Child Care Audits</a>