



## Frequently Asked Questions School and Child Care Immunization Requirements

Please see our **Arizona Immunization Handbook for Schools and Child Care Programs** for more detailed information.

### Immunization Schedule and Documentation

1. **Question:** What is the difference between the **recommended** immunization schedule and the Arizona School **required** immunization schedule?

**Answer:** The **recommended** immunization schedule is the optimum schedule approved by the Advisory Committee on Immunization Practices (ACIP), the American Academy of Pediatrics (AAP), the American Academy of Family Physicians (AAFP), and the American College of Obstetricians and Gynecologists (ACOG). This recommended schedule is considered the standard of practice when immunizing children against vaccine preventable disease.

The Arizona School **required** immunization schedule is the legislatively mandated immunization schedule required for attendance in Arizona schools and child care centers.

2. **Question:** Sometimes there is confusion as to which schedule to follow, the ACIP Recommended Schedule or the Arizona School Requirements schedule. Which immunization schedule should Arizona Schools follow?

**Answer:** Follow the Arizona School Immunization Requirements set forth by the Arizona Department of Health Services Immunization Program Office. These requirements are legislatively mandated. The Centers for Disease Control and Prevention (CDC) does not provide guidance to individual states regarding what immunizations are to be mandated for schools. It should be said, if all physicians followed the ACIP schedule, students attending schools would be in compliance with all school required vaccines.

The statutes and rules governing school immunization requirements are Arizona Revised Statutes 15-871-874 and Arizona Administrative Code, R9-6-701-708.

3. **Question:** What is the grace period (or extension time) for students to have their immunization records submitted to the school?

**Answer:** There is no grace period/extension time established by the state statutes or codes. The rules state that a pupil shall not be allowed to attend school without submitting documentary proof of all required immunizations, meet conditional admissions requirements, or submission of a signed and valid exemption.

4. **Question:** Which immunizations are required for school and/or child care attendance?

**Answer:** The Arizona school, child care, preschool and Head Start immunization requirements are posted at <http://www.azdhs.gov/phs/immunization/>.

5. **Question:** If a child's immunizations were not given on schedule, how do I know if the doses are valid and when are the next doses required?

**Answer:** The minimum ages and intervals for valid vaccine doses are posted at <http://www.immunize.org/catg.d/p2010.pdf>.

6. **Question:** When administering vaccines, or checking administration dates, what is the grace period for vaccines that are given earlier than the required age or interval?

**Answer:** ACIP allows for most vaccine doses administered within 4 days of the recommended minimum age or interval to be counted as valid. However, ACIP does **not** allow a 4-day grace period between doses of varicella and MMR vaccines. These live vaccines must be administered on the same day, or at least 28 days apart.

The Arizona Immunization Program Office (AIPO) accepts vaccine doses given within the ACIP-approved grace period as valid for child care and school entry. The 4-day grace period includes the first MMR, which may be counted if it was administered no sooner than 4 days before the child's first birthday.

7. **Question:** There are times when an immunization record does not include the complete date of vaccine administration. If a full date is not available, what is the "default date" for recording a vaccine in the record?

**Answer:** Guidance provided from the Arizona Immunization Handbook for Schools and Child Care Programs at <http://azdhs.gov/phs/immunization/school-childcare/requirements.htm>, in accordance with the Arizona Revised Statutes 15-871 and the Arizona Administrative Code R9-6-701 through 708, states: "To meet Arizona requirements for immunization records, the dates of all vaccine doses must contain the month, day and year the vaccine was administered. Immunization records that contain the month and year are only acceptable for non-MMR doses that were administered prior to January 1, 2003."

The MMR dose in particular, must have a month, day, and year to be considered a valid and acceptable dose. This is because we must be sure that the minimum 28 day interval has been met. This may also apply to a varicella dose, particularly when the first one is administered to children 13 years of age and older, as the minimum interval for dose #2 is also 28 days.

If the day the vaccine was administered is not noted, reasonable attempts should be made to obtain the exact day. If this information is not available/located, the dose **SHOULD NOT BE COUNTED**. The student should either have a lab titer drawn to see if they have antibodies or they should have the dose repeated. If the child has two valid doses, then these two doses should be the accepted and recorded doses.

8. **Question:** If any other dose of vaccine (other than MMR or Varicella) does not have the day documented, what is the default date?

**Answer:** As it is now required that providers enter the full date on records, it will be less and less likely that schools will come across this situation. However, there may be times when you do see an older record and the state statutes and code say that "Immunization records that contain the month and year are only acceptable for non-MMR doses that were administered *prior to January 1, 2003*." If the day the vaccine was administered is not noted, reasonable attempts should be made to obtain the exact day. If this information is not available/located, the dose should not be accepted as valid.

## **Varicella Vaccination and Chickenpox Disease**

**9. Question:** Are two doses of varicella (Chickenpox) vaccine required for school attendance?

**Answer:** One dose of varicella vaccine meets Arizona school requirements for all students except those who receive their first dose of varicella vaccine at 13+ years of age. Only students who receive varicella #1 at 13+ years of age are required to have 2 doses.

**10. Question:** What if a parent reports their child has a history of the chickenpox disease?

**Answer:** Students enrolling in an Arizona preschool or school for the first time **on or after 9/1/2011** are now required to present proof of varicella immunization or a valid exemption for medical reasons, laboratory evidence of immunity, or personal beliefs. Parental recall/verbal history of chickenpox disease cannot be accepted. If the parent says the child has had chickenpox, you are to give them a medical exemption form and refer them to their healthcare provider.

Students who were attending or were enrolled in an Arizona school or preschool **prior to 9/1/2011** with parental recall of chickenpox disease are allowed to continue attendance with recall and need no further documentation of immunity.

**11. Question:** Is documentation of chickenpox disease required to come from a **healthcare provider**?

**Answer:** Yes. A licensed physician or Advanced Practice Nurse (APN) diagnosis of disease is required and should be annotated on the Medical Exemption Form and signed by the child's physician or nurse practitioner, as well as the parent/guardian. If the child's medical history contains sufficient documentation of history of disease, the healthcare provider may feel comfortable in signing the Medical Exemption Form. Laboratory evidence/confirmation showing immunity to the disease is also acceptable, and results should be attached to the signed Medical Exemption Form, which then becomes part of the immunization record.

Please understand that if a healthcare provider feels there is not enough medical information to support a history of chickenpox, they may choose not to sign the Medical Exemption Form. The provider may suggest a blood test or titer be drawn which could then prove immunity. If the provider does not sign a Medical Exemption Form, and the parent declines to have a titer drawn or to have their child vaccinated, then the final option would be for the parent to sign a Personal Exemption Form for varicella.

## **Tdap/Td/DTaP**

**12. Question:** What grades are required to have Tdap (tetanus/diphtheria/pertussis) vaccine for school entry?

**Answer:** All 6<sup>th</sup>-12<sup>th</sup> graders who are 11 years or older are required to have proof of one Tdap unless they have received a dose of DTaP, DTP or Td in the last 5 years.

- Tdap is not required for 11-year-olds in 5<sup>th</sup> grade.
- Students 7 years and older who are in the process of receiving their minimum three-dose series of tetanus/diphtheria vaccine are required to receive 1 Tdap as part of the series.
- Tdap is licensed down to age 7 years, and some children do receive a dose of Tdap prior to age 11 (students who have not completed the full DTaP series before 6 years of age, or received Tdap for wound management). If a student received a Tdap dose between the ages of 7-10, the dose can be counted as valid and the student does not need to receive another dose at age 11 or older. Tdap is currently licensed for a one time dose only.

**13. Question:** What if a student, 7 years of age or older, does not have a complete series of DTaP vaccine? What is the school requirement?

**Answer:** In this case what is required is to ensure that a minimum of 3 appropriately spaced tetanus and diphtheria containing vaccines (DTaP, Td, Tdap) are noted in the immunization record. The appropriate intervals include 4 weeks between dose 1 & 2 and 6 months between dose 2 & 3.

ACIP recommends that a person aged 7 years and older who is not fully immunized with DTaP vaccine should receive Tdap as one of the doses (preferably the first) in the catch-up series. The use of DTaP in children over age 7 is not licensed, so when students are referred for an additional dose at an older age, the provider should give them a Tdap or Td vaccine. The receipt of a Tdap at age 7-10 is not a school immunization requirement; however, if you have a record of a child 7 – 10 years old with Tdap, the 6th grade entry requirement for Tdap is met and does not need to be repeated.

**14. Question:** If a student receives an inadvertent dose of **DTaP** after age 7, what is the required schedule?

**Answer:** There are times when DTaP may have been mistakenly administered to a child 7 years or older (remember that DTaP is only licensed for children through 6 years of age), but the dose is considered valid according to ACIP. The school requirements do not address this situation and the rules state a student is required to receive a Tdap when 5 years have passed since the student's last tetanus/diphtheria immunization was administered.

Issue: Although CDC informs clinicians to follow state school immunization laws over the ACIP Recommended Schedule, some clinicians choose NOT to administer Tdap after an inadvertent dose of DTaP. It is important to know that additional guidance from CDC states when a DTaP dose is given to a person older than 6 years of age, it can be counted as valid for the one-time Tdap dose.

**15. Question:** Sometimes I get a record which states the child received a Td, but is the right age for a Tdap. What do I do?

**Answer:** If possible, contact the provider office to verify which vaccine was given. Very often, a Tdap is actually given, but the staff writes Td or puts it in a space that only has Td identified on the form. Ask the provider to send you an updated copy of the immunization record with the corrected information. You may also be able to identify what was actually given through the ASIIS record, or contact your county health department Immunization Program or the Arizona Department of Health Services Immunization Program Office and ask to speak to the nurse who can help you decipher which vaccine was actually administered.

**16. Question:** If the student did indeed receive a Td instead of a Tdap, should I have them get the Tdap?

**Answer:** Technically, since the child has now received a Td, they are in compliance with the school requirement of having had a dose of tetanus/diphtheria within the past 5 years. However, since Td does not contain the pertussis vaccine, it provides no protection against the disease. A School Nurse (RN) can strongly recommend the child return to the provider and receive the Tdap vaccine, which can be given at any time as there is no minimal interval requirement.

## **Polio**

**17. Question:** What is the polio recommendation for Arizona students?

**Answer:** Four doses of polio vaccine meet the requirement for school entry in Arizona, regardless of when the fourth dose was given. Three doses meet the requirement if the 3<sup>rd</sup> dose was received after the 4<sup>th</sup> birthday.

## **MMR**

**18. Question:** What is the MMR requirement for students?

**Answer:** All Arizona students are required to have 2 doses of MMR (measles, mumps and rubella); *however*, there are students from other countries who may receive single antigen measles, mumps and rubella *or* a combination of 1 MMR and then a single dose of one of the three single antigens. These students may require an additional dose(s) of MMR to meet Arizona School Requirements.

## **General Immunization Questions**

**19. Question:** Are students 18+ years of age and still in high school required to have immunizations?

**Answer:** All immunizations are required for students attending K-12<sup>th</sup> grade except for the polio immunization, which is *not* required for students 18+ years of age. University and college immunization requirements are determined by the individual school.

**20. Question:** What if a student is 10 years of age when school starts (and entering grades 6-12), but turns 11 years of age during the school year?

**Answer:** The student may attend school and when they reach age 11, he or she should be referred for the meningococcal vaccine. The student should also be referred for Tdap if 5 or more years have passed since the last dose of a tetanus/diphtheria/pertussis vaccine.

**21. Question:** Is the meningococcal vaccine (MV/MCV) required for school?

**Answer:** All 6<sup>th</sup>-12<sup>th</sup> graders who are 11 years or older must have proof of one dose of meningococcal vaccine.

- Meningococcal vaccine is not required for 11-year-olds in 5<sup>th</sup> grade.
- A booster dose of MCV is recommended, but not required at 16 years of age.

**22. Question:** Sometimes an immunization record will show that the student received a meningococcal vaccine (such as MenC, Men A/C, or MenB). Does this count for school requirements?

**Answer:** At this time, Arizona school requirements state that one dose of meningococcal vaccine is needed to meet criteria. In the U.S. only the quadrivalent MCV4 vaccine is administered, but in some other countries (Canada, Great Britain, Australia, etc.) children do receive single-antigen meningococcal vaccines when young.

Based on the wording on our school requirements, these doses will count for Arizona school entry. *However*, you may give a strong recommendation to the parents to get the MCV4 vaccine for their children for optimal protection against meningitis. The MCV4 quadrivalent vaccine provides protection from the A, C, W and Y serotypes (strains) of the meningococcal disease.

**23. Question:** Is documentation of any history of disease or immunity required to come from a healthcare provider?

**Answer:** Yes. A licensed physician or Advanced Practice Nurse (APN) diagnosis of disease is required and should be annotated on the Medical Exemption Form and signed by the child's physician or nurse practitioner, as well as the parent/guardian. If the child's medical history contains sufficient documentation of history of disease, the healthcare provider may feel comfortable in signing the Medical Exemption Form. Arizona law/code states that confirmation of immunity to varicella, measles and rubella, specifically, *MUST* be proven through laboratory evidence and results should be attached to the signed Medical Exemption Form, which then becomes part of the immunization record.

Please understand that if a healthcare provider feels there is not enough medical information to support confirmed immunity for reported disease history, they may choose not to sign the Medical Exemption Form. The provider may suggest a blood test or titer be drawn which could then prove immunity or simply recommend vaccination. If the provider does not sign a Medical Exemption Form, and/or the parent declines to have a titer drawn or to have their child vaccinated, then the final option would be for the parent to sign a Personal Exemption Form for the specific vaccine(s).

**24. Question:** Where can I find exemption forms?

**Answer:** The SCHOOL personal exemption form for students in K-12 grades is posted at <http://azdhs.gov/phs/immunization/school-childcare/requirements.htm>.

The CHILD CARE religious exemption form for students in pre-school, child care and head start programs is posted at <http://azdhs.gov/phs/immunization/school-childcare/requirements.htm>.

**NOTE:** *We are currently in the process of implementing a new on-line Vaccination Education Course, which will require parents who wish to exempt their child(ren) from school required vaccines to take the course to obtain an exemption form. As we move towards this goal, you will see further information on the course and guidance on how it will impact parents, schools, and school healthcare personnel.*

**25. Question:** Where can I get more of the Arizona School Immunization Record (ASIR 109R) cards?

**Answer:** Complete the forms request form at <http://azdhs.gov/documents/preparedness/epidemiology-disease-control/immunization/forms-request.pdf>. Fax the completed form to (602)364-3285.

We also have a fillable 109R form that can be used in schools which can be found at <http://azdhs.gov/phs/immunization/school-childcare/requirements.htm>.

**26. Question:** Where can I get a copy of the Emergency Information and Immunization Record Card for preschool and child care use?

**Answer:** It is available through the ADHS Bureau of Child Care Licensing at [http://azdhs.gov/documents/licensing/childcare-facilities/providers/forms/emergency\\_info\\_immunization\\_card.pdf](http://azdhs.gov/documents/licensing/childcare-facilities/providers/forms/emergency_info_immunization_card.pdf) as well as on the ADHS Immunization Program website at <http://azdhs.gov/preparedness/epidemiology-disease-control/immunization/index.php#schools-immunization-forms>.

**27. Question:** When is the Immunization Data Report (IDR) due?

**Answer:** Immunization Data Reports are due from schools and child care centers by November 15 each year using the on-line application found on the Immunization Program Office website, <http://azdhs.gov/phs/immunization/school-childcare/data-reports.htm>. Schools submit reports on kindergarten and sixth grade students and child care facilities will use the web application process to submit their child care data.

**28. Question:** I have questions about an individual child's immunization record. How can I get the child's record reviewed?

**Answer:** You may contact your local county health department Immunization Program or call the ADHS Immunization Program Office at 602-364-3630 and ask for a nurse or assessment specialist.

**Maintaining Relationships:**

The Arizona Immunization Program Office is aware of the problems that can occur when physicians do not immunize according to the Arizona School Immunization Requirements. The goal is to protect students from disease and to preserve the relationships between physicians, parents and schools. There may be very good reasons for a physician to follow the ACIP Recommended Schedule and Arizona rules and statutes allow parents/guardians to sign an exemption form in order to be in compliance with school requirements.

It is our hope that there can be a harmonizing of the ACIP and Arizona School Immunization Requirements in the future so that obstacles and conflicts are avoided. The process of presenting before the Arizona Legislature is rigorous and any changes to the existing school immunization requirements will take time.

If you have questions or concerns, please contact the Arizona Immunization Program Office at 602-364-3630. AIPO is willing to assist you in addressing those inherent issues that can arise in response to the two immunization schedules.