



Conditional Status

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PUBLIC HEALTH
ALWAYS WORKING FOR A SAFER AND
HEALTHIER COMMUNITY



WAC before 2009

WAC 180-38-045

Every student must present proof of either:

- ✓ Full immunization, or
- ✓ Initiation of immunization in compliance with the schedule,
or
- ✓ Certificate of exemption

By first day of school

Pre-2009 WAC In Conflict with Interstate Compact

- Interstate Compact on Educational Opportunity for Military Children (Military compact RCW 28A.705.010. Article IV)
 - ✓ Requires public schools allow military dependents **30 days from the date of school enrollment** to get required immunizations or start immunization series
- SBOH, OSPI, Department of Defense, and DOH met in 2008 to discuss conflict between the Compact and WAC regarding school attendance

Nature of the Conflict with Interstate Compact

- The Compact states military dependents have **30 days** after enrollment to get immunized, while the RCW required proof of immunization status on or before the **first day** of attendance
- **Two standards of school entry** between military and civilian children
- Confusion led to military dependents being incorrectly designated as noncompliant
- Potential for exemptions increased

Homeless Students and Immunization Requirements

- Sec. 725 McKinney-Vento Act requires **immediate enrollment**, even if students do not have immunization records (42 U.S.C. §11432(g)(3)(C))
- Schools **cannot delay enrollment or keep homeless students out of school** because they lack immunization records
- Local school district homeless liaison must assist in getting children vaccinated or get immunization records

How many children are affected?

- 29,000 school aged military dependents (5-18 years old)
- 32,494 homeless children (2013-14 school year OSPI Homeless Students Data)

Comparison of Rule Before and After

Before 2009	After 2009
Immunizations required to be initiated prior to start of school	Immunizations allowed to be initiated within thirty days after the first day of attendance
Conditional status allowed for child who has begun immunizations but not fully immunized	Conditional status allowed for child who hasn't started or not fully immunized , as long as child is making satisfactory progress
Official notification of missing immunizations in spring so child is not allowed to start school in the fall	Official notification of missing immunizations must occur after the first day of attendance in the fall

School Practice Based on Current WAC

In the spring, school notifies parents about missing immunizations



Child allowed to start school without immunizations or with incomplete forms



Timeline for exclusion starts after the first day of current school year



Child is notified of conditional status and has 30 days to get fully immunized



After 30 days, child is sent exclusion notice and should be excluded if not making satisfactory progress

Stakeholder Meeting in 2012

- SBOH convened stakeholder meeting in January 2012
- Explained changes resulting from rule revision
- Outcome:
 - ✓ Better understood impact of implementation
 - ✓ Developed administrative solutions

School Nurses' Comments

“Parents are much more motivated to act to get the child into school than they are by the threat of expulsion after the student has already started.”

“Getting them to follow through is much harder than when we required them to have their shots before they could start.”



School Nurses' Comments

“When conditional means that we are allowing 30 days to get into compliance, such as at the beginning of the school year that is now allowed, we run into problems with getting the support for enforcing the law and excluding them.”

“My military families were on top of this. When the expectation is that immunizations are part of the enrollment process there is no confusion.”



Issues to Consider

- We don't know how widespread concerns are
- Interpretations of the current WAC vary
- What impact will the Immunization Information System School Module have?
- How can we assess the risk of some children starting school without some, or possibly any, immunizations?
- Is there a correlation between change in conditional status policy and immunization coverage?

DOH Recommendation

- Denial of petition at this time
- Implement next steps
 - ✓ Roll out School Module to reduce administrative burden for schools
 - ✓ Get broader input on conditional status; include school nurses, administrators, OSPI, and other stakeholders

Questions?

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