



Technical Advisory Group

Review of Criteria #8

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Criteria #8

The administrative burdens of delivery and tracking of vaccine containing this antigen are reasonable.



Department of Health (DOH)

- DOH manages the state's Childhood Vaccine Program
 - universal vaccine purchase state
- Due to federal requirements for the distribution and reporting of COVID19 vaccine, DOH has staff resources dedicated to:
 - COVID-19 vaccine provider enrollment and support
 - COVID-19 vaccine ordering
 - COVID-19 vaccine provider site visits, as required by the CDC
 - WAIS and PrepMod support
 - Community engagement & equity
- If COVID19 vaccine was added as a requirement, additional work for DOH would include:
 - Update guidance including the state's Certificate of Exemption (COE) and Certificate of Immunization Status (CIS) forms to include COVID-19 vaccine as a required immunization
 - Educate and communicate with providers, schools, and childcares
 - Update WAIS School Module

Department of Children, Youth & Families (DCYF)

- Requires all contractors (programs such as ECEAP, Home Visiting, Early Intervention) or those that are licensed by DCYF (child cares, foster homes, group homes) to follow the appropriate state laws and rules regarding immunization requirements
- If COVID19 vaccine was added as a requirement, DCYF will need to:
 - Work with DOH to offer training and technical assistance to licensors, child care and early learning providers and families, and child care health consultants
 - Vaccinate and track the immunizations in the Juvenile Rehabilitation population, about 2,000 youth ages 12-25

Office of the Superintendent of Public Instruction (OSPI)

- Will need to provide formal and informal communication about change in immunization requirements.
- Potential additional demands on guidance for exclusion of students not in compliance with a new requirement.
- OSPI adopted a rule (WAC 392-380-050 and WAC 180-38-050) on the procedural and substantive due process requirements governing the exclusion of such students from schools. They anticipate much more application of these rules, and subsequent requests for guidance, should a new requirement be adopted.
- Additional support for districts with budgeting and potential revenue shortfalls as they see enrollment declines due to families not wanting to comply with the requirement to provide proof of immunization status

Tribes

- Tribes are important partners in COVID19 vaccination work
- Impacts to Tribes of adding COVID19 vaccine to the state's list of immunization requirements:
 - Tribes are sovereign nations, not subject to state laws or rules
 - Students who are tribal members and receive healthcare services from tribal clinics but attend non-tribal schools need to present proof of immunization status upon school entry

Local Health Jurisdictions (LHJs)

- LHJs do not have a direct role in implementation, but provide significant support to their communities:
 - Communication and education with providers and families
 - Vaccine clinics
 - Technical assistance to report data to the state
- Disease surveillance staff utilize the information for outbreak tracing and response
- Some LHJs noted a need for increased staff for communications, response work, and additional clinics to support their communities
- Most responding LHJs noted that staffing needs would be burdensome
- Continued concerns around public trust

School Nurses

- Schools track student compliance with state immunization requirements and report aggregate school status to DOH, this includes educating parents on state requirements and the value and need for vaccines and follow-up with families
- A new requirement would create significant additional work
 - Overwhelmed with COVID19 mitigation measures for schools regarding masking, testing, outbreaks, etc.
 - *“We’ve had to bandage our way through our school year these past two years”*
 - *“All of the nurses in my district are in tears literally everyday, overwhelmed, overworked and seriously wanting to walk away.”*
 - OSPI asked school nurses about their employment plans for the next school year. Currently, 43% of school nurses are planning to return to their positions next year, compared to 73% last year.
- Concerns around implementing a new vaccine requirement for all grades, versus one grade
- Concerns around the WAIS School Module capacity to report and track new requirement
- Concerns around access to pediatric vaccine in some parts of the state
- Concerns around pushback from parents and families

School Administrators

- Schools track student compliance with state immunization requirements and report aggregate school status to DOH
- Anticipates a new requirement would create significant additional work, on top of COVID19 mitigation schools are already being asked to do
- Concerns around pushback from parents and families
- Anticipates reduction in enrollment
- Anticipates reduced enrollment leading to reduction in operating funds
- Concerned with kids who are out of compliance missing more school
- Anticipates increase in exemptions to process

Healthcare Providers

- Healthcare providers are required to report and track COVID-19 vaccine through the CDC COVID-19 Vaccine Provider Agreement. COVID19 vaccine providers must:
 - Submit vaccine administration data to the WAIS within 72 hours of administering the vaccine
 - Report COVID-19 vaccine inventory daily to the federal Vaccines.gov
- Healthcare providers also report appointment availability to the state's [Vaccine Locator](#)
- Healthcare providers nationwide have identified potential barriers to increasing pediatric COVID19 vaccine uptake. These include:
 - Staffing shortages
 - Differing formulas for the vaccine depending on age of vaccine recipient
 - Administrative burden of enrollment in the federal COVID19 Vaccine Provider program

Health Plans

- Through the federal CARES Act and CMS interim rules, health plans are required to fully cover, without cost-sharing, the COVID-19 vaccine in all eligible populations. This applies to those who receive coverage through:
 - Private Insurance
 - Medicaid
 - Medicare
- Through the CDC COVID-19 Vaccine Provider Agreement, those who are uninsured must also be given access to the vaccine at no cost to them.
- HCA, the state's largest purchaser of insurance, has been a key partner in COVID19 vaccine response work including communication, outreach, and identifying strategies to address known barriers

Summary

- Most of the infrastructure to track and report on COVID19 vaccination already exists per federal requirements.
- Similar to adding any new vaccine to the list of immunization requirements, partner agencies would have to do some initial work, including updating the WAIS School Module, updating guidance and communicating changes to families, schools, and child care facilities.
- Public and private schools stated that adding COVID19 vaccine to the immunization requirements would require significant initial work. This is due to:
 - Most school resources being already stretched thin with COVID19 mitigation responsibilities
 - A COVID19 vaccine requirement potentially impacting all grade levels

| THANK YOU

References

- Feedback gathered from staff at DOH and partner agencies including DCYF, OSPI, and LHJs
- Feedback gathered from member associations:
 - American Indian Health Commission (AIHC)
 - School Nurses of Washington, School Nurses Corps Administrators, private school nurses, school nurse leaders
 - Washington State Association of Local Public Health Officials
 - Washington Association of School Administrators, Washington State School Director Association, Association of Washington School Principals, Association of Christian Schools International
- Fiscus M., Wilkniss S., Tewarson H. COVID-19 Vaccines and Children: State Strategies to Increase Access and Uptake through Pediatric Providers. National Academy for State Health Policy;2021.
- CDC COVID-19 Vaccine Provider Agreement: <https://www.cdc.gov/vaccines/covid-19/vaccination-provider-support.html>
- §4203 CARES Act: <https://www.congress.gov/bill/116th-congress/senate-bill/3548/text?q=product+actualizaci%C3%B3n>
- CMS Interim Final Rule: <https://www.cms.gov/files/document/covid-vax-ifc-4.pdf>