

State of California—Health and Human Services Agency California Department of Public Health



KAREN L. SMITH, MD, MPH Director and State Health Officer EDMUND G. BROWN JR. Governor

Date: October 27, 2016

To: School Principals and Superintendents of kindergartens with >25% conditional admission rates in fall 2015

Re: Risk of 2016-2017 audit - immunization requirements

In accordance with the recent addition of an immunization component to the required financial and compliance audits of local educational agencies, California public schools will be audited if they:

- Do not submit immunization assessment reports to the California Department of Public Health (CDPH) in fall 2016 or
- Report that more than 25% of kindergarteners were conditional entrants in fall 2016.

Average daily attendance (ADA) funding may be disallowed for students who are judged to have been inappropriately in attendance.

You are receiving this letter because, in the 2015-2016 academic year, a school under your supervision met the audit criteria. Without improvements in fall 2016, this school may be audited in 2016-2017. To avoid a potential audit or audit finding, ensure that all students are accurately reported and that kindergarteners admitted as conditional entrants are monitored and caught up on immunizations according to the <u>Conditional Admission Immunization Schedule</u> or as temporary medical exemptions end. CDPH found that most students who were identified as "conditional entrants" were improperly classified (based on a sample of kindergarten immunization records during the 2013-2014 school year). These students should have been excluded from school until they received the catch up shots that were due at the time of school entry.

Pupils are considered conditional entrants only if they have:

- Been recently vaccinated and aren't due for the next shot in the series yet (see <u>Table 2</u> of the <u>California Code of Regulations, Title 17, Division 1, Chapter 4</u>) or
- Received a temporary medical exemption. See enclosed Conditional Admission FAQs.

To meet these requirements, we stress the importance of supporting staff with dedicated and protected time for immunization-related work, including trainings, data entry, and follow up.

See the Education Audit Appeals Panel website at <u>http://eaap.ca.gov</u> for additional information on the 2016-2017 audit guide. For information regarding immunization requirements, please contact your county office of education or <u>local health department</u>. Additional information, including tools for your staff, is available from CDPH's Shots for School website at <u>www.shotsforschool.org</u>.

Sincerely,

Kyc

Sarah Royce, MD, MPH Chief, Immunization Branch California Department of Public Health

Conditional Admissions: Frequently Asked Questions

1. What is conditional admission?

In limited circumstances, some children who have not received one or more required immunizations may attend kindergarten while they catch up on these immunizations. Children are considered conditional entrants if they:

- Are behind schedule, have received at least 1 dose in a series and the deadline date for the next dose has not passed (see <u>Table 2: Conditional Admission Immunization Schedule</u> of the <u>California Code of Regulations, Title 17, Division 1, Chapter 4</u>).
- Have a temporary medical exemption.

2. What are examples of children who may attend kindergarten under conditional admission?

- Children who have received some but not all required doses in an immunization series and are NOT CURRENTLY DUE for any doses at the time of admission. For example, a child who received a first dose of DTaP the day before starting school is not yet due for a second dose before admission. Schools and child care facilities should review <u>Table 2</u>.
- Children admitted with a temporary medical exemption to one or more immunization(s) as documented by a California-licensed physician (M.D. or D.O.) prior to admission. These children should receive all vaccines except those listed in the exemption. The physician documentation must include the date when the exemption expires.

If a child has NOT received all immunization doses which are currently due, the child should NOT be admitted until all doses currently due are received. <u>Table 2</u> shows the intervals when doses are due. If a child has not received any dose of a required vaccine, a first dose MUST be received prior to admission.

3. What if conditionally admitted children are exposed to diseases to which they have not been fully immunized?

Any child who is not completely immunized against a particular communicable disease may be subject to exclusion if exposed to the disease or during an outbreak of the disease as determined by the local health department.

4. How often do I review the immunization records of students who are conditionally admitted?

<u>California Code of Regulations (CCR), Section 6070 (f)</u> states that "the governing authority shall see that the immunization record of each pupil admitted conditionally is reviewed **every 30 days** until that pupil has received all the required immunizations. Any immunizations received subsequent to conditional admission shall be entered in the pupil's immunization record."

5. How do I establish deadlines for the next dose?

When you admit a child conditionally, the parent must be advised of the time interval and encouraged to have their child receive the next dose at the beginning of the time interval. Here is an example based on the intervals shown in <u>Table 2</u>:

- A student needs the 3rd dose in the hepatitis B series. The child received the 1st dose on 7/1/2016 and the 2nd dose on 8/1/2016.
 - The table shows the time interval is 2-6 months with a minimum interval of 4 months after the 1st dose. This means the 3rd dose can be given as soon as two months after the 2nd dose, or 10/1/2016 in this example. However, the maximum time allowed is six months, or 2/1/2017.
 - Use the six-month maximum time interval after the 2nd dose (specific to each vaccine and dose) as your deadline. Advise parents that their child will be excluded the day after the deadline date, 2/2/2017 in this example, unless they provide documentation that the 3rd dose was received.