Guidance to Schools on recording and reporting Immunization Information

August 2018

Immunizations are an important part of keeping our children healthy. Schools and State and Local health departments must monitor immunization levels to ensure that all communities are protected from potentially life-threatening diseases and, if necessary, respond promptly to an emerging public health threat. It is important that disease threats be minimized through the monitoring of students being immunized.

Sharing immunization and personally identifiable information including the students name, Date of Birth, gender, and address with local and state health departments will help to keep your child safe from vaccine preventable diseases. The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, requires written parental consent before personally identifiable information from your child's education records is disclosed to the health department. If your child is 18 or over, he or she is an "eligible student" and must provide consent for disclosures of information from his or her education records.

Introduction of 'FERPA No Consent' checkbox in MCIR SIRS

As of August 1, 2018, the Michigan Care Improvement Registry School Immunization Reporting System (MCIR SIRS) module will have in place a checkbox indicating whether a parent authorized a school to share SIRS-entered data for their child. This information will still be contained in aggregate (not personally identifiable) form for school to state and local health department reporting. Schools will be responsible for obtaining permission on the **Consent for Disclosure of Immunization Information to Local and State Health Departments** form from parent/guardian for

those students entering K, 7th grade or transferring from another school district.
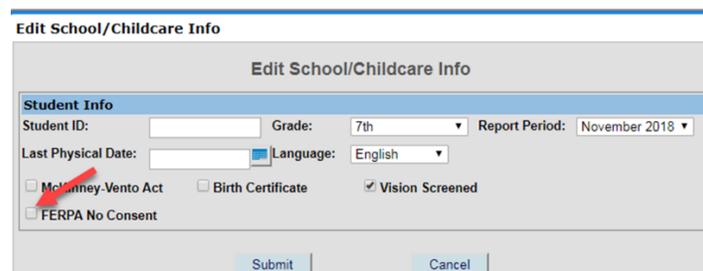

Screenshot 1.

Parents or guardians who provide their authorization to share a students' immunization record will have an UNCHECKED box that indicates permission to share school-entered MCIR SIRS data with state and Local Health Departments (LHD)s.

Should school personnel fail to receive from a parent or guardian a signed consent form which indicates authorization to share a child's immunization record, the school MCIR user will take the following steps:

1. Log into MCIR SIRS
2. Search for Student
3. On Student information page, click *Edit Information* hyperlink (screenshot 1)
4. Edit the School information for the Student by *checking the new "FERPA No Consent" checkbox* (screenshot 2)
5. Save the change by clicking *Submit* button (screenshot 2)
6. The **FERPA No Consent** checkbox with a checkmark should now be visible (screenshot 3)

Screenshot 2.

Screenshot 3.

In Summary:

Consent = an unchecked/blank FERPA checkbox

No Consent = a checked FERPA checkbox, do not share with MDHHS/LHD

When can MCIR SIRS School Administrators add LHD staff to a school site?

When a MCIR SIRS site administrator adds a person directly to their school site, that person is potentially able to see all the student SIRS data. Persons should only be added to the site when there is a specific need <u>and</u> access should expire or be expired/removed after that need is met.

Examples:
1. MCIR Field or Regional Representatives who provide SIRS training and technical assistance.
2. Local Health Department personnel who are assisting the school with a suspected or confirmed disease outbreak.
3. Occasionally, LHD personnel need to provide assistance to school staff to help resolve reporting issues or errors (Roster adjustment per reporting periods, grade assignments, duplicate student records, etc.)

<u>MDHHS Division of Immunization recommends that School Administrators only grant school site access for a short time frame during the assistance period.</u> Once there is no further need for assistance, it is the school site administrator's responsibility to expire/end the access rights.

Who is our School Site Administrator?

There are two types of MCIR SIRS access profiles.
1. **School Administrator** – who access to all SIRS school site system functions including adding/expiring users from the school site.
2. **School User** - who has access to the information but does not have all SIRS site functions.

MCIR Helpdesk staff can assist with confirming School Administrators on school sites.

MCIR Helpdesk : 1-888-243-6652

Email : mcirhelp@mphi.org

Should the School Administrator need to be changed, visit MCIR.org to retrieve the *Change Site Administrator form* for completion and submittal.

https://www.mcir.org/school-childcare/forms-reports/

This same web page also contains the *School/Childcare Manual* that contains information and instructions on site administration.