



STATE OF MICHIGAN

GRETCHEN WHITMER
GOVERNOR

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ROBERT GORDON
DIRECTOR

MEMORANDUM

DATE: August 29, 2019

TO: Local and Intermediate School District Superintendents
Public School Academy Directors
Local Education Agency Principals
Nonpublic School Administrators

FROM: Robert Gordon 
Director, Michigan Department of Health and Human Services
Michael F. Rice, Ph.D. 
State Superintendent, Michigan Department of Education

SUBJECT: 2019 Immunization Requirements for Children Entering Kindergarten and 7th Grade, or Enrolling in a New School District in Grades 1-12

Please share this important information with all staff who will be working with child immunization records at your facility.

Immunizations are one of the most effective and scientifically proven ways to protect children from harmful diseases and death. Since 1978, Michigan law has required that each student have an up-to-date certificate of immunization at the time of registration (or no later than the first day of school) for entry into kindergarten and 7th grade, and for enrollment into a new school district, grades 1-12.

In order for a child to attend school in Michigan, the Michigan Public Health Code requires parent(s)/legal guardian(s) to have one of the following on file with the school:

1. A valid, current immunization record.
 - i. [Note: *Provisional Status Vaccines*. In the event the child has received at least one dose of a required vaccine and the next dose is not yet due, the school is required to follow up with the child to ensure s/he has received the required follow-up doses of the vaccine and are up-to-date for all other required vaccines.]
2. A medical doctor's (M.D./D.O.) signed State of Michigan 2019 Medical Contraindication Form, which states the medical contraindication(s), the vaccines involved, and the time period during which the child is not able to get the vaccines.

3. A current, certified State of Michigan 2019 Immunization Nonmedical Immunization Waiver Form required under Michigan Administrative Rules.
 - i. [Note: When a parent or legal guardian holds a religious or other objection that prevents a child from receiving vaccines, a 2019 Immunization Nonmedical Waiver Form is required to be completed, signed, and certified at the local health department. The local health department will provide education from a health professional on the benefits of vaccination and the risks of disease. Health professionals will address questions and concerns prior to signing the current State of Michigan 2019 Nonmedical Immunization Waiver Form.]

Any student who fails to submit the required immunization information shall not be admitted into the school.

This year, additional direction is being given to avoid confusion regarding information that may be added to Michigan Care Improvement Registry/School Information Reporting System (MCIR/SIRS), and the information that is subject to the federal Family Educational Rights and Privacy Act (FERPA). Immunization data added by health care providers are not subject to FERPA, and therefore are not part of an educational record.

Proper maintenance of up-to-date immunization records, including waivers, is critical and required to be on file for all students. The Michigan Department of Health and Human Services (MDHHS) or the local health department may conduct an audit in the event of an outbreak and/or cases of non-compliance.

The MCIR/SIRS system links immunization records contained within the MCIR for students entered on the MCIR/SIRS school roster. All enrolled students in kindergarten and 7th grade, as well as any students newly enrolled to a school district, can be placed on the roster to meet school immunization reporting requirements. Districts should contact their local health department for other means of school immunization reporting if MCIR/SIRS is not used.

Before entering any immunization data into MCIR/SIRS, including immunization waiver data, the school must have a valid FERPA consent form on file for the student. Once the FERPA consent form is signed and returned, data can be added to MCIR/SIRS in compliance with FERPA. Without consent, the school cannot enter immunization information into MCIR/SIRS. If a student is 18 years or older, s/he is considered an "eligible student" who may provide consent for disclosure of information from his/her education records. Please review the enclosed Frequently Asked Questions (FAQ) document regarding "FERPA No Consent." A template of the disclosure form and further guidance on immunization reporting can be found at www.mcir.org under School & Childcare, Reporting to the Health Department.

In the event that a FERPA consent form has not been received, or is not on file, for a student:

1. The "No FERPA" consent box in MCIR/SIRS must be checked.
2. Students may be added to rosters in order to view the provider-entered data, but then must be removed to avoid the student from being reported twice.

3. If the provider-entered data show that the student is complete in his/her school immunization requirements, the student can remain on the roster, since no additional immunization data will be added to MCIR/SIRS.
4. If there is no FERPA consent on file, and the provider-entered data indicate that the student has not completed the required school immunizations, immunization data should not be entered into MCIR/SIRS.

The immunization status for a "No Consent Student" must still be reported to the local health department using the "Immunization Reporting Form for Students with No FERPA Consent." To protect student privacy, this form should only contain aggregate non-identifiable information for students who do not have a consent on file. Those students being reported on this form should be removed from the student roster in MCIR/SIRS, so they are not reported twice. The completed "Immunization Reporting Form for Students with No FERPA Consent" form must be submitted to the local health department each November and February when the MCIR/SIRS report is completed.

To obtain technical assistance, or to enroll as a MCIR/SIRS user, districts may contact their local health department or the MCIR Help Desk at 1-888-243-6652. **Please see the enclosed handout, "Important School and Childcare Immunization Information and Resources," for additional guidance about school immunization reporting.**

Thank you for your continued support and cooperation to ensure Michigan's children are properly immunized to avoid the ongoing threat of illness associated with vaccine-preventable diseases.

Immunization guidance documents can be accessed at: <https://www.mcir.org/school-childcare/reporting-immunization-program-status-to-the-health-department/>

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cc: Michigan Local Health Departments
Michigan Education Alliance