Date: July 27, 2015

To: Local Health Departments
   District Attorneys

From: Stephanie Schauer, Ph.D.
      Interim Program Manager
      Wisconsin Immunization Program

Subject: Changes to Enforcement of the Immunization School Law

The reporting requirements have changed for the enforcement of the school immunization law. Schools can no longer report individual student information for those out of compliance to the local health department or to the District Attorney without specific written parent consent for the reporting. (Note: DPH doesn’t have this parental consent release form. Schools or districts wishing to report to either of these entities should consult with legal counsel regarding proper consent.) These changes ensure that schools remain in compliance with the Federal Educational Rights and Privacy Act (FERPA). As a result, follow-up with students who are out of compliance, and enforcement of the school immunization laws, should be done by the individual school or school district.

Therefore, only F-04002 of the School Report to the Local Health Department (formerly part A of F-04002), should be submitted directly to the local health department, as this contains only summary data. Form F-01580 (which was formerly Part B of F-04002) should be completed and retained with the school, but should not be submitted to the local health department without parent consent. As such, it will still fulfill the obligations outlined in Wis. Admin. Code § DHS 144.07(6) and will be useful in the event of a vaccine-preventable disease outbreak. Please note that in the event of an outbreak, the release of specific, relevant student information to the local health department for the purpose of preventing further disease is still required, per Wis. Admin. Code § DHS 144.07(9).

In addition, the School Report to the District Attorney (F-44212) is no longer in use and has been removed from the school booklet. Individual student information for children who are out of compliance should not be sent to the District Attorney.

We understand that the collaboration among schools, local health departments and district attorneys has been important to ensure children receive all the required vaccinations and are protected. Given these changes, we hope to work with you to explore other options for continuing this assurance role. Therefore, in the near future,
DPH will be conducting a survey with schools and local health departments to find out more about what is being done in order to learn and share best practices in this area.

If you have any problems, questions or need assistance, please contact your nearest Regional Immunization Program Advisor listed below.

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Thank you for your continued cooperation.

cc: School Superintendents, DPI School Health Services, Local Health Departments, Regional Office Directors, Nursing Consultants, and Immunization Program Advisors