

Frequently Asked Questions for
Public Health Law (PHL) §§ 2164 and 2168
10 N.Y.C.R.R. Subpart 66-1
School Immunization Requirements

GENERAL QUESTIONS

Q1: Why did the New York State Department of Health (NYSDOH) change the regulations governing school immunization?

A1: The NYSDOH made these changes to conform to recent changes to Public Health Law Section 2164 which require meningococcal vaccine for students in 7th and 12th grades and to ensure that children entering pre-kindergarten are fully vaccinated against polio. The regulations were also updated to incorporate the current Advisory Committee on Immunization Practices (ACIP) Recommended Schedules and to update the regulations for the New York State Immunization Information System (NYSIIS).

Q2: What is the legal basis for the school immunization requirements and the New York State Immunization Information System (NYSIIS)?

A2: The legal authority for school entry immunization requirements and NYSIIS stems from New York State Public Health Law (PHL) Article 21, Title VI, Sections 2164 and 2168, respectively.

Q3: When will these regulatory changes take effect?

A3: The revised regulations will take effect on September 1, 2016.

Q4: What changes have been made to the school immunization regulations?

A4: Several changes have been made to the school immunization requirements for the 2016-17 school year.

- Students entering grade 7 are required to receive one dose of meningococcal conjugate vaccine (MenACWY; sometimes abbreviated as MCV4; brand names Menactra or Menveo).
- Students entering grade 12 are required to receive two doses of MenACWY vaccine. However, if the first dose was received at age 16 years or older, then only one dose will be required.
- Students entering pre-kindergarten, nursery school or day care on or after September 1, 2016 must have received immunization against polio in accordance with ACIP minimum intervals.
- All other vaccine requirements established for the 2015-16 school year remain in effect. Refer to the “New York State Immunization Requirements for School Entrance/Attendance” for the 2016-17 school year for further detail.

Q5: Will the meningococcal vaccine requirement roll out over additional grades in future years?

A5: Yes. As students enrolling in grade 7 in the 2016-17 school year move up a grade level each year, the students enrolling in those higher grades, or grade equivalent, will also be covered by the meningococcal vaccine requirement. The anticipated roll-out will be:

School Year 2016 – 2017: Grades 7 and 12

School Year 2017 – 2018: Grades 7, 8 and 12

School Year 2018 – 2019: Grades 7, 8, 9 and 12

School Year 2019 – 2020: Grades 7, 8, 9, 10 and 12

School Year 2020 – 2021 and following years: Grades 7, 8, 9, 10, 11 and 12

Q6: Are schools required to check intervals for students in grades 9 through 12 in the 2016-17 school year?

A6: For the 2016-17 school year, students in grades 9 through 12 (or comparable age level grade equivalents) will be exempted from the interval requirements (with the exception of the 28-day interval between dose 1 and dose 2 of measles-containing vaccine which was in effect in the 2013-14 school year), if they had the appropriate numbers of doses of vaccine in accordance with the requirements that were in effect in the 2013-14 school year. However, students in grade 12 will still be required to comply with the new meningococcal vaccine requirement.

The interval requirements will continue to phase in according to this schedule:

School Year 2016 – 2017: Pre-K through grade 8

School Year 2017 – 2018: Pre-K through grade 9

School Year 2018 – 2019: Pre-K through grade 10

School Year 2019 – 2020: Pre-K through grade 11

School Year 2020 – 2021 and following years: Pre-K through grade 12

Q7: How will these regulations affect my workload as a school nurse?

A7: Students in grades 7 and 12 will need to be assessed for meningococcal vaccine in order to enter or attend school in the 2016-17 school year. Children entering day care, nursery school and pre-kindergarten will need to have the intervals between doses of polio vaccine assessed. However, schools are not required to check the intervals for students enrolling in grades 9 through 12 in the 2016-17 school year.

MENINGOCOCCAL VACCINE

Q1: How many doses of meningococcal vaccine are required for grade 7?

A1: One dose of meningococcal conjugate vaccine (MenACWY; sometimes abbreviated as MCV4; brand names Menactra or Menveo) is required for entry into grade 7.

Q2: How many doses of meningococcal vaccine are required for grade 12?

A2: A total of two doses of MenACWY vaccine are required for entry into grade 12. The second dose must be administered no sooner than 16 years of age. However, if the first dose of MenACWY vaccine was received at 16 years of age or older, only one dose is required. The regulations allow for a grace period of up to 4 days before the 16th birthday.

Q3: Is there a minimum age for the first dose of MenACWY vaccine?

A3: The minimum age for the first dose of meningococcal conjugate vaccine is 6 weeks of age. The *recommended* age for most healthy teens is 11 through 12 years of age, however any dose of MenACWY vaccine received on or after 6 weeks of age will meet the grade 7 requirements.

Q4: Is there a minimum age for the second dose of MenACWY vaccine?

A4: The minimum age for the second dose is 16 years of age.

Q5: What is the minimum interval between doses of MenACWY vaccine?

Q5: The minimum interval is 8 weeks.

Q6: Will the 4-day grace period apply to doses of MenACWY vaccine?

A6: Yes. Doses of MenACWY vaccine received within 4 calendar days of the minimum age or interval will meet the school immunization requirements.

Q7: A student entering grade 12 received one dose of MenACWY vaccine at 16 years of age. Will he or she need a second dose?

A7: No. A second dose will not be required if the first dose was received at 16 years of age or older.

Q8: A student entering grade 12 received one dose of MenACWY vaccine at 15 years of age. Will he or she need a second dose?

A8: Yes. If the first dose of MenACWY vaccine was received more than 4 days before the 16th birthday, then a second dose, received a minimum of 8 weeks after the first dose, will be required for grade 12.

Q9: A student entering grade 12 received 2 doses of MenACWY vaccine before 16 years of age. Will he or she need a third dose?

A9: Most likely, yes. Students entering grade 12 must have a booster dose of MenACWY vaccine on or after the 16th birthday. If the second dose was received more than 4 days before the 16th birthday then a third dose, received a minimum of 8 weeks after the second dose, will be required for grade 12.

Some students with rare medical conditions may have received several doses of MenACWY vaccine before 16 years of age. Schools are encouraged to call the NYSDOH if they have any students entering grade 12 that have received multiple doses of MenACWY vaccine before 16 years of age. The NYSDOH Bureau of Immunization Medical Director is available for consultation upon request of the school.

Q10: I have heard that there are several kinds of meningococcal vaccines. Which vaccine(s) are required for school, and which will meet school immunization requirements?

A10: There are several kinds of meningococcal vaccines available in the United States:

- Meningococcal conjugate vaccines (MenACWY; sometimes abbreviated as MCV4; brand names Menactra or Menveo).

- MenACWY vaccines are required for students entering or attending grades 7 and 12.
- Meningococcal polysaccharide vaccine (MPSV4; brand name Menomune). Menomune is rarely used in the United States, and is usually only used in adults more than 55 years of age.
 - MPSV4 is not required for school entry or attendance, but doses of MPSV4 will meet the meningococcal vaccine requirements.
- Vaccines against serogroup B of meningococcal disease (brand names Bexsero or Trumenba, sometimes abbreviated as MenB).
 - MenB vaccine is not required for grades 7 or 12 in the 2016-17 school year, and doses of MenB vaccine will not meet the meningococcal conjugate vaccine requirement. However, in the event of an outbreak of serogroup B meningococcal disease in a school, the New York State Commissioner of Health may order students to either receive the MenB vaccine or be excluded from school. If an outbreak occurs, the health department will work closely with the school.
- A combination meningococcal/Hib vaccine, MenHibrix, is sometimes given to babies, however it was first introduced in 2012 and it is not expected that any students entering grades 7 or 12 in the 2016-17 school year will have received MenHibrix. Schools are encouraged to call their local health department or the NYSDOH if they have any students entering grades 7 or 12 that have received MenHibrix.

Q11: Are students required to document vaccination with MenB vaccine?

A11. Students are not required to document MenB vaccination at this time. In the event of an outbreak of serogroup B meningococcal disease in a school, the health department will work closely with the school to identify students that have not received MenB vaccine.

Q12: A student entering grade 12 has two doses of MenB vaccine and no doses of MenACWY vaccine. Does he or she meet the meningococcal vaccine requirements?

A12: No. Doses of MenB vaccine do not meet the MenACWY vaccine requirement. If the student is 16 years of age or older, then the student will need one dose of MenACWY vaccine. If the student is less than 16 years of age, then he or she will need a first dose now and a second dose at 16 years of age or older, and at least 8 weeks after the first dose.

Q13: If an immunization record just states “meningococcal” or “meningitis”, but doesn’t specify Menactra or Menveo, what steps will the school need to take to determine whether it meets the school meningococcal vaccine requirement?

A13: MenACWY vaccine may be documented in a variety of ways. It may not be necessary to document the brand name if the vaccine is identifiable as MenACWY vaccine. In addition, a school may safely assume that a meningococcal vaccine given in the United States (U.S.) before MenB vaccine was first licensed in October 2014 is either MenACWY or MPSV4 and therefore meets the school meningococcal vaccine requirements. However, if a meningococcal vaccine was given on or after October 2014 or in another country at any time then the specific vaccine given must be specified on the immunization record for the vaccine to meet the NYS school meningococcal vaccine requirements.

An immunization record indicating any of the following will satisfy the NYS school meningococcal vaccine requirements:

- MenACWY
- MCV4
- Menactra

- Menveo
- MPSV4
- Menomune
- meningococcal conjugate vaccine
- quadrivalent meningococcal vaccine
- Any meningococcal vaccine given in the U.S. before October 2014.

If the record does not clearly indicate any of the above information, then parents and healthcare providers should be asked to specify which meningococcal vaccine was given. In addition, schools should check students' immunization records in NYSIIS or the Citywide Immunization Registry (CIR) if the specific meningococcal vaccine is not clear in the immunization record. Most immunization records in NYSIIS and the CIR will state the specific vaccine that was given. If the specific vaccine cannot be identified or assumed through any of these methods, then the student will need to be revaccinated with MenACWY vaccine.

Please note that students entering grade 12 will meet the grade 12 requirements if they have a single dose of MenACWY vaccine on or after 16 years of age, even if an earlier dose was not clearly specified.

Q14: Will serological evidence of immunity to meningococcal disease be acceptable as evidence of immunity to meningococcal disease?

A14: No. The CDC does not recognize any serologic tests as useful for determining immunity to meningococcal disease. Serological evidence of immunity to meningococcal disease will not meet the meningococcal vaccine requirement for school.

Q15: Some students who come to NYS from other countries were vaccinated in their country of origin with vaccines against one (A or C) or two (A and C) strains of meningococcal disease. Will MenA, MenC, or MenAC vaccines meet NYS school meningococcal vaccine requirements?

A15: No. MenA, MenC, and MenAC vaccines provide no protection against meningococcal serogroup Y, which causes approximately one-third of cases of meningococcal disease in the United States. Students entering grades 7 or 12 who received MenA, MenC or MenAC vaccine will still need to receive MenACWY vaccine in order to meet NYS school meningococcal vaccine requirements. MenACWY vaccine can be given at any time after receiving MenA, MenC or MenAC vaccine.

POLIO

Q1: What are the new polio vaccine requirements for children entering or attending day care, nursery school and prekindergarten?

A1: As previously, children entering or attending day care, nursery school and prekindergarten must have age-appropriate doses of polio vaccine according to the ACIP recommendations. Effective September 1, 2016, the NYSDOH has updated the regulations to clarify that the intervals between doses of polio vaccine for these children must be in accordance with ACIP recommended and minimum intervals.

Q2: When are three doses of polio vaccine acceptable?

A2: Students in kindergarten and grades 1, 2, 6, 7 and 8 are required to have four doses of polio vaccine. If, however, the third dose of polio vaccine was administered at age four years or older and at least six months after the second dose, then three doses will be acceptable. Students entering pre-K and grades 3 through 5 or 9 through 12 in the 2016-17 school year are only required to have three doses of polio vaccine.

Q3: A student received four doses of polio vaccine before August 7, 2010. The fourth dose was given before four years of age. Will this student need an additional dose of polio vaccine?

A3: No. The NYSDOH follows CDC guidance that for students who received their fourth dose prior to August 7, 2010, four doses separated by at least four weeks is sufficient.

Q4: Are schools required to check polio vaccine intervals for students entering grades 3 through 5 and 9 through 12 for the 2016-17 school year?

A4: Schools are not required to check polio vaccine intervals for students entering grades 3 through 5 or 9 through 12 for the 2016-17 school year.

Q5: Is serological evidence of immunity acceptable for proof of immunity to polio?

A5: Serological evidence of immunity to polio is acceptable proof of immunity for school attendance if all three serotypes (polio 1, polio 2 and polio 3) were tested and found to be positive. If any of the three serotypes were not tested for or not found to be positive, then the student must provide proof of the required number of doses of polio vaccine as specified in the regulations to be in compliance with school immunization requirements.

VARICELLA

Q1: For what grades are students required to have received two doses of varicella vaccine?

A1: For the 2016-17 school year, children entering kindergarten and grades 1, 2, 6, 7 and 8 are required to have received 2 doses of varicella vaccine. Students entering grades 3 through 5 or 9 through 12 for the 2016-17 school year are only required to have received one dose of varicella vaccine.

NYSIIS

Q1: What are the changes to regulations for NYSIIS?

A1: The regulations have been amended to clarify that pharmacists and registered nurses are authorized users of NYSIIS.

Q2: Are schools allowed access to the NYSIIS?

A2: Yes, schools have read-only access for student look-up. School users cannot enter or edit immunization data in NYSIIS. School nurses must participate in a recorded NYSIIS "School Access User" training to gain access to NYSIIS. Users must first obtain their **own** NYSDOH Health Commerce System (HCS) account to access NYSIIS. Additional

information on how to get an HCS account, NYSIIS user guides, and NYSIIS school access user training can be found at http://www.health.ny.gov/prevention/immunization/information_system/schools/.

- Q3: How can a school nurse or pre-K provider keep track of whether doses of vaccines were administered at the correct interval?
- A3: In NYSIIS, school users have the ability to search for students and review their immunization history and recommended vaccinations. NYSIIS tracks vaccine doses by the recommended ACIP schedule. When those doses were not administered at the correct interval they are marked as "Invalid." The "Date Administered" for that invalid dose will become a blue hyperlink that you can click on for an explanation of why the dose is invalid and displays the appropriate age and intervals for the series. **Keep in mind, NYSIIS only displays immunizations that have been recorded by the physician's office.** If there are vaccine doses missing, schools must work with the parent or physician to determine if missing immunizations in NYSIIS are truly missing or, alternatively, just not entered into NYSIIS.