

Best Practices for Post-secondary Institutions Regarding Student Compliance with Public Health Law (PHL) Section 2165

Access Student Immunization Records

For assistance obtaining student immunization records, use the following sources:

New York State (outside of New York City):

- New York State Immunization Information System (NYSIIS) information is available at http://www.health.ny.gov/prevention/immunization/information_system/schools/.
- To access NYSIIS, institution staff must have a Health Commerce System (HCS) account.
 - To request an HCS account, send an email to osas@health.state.ny.us.
- NYSIIS Education and Training:
 - To look up individual student records, institution staff are required to register for a recorded webinar training titled: NYSIIS School Access User Training. You can copy and paste the following link to the School user training:
<https://meetny.webex.com/tc3100/trainingcenter/record/downloadViewAction.do?recordId=21583817&siteurl=meetny&actionType=view&setted=102&internalrKey=4832534b00000004bacf429272a52b9109d08f45778385713b0180deb6d5fdc a894cbf89cd280881&Rnd=0.568070564788749>
 - For post-secondary institutions that administer vaccines to students, a NYSIIS College and University webinar training is available. You can copy and paste the following link to the College and University webinar training:
<https://meetny.webex.com/tc3100/trainingcenter/record/downloadViewAction.do?recordId=21566192&siteurl=meetny&actionType=view&setted=102&internalrKey=4832534b000000048fda0e7d7e3f240c01706d2db1b94bbd2f1110a01296448 65d324c051c512643&Rnd=0.0891455649135603>
 - Webinar covers the NYSIIS Standard User functions:
 - Searching for and adding students,
 - Managing immunizations, and
 - Running reports.

New York City:

- Citywide Immunization Registry (CIR) information is available at <http://www1.nyc.gov/site/doh/providers/reporting-and-services/citywide-immunization-registry-cir.page>.

To create a CIR account, complete the Security Administrator Designation form (available at <http://www1.nyc.gov/site/doh/providers/reporting-and-services/citywide-immunization-registry-cir.page>) and fax it to (347) 396-2559.

- For additional questions, contact the CIR phone number: (347) 396-2400.

Vaccine Access for Students

- Provide free or low cost immunizations at institution's health clinic.
- Students without proof of immunity should be referred to an appropriate location in order to obtain the required immunizations, such as:
 - Onsite health clinic, or
 - Mobile MMR clinic.
- Your county health agency may be able to provide you with information on vaccine distributors from which you can order.
 - A list of county contacts is enclosed.
- Request that students return to orientation/registration with completed immunization records.
- For institutions that do not have a health clinic/onsite mobile clinic capacity:
 - Contact county health agency about the feasibility of conducting a mobile vaccine clinic during orientations/registrations.
 - Refer students who do not have health insurance and cannot afford immunizations to the county health agency.
 - County health agencies are required by PHL to provide vaccine at no cost for students who cannot afford them.
 - Provide students with a flyer listing free county health clinics and other walk-in clinics in your area that administer immunizations.
 - For institutions in New York City, a schedule of clinic hours and locations is available on the New York City Department of Health and Hygiene, Bureau of Immunization web site at <http://www.nyc.gov/html/doh/html/imm/immclin.shtml>.
- Provide serologic titer testing for students.
 - Provide free testing (for institutions able to absorb this cost).
 - Contact local laboratories to consider providing low cost testing for students who do not have insurance.

Sample Compliance Interventions

Prior to student registration

- Provide students, along with their admissions notification, an immunization packet regarding MMR compliance requirements and an immunization record form that:
 - Explains immunization requirements and what constitutes valid proof of immunity for entrance/attendance, and
 - Advises students to begin the process of meeting immunization requirements at least 6 to 8 weeks prior to registration.
- Provide an immunization information packet regarding MMR compliance requirements at orientations for new students and those transferring from other institutions.
- Post immunization information regarding MMR compliance on the institution's web site.
- Send letters to students not in compliance with PHL:
 - Suggested time frame: one month prior to registration.
- Make phone calls to students/send email reminders to students to ensure compliance prior to their attendance.

During registration process

- During the registration process, direct students to health services, mobile clinic or county health agency clinic before they may register for classes:
 - Discuss immunization requirements.
 - Provide vaccine at this time.

OR

- Do not allow students to register for classes without proof of immunity to measles, mumps and rubella:
 - Notify students via letter/email/web site that failure to comply with PHL Section 2165 will result in their not being able to register for classes.

OR

- Do not permit students to register for classes without proof of at least 1 MMR:
 - Set a date by which the student must submit documentation of the 2nd MMR or positive serological evidence of immunity to measles.
 - Notify the student that he/she will no longer be able to attend classes if documentation of the 2nd dose of measles vaccine or serological evidence of immunity is not provided by the date given.

If there is non-compliance after the registration process (before 30 to 45 day grace period elapses) or during the time a student is considered to be in process of complying with PHL:

- Contact high schools for student records (see attached letter from the State Education Department).
- Do not permit students to move into a dormitory until they have complied with PHL.
- Cancel student's electronic access to any school system:
 - Deny access to school email accounts.
 - Deny access to online course work, lectures, exams, etc.
 - Deny access to register for future classes.
- Withdraw the student's registration for classes:
 - Send notice of withdrawal from classes to all of the student's professors, so the student is unable to attend class.
- Impose a financial penalty on students who fail to comply with PHL Section 2165:
 - Charge a re-registration fee to students who are de-registered because of non-compliance with PHL.
- Apply pre-registration holds for the next semester for those students who:
 - Have not yet complied with PHL prior to the elapsing of the 30 or 45 day grace period, and/or
 - Who are considered in process and have been given a date to be in compliance with PHL.
- Strictly enforce exclusion of non-compliant students from classes after 30 (or 45 days for students from out of state) day grace period or as soon as a student is no longer considered to be in process of complying with PHL.