

## Immunization Policy and Procedures

### POLICY:

SUNY Cortland requires all students to comply with New York State Public Health Laws related to immunizations for college students. In addition, it encourages students to comply with current vaccine recommendations as suggested by the American College Health Association (ACHA) and the Advisory Committee on Immunization Practices (ACIP).

SUNY Cortland policy requires ALL students taking classes on any of our campus sites, regardless of credit hours, comply with MMR and Meningitis requirements. In addition, students must be in compliance prior to the beginning of classes with only the following exception: students initially registering less than two (2) weeks prior to the start of classes will be given 30 days from the start of classes to become compliant. All other students not compliant before classes start will have a hold placed on their account by SHS. Their Associate Deans will be notified if they are still not compliant by the last business day before classes start, and they will not be allowed to attend class until they become compliant. If they are still not compliant and make no effort to become compliant by the end of drop/add, they will be deregistered.

### VACCINES REQUIRED BY New York STATE:

#### Measles, Mumps, Rubella:

**Definitions:** In accordance with Section 2165, Subpart 66-2 of New York State Public Health Law:

1. “Student”: Student shall mean any person born on or after January 1, 1957 who is registered to attend or attends classes at SUNY Cortland.
2. “Attendance”: Shall mean any person who is physically present at the SUNY Cortland campus or the SUNY IT campus or any other group classroom setting.
3. “Certificate of immunization”: Shall mean that document, prepared by the health Practitioner who administers an immunization, which specifies the products administered and the dates of administration. It may also show physician verified history of disease and/or laboratory evidence of immunity. “Certificate of Immunization” shall also mean an Immunization record submitted by the institution or school which the student previously attended, which specifies the products administered and the dates of administration and whose source was a certificate of immunization from a health practitioner.
4. “Serological Evidence”: Shall mean demonstration of antibodies through a blood test performed by an approved medical laboratory. SUNY Cortland will accept a copy of the results as positive proof of immunity if the student has demonstrated antibodies within

the “positive range”. Levels within the “negative range” or “equivocal” will not be acceptable. SUNY Cortland will also accept a signed statement from a clinician noting a positive titer as acceptable “serological evidence”.

**Requirements for Proof of Immunity:** As stated in the Immunization Handbook for NYS Post-Secondary Institutions, Section III.

Measles:

A student must demonstrate receipt of two doses of live measles vaccine: the first dose given no more than four days before the first birthday and the second on or after 15 months of age and at least 28 days after the first dose. The second dose may be given as early as 28 days after the first dose, but not sooner than 28 days:

**OR**

The student must submit serological evidence of immunity.

**OR**

The student must submit a statement from the diagnosing physician that the student has had measles disease;

**OR**

The student must present proof of honorable discharge from the armed services within ten years from the date of application to the institution. The proof of honorable discharge shall qualify as a certificate enabling a student to attend the institution pending actual receipt of immunization records from the armed services.

**OR**

If a student is unable to access his/her immunization record from the medical provider or previous school, documentation that proves the student attended primary or secondary school in the United States after 1980 will be sufficient proof that the student received one dose of live measles vaccine. If this option is used, the second dose of measles vaccine must have been administered within one year of attendance at the post-secondary institution.

Mumps:

Evidence of a single dose of live mumps vaccine given no more than four days before the first birthday;

**OR**

Serological evidence of immunity;

**OR**

A statement from the diagnosing physician that the student has had mumps disease;

**OR**

Submit proof of honorable discharge from the armed services within ten years from the date of application to the institution.

Rubella:

A student must demonstrate receipt of a single dose of live rubella virus vaccine given

no more than four days before the first birthday;

**OR**

A student must submit serological evidence of rubella antibodies;

**OR**

A student must submit proof of honorable discharge from the armed services within 10 years from the date of application to the institution.

**Acceptable Vaccines:** As stated in the Immunization Handbook for NYS Post-Secondary Institutions, Section III/[www.health.state.ny.us](http://www.health.state.ny.us).

Measles:

The law specifies that only live virus measles vaccine is acceptable. Both inactivated and live virus measles vaccines were licensed in 1963. The inactivated (killed) vaccine was withdrawn in 1967. Measles immunizations given after January 1, 1968, constitute acceptable doses of vaccine since all measles vaccine given after that time was live virus vaccine. Immunizations given before 1968 technically meet legal requirements if the medical record clearly indicates that the vaccine was live virus vaccine. Because simultaneous administration of immune globulin (IG or ISG) and live virus vaccine was commonplace prior to 1968, it is recommended that all immunizations for measles, Mumps and/or rubella given prior to 1968 should be repeated unless specifically noted that IG or ISG was not given.

MR and MMR, available since 1972, contain live, further attenuated measles vaccine. Some of the brand names for live measles vaccine include Rubeovax (lyovac), Mevilin-L, Lirugen and Attenuvax (lyovax).

Mumps:

Killed mumps vaccine, which does NOT fulfill the New York State requirement, became available in 1968. Live mumps vaccine became available in 1969. MMR combined vaccine became available in 1972.

Rubella:

Live rubella vaccine was first available in 1969. The combination of MR and MMR became available in 1972.

### **Meningococcal Meningitis:**

**Definitions** In accordance with Section 2167 of New York State Public Health Law and SUNY Cortland policy.

1. "Student": Student shall mean a person who is registered to attend or who attends classes at an institution.

2. “Immunization”: Immunization shall mean an adequate dose or doses of an immunizing agent against meningococcal meningitis which meets the standards approved by the United States public health service for such biological products and which is approved by the department under such conditions as may be specified by the public health council.
3. “Information”: Information shall refer to written information provided to students about meningococcal meningitis and meningitis immunization. This information will be provided by or approved by the commissioner.

**Requirements for proof of compliance with the meningitis law for post-secondary students:**

The student, or if under the age of 18 years the parent or guardian of the student, certifies that the student has already received immunization against meningococcal meningitis within the 10 years preceding the date of the response form. The student/parent/guardian must complete SUNY Cortland’s response form. Response forms from other institutions will not be accepted.

**OR**

The student, or if under the age of 18 years the parent or guardian of such student, has received and reviewed the information provided by the institution, understands the risks of meningococcal meningitis and the benefits of immunizations, and has decided that the student shall not obtain immunization against meningococcal meningitis. The student/parent/guardian must complete SUNY Cortland’s response form. Response forms from other institutions will not be accepted.

**OR**

certification from a health care provider that the student has received meningococcal vaccine. Certification will meet the definition of “Certificate of Immunization” as listed for MMR.

**Protocol for determining religious exemption from the MMR vaccination (PHL 2165)**

Only refusals based on religious beliefs are acceptable. Philosophical, ethical and non-medically justifiable concerns do not qualify. The religious belief must be genuine. The student (or parent of a minor) has the burden of showing, by a preponderance of the evidence, his/her religious conviction by demonstrating that: they are members and conform to the practices of an organized religion whose teaching precludes immunizations, or his/her opposition is a personal and sincerely held religious belief.

Protocol:

Upon request of exemption the student is mailed a copy of religious exemption letter and the religious exemption student statement form. These are to be completed and returned to SHS. Upon review, the College Physician decides either:

- a) There is, or is not, a justification for exemption

**OR,**

- b) There is *possibly* a justifiable religious exemption. In this case the student or parent is asked to provide additional *written* information. Specifically this may include: (refer to Student Statement Form)
1. The length of time they have adhered to the principles and practice of their faith.
  2. The impact their religious beliefs have on other medically related matters.
  3. Clarification regarding whether all (or the preponderance of) practitioners of this faith, also adhere to the practice of refusing immunizations.
  4. A statement of how the student or parent (if student under 18 years of age) feels accepting immunization would compromise their beliefs.
  5. This documentation should include a letter from a qualified leader of the religious group which addresses/substantiates this information.

Upon review of the additional documentation, the College Physician will take one of three actions:

1. Decline the request for exemption, in which case the student must be informed in writing.
2. Accept the request for exemption. In which case the student's name is placed on a list of susceptible students.
3. The student/parent is asked to provide additional information, or to meet with the College Physician.

In the event a request is denied, the student/parent has 3 options:

1. Consent to immunization.
2. Appeal to the NYS Commissioner of Education within 30 days.
3. Initiate a lawsuit against SUNY Cortland for a declaration of his/her rights.

### **Procedures followed at SUNY Cortland to bring students into compliance with NYS immunization requirements for post-secondary institutions.**

1. Upon acceptance at SUNY Cortland, undergraduate students are sent a letter from the Admissions Office informing them of their acceptance to the college. Pre-Admission deposits are due May 1<sup>st</sup>. Once a student pays their pre-admission deposit, e-mail reminders are sent from the Admissions Office directing the student to our web site to print and complete the required health history and immunization forms. The required health history and immunization forms list required and recommended vaccines. It also includes a copy of a meningococcal meningitis fact sheet approved by the New York State Department of Health. The immunization requirements page of the required health history and immunization form is to be completed by either the student or a parent/guardian for underage students and health care providers. Once completed, the required health history and immunization form is to be returned to the Student Health Service for review and any necessary action. Health forms are also available by accessing the Student Health Service web-page.
2. Required health history and immunization forms or other acceptable certificates of

immunization returned to the Student Health Service are date stamped, hole punched and placed in the student's medical record housed at the Student Health Service.

3. The student's medical record is then given to a Student Health Service RN or clinical staff member for review.
  - a) Those records that satisfactorily meet the requirements for MMR and Meningococcal meningitis as outlined under "Requirements for Proof of Immunity" are appropriately marked by the reviewer and given back to the secretarial staff to enter into the College's computer system. Once entered into the Student Health Service database, the secretarial staff makes a note on the medical record cover and files the record in the active students file.
  - b) Those students whose immunization records are missing required information are sent a letter requesting the missing information. The "Health Information/ Immunization Review Flow Sheet" is placed in the medical record and appropriate notations are made. The information that is available is entered into the College's computer system by the secretarial staff and duly noted by them on the medical record cover. The chart is then filed in the "Missing" section of the Student Health Service's active students file.
  - c) Students who are waiting to receive their second measles shot are given a "temporary ok" when they are entered into the College's computer system. The system automatically removes them from this category 30 days after their first shot and places them in the non-compliant category. These records are also filed in a special section of the Student Health Service's active students file.
  - d) Students requesting medical or religious exemptions to immunizations are noted by the reviewer and forwarded to the SHS physician for review. Upon approval, a letter is sent acknowledging approval and a copy is filed in the student's medical record. It will then be entered into the college's computer system by the secretaries who note that entry on the medical record cover and then file the record in the active students file. Students with immunization exemptions are kept on a list to be notified in the case of an outbreak of illness on campus. See "Protocol for Determining Religious Exemption."
  - e) Any chart that a reviewer has questions about will be given to the Student Health Service physician for review and final disposition.
4. When missing immunization information is returned to the Student Health Service, the same steps as outlined in # 1-3, under "Procedures..." above are repeated.
  - a) Steps # 1-3 may be repeated one or two times.
  - b) At the discretion of the reviewer, a telephone call may be made at any time to the student/parent/guardian or a health care clinician to help clarify the

information provided or the information that is still needed. The staff member obtaining the clarifying information will make a notation in the student record and date and initial the notation.

5. For those still missing required information, refer to Appendix A, "Process for Notifying Students of Health History & Immunization Requirements."

### **Reporting requirements for MMR and Meningococcal Information/Immunization:**

1. New York Public Health Law mandates that each institution shall report annually to the Commissioner of Health, on forms provided by the commissioner, concerning compliance with immunization requirements. At SUNY Cortland it is the College Physician or his/her designee who completes the "Post-Secondary Institution Immunization Summary" form and submits it by the deadline per NYS DOH as of fall 2010. At this time New York State only requests annual statistics related to MMR compliance.

### **VACCINES RECOMMENDED BY SUNY CORTLAND:**

SUNY Cortland encourages students to comply with current vaccine recommendations as suggested by the American College Health Association (ACHA) and the Advisory Committee on Immunization Practices (ACIP). These recommendations are made to provide protection to the campus community as well as to individual students.

SUNY Cortland has designated the Student Health Service as the campus office responsible for reviewing these recommendations and incorporating the appropriate recommendations into its "Required Health History and Immunization Form" and tracking students' compliance with the recommendations. The currently recommended immunizations, for those at risk, are: Hepatitis A, Hepatitis B, Influenza, Tdap, Tetanus-Diphtheria, Meningococcal, Polio and Varicella.

### **Requirements for Proof of Immunity against Hepatitis A, Hepatitis B, Influenza, Tdap, Tetanus-Diphtheria, Varicella and Polio:**

Requirements for proof of immunity are outlined in the attached "Summary of Recommendations for Adult Immunization", adapted from ACIP. The ACHA and ACIP also support New York State's immunization requirements for MMR and meningococcal disease.

SUNY Cortland also accepts:

1. Clinician documentation of disease and/or serologic evidence as defined under "certificate of immunity" for Measles, Mumps and Rubella, as proof of immunity against Varicella.
2. Serologic evidence as defined under "definitions" for Measles, Mumps and Rubella, as proof of immunity against Hepatitis A and Hepatitis B.

### **Recommended Tuberculin Skin Testing:**

Although not a vaccination, SUNY Cortland strongly encourages tuberculosis skin testing for students at high risk of tuberculosis exposure and/or development of active tuberculosis disease. It also requires foreign born students from areas that have a high TB incidence or prevalence to have a tuberculosis skin test (i.e.: Asia, Africa, Latin America, Eastern Europe, and Russia).

### **Requirements for Tuberculosis Skin Testing:**

SUNY Cortland uses the Center for Disease Control and Prevention's definition of "high risk" to define those students who should receive a tuberculin skin test. It requests that clinicians refer to the CDC website at [www.cdc.gov](http://www.cdc.gov) for clarification, if needed. Foreign born students as described above are also required to have a skin test for tuberculosis.

Clinicians are asked to check a box stating students are not at high risk if a tuberculin skin test is not done.

Students who are tested should have a Mantoux test placed. The amount of induration is to be recorded. SUNY Cortland uses CDC guidelines to determine if a student's test is positive or negative. See attached ACHA/CDC Guidelines.

Any student with a positive tuberculin skin test will be required to provide the results of a chest x-ray taken after the date of the positive tuberculin test.

### **Procedures followed at SUNY Cortland to bring students into compliance with immunizations that are recommended or suggested, but not required:**

1. Upon acceptance and payment of deposit, ALL students (under-graduate and graduate), attending classes at SUNY Cortland are sent an e-mail advising students to download and complete a "Required Health History and Immunization Form" from the Admissions Office. This form lists required and recommended vaccines. The "Immunization Requirements" page of the "Required Health History and Immunization Form" is to be completed by either the student or a parent/guardian for underage students and health care providers. Once completed, the "Required Health History and Immunization Form" is to be returned to the Student Health Service for review and any necessary action.
2. "Required Health History and Immunization Forms" or other acceptable "Certificates of Immunization" returned to the Student Health Service are date stamped, hole punched and placed in the student's medical record housed at the Student Health Service.
3. The student's medical record is then given to a Student Health Service RN or clinical staff member.
  - a) Those records that satisfactorily meet the requirements for Hepatitis A, Hepatitis B, Tdap, Tetanus-Diphtheria, Meningococcal, Polio and Varicella immunizations as well as tuberculosis skin testing as outlined under "Requirements for Immunity" is appropriately marked by the reviewer and given back to the secretarial staff to enter

into the College's computer system. Once entered into the Student Health Service database, the secretarial staff makes a note on the medical record cover and files the record in the active students file.

Influenza immunization is suggested each year. If proof of immunization from an outside clinician is provided; the hard copy will be placed in the student's medical record. However, no entry will be made into the student's computerized record. No computer entry will be made except as required into the NYSIS system. Students receiving influenza vaccination at SHS will have their record kept in a separate folder that is arranged alphabetically.

- b) Those students whose immunization records are missing suggested immunization or tuberculosis information are sent a letter requesting the missing information. Missing information is noted on the Health Information/Immunization Review Flow Sheet. The information that is available is entered into the College's computer system by the secretarial staff and duly noted by them on the medical record cover. The medical record is then placed in the active students file.
  - c) Students with acceptable medical or religious exemptions to immunizations are noted by the reviewer, entered into the College's computer system by the Secretaries who note that entry on the medical record cover and then file the record in the active students file. Those students are kept on an exemption list to be notified in the case of a vaccine preventable communicable disease outbreak on campus.
  - d) Any chart that a reviewer has questions about will be given to the Student Health Service physician for review and final disposition.
4. When missing immunization information is returned to the Student Health Service, the same steps as outlined in #1-3, under "Procedures..." above are repeated.
- a) Unlike MMR and meningococcal information, no repeated requests will be made for the missing information, except for those students who lack tuberculosis information and are at high risk.
  - b) At the discretion of the reviewer, a telephone call may be made at any time to the student/parent/guardian or a health care clinician to help clarify the information provided or the information that is still needed. The staff member obtaining the clarifying information will make a notation in the student record and date and initial the notation.

### **Reporting requirements for recommended vaccines:**

Currently there are no New York State or SUNY requirements for reporting compliance with recommended vaccines. However, as this information is recorded on the Student Health Service database, that information is available, should it ever be required.

**COMMUNICABLE DISEASE REPORTING:**

SUNY Cortland will comply with New York State requirements related to the reporting of communicable diseases. These requirements can be found in New York State Sanitary Code 10NYCRR2.10a. SUNY Cortland has designated the Student Health Service as the campus office charged with reporting any infectious disease outbreak to the local county health department.

Also refer to the College’s Emergency Infection Control Plan.

**CONFIDENTIALITY OF IMMUNIZATION RECORDS:**

SUNY Cortland considers immunization information to be part of the student’s medical record. Therefore, immunization information is kept confidential. Please refer to the SUNY Cortland Student Health Service standards related to clinical records and to its policy on confidentiality.

**RETENTION OF IMMUNIZATION RECORDS:**

1. Currently SUNY Cortland keeps both a hard copy and a Banner computer record of a student’s immunization record. Hard copy records are destroyed seven years after the student leaves the college. The Banner computer record is kept for ten years after the student leaves the college.

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Revised: 10/09, 7/11, 3/12, 10/12  
Signature \_\_\_\_\_

Reviewed (Signature/Date):  
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