

**Administrative Procedures for Immunizations and Communicable Diseases**  
(Attachment for Policy No. 203)

**Purpose**

In accordance with Policy 203 - Immunizations and Communicable Diseases and to ensure that school children are immunized against diseases which spread easily in schools and interrupt school life and learning for individuals and groups, the School District of Philadelphia (“District”) has developed the following administrative procedures.

The goal of these procedures is to ensure that students have the immunizations required for school attendance by Pennsylvania law and to reduce the risk of communicable diseases within our schools. The procedures are designed to promote school health and safety and to minimize the possible risk of vaccine-preventable outbreaks and communicable disease spread.

**Definitions**

For purposes of these procedures, terms are defined as follows:

**Certificate of immunization:** Official document signed by the health care provider, public health official or school physician, school nurse, or a designee that shows proof of full immunization.

**Communicable disease:** An infectious disease that can be spread from one person to another through direct or indirect contact.

**Immunization:** Administration of a vaccine.

**Medical certificate (also called the red and white card or the medical plan):** Documentation from a physician, certified registered nurse practitioner, physician assistant, or public health official setting out the immunization plan for a student who is not fully immunized, and given to a school as proof that the student is scheduled to complete the required immunizations.

**Provisional admission:** Temporary admission of a student who is not compliant with the immunization requirements or does not have documentation of compliance with the immunization requirements. This admission can become permanent given proof of immunization is provided within the required timeframe.

**Record of immunization:** A written document showing the date of immunization—such as, baby book, Health Passport, other states' official immunization documents, International Health Certificate, immigration records, physician record, school health records, and other similar documents or history.

**Reportable communicable diseases:** Diseases and conditions that must be reported by the Principal or designee to the Department of Public Health.

## **Procedures**

The Pennsylvania Department of Education and the Pennsylvania Department of Health require all school-age students to receive the state-mandated immunizations to enroll or attend a public school.

### **Parent/Guardian Responsibility**

Unless a religious, philosophical, or medical exemption applies or the child is eligible for provisional admission and is approved as set forth below, Pennsylvania law requires parents/guardians to provide records that indicate their child has been immunized against certain diseases to attend school. On or before the first day of school, the parent or guardian must provide a certificate/record of immunizations for their children showing the immunizations received to date.

### **Immunization Rules for Admission**

Any student that is non-compliant with the state-mandated vaccinations will be excluded from school on the first day of school. The “Immunization Rules for Admission,” as outlined below, explain the groups of students that can start school. Any student who does not fall into one of these categories will be excluded.

1. **Fully Compliant** - The student’s record is fully compliant with all state required immunizations to attend school.
  - a. The student has received all vaccinations that are required for school attendance as reflected on the student’s record.
  - b. Proof was presented either by the parent submitting a fully compliant immunization record or a matching record was found in PhilaVax or PA SIIS.
2. **Current Medical Exemption** - The student’s record reflects a [current medical exemption signed](#)<sup>1</sup> by the student’s medical doctor stating that the immunization may be detrimental to the health of the student.
  - a. Medical exemptions may expire according to the doctor’s instructions on the medical exemption.
  - b. If a medical exemption expires, the student’s exclusion date is the next day, unless another basis for exemption exists.
3. **Religious or Philosophical Exemption** - The student’s record reflects a [religious or philosophical exemption signed](#) by the student’s guardian that states they will not vaccinate their child with the missing immunizations required for school attendance due to a religious, philosophical, or strong moral belief.

### ***Exemption Requests***

Requests for religious, philosophical, or medical exemptions must be provided annually using a District exemption form, available on [Student Health Services’ Immunizations webpage](#), to the

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<sup>1</sup> The exemption form on Student Health Services’ Immunizations webpage is available at <https://www.philasd.org/vax>

school nurse. Requests for medical exemptions must be signed by a licensed health care provider stating that immunization may be detrimental to the life or health of the child.

The District may exclude from school any student who is not properly immunized during an outbreak of a communicable disease against which the student has not been immunized regardless of an otherwise applicable exemption.

#### Immunization Rules for *Provisional Admission*

1. **Subsequent Dose Needed** - The student has received at least one dose of a multiple dose vaccine series required by Pennsylvania law and either (i) the student will receive the final dose of the multiple vaccine series within five days of the child's first day of attendance, or (ii) the student will receive the next scheduled dose within five days of the child's first day of attendance, or (iii) the additional required doses are not due until after the five days of the child's first day of attendance. If the required vaccine is not medically appropriate to be given within the first five days of school, a medical certificate is needed within the first five days of school outlining the plan to receive the required vaccine(s). The school nurse shall enter the date of the doctor's appointment as the provisional expiration date.
  - a. The student must submit evidence of obtaining the missing immunizations on the scheduled date or the provisional status will expire, and the student's exclusion date will be the next school day.
2. **Students Experiencing Homelessness** - School may admit a student who is experiencing homelessness as defined by the McKinney-Vento Act even if the student has not been immunized or cannot provide records due to experiencing homelessness.
3. **Students New to the District** - School may admit, for up to 30 calendar days from the student's date of enrollment, a student who is transferring into the District.
  - a. Students transferring from charter schools, private schools, and other school districts qualify as new students to the District.
4. **Students in Foster Care** - School may admit a student who is in foster care who has not been immunized or cannot provide immunization records. Students have up to 30 calendar days to provide records evidencing compliance with the immunization requirements.

#### Notification of Immunization Requirements

Immunization requirements for each grade shall be posted on the Office of Student Health Services' website. The Office of Student Health Services and school nurses shall notify families of rising seventh and twelfth graders of immunization requirements for those grades.

#### Immunization Compliance Monitoring

Principals are responsible for creating an immunization monitoring protocol within the school. Schools shall follow the below exclusion process for students who are not compliant with the immunization requirements.

## Student Exclusion Process

Students who do not qualify for provisional admission must be excluded from school. The District requires school principals to implement the “Student Exclusion Process” starting on the first day of school and every school day thereafter until all students are following the state’s school-age vaccination laws. The purpose of the Student Exclusion Process is to protect children and school communities from contagious diseases; therefore all schools shall implement the following actions for non-compliant students:

- **Prohibit Building Access:** Principals are required to prohibit any student that is non-compliant from entering a District building at any time. Excluded students may not participate in face-to-face or virtual instruction, extracurricular activities, sports, cheerleading, before and after school programming, tutoring, assessments, events, or any other activity taking place on District property.
- **Mark Unexcused Absence Leading to Truancy Consequences:** Excluded students will be marked as “unexcused absence” daily until the student is compliant with the immunization requirement. Continued unexcused absences will trigger the [truancy process](#).<sup>2</sup> Parents will be informed of the consequences related to truancy.

## *Staff Roles and Responsibilities*

1. **School nurses** are the primary contact to support families in obtaining the required vaccinations. Specifically, school nurses will:
  - a. Enter student immunization records in the SIS;
  - b. Upload all forms in the SIS Document screen, for example, immunization records, exemption form, provisional medical plans, etc.;
  - c. Confirm the student’s compliance status;
  - d. Notify parent/guardian that student is excluded and must be picked up from school;
  - e. Document outreach attempts for students that continue to be excluded in the SIS Contact Log;
  - f. Assist and support families with making appointments and finding resources; and
  - g. Support the principal as requested with the student exclusion process.
2. **School principals** are the primary enforcer of the state’s school-age immunization law in the school building. Principals play a vital role in the diligent execution of this process. Specifically, principals will:
  - a. Implement the student exclusion process starting on the first day of school and every school day thereafter until all students are in compliance with the state’s school-age vaccination laws,
  - b. Implement internal procedures to ensure that the student exclusion process is completed with fidelity within the school building,
  - c. Prohibit building access for any student that does not have up-to-date school-age immunizations,
  - d. Ensure only parents/guardians or the emergency contact of non-compliant students are called to pick up their child, and
  - e. Designate school staff to follow-up and support families that are excluded.

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<sup>2</sup> Information about the District’s truancy process is available on the Office of Attendance and Truancy’s webpage, available at <https://www.philasd.org/studentrights/programsservices/attendance-truancy/>

3. **The Office of Student Health Services** serves as the central office support for schools. Specifically, Student Health Services will:
  - a. Provide immunization training to school nurses.
  - b. Provide technical support to school principals and school nurses with the student exclusion process.
  - c. Monitor schools for completion of the student exclusion process.
  - d. During the summer:
    1. Enter student immunization records in the SIS;
    2. Upload all forms in the SIS Document screen, such as immunization records, exemption form, provisional medical plans, etc.; and
    3. Confirm the student's compliance status and notify parents/guardians.
  - e. Run non-compliance reports to identify trends in non-compliance.
  - f. Partner with community health providers to host vaccination initiatives, using trends from non-compliance reports to inform their location and design.
4. **Assistant Superintendents** provide oversight of the student exclusion process in their network, including:
  - a. Working with principals to overcome operational difficulties and
  - b. Reviewing the weekly exclusion report sent from the Central Office.
5. **Attendance Designees** will support accurate recording of student daily attendance in collaboration with the principal, school nurse, and classroom teacher.

### *School Exclusion Steps*

#### **Step 1: Run non-compliance report**

Prior to the start of school, the principal will designate a suitable space in the building for excluded students to wait until their parent/guardian picks them up ("Designated Space").

Starting on the first day of school, the principal will print the report called, "[Students Eligible for Exclusion](#)"<sup>3</sup> from the SIS (page 6 of the stepper only). The report lists all students who have not submitted proof of compliance with the immunization requirement. A new list should be pulled every morning for the most accurate information.

#### **Step 2: Prohibit access to academic programming**

Principal will designate one or more staff, who will bring all students on the "Students Eligible for Exclusion" list to the Designated Space.

Note: Philadelphia Virtual Academy ("PVA") staff shall discontinue student access to the online instructional access as well as building access.

#### **Step 3: Verify non-compliance**

After the student is in the Designated Space, the school nurse must verify the student is non-compliant, including by searching PhilaVax.

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<sup>3</sup> The Students Eligible Exclusion document is available at <https://drive.google.com/file/d/1JZ2DQl6XwxQUNCsmjk3OL65Wsy9CmDt8/view>

- A. Compliant students shall be sent back to class. Attendance will be updated to reflect present for these students.

Note: The principal will put a process in place to update attendance to reflect present for these students. The teacher may have marked the student absent. The attendance designee or person with access to attendance in the SIS may need to change the attendance to present.

- B. Non-compliant students shall remain in the designated space and not have access to the academic program until picked up by a parent/guardian or emergency contact.

Note: The principal will put a process in place to update attendance to reflect unexcused absences for these students. The teacher may have already marked the student present. The attendance designee or person with access to attendance in the SIS may need to change the attendance to unexcused absent.

#### **Step 4: Call parent/guardian to pick up student**

Call the parent/guardian to come pick up their child immediately. If the parent/guardian does not respond, call all the emergency contacts until someone is reached to pick up the student from school immediately.

#### **Step 5: Communicate with the parent/guardian or emergency contact when they arrive**

Encourage the parent to take their child the same day to their primary care physician or one of the City's [Federally Qualified Health Centers](#)<sup>4</sup> ("FQHC") to receive the immunization. Walk-ins are accepted at the [City's Health Clinics](#).<sup>5</sup>

Inform the parent/guardian that the student will not be allowed to attend school until up-to-date immunizations are received.

#### **Step 6: Continue outreach to the family**

The principal and nurse must provide the support needed for families to quickly return to school. Principals and nurses should utilize the support of others currently working with students, such as the student's IEP team, case manager, BCAs, etc. The principal and/or nurse should call families, discuss their barriers, and provide solutions to barriers as described on the [District's immunization website](#).<sup>6</sup>

#### **Step 7: Follow truancy protocol**

Continued unexcused absences will trigger the [truancy process](#). Parents will be informed of the consequences related to truancy.

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<sup>4</sup> A list of the City's FQHCs is available at <https://vax.phila.gov/index.php/resources/federally-qualified-health-centers/>

<sup>5</sup> A list of the City's Health Clinics is available at <https://www.phila.gov/services/mental-physical-health/city-health-centers/>

<sup>6</sup> The District's immunization webpage is available at [www.philasd.org/vax](http://www.philasd.org/vax)

**Step 8: Returning students back to school**

When the parent/guardian submits an up-to-date immunization record and the nurse reviews the record and accepts it as up-to-date, the student can return to school and attend class as normal.

**Step 9: Excluded students that continue returning to school**

If an excluded student returns to school at any time prior to submitting an up-to-date immunization, then the student exclusion process begins again for the student and is repeated daily until the parent/guardian complies.

**Communicable Diseases**

The control of communicable diseases is a function of the State and City Departments of Health, governed by State laws and Philadelphia Department of Public Health (“PDPH”) regulations. The District is a key partner in this effort.

***General Notification Requirements***

When the District learns of a reportable communicable disease in a member of the school community, PDPH must be notified. Such notice shall occur at the earliest possible opportunity during normal school/business hours unless immediate notification outside normal school hours is required, as set forth below.

When an employee receives information regarding a communicable disease concern, regardless of the source, the employee shall notify the school nurse immediately and if the school nurse is not available shall notify the principal. The school nurse shall notify PDPH, the principal, and Student Health Services immediately. If Student Health Services becomes aware of the concern first, it shall notify PDPH, the school principal, the school nurse, the Office of Communications, and the Chief of Student Support Services.

The school nurse will gather all relevant information regarding the student’s current location, onset of symptoms, student’s last day of attendance, and other relevant information regarding possible contact with the student and the illness and relay that information to PDPH and Student Health Services. Confidentiality regarding the identity of the student with the communicable disease being reported shall be maintained at all times by all parties.

The District and schools shall follow the guidance of PDPH regarding any action to take in response to the communicable disease concern, including any decisions on dismissal or closing of schools.

***Immediate Notification Outside of Normal School Hours Requirements***

There are a small number of special situations which require immediate sharing of information between the District and PDPH during evenings, weekends, and holidays. These special situations are:

- Any unexpected death of a student from a reportable communicable disease;
- Any case of meningococcal disease or measles; and

- Any cluster of a severe communicable disease (e.g., invasive diseases).

The District shall follow the protocol outlined in PDPH's [Guidelines for the Control of Communicable Diseases among School Children](#) (the “Yellow Book”).<sup>7</sup>

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<sup>7</sup> PDPH's *Guidelines for the Control of Communicable Diseases among School Children* (the “Yellow Book”) is available at <https://hip.phila.gov/DiseaseControlGuidance/SchoolsChildcare>