

Frequently Asked Questions about Compliance with Immunization Requirements for General First-Year Students in Higher Education Institutions

1. A student is subject to the state Department of Health immunization requirements if:

- a. Student is a new enrollee in a higher education institution that has over 200 students, **and**
- b. Student enrolled for the number of hours the school classifies as full time (e.g., 12 semester hours for an undergraduate), **and**
- c. Student is **not** a full time distance learning student.

2. A student may meet with the state requirement for vaccination against measles, mumps and rubella (MMR) in the following ways:

- a. **Born before 1957 (exempt from requirement)**
- b. **Provide dates of 2 doses of MMR vaccine** (both given after the first birthday)
 - o Note: most adults born in the 1960s through 1980s who never went to college only had only 1 dose of vaccine (because 2 doses were not recommended till 1989). They are not exempted from requirements because they are, in fact, the people likely to get infected because they were never optimally immunized (2 of the 3 cases of measles in TN in 2011 were in business-persons born in the 1960s).
 - o If a student or the family cannot obtain written documentation, then re-vaccination is recommended by the CDC. This is safe and is a standard recommendation.
 - o The regulation does not provide for schools to presume a student had vaccine just because the student attended a Tennessee primary or secondary school.
- c. **Provide a blood test showing immunity from all 3 viruses** (measles, mumps and rubella)
 - o Note: we don't generally encourage blood testing because of the cost and limitations of the test. It is not uncommon for someone who was properly vaccinated as a child to have a negative blood test on one of the three viruses (and in that case, 2 documented doses of vaccine would be required anyway). CDC advises that the more reliable indicator of protection for these diseases is having 2 documented doses of vaccine, not the test.
- d. **Exemption due to medical** (exempted by a medical doctor or health department only) **or religious reasons** (student signs statement that vaccination conflicts with his or her religious tenets or practices).

3. A student may meet the state requirement for immunity to chickenpox in the following ways:

- a. **Born before 1980 (exempt from requirement)**. No further action needed.
- b. **Born in 1980 or more recently AND give a credible history of chickenpox illness to a qualified healthcare provider.**
 - o Note: MOST adults will have this history.
 - o No documentation of the original illness or diagnosis is required

- No specific dates or records of illness are needed
 - Any qualified healthcare provider may sign a statement that he or she believes the student's reported illness is credible (believable). This includes any licensed physician, advanced practice nurse, physician assistant or local health department.
 - All the student has to do is tell the healthcare provider they had the illness, describe what they or their parent recalls of it, and if the provider believes them, then the provider can sign the form saying that, in their opinion, they believe the student had chickenpox.
 - A blood test should **only** be done if the healthcare provider does not think the student's report is consistent with chickenpox or if no one in the family can recall for sure. For example, neither the student nor their family can recall them having chickenpox (this is common in immigrants from tropical climates where chickenpox is not something that all children get the way they used to here).
 - The CDC recommends the acceptance of a verbal history of chickenpox because the illness was nearly universal, classically memorable and because it is impractical and wasteful to do blood tests on everyone. Positive blood test results are highly correlated with a recollection of typical illness; thus, the blood test is reserved only for those for whom no one can recall typical illness or for those who need to be absolutely sure (such as healthcare workers) because of their work.
 - The Tennessee Department of Health has accepted this history of illness as proof of chickenpox immunity since 2000 for all younger students, starting in daycare.
- c. **Born in 1980 or later AND has had 2 doses of vaccine**, both given after the first birthday (dates required)
- Note: Many students vaccinated as children may have gotten only 1 dose and need a second dose: those with only 1 dose are more likely to develop mild (but contagious) illness if exposed to chickenpox and be sources of spreading disease in an outbreak. 1dose of vaccine was required for Kindergarten in Tennessee beginning in 2000, but 2 doses were not recommended by the CDC until 2006 and not required in Tennessee (at Kindergarten and 7th grade) until 2010.
 - Immunization regulations in Tennessee do not allow for presuming that a student without any records of immunization actually had specific immunizations just because he or she attended a Tennessee school. In accordance with guidelines published by the CDC, those without any records of vaccine or history of disease are presumed to need vaccination.
 - Blood tests should not be done on students who have had the vaccine (but not chickenpox illness) because the blood test (serology) is reliably positive only if the student has had wild disease: results for vaccinated students will often be a false negative, due to limitations of the test.
- d. **Born in 1980 or later AND positive blood test** (IgG serology) for chickenpox (varicella)

- As noted above, blood tests are reasonable only when the student and the family have no reliable recollection of chickenpox illness. The blood test will often be negative if the student was vaccinated but never had disease. The blood test is unnecessary if the student or family recalls having had typical illness.
- e. **Exemption due to medical** (exempted by a medical doctor or health department only) **or religious reasons** (student signs statement that vaccination conflicts with his or her religious tenets or practices).

4. Where a student may obtain vaccinations:

- Personal healthcare provider
 - Affordable Care Act (ACA, Healthcare Reform) is phasing in a requirement that private insurance cover all recommended vaccines, when needed, without deductible or co-pay. Many more young adult students may be insured under a parent's insurance plan.
- Immunizing pharmacist
 - Those who stock the vaccine can give it with a prescription and may bill insurance (places like Walgreen's now have immunizing pharmacists in nearly all stores)
- Other community immunization providers
 - Some specialty immunization providers, such as Shots, Etc. or the Shot Nurse, or clinics in retail pharmacy settings (Take Care, Little Clinic) may offer these to the public.
- Health Department
 - Health department will evaluate student's need for immunization and issue the college immunization form used by the health department. If the nurse believes the student has had chickenpox, vaccine will not be provided, but a history of disease will be checked.
 - Students with insurance coverage will have to pay up front for vaccine and the administration fee and may file their own claim with their insurer (health departments may bill TennCare but not other private plans).
 - Uninsured students may receive free vaccine (from a small federal funding source) with an administration fee that slides based upon income.
 - Health departments do not do blood testing (serology)

5. Provisions for students to start classes with incomplete immunizations:

- The state Department of Health regulations: "students may be enrolled or registered after a single dose of all required vaccines provided that the second dose is obtained within 2 months of registration, and at least 28 days after the first dose, and provided, further, that the institution has a procedure for identifying students who have failed to obtain the necessary immunizations and for taking appropriate action to ensure compliance."
 - The Department of Health considers acceptable any system that prevents the student from enrolling in a second semester or quarter without submitting necessary documentation of complete immunization, as is used to ensure students complete other required activities, such as paying bills, library fines and other required steps.