

Topic: Schools & IIS Access

Request Date: October 11, 2017

Information Requested: We are interested to know from other IIS:

1. If your jurisdiction allows schools to access the IIS:
 - a. Is access limited to school nurses or can other staff access? What is the policy?
 - b. Are viewable students added by and limited to a roster provided by the school, or can they also search for other children?
 - c. Is there an audit process to evaluate appropriate access to records? Please describe.
2. If your jurisdiction allows child caring facilities to access the IIS, is access limited to a specific role or number of users? What is the policy?
 - a. Is there an audit process to evaluate appropriate access to records? Please describe
 - b. Did you complete a risk assessment or similar activity for child care access? If so, can you share?

Requesting Member: Jude Alden (WY)

Responding Member(s): Nancy Sharova (CT) Kim Tichy (IA), Teri Nicholson (IL), Patricia Swartz (MD), Miriam Muscoplat (MN), Becky Pearsall (TN)

Results:

CT:

1. Yes
 - a. Yes, School Nurses are allowed 'read-only' access to the IIS. It is limited to school nurses and this was written into our state regulations (see amendment below). We used AIRA to query other states and many allowed read-only access to view and print. Note: School Based Health Center nurses are allowed 'read-write' access because they are vaccinating children.
 - b. They can search for any child as long as they have the 3 required fields to conduct the search (usually first name, last name or mother's maiden name, and DOB.) We are in the process of moving to a new IIS which will include a roster feature.
 - c. Each user must sign a user agreement before receiving their username and password. We can audit when users log in or haven't logged in (in case we need to deactivate them.) Users must complete 3 required fields in order to search for a child.
2. CT regulations do not allow child care facilities to access the IIS directly.

State Regulations Amendment to add School Nurse access:

Sec. 4. Subsections (b) and (c) of section 19a-7h of the general statutes are repealed and the following is substituted in lieu thereof (Effective October 1, 2014):

(b) For purposes of this section, "health care provider" means a person who has direct or supervisory responsibility for the delivery of immunization including licensed physicians, nurse practitioners, nurse midwives, physician assistants and nurses. Each health care provider who has provided health care to a child listed in the registry shall report to the commissioner, or the commissioner's designee, sufficient information to identify the child and the name and date of each vaccine dose given to that child or when appropriate, contraindications or exemptions to administration of each vaccine dose. Reports shall be made by such means determined by the commissioner to result in timely reporting. Each health care provider intending to administer vaccines to any child listed on the registry and each parent or guardian of such child shall be provided current information as contained in the registry on the immunization status of the child for the purposes of determining whether additional doses of recommended routine childhood immunizations are needed, or to officially document immunization status to meet state day care or school immunization entry requirements pursuant to sections 10-204a, 19a-79 and 19a-87b and regulations adopted thereunder. Each director of health of any town, city or health district and each school nurse who is required to verify the immunization status for children enrolled in prekindergarten to grade twelve, inclusive, at a public or private school in any town, city or school district pursuant to section 10-204a shall be provided with sufficient information on the children who live in his or her jurisdiction and who are listed on the registry to enable determination of which children are overdue for scheduled immunizations and to enable provision of outreach to assist in getting each such child vaccinated.

(c) Except as specified in subsections (a) and (b) of this section, all personal information including vaccination status and dates of vaccination of individuals shall be confidential pursuant to section 19a-25 and shall not be further disclosed without the authorization of the child or the child's legal guardian. The commissioner shall adopt regulations, pursuant to chapter 54, to specify how information on vaccinations or exemptions from vaccination is reported in a timely manner to the registry, how information on the registry is made available to health care providers, parents or guardians, directors of health, and school nurses, how parents or guardians may decline their child's enrollment in the registry, and to otherwise implement the provisions of this section.

<http://www.cga.ct.gov/2014/amd/H/2014HB-05537-R00HA-AMD.htm>

IA:

- Iowa allows schools to access the IIS as view-only. We do not have a policy stating what level of credential an IRIS user must be, as long as the person signs the IRIS Site Enrollment Form and abides by the Confidentiality Policy.
- Users have access to search the entire IIS.
- Iowa's database allows for detailed audit history of searches conducted by users. This is generally not employed unless there is a suspected concern or violation of the Confidentiality Policy. Iowa has terminated user access when the use violated the user agreement and confidentiality policy, but this was for a clinical user not a school user.
- Iowa does not allow child care facilities to enroll or access the IIS.

IL:

1. Yes
 - a. Mostly school nurses, and if the school does not have a nurse, we allow the attendance officer or whomever is responsible for validating school physicals. They are granted view only access and cannot add, edit or delete information.
 - b. They can search for other children.
 - c. They need to obtain proper consent from the parent or guardians.
2. It is view only access.
 - a. Same process for schools
 - b. No.

MD:

1. Yes, schools are allowed to access our IIS.
 - a. School nurses are given read only access.
 - b. They can search for other children, not just the ones in their school roster.
 - c. We're not sure what you mean by audit process; we can pull up logs on the back-end on who's accessing what, but if you mean check each school periodically for current employees/users, then no, we do not have that process in place at this time.
2. There are only a handful of child care facilities with access to our IIS, and one or two users per facility.
 - a. We're not sure what you mean by audit process; we can pull up logs on the back-end on who's accessing what, but if you mean check each school periodically for current employees/users, then no, we do not have that process in place at this time.
 - b. Risk assessments have not been completed at this time.

MN:

1. Yes
 - a. MN Law (MN statute 144.3351) allows for schools to access data, so is not limited to specific role within school. Most of those who access are school nurses.

- b. MIIC Data Use Agreement indicates that users will only look up clients they are “providing services on behalf of” without consent.
 - c. We don’t have an audit process.
- 2. We do allow licensed childcare centers to access MIIC directly, but not in-home centers. We had additional security concerns with in home centers. However, in-home centers are still covered under the data sharing law (same as cited above), so we do work with them to get the immunization information on their enrollees when requested. They are not limited to a specific role, though the majority have a read-only role.
 - a. We don’t have an audit process.
 - b. No specific risk assessment was completed.

TN:

- 1. Yes
 - a. We allow school administrative staff to access TennIIS in addition to school nurses. Administrative staff are only allowed view access for immunizations at this time. Most school nurses also have view access for immunizations, but some nurses have expanded access which allows them to enter vaccine data. All school users can view and also edit demographic data. Only school nurses with expanded access can add new patients.
 - b. School users can view all patients in TennIIS.
 - c. There is no routine audit process in place. If needed, we could run the TennIIS Patient Queries report or Patient Changes report for an individual patient to investigate user access to the patient record.
- 2. We allow child care facility staff to access TennIIS. They are only allowed view access for immunizations, but can view and also edit demographic data. We do not limit access to specific roles or limit the number of users per facility.
 - a. There is no routine audit process in place. If needed, we could run the TennIIS Patient Queries report or Patient Changes report for an individual patient to investigate user access to the patient record.
 - b. We have not completed a risk assessment or similar activity for child care access.