



Office of the
Washington
State Auditor
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PERFORMANCE AUDIT

Report Highlights

Common Barriers to Compliance with Student Immunization Requirements

To help limit the spread of vaccine-preventable diseases, Washington has set a public policy goal of a 95 percent immunization rate. Medical professionals often refer to this level of protection against disease as “herd immunity.” State law makes it clear that schools play an essential role in helping achieve that goal. Schools must collect proof of immunization or a valid exemption for every student on or before the first day of school. Without these records, schools are not supposed to allow students to attend school. Furthermore, schools must report their data to the Washington Department of Health (DOH).

This audit looked at eight school districts, four with high vaccination compliance rates and four with low rates.



Learn about actions schools and districts can take to improve vaccination compliance in [this booklet](#) of resources drawn from the audit.

Washington does not know its true vaccination rate

The audit looked at DOH data for the state’s 295 school districts for the 2017-2018 school year. In that year, immunization data for schools in 29 districts either was not included in the database or showed they had zero kindergarten enrollment. Student enrollment data from the Office of Superintendent of Public Instruction shows that most of these districts do in fact have kindergarteners enrolled.

Of the schools whose data was included in the database, 8 percent of all kindergarteners lacked complete immunization or exemption records. But because of the number of districts and schools whose data is missing, the actual percentage of kindergarteners without records may be greater.

Some principals chose not to exclude out-of-compliance students from school

State law makes school principals or someone they designate responsible for obtaining immunization records from their students. Principals must exclude students from school when their parents fail to provide one of the acceptable proofs of immunity. We found school principals in the four low-compliance districts chose not to exclude out-of-compliance students because they felt other considerations outweighed the requirement they exclude these students.

Schools that actively engaged parents produced higher document compliance rates than schools that did not engage to the same degree

Schools with high compliance rates ensured parents are aware of legal requirements related to vaccination documentation, all of the ways to comply with those laws, and the consequences of noncompliance. They communicated this information to parents well before the new school year and continued year round. These schools had dedicated staff with clear roles and responsibilities who monitored students' progress and kept administrators focused on the topic.

Schools with lower compliance rates generally did not use these strategies to the same degree. In some cases, schools gave parents incomplete information, and did not follow up on conditional-status students to the same degree. Training for school staff was inadequate. Finally, they had an insufficient number of school or district staff to complete immunization compliance duties.

Schools also helped parents address barriers to vaccination

School districts also reported a variety of barriers to vaccination. These issues included limited access to vaccination resources, parents who choose not to vaccinate their children or vaccinate on a delayed schedule, and language barriers that contribute to poor understanding of immunization requirements. Schools are not the cause of these barriers, but in several areas, staff reported being able to help parents overcome barriers and to positively influence vaccination outcomes.

State Auditor's Conclusions

To help limit outbreaks of vaccine-preventable diseases, such as measles, Washington has set a public health policy goal of a 95 percent immunization rate. This level of protection against disease is often referred to as "herd immunity." Schools play an essential role in reaching this goal: they are required by law to collect proof of immunization or a valid exemption for every student on or before the first day of school. Without these records, schools are not supposed to allow students to attend school.

However, the immunization data held by the Washington Department of Health (DOH) shows not all schools in the state are following the law. In addition to the difficulty some districts have in collecting vaccination records, there are other districts that aren't included in the immunization data compiled by DOH. Because of this, the state's true immunization rate is not known.

This audit found several school districts in Washington have succeeded in complying with state law using practices that are clear, effective and simple: clearly communicate the rules to parents, pay attention to whether they comply, and enforce the law when necessary. Additionally, DOH offers a robust set of materials to assist schools in this area.

Right now, the burden of ensuring school administrators comply with the law rests with superintendents and elected school boards. However, if schools, school districts and local leaders do not make immunization compliance a priority, state leaders might consider enacting a statewide accountability system to enforce the rules and help meet the goal of herd immunity.

Recommendations

We consider the audit results so broadly applicable that it is in the state's best interest for every school and district to undertake any relevant and repeatable good practices reported by districts that participated directly in the audit. We recommend school authorities make parents aware of legal requirements related to vaccination documentation, all of the ways to comply, and the consequences of noncompliance. Provide this information in languages other than English when appropriate. Ensure staff understand their roles and responsibilities related to immunization compliance and monitoring. Exclude out-of-compliance students as the law requires. Finally, we recommend districts hold schools accountable for following the law.