

REGULATORY AMENDMENTS UNDER THE IMMUNIZATION OF SCHOOL PUPILS ACT (ISPA)

FAQS FOR SCHOOL BOARDS

Regulatory Amendments under the ISPA – Implications for School Boards

Q1: What is the Immunization of School Pupils Act (ISPA)?

A1: Ontario's Immunization of School Pupils Act (ISPA) requires that parents of children attending primary or secondary school provide their local medical officer of health with proof of their child's immunization against designated diseases.

Public Health Units (PHUs) assess immunization coverage and contact parents of students for whom they do not have complete immunization records.

Exemptions from immunization requirements are allowed for medical reasons (i.e., prior immunity or medical contraindication) or based on an affidavit of conscience or religious belief.

Children for whom the PHU does not have required immunization records or a valid exemption may be temporarily suspended from school.

Q2: What is Regulation 645 under the ISPA, and how will the 2013 amendments affect schools/school boards?

A2: Regulation 645 sets out the standard list of personal information (student data elements) that schools/school boards are required to disclose in reports made to their PHUs (only if the schools/school boards already collect and maintain that personal information). The Ministry of Education and the Ministry of Health and Long-Term Care (MOHLTC) have worked hard to ensure that schools/school boards disclose the same information to every PHU and that the personal information requested by PHUs is similar to the information reported to the Ministry of Education through the Ontario School Information System (OnSIS).

The amendments to Regulation 645 were made in consultation with the Office of the Information and Privacy Commissioner (IPC) and the IPC has approved the disclosure of the personal information by schools/school boards and its collection by the PHUs.

The amendments to Regulation 645 were intended to provide certainty to schools/school boards of their authority to disclose the information specified in Regulation 645 to the PHUs, reduce the administrative burden to schools/school boards as they assist with the administration of the ISPA and result in fewer students being suspended under the ISPA.

The amendment to the regulation also updated the schedule of required immunization for school attendance effective July 1, 2014, in time for the 2014/15 school year. These updates included the addition of three new designated diseases requiring proof of immunization for school attendance. Parents will be required to provide proof of their child's immunization against meningococcal disease, pertussis, and - for children born in 2010 or later - varicella, unless they have a valid statement of exemption.

Q3: What student data elements are specified in the September 18, 2013 amendments to Regulation 645 made under the ISPA?

A3: As of September 18, 2013, all schools/school boards are required to submit reports for each pupil in the school to the medical officer of health, upon request. If the school has collected and maintains them, the report must include the following data elements specified in s. section 1.1(4) of Regulation 645:

- The pupil's full name, address and telephone number.
- If applicable, every alternate name of the pupil.
- The pupil's sex.
- The pupil's date of birth.
- The pupil's country of birth.
- The name of the school attended by the pupil and the identifying number, if any, assigned by the Ministry of Education to the school
- The pupil's school grade or class.
- The pupil's Ontario education number, if one has been assigned to the pupil.
- The full name, address and telephone number of every parent of the pupil.
- The preferred language or languages of the pupil's parents.

This means that schools have the authority to disclose the above noted information to medical officers of health, in addition to the information set out in s. 266(2.1) of the Education Act.

Q4: If a school/school board does not collect or maintain one or more of the data elements listed in Q3, for example, preferred language of a student's parent(s), will the school be required to collect the information on behalf of the PHU?

A4: No. Schools/school boards are only required to provide PHUs with student information that they ordinarily collect and maintain.

Q5: What impact will the new immunization requirements have on kindergarten classrooms where registration has already taken place?

A5: Parents should be reminded of the requirement for providing proof of their child's immunization, for example at orientation sessions or other opportunities. A parent handout has been developed for distribution and further information is also available at www.ontario.ca/vaccines.

Public health units will follow their current processes for assessing student immunization status and notifying parents of children for whom they do not have the required immunization records.

Q6: How can school boards report on student Ontario Education number (OEN) for students who have yet to be assigned an OEN number? For example, a new junior kindergarten or kindergarten student that joins mid-year. This is also the case with students from another jurisdiction as there is a time lapse between collecting the immunization information and obtaining the OEN.

A6: JK Students are assigned OENs when they start school. For those who join mid-year, the board/school assigns the OEN shortly after the student starts to attend school. The PHUs can follow up with these schools/Boards as needed to obtain the OEN if it was missing at the time the class lists were provided by the school/Board.

Q7: What if a student moves into the province or from another country after July 1, 2014 when the requirement to have proof of immunization for the 3 new diseases comes into effect?

A7: The requirement for the parent to provide the student's immunization records to the local medical officer of health applies. Proof of immunization is required for all designated diseases under the *Immunization of School Pupils Act*, including the three new ones. Schools should notify parents of these requirements upon the student's registration at the school.

Q8: Are provincial schools subject to the requirements under Regulation 645?

A8: Yes. Provincial Schools are subject to the requirements under Regulation 645.

Panorama – Implications for School Boards

Q9: What is Panorama and what impact does it have on schools/school boards?

A9: In August 2013, provincial public health care professionals began to use Panorama to support their immunization programs. This integrated system is designed to help public health respond to infectious disease outbreaks, initiate targeted and mass immunization response plans and strategies, provide a provincial immunization repository to eventually replace the paper-based "yellow card", and ensure effective and timely vaccine distribution and inventory management. Panorama is intended to be used by medical officers of health as a provincial immunization record repository focussed on schoolchildren to improve the immunization status of students. This will result in better health outcomes with fewer student illnesses from vaccine-preventable diseases, as well as reduce the number of school suspension notices being sent to parents and the number of days students are suspended from school as a result inaccurate or incomplete immunization records.

Panorama is being phased in with a first group of six public health units (PHUs) now using Panorama to record and track students' immunization records (Niagara Region, Grey Bruce, Huron County, Thunder Bay District, Oxford County and Perth District). The 18 school boards which fall within the catchment area of the first group of PHUs began submitting files containing student data using the standardized electronic process.

By the August 2014, the remaining 30 PHUs will be using Panorama as the provincial immunization record repository. The remaining school boards will also be required to submit files containing student data using the standardized electronic process by August 2014.

Q10: Will school boards have access to Panorama?

A10: No, only PHUs will have access to the Panorama integrated system.

Q11: How will the creation of student data files differ from what schools/school boards currently provide to PHUs?

A11: As Panorama is implemented, PHUs will provide school boards with the new file format required for the student data file.

This new file format will include all the new data elements outlines in the amended regulation (see Q.3), as well as the data standards to be applied to these data elements.

School boards in the PHU catchment area will be required to compile student data provided by schools and submit the rolled-up student data file to PHUs on behalf of their schools in a format specified by the PHUs. For some schools/school boards, this will be a change as at the present time, some schools create and submit the student data files directly to PHUs, whereas in other boards, the school board creates and submits student data files on behalf of all schools in their board.

Note: There may be times when student data files may need to come directly from a school rather than a school board. In these instances, a school should use the appropriate file format and a transmission method as stipulated by the PHU, with a copy to their respective school board.

Q12: How will vendors contracted by school boards for the student management systems (SMS) be notified of the new file format required for Panorama?

A12: As Panorama is rolled out to school boards, PHUs will provide information directly to school boards, including the required format for collecting and submitting student data. School boards may share the details of the new file format with their SMS Vendors.

Q13: Who can my student management system (SMS) vendor contact with questions regarding the file layout?

A13: School boards should contact their PHU(s) for details about the student data file structure. The Ministries of Education and Health and Long-Term Care will not be providing information directly to vendors.

Q14: Where can my school board obtain the student data file format specifications?

A14: School boards must contact any of their PHUs for the student data file format specifications. The student data file format specifications are consistent across all PHUs.

New Immunization Requirements – Implications for Parents

Q15: What are the new immunization requirements for children to attend school in Ontario?

A15: The province has updated the immunization requirements for the 2014/15 school year to include new mandatory immunizations and dose requirements that align with Ontario's current publicly funded immunization schedule which is based on current clinical guidelines for the best protection of the population against vaccine-preventable diseases. Students who have followed the immunization schedule will not require any further vaccines – they will have already received all the shots they need.

All students attending primary or secondary school this fall will need to have proof of immunization against the following diseases:

- Diphtheria – Updated dose requirement for 2014/15 school year
- Tetanus – Updated dose requirement for 2014/15 school year
- Polio – Updated dose requirement for 2014/15 school year
- Measles
- Mumps – Updated dose requirement for 2014/15 school year
- Rubella
- Meningococcal Disease – NEW immunization requirement for 2014/15 school year
- Pertussis (whooping cough) – NEW immunization requirement for 2014/15 school year
- Varicella (chickenpox) – NEW immunization requirement for 2014/15 school year, for children born in 2010 or later

Parents should take the following steps to ensure that their children meet the new immunization requirements:

1. Double-check with their doctor, nurse practitioner or local PHU to make sure their children's immunization records are up to date.

2. Make sure that their child's updated immunization record has been reported to their local PHU.

Once the school year begins, parents will be contacted by the local PHU if catch-up immunizations are required.

Q16: Why are children and adolescents required to be immunized against certain diseases to attend school in Ontario?

A16: The province is committed to improving the health and safety of school children in Ontario. Requiring proof of immunization for meningococcal disease, whooping cough and chickenpox will help further protect children from vaccine-preventable diseases and reduce the risk of disease outbreaks in schools. The updated immunization requirements for school attendance will now be up-to-date with Ontario's current immunization schedule. This is based on current clinical guidelines for the best protection of the population against vaccine-preventable diseases.

Q17: What happens if a parent and/or guardian wants to exempt his or her child/children from being immunized?

A17: Exemptions from the immunization requirements for school attendance can be made for medical reasons or due to statement of conscience or religious belief.

- For medical exemptions, a Statement of Medical Exemption form must be completed and signed by a physician or nurse practitioner, indicating the reason for the medical exemption.
- For an exemption due to conscience or religious belief, a Statement of Conscience or Religious Belief Affidavit must be sworn before a commissioner for taking affidavits in and for the courts in Ontario.
- Exemption forms must be provided to the local medical officer of health.

Effective July 1, 2014, exemption forms will be available on the [Government of Ontario central online forms repository](#)

Parents of children requiring an immunization exemption should speak to their local public health unit for more information.

It is important to note that in the event of an outbreak of a communicable disease in a school, the local medical officer of health may, in accordance with s. 12 of the ISPA, order the school to exclude from attendance at the school until the disease is no longer present the child/children of a parent who has filed an exemption. In such a case, the medical officer of health is required to serve the parent with a copy of the order.

Q18: In the past, the medical officer of health ordered schools to suspend children who were not immunized – will this still be the case?

A18: Yes. There will be no change to the current process, which is set out in sections 6-9 of the ISPA.

If the parent has not provided the required immunization records or a valid exemption (Statement of Medical Exemption, or a Statement of Conscience or Religious Belief Affidavit) as specified under the ISPA and Regulation 645, then the medical officer of health may order the school to suspend the child/children from school for a period of twenty school days. In such a case, the medical officer of health is required to serve the parent with a copy of the order.

Q19: When do parents need to have proof their children are immunized against these added vaccine-preventable diseases?

A19: Parents should report their child's immunization records to their local PHU prior to the start of the 2014/15 school year.

If a student requires a catch-up immunization to meet the updated requirements for school attendance, most are available from their regular health care provider. For some vaccines, catch-up immunization clinics will be offered by health units during the school year.

Q20: How does a child's immunization record get reported to the local PHU?

A20: Parents are responsible for reporting their child's immunization records to their local PHU. Parents should contact their local PHU if they are unsure whether their child's immunization records have been reported.

Q21: How will students be able to get these required vaccines?

A21: The majority of students will not require any additional vaccines. If children have followed the routine immunization schedule, they will already have received all the vaccines they need to attend school. Parents will just need to make sure they have reported these immunizations to their local PHU.

If a student requires a catch-up immunization to meet the updated requirements for school attendance, most are available from their regular health care provider. For some vaccines, catch-up immunization clinics will be offered by health units during the school year.

Q22: If a child has received all of the recommended vaccines on the current immunization schedule will any further action need to be taken? Will they require additional vaccines?

A22: Children and adolescents who have followed the immunization schedule will not require any additional vaccines - they will have already received all the vaccines they need. More than 70 per cent of students are already immunized against the three new designated diseases. Parents must just make sure they have reported these immunizations to their local PHU.

Q23: How are parents and/or guardians being informed of these changes?

A23: Information on the new requirements for proof of immunization will be sent to parents by PHUs either directly or through their child's school. Information is also available on the ministry of Health and Long-Term Care's website at: www.ontario.ca/vaccines. Parents who have not provided the required immunization records to their PHU will receive notification from the PHU.

Q24: Where can parents and/or guardians find out more information on immunization requirements for school attendance?

A24: For more information about the updated immunization requirements for school attendance beginning in the 2014/15 school year, parents can download this [parent handout](#), visit www.ontario.ca/vaccines or contact their [local PHU](#).