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Navigating the Population Assessment Manual (PAM)

**School Compliance Team (DSHS
Immunization Assessment,
Compliance, & Evaluation Group)**

Purpose of the Population Assessments



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- The Centers for Disease Control & Prevention (CDC) lists population assessment as a vital component of a successful immunization program.
- Activities such as assessments to validate coverage reports received from schools & sample surveys to estimate immunization & exemption rates among child-care facility attendees help immunization programs evaluate progress towards immunization goals.

Webinar Overview



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- This webinar serves as a supplement to the Population Assessment Manual that is annually distributed.
- The four types of assessments include child-care audits, school audits, the Annual Report of Immunization Status, and the Texas School Immunization Validation Survey.



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Commonly Used Terms



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- **Age Appropriate**: A child is age-appropriately vaccinated if, from birth, he or she has received all recommended vaccines at the age at which they are recommended.
- **Up-to-Date**: A child's vaccinations are up-to-date if he or she has received all the vaccines recommended for his or her age.



Terms Cont.

- **Immunization Compliance:** A child is in compliance with immunization requirements if he or she has received all the vaccinations required for his or her age or has documentation or allowable exclusion from vaccination.
- **Immunization Coverage:** A child has received all the vaccination requirements for his or her age.

Immunization Coverage Example



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Scenario: Carmen was assigned to audit XYZ elementary school and when she started reviewing Bonnie's immunization records, she wondered if Bonnie was considered to be in compliance or covered. Bonnie is a kindergartner and has received the following:

- 4 doses of DTaP/DTP/DT/Td/Tdap
- 4 doses of polio
- 2 doses of MMR
- 2 doses of HepA
- 3 doses of HepB
- 2 doses of varicella

Answer: Bonnie is considered to be covered since she has received all of the vaccinations required for her age. Since she is covered, Bonnie is also considered to be in compliance.

Immunization Compliance Example



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Scenario: When Carmen finished reviewing Bonnie's immunization record, she started reviewing Sam's immunization record. Sam is also in kindergarten, is not vaccinated, but he does have a valid conscientious exemption affidavit on file.

Answer: Since Sam has a valid conscientious exemption affidavit on file, he is considered to be in compliance.

Exclusions from Compliance



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- **Title 25 Health Services Texas Administrative Code [Rule § 97.62](#) Exclusions from Compliance**
- Exclusions from compliance are allowable on an individual basis for medical contraindications, reasons of conscience, including a religious belief, and active duty with the armed forces of the United States.
- Children and students in these categories must submit evidence for exclusion from compliance as specified in the Health and Safety Code, §161.004(d), Health and Safety Code, §161.0041, Education Code, Chapter 38, Education Code, Chapter 51, and the Human Resources Code, Chapter 42.

Handling Immunization Exemption Affidavits



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- DSHS is prohibited from maintaining any record of the names of individuals requesting an exemption affidavit form.
- For a non face-to-face audit, the LCCC/RCCH may make copies of the official exemption affidavit forms and mail the copies to the PHR or LHD.
- PHRs and LHDs are prohibited from scanning, e-mailing, or otherwise sharing or maintaining copies of exemption affidavit forms.
- The PHR or LHD must destroy all copies of exemption affidavit forms once the audit/assessment is complete.

Child-Care Audits



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- Texas Health & Human Services Child-Care Licensing (CCL) and DSHS have developed a protocol to coordinate inspections and monitoring of LCCCs and RCCHs to eliminate duplicate inspections of immunization records.
- This protocol is required by House Bill 1555 of the 75th legislature.

Child-Care Audits



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- 20% of randomly selected child-care facilities in the region/local area will be audited every year.
- Prior to visiting the child-care facility, the auditor should verify the center is still open by visiting the HHSC
https://www.dfps.state.tx.us/Child_Care/Search_Texas_Child_Care/ppFacilitySearchDayCare.asp
- Within 2 weeks of completing a child-care audit, the regional HHSC Child Care Licensing(CCL) staff should be notified of the outcome in writing. Forms are in the PAM.

Child-Care Audits Continued



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- 100% of immunization records for currently enrolled children should be audited.
- The audit results should be reviewed with the center director once the audit has been completed.
- Results of the child-care audits must be entered into CHRS by PHR or LHD staff.
- Child-care audits should **not** be emailed to ACE.

Child-Care Audit Timeline



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- August to July annually.
- Survey assignments are mailed out in August.
- Childcare audit data entry into CHRS is due by July 15th every year.

Child-Care Auditing Example 1



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Scenario: 123 Call on Me Childcare is on Willie's childcare audit list. When Willie spoke with the center director, they agreed on a day and time for Willie to audit the immunization records for the 50 currently enrolled children. After Willie reviewed the immunization records, he noticed that 40 children were up-to-date on their vaccinations, 5 children had valid vaccine affidavits on file, and 5 were missing vaccine records. Willie is new to his position and he isn't sure what to do.

Child-Care Auditing

Example 1 Answer



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Answer: Based on this example, only 90% of children are in compliance since 40 children are up-to-date and 5 children have valid conscientious exemption affidavits on file. Willie should provide a list to the director that contains the names of the 5 children that do not have vaccine records.

Since 123 Call on Me Childcare is below a 95% compliance rate, Willie should schedule a follow-up visit to review the immunization records for the 5 children that are not in compliance. When Willie returns for a follow-up visit, he should review the immunization records for the five children that were missing immunization records during his first visit. If there are no current vaccine records or valid vaccine exemption affidavits for the 5 children when Willie returns for the follow-up visit, a referral shall be made to the HHSC Child-Care Licensing division.

Child-Care Auditing Example 2



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Scenario: Lola's House is on Amelia's child-care audit list. Amelia emailed the center director and told him that she would be auditing 100% of immunization records for currently enrolled children and she needed the immunization records mailed to her. The director informed Amelia there are 80 children currently enrolled and he will mail Amelia the immunization records tomorrow.

After Amelia reviewed 80 records, she noticed that 65 children were up-to-date on their immunizations, 13 children had valid vaccine exemptions, and two children were in the process of receiving the required number of vaccine doses as medically feasible. Amelia asks her supervisor as she isn't sure if the facility would be in compliance or not.

Child-Care Audit

Example 2 Answer



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Answer: Lola's House has a 100% compliance rate as 65 children have received all the vaccinations required for their age group, 13 children have documentation for allowable exclusion from vaccination, and two children are receiving required vaccine doses as fast as medically feasible.

School Audits



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School Audit Selection Criteria:

- Annual Report non-responders
- >5% of student population delinquent on any vaccine in previous school year's Annual Report.
- >5% of provisionally enrolled students in previous school year's Annual Report.
- Participation in school audits is mandatory.

School Audits Continued



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- Determine school auditing method.
- If a facility does not respond after two documented attempts, the facility should be visited in-person.
- 100 immunization records should be randomly selected, de-identified, and reviewed.

School Audit Timeline



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- August to July annually.
- Survey assignments are mailed out in August.
- School audit data due to ACE by July 15th every year.

School Auditing Example 1



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- **Scenario 1:** LJJ ISD was identified as having a high provisional enrollment rate for 7th grade students. The district only has one middle school, KER middle school. KER middle school is small and has 80 7th grade students. When Marvin started auditing the immunization records for 7th grade students, he wondered why the school nurse had marked several students compliant for hepatitis A when they had received the second dose before six months had elapsed since receiving their 1st dose. Marvin called the ACE school compliance staff to ask what he should do.

School Auditing

Example 1 Answer



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Answer: The State of Texas immunization requirements are based on # of doses/ month &/or grade level and not the intervals of when the student receives the doses. In this example, every student that has received two doses of hepatitis A is in compliance. The vaccine requirements for school entry can be found at <https://www.dshs.texas.gov/immunize/school/school-requirements.aspx>

School Auditing Example 2



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Scenario: QRS private school has been selected for audit due to not reporting immunization data on the previous year's Annual Report. There is one elementary school with 75 students, one middle school with 25 students, and one high school with 40 students.

Answer: Since there are less than 100 currently enrolled students at each school, the immunization records for all students should be audited. In this example, 140 student immunization records would be audited.

School Auditing

Example 3



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Scenario: LMN ISD was identified as having a high vaccine delinquency rate for 7th grade students. When ACE called and spoke with the school nurse, VKJ middle school was selected for audit due to a high vaccine delinquency rate that was reported on the previous year's Annual Report. 250 students are currently enrolled in 7th grade at VKJ middle school. How many immunization records should be audited?

Answer: 100 7th grade immunization records should be de-identified, randomly selected using the CoCASA Random Generator, and audited.

Auditing Timelines



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- At the end of August, DSHS ACE Group distributes the list of facilities slated to be audited to Public Health Region staff.
- Public Health Region staff distribute the audit lists to the local health departments.
- Audits are due to DSHS ACE Group by the 3rd Monday in July every year & should be submitted electronically.
- The 10 month window allows regional and local staff to conduct audits when it is conducive to their schedules.



Auditing Tips

- Check in the [Child Health Reporting System \(CHRS\)](#) that the school or childcare facility has the correct address and phone number.
- The HHSC childcare licensing [website](#) should be checked prior to the visit to ensure the facility is still operating.
- Send out a letter to school or childcare facility to notify them that their facility has been selected for an audit.
- If an audit will be conducted in-person, the superintendent or principal should be contacted in writing to schedule an appointment. The person conducting the audit should speak with the school nurse and explain the process, anticipated amount of time, and the documents that should be available during the audit.

Auditing Tips Continued



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- The school or childcare facility should be contacted by email or phone one week prior to the audit as well as called the day before to ensure the facility has all the information needed and that there haven't been any changes in staff since the facility was first contacted.
- Get familiar with rules and regulations regarding vaccine requirements in schools and childcare facilities.
- When the audit has been completed, it's a good idea to explain the results to the school/childcare staff and answer any questions

Annual Report of Immunization



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- Texas monitors vaccine compliance for school districts & private schools throughout the state.
- Data collected is submitted to the CDC.
- The Annual Report opens the last Friday in October and is due by the 2nd Friday in December every year.
- Immunization data can only be submitted by schools online at www.artximmunize.com

School Validation Survey



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- Authenticating the self-reported Annual Report data is the purpose of a validation survey.
- School participation in the validation survey is completely voluntary, unlike school audits that are mandatory.
- The school administrator should be contacted in writing in regards to their participation in the survey.

School Validation Survey Continued



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- Determine validation method.
- Immunization data should only be validated for currently enrolled students.
- The school or district PEIMS Coordinator should generate & provide a sequentially numbered roster of currently enrolled students.
- Immunization records should be de-identified before the PHR or LHD receives them.
- CoCASA transfer files are due to DSHS ACE Group by March 1st.



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Thank you

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