

“FERPA No Consent” Checkbox in MCIR/SIRS and Forms

Frequently Asked Questions: Information for Schools

Why is this important?

The Family Educational Rights and Privacy Act (FERPA) protects the release of a student’s personal data. Any student’s vaccine and/or waiver status is protected by FERPA, including entry of such data by school personnel in the Michigan Care Improvement Registry (MCIR) under the School Immunization Reporting System (SIRS). Parental consent must be obtained before a school can enter a student’s personally identifiable information (PII) and immunization data into MCIR/SIRS (i.e., vaccine and/or waiver data provided by a parent/guardian and entered by a school in MCIR/SIRS). An **unchecked FERPA box** in MCIR/SIRS indicates parent/guardian permission to enter PII and vaccine and/or waiver data in MCIR/SIRS for sharing with local health departments (LHDs). It is anticipated that most parents will provide permission. School data in MCIR/SIRS will not be visible in MCIR to the Health Care Provider (HCP). Vaccine data entered by HCPs are not affected by FERPA and can be viewed by schools, Local Health Departments (LHDs), and other HCPs.

Who does this apply to?

This applies to parents of children who are enrolling in a public or private school:

- Kindergarten, 7th grade, and any newly enrolled student into the school district.
- School personnel must send the form, “Consent for Disclosure of Immunization Information to Local and State Health Departments,” to these students’ homes for parent/guardian signatures and then collect all those forms.
- Parents or guardians who give permission to share a student’s immunization record will have an **unchecked FERPA No Consent box**. This indicates that a parent or guardian has provided consent for schools to enter PII and vaccination data into MCIR/SIRS to be shared with the State and LHDs.
- FERPA is an active consent or opt in process. This means schools do not need to collect a document that states the parent does not want to share immunization information with the State or LHD. If a consent form is not collected, the school will need to check the “FERPA No Consent” box in MCIR/SIRS, and the immunization information will not be shared with the State and LHDs.

For more information, refer to: www.mcir.org/school-childcare/reporting-immunization-program-status-to-the-health-department/.

Does the “Consent for Disclosure of Immunization Information to Local and State Health Departments” form need to be redone with each assessment year?

After initial submission to the school, there is no need to complete this form every year. However, this form needs to stay with the student’s file. For example, when a child moves from elementary school to middle school, the middle school will need to have that form in the student’s file.

Does this replace the waiver document?

No, parents/guardians seeking to claim a nonmedical waiver are still required to participate in an immunization-focused discussion with LHD staff. During the discussion, parents/guardians can bring up any immunization-related questions and concerns they may have. The staff will present evidence-

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based information regarding the risks of vaccine-preventable diseases and the benefits/potential risks (risks consisting mostly of moderate side effects) of vaccination. This rule preserves the ability to obtain a nonmedical waiver following the completion of the required educational session.

What if school personnel fail to receive from a parent/guardian the signed consent form, or receive a signed consent form which prohibits authorization of sharing a child’s immunization data?

When a parent/guardian does not give permission for the school to share PII and immunization data in MCIR/SIRS, the MCIR/SIRS “FERPA No Consent” checkbox should be utilized. Immunization information, including waiver data, will be reported using aggregate numbers on the “MDHHS Immunization Reporting Form for Students with no FERPA Consent” to the local health department.

The school MCIR/SIRS user will take the following steps:

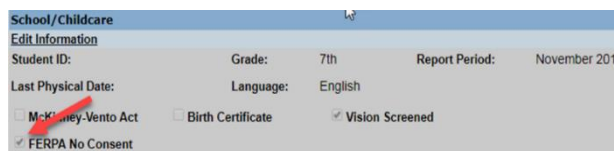
1. Log into MCIR/SIRS
2. Search for student
3. On student information page, click **Edit Information** hyperlink (screenshot 1)
4. Edit school information for the student by **checking the “FERPA No Consent” checkbox**
5. Save the change by clicking the **Submit** button

The “FERPA No Consent” checkbox with a checkmark should now be visible.

In Summary:



School/Childcare
Edit Information
Student ID: [redacted] Grade: 7th Report Period: November 2018
Last Physical Date: [redacted] Language: English
 McKinney-Vento Act Birth Certificate Vision Screened
 FERPA No Consent



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Edit Information
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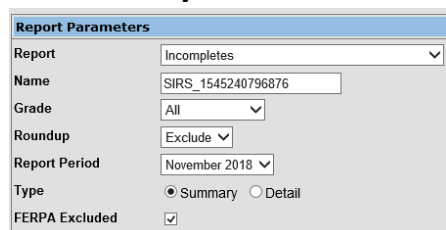
Consent = an unchecked/blank FERPA checkbox

No consent = a checked FERPA checkbox, do not share data with MDHHS/LHD

Does the school still generate reports for the LHD?

The school will have the option to check a box called “FERPA excluded” when generating the following reports: IP-100 Detail, Incompletes, Provisionals and Waivers. All children who have the “FERPA No Consent” box checked on the General Information Screen will not display on these reports. Their totals will be included in the aggregate numbers.

In Summary:



Report Parameters
Report: Incompletes
Name: SIRS_1545240796876
Grade: All
Roundup: Exclude
Report Period: November 2018
Type: Summary Detail
FERPA Excluded:

Where can I find more information?

For more information, please visit www.mcir.org/school-childcare/forms-reports/