



# Executive Order 10 – Chapter 7 Immunization Requirements Frequently Asked Questions

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**Bureau of Immunization and Tuberculosis,  
Division of Public Health**



**Health and  
Human Services**

## Background

On January 10, 2023, Governor Reynolds signed Executive Order 10, putting a moratorium on administrative rulemaking and instituting a review of existing administrative rules. The Order directed an evaluation and cost benefit analysis of all existing and proposed rules. Each rule chapter review must reduce the overall regulatory burden, or remain neutral, compared to the previous rule chapter. The Iowa Immunization Program completed the review process for Iowa Administrative Code 641, Chapter 7: *Immunization and Immunization Education Persons Attending Elementary or Secondary Schools, Licensed Child Care Centers or Institutions of Higher Education*. **The changes will be implemented effective July 1, 2024.**

## Religious Certificate of Immunization Exemption

**Q1. Why is a notary signature no longer required on the Religious Certificate of Immunization Exemption?**

**A:** Iowa HHS has determined the use of a notary is not effective or necessary to prevent fraud in this circumstance. In addition, notary signature was removed in this section and other departmental code citations as there is inconsistent access to notary services in Iowa. Additionally, some notaries charge for services, creating disparate impact on Iowan's seeking these services.

**Q2: Is the Religious Certificate of Immunization Exemption being updated?**

**A:** Yes, the Religious Certificate of Immunization Exemption form will be updated to remove the notary signature. The current version of the Religious Certificate of Immunization Exemption, dated July 2024, will be available on the [Immunization webpage](#). Certificates can be ordered on the [Immunization Materials Order Form webpage](#).

**Q3: When conducting school immunization audits, do all students with a previous version of the Religious Certificate of Immunization Exemption records need to submit the new form?**

**A:** For the 2024-25 school year and beyond, effective July 1, 2024, previous versions of the Religious Certificate of Immunization Exemption remain valid since there was a more restrictive notary requirement.

**Q4: Are students enrolling in licensed child care or school for the first time, seeking a Religious Certificate of Immunization Exemption, required to submit the new form?**

**A:** If a new student enrolling in school or child care for the first time submits a previous version of the Religious Certificate of Immunization Exemption, the certificate is valid. Although the most current version of the certificate is preferred, previous versions will be accepted.

**Q5: If a student enrolling in licensed child care or school, submits a previous version of the Religious Certificate of Immunization Exemption with the notary's signature left blank, is the certificate valid?**

**A:** For the 2024-25 school year and beyond, effective July 1, 2024, the notary signature is no longer required. While the new form is preferred, previous versions will be accepted even if the notary signature line is blank.

**Q6: When conducting school immunization audits, do all students with a previous version of the Religious Certificate of Immunization Exemption records need to be reviewed every year?**

**A:** No, previously audited records do not need to be reviewed every year. Routinely, when Local Public Health Agencies (LPHAs) audit student records, the certificate is marked to indicate the record has been audited and meets immunization requirements.

**Q7: Is an out of state Religious Certificate of Immunization Exemption valid?**

**A:** No, certificates from other states are not valid. In order to attend school or licensed child care, the child needs to submit a Religious Certificate of Immunization Exemption issued by the Iowa Department of Health and Human Services.

**Q8: What religions are acceptable for a religious exemption?**

**A:** The Iowa administrative code does not specify religious denominations eligible for a religious immunization exemption. A Religious Certificate of Immunization Exemption is valid when completed appropriately. A religious exemption may be granted to a student if the immunization conflicts with a genuine and sincere religious belief and the belief is in fact religious and not based merely on philosophical, scientific, moral, personal, or medical opposition to immunizations.

**Q9: Are Certificates of Immunization Exemption forms valid if the form has been altered?**

**A:** The validity of the Immunization Exemption Certificates is based on language in Iowa Administrative Code, Chapter 7. Language included on the religious certificate of immunization exemption referencing rule 641—7.3(139A) cannot be altered. Any edits or alterations to the certificate referencing rule 641—7.3(139A) will invalidate the certificate.

**Q10: Who is allowed to sign the Religious Certificate of Immunization Exemption?**

**A:** To be valid, the Religious Certificate of Immunization Exemption requires the signature of the applicant or, if the applicant is a minor, the applicant's parent or guardian. Instances when the applicant is a minor and the Iowa Department of Health and Human Services is the guardian, documentation of guardianship must be obtained and attached to the Religious Certificate of Immunization Exemption. Without this documentation, the certificate of exemption is invalid.

**Q11: Are photos or photocopies of exemptions acceptable?**

**A:** Yes, photographs or photocopies may be acceptable as long as all the fields are complete and it is of the Iowa Department of Health and Human Services, Religious Certificate of Immunization Exemption or Medical Certificate of Immunization Exemption.

**Q12: Is a foreign exchange student's host family able to sign a Certificate of Immunization Exemption-Religious?**

**A:** Many host parents will have the authority to make decisions for treatment in a medical emergency. However, this authority does not allow for the host parents to sign or request a Religious Certificate of Immunization Exemption. Please reference the following link for information from the [US Bureau of Educational and Cultural Affairs Exchange Program](#).

## **Administrative Code 641, Chapter 7 Immunization Requirements Table**

**Q13: Were changes made to the Immunization Requirements Table in Chapter 7?**

**A:** Yes, the Immunization Requirements table was updated to remove language regarding the phased in approach of immunization requirements, footnotes were incorporate into the table when possible and to clarify vaccine dose requirements for vaccines with age indications based upon administration.

**Q14: Did vaccine and dose requirements change for students seeking enrollment in licensed child care or schools?**

**A:** No. Vaccine and dose requirements for licensed child care and schools were not changed. Vaccines previously phased in by date of birth now include all grades. The language regarding the phased approach is no longer necessary and was removed.

## **Certificate of Immunization**

**Q15: Is the Certificate of Immunization being updated?**

**A:** Yes, the Certificate of Immunization form will be updated with an effective date of July 1, 2024. The updated version of the Certificate of Immunization, dated July 2024, will be available on the [Immunization webpage](#). Certificates can be ordered on the [Immunization Materials Order Form webpage](#).

**Q16: Why does the Certificate of Immunization only include required vaccines and no other recommended vaccines?**

**A:** The Certificate of Immunization was updated to only include vaccines that are required by law to attend a licensed child care, elementary or secondary school in Iowa. This change was to address concerns of child care centers and schools having access to a student's vaccine history other than what is required by law.

**Q17: When conducting school immunization audits, do all students with a previous version of the Certificate of Immunization need to submit the new form?**

**A:** Previous versions of the Certificate of Immunization remain valid for the 2024-25 school year and beyond.

**Q18: Are students enrolling in licensed child care or school for the first time required to submit the new Certificate of Immunization form?**

**A:** If a new student enrolling in school or child care for the first time submits a previous version of the Certificate of Immunization the certificate is valid. Although the most current version of the certificate is preferred, previous versions will be accepted.

**Q19: If a student enrolling in licensed child care or school, submits a previous version of the Certificate of Immunization, is the certificate valid?**

**A:** Yes, previous versions of the Certificate of Immunization remain valid for the 2024-25 school year and beyond

**Q20: When conducting school immunization audits, do all students with a previous version of the Certificate of Immunization record need to be reviewed every year?**

**A:** No, previously audited records do not need to be reviewed every year. Routinely, when Local Public Health Agencies (LPHAs) audit student records, the certificate is marked to indicate the record has been audited and meets immunization requirements.

**Q21: Are Certificates of Immunization forms valid if the form has been altered?**

**A:** The validity of the Immunization Exemption Certificates is based on language in Iowa Administrative Code, Chapter 7. Language included on the certificate of immunization referencing rule 641—7.3(139A) cannot be altered. Any edits or alterations to the certificate referencing rule 641—7.3(139A) will invalidate the certificate.

## Provisional Certificate of Immunization and Medical Certificate of Immunization Exemption

**Q22: Was the Provisional Certificate of Immunization and Medical Certificate of Immunization Exemption updated?**

**A:** Yes, both forms will be updated with an effective date of July 1, 2024. The current versions of these forms will be available on the [Immunization webpage](#). Certificates can be ordered on the [Immunization Materials Order Form webpage](#).

**Q23: When conducting school immunization audits, do all students with a previous version of the Medical Certificate of Immunization Exemption records need to submit the new form?**

**A:** For the 2024-25 school year and beyond, effective July 1, 2024, previous versions of the Medical Certificate of Immunization Exemption remain valid.

**Q24: Are students enrolling in licensed child care or school for the first time, seeking a Medical Certificate of Immunization Exemption, required to submit the new form?**

**A:** If a new student enrolling in school or child care for the first time submits a previous version of the Medical Certificate of Immunization Exemption, the certificate is valid. Although the most current version of the certificate is preferred, previous versions will be accepted.