

May 21, 2024

Dear Immunization Stakeholders,

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 proposed Chapter 7 language is included in the February 5, 2024, [Iowa Administrative Bulletin](#). A summary of key language changes to Iowa Administrative Code 641, Chapter 7 are outlined below. The changes will be implemented effective July 1, 2024.

Religious Certificate of Immunization Exemption

Language Changes:

- Removal of language requiring a notary signature for the certificate to be valid.

Impact:

- 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 Iowans seeking these services.
 - Previous versions of the immunization certificates remain valid and student records do not need to be updated when versions change.
 - Additionally, previously audited records do not need to be reviewed. 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. When this has occurred, the record only needs to be re-evaluated when vaccines are required for entry into additional grades (e.g., 7th grade - Tdap vaccine, 7th and 12th grade - Meningococcal vaccine).
 - 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, it is not required.
- Clarification that 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.

Immunization Requirements Table

Language Changes:

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

Impact:

- Vaccine and dose requirements for licensed childcare 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.

Additionally, the Certificate of Immunization, Provisional Certificate of Immunization, and the Medical and Religious Certificate of Immunization Exemption have been updated with an effective date of July 1, 2024. Previous versions of the immunization certificates remain valid and student records do not need to be updated. Although the most current version of these certificates are preferred, it is not required for 2024-25 school year and beyond. Updated immunization certificates will be available to coincide with the July 1, 2024 effective date.

The Program is committed to keeping partners informed of these changes and will provide additional guidance for the upcoming school year. Questions regarding this change may be directed to Jessica Schultz at Jessica.schultz@idph.iowa.gov or Shelly Jensen at Shelly.Jensen@idph.iowa.gov.

Sincerely,



Donald J. Callaghan
Bureau Chief,
Immunization and TB