December 28, 2004

TO: PRIMARY WIC PROGRAM CONTACT

SUBJECT: Sharing of Immunization Information about WIC Participants with California’s Immunization Registries

California’s immunization registries (www.ca-siis.org) are web-based automated immunization record systems that are used by health care providers and by public health and social service agencies to assist in childhood immunization. Women Infants and Children (WIC) Supplemental Nutrition Program agencies are allowed to share information with and to use California’s immunization registries. This may assist WIC agencies in the immunization screening and referral activities described in USDA Policy Memo 803-AT and the WIC Program Manual section 260-50.2. The purpose of this memorandum is to clarify requirements for the sharing of information about WIC participants with California’s immunization registries. This memorandum is the result of collaboration between the WIC Branch and the Immunization Branch of the California Department of Health Services.

In summary, immunization record activities that require the use of WIC information systems (ISIS, ISIS-IZ) are subject to WIC program requirements [7 CFR Part 246, http://www.fns.usda.gov/wic/lawsandregulations/default.htm]

- Informed signed consent from a parent or guardian to share ISIS-IZ system data must be obtained at least annually.
- Receipt of WIC benefits is not contingent upon participation in an immunization registry.
- A parent or guardian may refuse at any time to share ISIS-IZ data with the immunization registry.

In contrast, immunization record and registry activities that do not require the use of ISIS or ISIS-IZ are subject to immunization program and registry requirements [California Health and Safety Code 120440 http://www.ca-siis.org/legis.html], which vary from those of the WIC Program:

- A parent or guardian must be notified in person or by mail about the immunization registry before the child’s data can be entered into the registry. A sample notification letter for participation in an immunization registry may be found at www.ca-siis.org.
- Periodic notification about the registry is not required.
- A parent or guardian may request at any time that the child’s data no longer be included in the immunization registry.
The following table lists the requirements for parental notification or signed consent by WIC staff to conduct certain immunization registry activities. The same requirements also apply to immunization registry staff conducting these activities:

<table>
<thead>
<tr>
<th>Immunization (IZ) Registry Activity</th>
<th>Pertinent regulations</th>
<th>Notification required?</th>
<th>Signed consent required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. WIC staff uses an IZ registry to review a WIC client’s immunization records.</td>
<td>Immunization Registry</td>
<td>No; has already occurred.</td>
<td>No</td>
</tr>
<tr>
<td>2. WIC staff updates records in an IZ registry based on child’s “yellow card” or similar personal immunization records.</td>
<td>Immunization Registry</td>
<td>No; has already occurred.</td>
<td>No</td>
</tr>
<tr>
<td>3. A child’s record cannot be found in the IZ registry. Separately from and after the WIC certification process, WIC staff creates a new record for the child in the registry, based on the child’s “yellow card” or similar personal immunization records.</td>
<td>Immunization Registry</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>4. Immunization information on a child is transferred from a non-WIC data system that does not interface with ISIS, such as ITS LA, to an IZ registry.</td>
<td>Immunization Registry</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>5. Immunization information on a child is transferred from a WIC data system, such as ISIS-IZ, to an IZ registry.</td>
<td>Immunization Registry and WIC</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

For additional information on these issues, please contact Deborah Starbuck, Immunization-WIC Coordinator, at (510) 540-2285 or at dstarbuc@dhs.ca.gov. A variety of information on California’s immunization registries is also available at [www.ca-siis.org](http://www.ca-siis.org).

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Immunization Registry Managers
Local Immunization Coordinators
Immunization Branch Field Representatives
WIC Branch Regional Consultants and Advisors