

The Immunization Unit is providing the following information to ensure authorized school users of the Wyoming Immunization Registry (WyIR) know the approved uses for accessing, reviewing, and printing vaccination records.

As part of the Information Sharing Agreement (ISA) signed by schools for access to the WyIR, it is important to remember some key things about WyIR use. [School authorized users may access the WyIR](#) to determine appropriate immunization for students attending the school, confirm compliance with school and child caring facility immunization requirements, to control disease outbreaks, for treatment purposes, or for program oversight.

School authorized users may not access an immunization record from the WyIR for the purposes of obtaining an employment record. This is not a permitted purpose under the law or the policies and procedures of the Wyoming Department of Health.

Pursuant to the WyIR ISA and End User License Agreement, the School Districts' designee and authorized users agree to not acquire or transmit PHI in a manner that would violate any provision of the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules. The HIPAA Privacy Rule generally prohibits the disclosure of protected health information (PHI) -- such as immunization status -- to an employer by a covered entity. The Office of Civil Rights (OCR) has expressly affirmed this position in recent guidance *HIPAA, COVID-19 Vaccinations, and the Workplace*, available at:

<https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/hipaa-covid-19-vaccination-workplace/index.html>.

If your facility must check immunization status of employees, below are options for obtaining vaccination records:

- The employee may complete the WDH's Authorization to Release Health Records form and submit it to the Immunization Unit along with a copy of the employee's photo ID. This form is available on the WDH website at: https://health.wyo.gov/wp-content/uploads/2020/11/F-011_-_Authorization-to-Release-Health-Records-November-2020.pdf.
- The employee may be able to get a record from the COVID-19 Vaccine Provider who administered the vaccination and then provide it to the employer.
- The employer may accept the vaccination record card from the employee.

Thank you for your attention to this important matter,
Wyoming Department of Health Immunization Unit