

July 10, 2019

## **MEMORANDUM**

TO:

Council of Senior Student Affairs Officers

FROM:

Hae K. Okimoto, PhD

Associate Vice President for Student Affairs

SUBJECT:

Tuberculosis Clearance and Immunization Records Requirements

Changes in Hawaii Administrative Rules (HAR) 1 and a new state law, Act 101, impact implementation of Department of Health rules regarding tuberculosis (TB) clearance and immunization records for University of Hawaii students. For most students, there will be no changes. However, for students in select fully online programs, there is new flexibility.

Students in fully online or distance programs which do not have any course requirements for on-campus activities are exempt from requirements for TB clearance (per HAR §11-164.2-23) and providing immunization records (per Act 101, 2019 which became effective on July 1, 2019).

Act 101's exemption is limited. Online programs are exempt if they do not have any courses which require any on-campus activities (e.g., group meeting, testing, on-campus labs). Exempt programs must have a method for tracking students' participation as an identifiable group (e.g., major code) and managing their students' registration status since classes which require on-campus activities requires that students show evidence of vaccinations even if the program is otherwise online.

The OVPAPP Office of Student Affairs will review online programs' eligibility for the exemption and maintain a list of programs eligible to exempt students from TB and vaccination record requirements. For Fall 2019, eligible programs are the Accelerated AA Online (Major code: LBRO) and Returning Adults Online AA (Major code: LBRD). Faculty have verified that the syllabi of the courses included in this do not include oncampus requirements. Additionally, there is a process in place for limiting the online students' registration to online courses only. The courses have a course attribute which limits registration to students in the LBRO or LBRD major code; course attributes are ONL5 and ONLD, respectively. Students in these majors are only able to register for courses with the respective course attribute, thus restricting students from registering from other classes unless they work with their counselor.

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Department of Health's proposed revisions to the HAR for Examinations and Vaccinations would provide additional flexibility regarding exemptions for online programs. Once the HAR is revised, new guidance will be issued.

If you have questions, please contact Merrissa Brechtel.

C: Registrars

<sup>1</sup> This memo is based on changes in Hawaii Administrative Rules §11-164.2 for TB, effective March 17, 2018. DOH is in the process of revising HAR for examinations and immunizations; however, these proposed changes are not incorporated in this memo as they were not effective, as of date of this memo.