



May 19, 2020

MEMORANDUM

TO: Council of Senior Student Affairs Officers

FROM: Hae K. Okimoto, *Hae K. Okimoto*
Associate Vice President for Student Affairs and
Director of Academic Technologies

SUBJECT: Clarification on Health Clearance Process

There have been inconsistencies regarding Immunization/ Health Clearance Records within the University of Hawai'i System. This memo documents how these records will be managed moving forward.

Immunization/ Health Clearance Records are defined and classified as an "education record" under FERPA and are excluded from coverage under the HIPAA Privacy Rule (appendix 1). As an "education record," authorization from the student to release records from one University of Hawai'i campus to another University of Hawai'i will not be required.

- 1) Immunization/ Health Clearance Records provided by the student as part of the enrollment process will be recorded in Banner and an electronic copy of the record will be uploaded to the systemwide document imaging system (OnBase). It is incumbent upon the Home Campus to ensure documents submitted are compliant with the current immunization requirements for post-secondary school enrollment, as set forth by the State of Hawaii Dept of Health.
- 2) Students within the University of Hawai'i system only need to present Immunization/Health Clearance Records upon initial enrollment within the system. If documents are available in OnBase, students will not be required to resubmit records. All records are subject to review by the new campus prior to registration or the start of the semester for validation.
 - a) Continuously enrolled (Fall to Spring or Spring to Fall) students transferring within the University of Hawai'i system, who have had no break in enrollment, will NOT be required to resubmit immunization information for registration purposes.
 - b) Students Changing Home Institutions, and Auto Admit recipients within the University of Hawai'i System will NOT be required to resubmit immunization information for registration purposes.

- c) Beginning with the Fall 2020 semester, students entering campus housing for the first time (21 years or younger) will need to submit the record of the Meningococcal Conjugate Vaccine.
- 3) Per Hawai'i State Department of Health guidance (email received from Heather Winfield-Smith of the Hawai'i State Department of Health), Hawai'i high school students (Dual Enrolled - SPEA) are covered by the compulsory school (K-12) requirements and do not need to provide additional immunization information to participate in college courses.
- a) This provision excludes home schooled students.
- b) Immunization/Health Clearance will be required if the student matriculates to the University of Hawai'i upon high school graduation.
- 4) If a student applies to and is admitted to multiple campuses, the Registrar of the student's **home campus** will remove the Health Clearance holds from all other campuses.
- 5) Returning students, regardless of how long they've been out, are required to meet the immunization requirements at the time of readmission.

Admissions Officers and Registrars will continue to have discussions regarding the recording of immunization records within the student information system to help better facilitate the sharing of this educational record among University of Hawai'i system campuses.

Definitions:

Immunization Records aka Health Clearance Records - will be classified as an "education record."

Continuing Student - students transferring within the University of Hawai'i system, who have had no break in enrollment. This includes: students transferring between colleges within the UH system, students Changing Home Institutions, and Auto Admit recipients.

SPEA (Dual Enrollment) Students – includes all high school students.

- Early College = high school student taking college classes at the high school with dual credit possibility
- Running Start = high school student taking college classes at the College campus with dual credit possibility
- Early Admit = high school student taking college classes at the College campus with NO intention of dual credit
- Homeschool = high school student that is homeschooled

Banner - the "official" university student information system

OnBase - the "official" university document imaging system.

c: UH Registrars, University Admissions Officers, Health Centers