



December 1, 2020

MEMORANDUM

TO: Council of Senior Student Affairs Officers

FROM: Hae K. Okimoto
Hae K. Okimoto
Associate Vice President for Student Affairs

SUBJECT: Addendum to the May 19, 2020 Memorandum on Clarification of Health Clearance Process

The State of Hawai'i Department of Health (DOH) Hawai'i Administrative Rules, Title 11 (Chapter 157 and 164.2) mandates health requirements be met in order to attend a post-secondary institution. However, after further consultation with the Hawai'i State Department of Health, it was further clarified that these new rules, which went into effect on July 1, 2020, only apply to students who are "new" to the University system. Therefore, the following have been updated to reflect this clarification.

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 campus 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. Continuously enrolled students will not be subject to new health requirements that changed after initial enrollment, unless specified by the Department of Health, or moving into on-campus housing for the first time.
 - 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 [health clearance](#) 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 [health clearance](#) 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) [and memo from the Chief of the Hawai'i State Department of Health Tuberculosis Branch, Hawai'i high school students \(Dual Enrolled - SPEA\) are covered by the compulsory school \(K-12\) health requirements and therefore](#) 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 [any](#) Health Clearance holds from all other campuses.
- 5) Returning students, regardless of how long they've been out, are required to meet [new](#) immunization requirements at the time of readmission.

Note: Beginning with the Spring 2021 semester, students who are registered for exclusively online classes can be exempt from the requirements of Title 11, chapter 157, Hawaii Administrative Rules. To facilitate this, a new system-wide Health Clearance Waiver (HW) Hold has been created. This hold is informational only and will not restrict registration but serve as a notice to student, staff and advisors that this student is eligible to register for only online classes. This hold can restrict in-person services. Once a student submits all their necessary health information, the student will be able to register for any face-to-face or hybrid class. Please refer to the attached memo.

If you have any concerns or questions, please feel free to contact me at 956-3504 or hae@hawaii.edu.

Attachment:

[May 19, 2020 Clarification on Health Clearance Process Memo](#)
[New Systemwide Health Clearance Waiver Memo](#)

2444 Dole St. Bachman Annex 9-6
Honolulu HI 96822
Telephone (808) 956-5023
Fax (808)956-7292

Definitions:

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

Continuing Student - students who have had no break in enrollment. This includes: students who are 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.