



September 27, 2022

MEMORANDUM

TO: Council of Senior Student Affairs Officers
UH Registrars
UH Admissions Officers
Health Centers

FROM: Debora Halbert
Vice President for Academic Strategy

SUBJECT: UPDATE to Health Clearance Process

As of Fall 2022, the University of Hawai'i System (UH campuses) has partnered with [Med+Proctor](#) for the clearance of Health Immunization Records. This memo documents how these records will be managed moving forward and is an update to the original memo dated May 19, 2020, and subsequent memo dated December 1, 2020.

Immunization/Health Clearance Records are defined and classified as an “education record” under FERPA, when directly related to a student and maintained by the UH campuses. As such, they are excluded from coverage under the [HIPAA Privacy Rule](#) (page 4). As an “education record,” authorization from the student to release records from one UH campus to another campus will not be required as the sharing of these records between campuses is being done out of a legitimate educational interest.

1. **Documenting and Verifying Immunization/Health Clearance Records:** Immunization records provided by the student as part of their enrollment at any UH campus will be recorded in the BANNER student information system.
 - a. Campuses shall honor any existing health clearances previously recorded in BANNER, whether or not the supporting health documents are on file in OnBase.
 - b. Starting with the Spring 2023 admission term, Med+Proctor will assist campuses with the verification of health clearance documentation, including those involving immunizations received at pharmacies as well as health clearance records from international medical providers. Med+Proctor serves as the repository for these student health records. Student Health Records no longer have to be downloaded and housed in OnBase unless it is the campus' preference to do so.

- c. For detailed information on health clearance requirements, visit:

<https://www.hawaii.edu/health-clearance/>.

2. **Health Requirement Standards:** Per the Department of Health, students within the University of Hawai'i System only need to present immunization/health clearance records upon initial admission into the UH system. Therefore, 1) students who had previously submitted required health documents and have their clearances documented in BANNER do not need to resubmit those documents at any time for enrollment or re-enrollment purposes; and 2) students are held to the health requirements in place at the time of their initial admission into the UH system, even if those requirements subsequently change. Further clarification is provided below:

- a. Health Requirements for Students Returning to and/or Transferring between UH campuses.

- 1) Students returning to a UH campus and/or transferring between UH campuses who had previously met their health requirements and had it recorded in BANNER will NOT be required to resubmit TB clearance and immunization information for enrollment purposes.

- a) Any student with a prior admit term* at any UH campus who, per BANNER, has satisfied all health requirements, will not be asked to resubmit health requirements at the time of enrollment or re-enrollment, regardless of whether or not they've had a break in their enrollment.
b) This includes students who change their home campus or are participating in the Auto Admit Program or in UH Mānoa's Ka'ie'ie Program.

- b. Health Requirements for Students who are new to the UH System.

- 1) Students who are newly admitted to the UH system (i.e. have no prior admit term) must adhere to the requirements in effect at the time of their admission.

- 2) Students who were admitted on or after July 1, 2020, must comply with the Hawai'i Department of Health's revised [HAR 11-167, passed on July 1, 2020](#), that requires Varicella, TDap, and Meningococcal Conjugate (for students age 21 or younger living in on campus housing) in addition to Measles, Mumps and Rubella (MMR).

- 3) Students must also be cleared for TB.

- a) As of Fall 2022, per the Hawai'i Department of Health TB Branch, Japan is no longer considered a high-risk country. Therefore, just as with students from Australia, New Zealand, Canada – students from Japan do not need a skin test if their risk assessment is negative. Their TB clearance will state that their clearance was based on a negative risk assessment.

- c. Health Requirements for SPEA (Dual Enrollment Students)

- 1) Early College students (i.e. Early College/Running Start non-matriculated high school students who are enrolled with a UH campus) 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.

- 2) Please refer to the [Revised Feb 2020 Department of Health TB clearance memo](#) regarding an update to the TB requirements for Early College students.
 - 3) Early College students must comply with the University's health requirements once they graduate from high school and apply for admission as a traditional college student. They must comply with the health requirements in effect at the time of their post-high school admission.
3. **Removal of Health Clearances:** Beginning with the Spring 2023 admit term, Health Clearance holds will no longer be used. This change in process will apply to all 10 campuses within the UH System.
- a. During the transition period of the Spring 2023 admit term, campuses may still allow students to submit health clearance documents directly to the campus.
 - b. From the Fall 2023 admit term, starting September 1, 2022, all students should be referred to Med+Proctor for submission of health clearance documents.
4. **STAR Registration:** STAR programming will allow students who have not completed their Health Clearances to register for online only classes until such time that they are able to submit all required Health Clearance documents and are verified through Med+Proctor.
- a. Students will not be allowed to attend face-to-face or hybrid classes until they meet the health clearance requirements, but students who do not submit health clearances **may continue to register for and attend online only classes.**
 - 1) Please note, if students want to participate in on-campus employment and/or activities, they must submit Health Clearances to be allowed to do so.
 - b. International students are not able to complete some of the Health Clearance requirements until arriving in the United States. Students coded as IN in the Banner Admissions screen (SAAADMS) will be allowed to register for all class modalities. A process for monitoring clearance and enrollment of these students prior to the start of the semester will be shared as a separate document.
5. **Medical and Religious Exemptions:** All medical and religious exemption documents will also be processed by Med+Proctor. Per the [Hawai'i Administrative Rules for Tuberculosis Ch 164.2](#), there are no medical or religious exemptions for TB for classified students.

Further procedural information regarding the functional implications for the changes to in-person and online registration at UH starting with Spring 2023 and Fall 2023 onward will be provided to campus functional staff as a separate document.

Questions or concerns can be addressed to the Office of the Associate Vice President for Student Affairs at avpsa@hawaii.edu or to Merrissa Brechtel, Policy & Program Specialist for Student Affairs at merrissa@hawaii.edu.

DEFINITIONS:

Immunization Records/Health Clearance Records: For purposes of the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA), immunization and health clearances are classified as an “education record” when used for the purposes of a student’s enrollment.

Educational Record: Broadly defined under FERPA to mean those records that are: (1) directly related to a student and (2) maintained by an educational agency or institution or by a party acting for the agency or institution. At a postsecondary institution, FERPA excludes health or treatment records from the definition of education records so long as the specific conditions listed at §99.3(b)(4) "Education Records" are met. See [34 CFR § 99.3](#), “Education records.”

Continuing Student: Students within the University of Hawai'i system, who have had no break in enrollment.

Initial Admission and/or Admit Term*: The first term a student has a registration record (sfrstcr) even if they dropped all the classes.

Internal Transfer Student: Students transferring between two of the UH campuses (i.e., Honolulu Community College to UH Mānoa). This includes: students transferring between colleges within the UH system, students Changing Home Institutions, and Auto Admit recipients.

External Transfer Student: Students transferring to a UH campus from outside (i.e., Chaminade University to UH Hilo).

Returning Student: Student who had previously attended a UH campus and is being readmitted to that UH campus after a break of enrollment.

SPEA (Dual Enrollment) Students: Includes all high school students.

- Early College - high school student taking college classes under a Memorandum of Agreement with the sponsoring 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, not earning dual credit
- Homeschool - high school student that is homeschooled

BANNER: The University’s official student information system and the system of record.

OnBase: The University’s official document retention and imaging system.