



# Immunization Policy

<b>Responsible Officer:</b>	EVP - UC Health
<b>Responsible Office:</b>	HS - UC Health
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<b>Effective Date:</b>	11/15/2016
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<b>Scope:</b>	This policy applies to all incoming students at the University of California.

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## I. POLICY SUMMARY

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This policy mitigates the risk of our students contracting vaccine-preventable illnesses that could be acquired in a University facility. To this end, the UC Student Health Directors, supported by the Executive Vice President (EVP) of UC Health and the Vice Chancellors of Student Affairs, have implemented a plan that will ultimately require Incoming Students to provide proof of immunity to respiratory transmitted vaccine-preventable diseases, and undergo screening for tuberculosis.

This three- to four-year plan began with an education-only phase during the 2015-16 academic year. Beginning with the fall 2016 academic term, this policy requires submission of documentation of vaccination or antibody response for these vaccines, as well as tuberculosis screening for all Incoming Students entering the system. In the final phase of implementation, the plan calls for SHS centers to begin submitting compliance data to their campus Registrar’s Office, so that these offices can develop the necessary processes to begin implementation of registration holds for Incoming Students who are

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not compliant with these requirements, preferably by academic year 2017-18, and no later than academic year 2018-19. This policy also stipulates that only medical exemptions to the vaccination requirement be allowed and provides a process for student appeals for denials of medical exemption requests.

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## II. DEFINITIONS

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**Incoming Students**—all matriculated incoming undergraduate and graduate students, including transfer students, and students studying on campus for a period of one academic quarter/semester or longer

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## III. POLICY TEXT

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The UC Immunization Policy requires Incoming Students to obtain the vaccinations and screening recommended for colleges and universities by the California Department of Public Health (CDPH) for those diseases that can be passed on to others by respiratory transmission<sup>1</sup>. These vaccines currently include: measles, mumps, rubella (MMR), varicella/chickenpox (VZV), and tetanus, diphtheria, pertussis (Tdap). In addition, meningococcal conjugate vaccine (MenACWY) is required for students aged 21 and younger. All Incoming Students must also complete an online screening questionnaire for tuberculosis (TB), based upon CDPH guidance. Incoming Students who are assessed as potentially at higher risk for TB infection, based on their responses to the screening questionnaire, will be required to undergo further evaluation and testing by their medical provider. Results of this evaluation, in addition to documentation of required vaccinations (or evidence of immunity to these diseases) must be submitted to the Student Health Services at the campus the Incoming Student plans to attend.

Implementation of the Immunization Plan will occur over a three- to four-year period. In the first year (2015-16), the initial focus was to communicate the plan and to provide vaccine education to the campus community, Incoming Students, their parents, and the general public. As of fall 2015, all Incoming Students were routinely notified of the Immunization Plan rationale and its requirements. In fall of 2016, all campuses launched an online immunization module for student self-entry of vaccination history and screening for TB. Incoming Students, parents, campus partners, and the general community have been notified that the appropriate vaccinations, TB screening, and documentation are now requirements of enrollment for all Incoming Students for the fall 2016 academic term. In the final phase of implementation, the SHS centers will begin submitting compliance data to their campus Registrar's Office, so that these offices can develop the necessary processes to begin implementation of registration holds for non-

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<sup>1</sup> Revisions to the CDPH Recommendations for Required Immunizations will be implemented the academic year following any modifications; current requirements are based on CDPH recommendations as of March 16, 2016: <http://eziz.org/assets/docs/IMM-1014.pdf>

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compliant Incoming Students, preferably by academic year 2017-18, and no later than academic year 2018-19.

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### IV. COMPLIANCE / RESPONSIBILITIES

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- A. Student Health Services (SHS), under the oversight of the EVP of UC Health, are responsible for implementing and enforcing this policy.
- B. Campus Registrars are responsible for cooperating with Student Health Services to develop holds that restrict class enrollment and registration for non-compliant students.
- C. Campus IT is responsible for creating interfaces between the SHS and electronic medical record (EMR) and the Registrars system to facilitate information transfer needed to connect students with the secure data entry site on the EMR, and to place and remove registration holds.

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### V. PROCEDURES

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- A. **UC Required Vaccines and Screening**
  - 1. The diseases targeted by this policy include those that are spread by respiratory transmission, and therefore can pose risk to others attending classes, living in residence halls, using other University facilities or attending University events.
  - 2. The required vaccines and screening reflect recommendations by the California Department of Public Health (CDPH) for Colleges and Universities, the American College Health Association (ACHA), and the CDC Advisory Committee for Immunization Practices. Given that these recommendations are subject to change, the required immunizations and screening for fall of each academic year will reflect the CDPH recommendations in place on February 1 of that same year.
  - 3. Immunizations and screening required for 2016-17 include: MMR, VZV, Tdap, MenACWY and TB screening, and are listed in detail on the **UC Immunization Requirements**.
- B. **Vaccination Documentation**
  - 1. All Incoming Students must enter their vaccination history and/or disease-specific antibody titers directly into their electronic medical record (EMR) via a secure interface prior to their first term of enrollment.
  - 2. Students must also submit documentation of vaccinations received, or titers indicating immunity to disease, directly to the SHS via secure document upload, fax, mail, or hand delivery prior to the initial academic term.

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3. Verification of student-entered immunization history will be performed on some or all of the self-entered data.

### **C. Access to Vaccines/Testing**

1. Students are strongly encouraged to complete all necessary vaccinations and/or testing prior to arriving at their campus, and to submit their vaccination history and documentation in advance so they do not experience a delay in registration. Where necessary, students may alternatively obtain the necessary vaccinations/testing at the SHS where they are enrolled.
2. Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. However, students without SHIP insurance plans should obtain vaccinations from their primary care provider in order to avoid paying the full cost for these vaccinations or tests at the SHS.

### **D. Registration Hold for Students Who Fail to Comply with Vaccination Documentation Requirement**

1. SHS will provide a list of students who are not compliant with the immunization/screening requirement to the local campus Registrar who will apply holds for class registration for the upcoming term.

### **E. Exemptions to Receiving Required Immunizations**

1. Students with a medical condition that prevents them from being safely vaccinated may apply for a medical exemption by having a licensed, treating medical provider [specifically a physician (MD or DO), nurse practitioner (NP), or physician assistant (PA)] complete a [Medical Exemption Request Form](#). Students must then submit the completed form to the Medical Director at the SHS on the student's home campus.
2. Requests that specify either a CDC or vaccine manufacturer's listed contraindication for one or more vaccines, or that contain a statement from the treating medical provider that the physical condition of the person or medical circumstances relating to the person are such that immunization is not considered safe, indicating the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the vaccine(s), will meet criteria for approval. Exemption requests outside of these categories will be denied.
3. An Incoming Student whose medical exemption request has been denied may appeal the decision by submitting a request for appeal, along with a copy of the [Medical Exemption Request Form](#), to the Medical Director at the SHS on the student's home campus. The appeal request and accompanying [Medical Exemption Request Form](#) will be de-identified and forwarded to the Immunization Exemption Appeals

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Committee (IEAC) for review and a decision. IEAC membership and the process for appeals is outlined in the [UC Immunization Exemption Policy](#), and section V.G., below.

### **F. The [UC Immunization Exemption Policy](#) Committee**

1. The [UC Immunization Exemption Policy](#) Committee (IEPC) is comprised of UC faculty, staff and students, and public health officials, with members having expertise in primary care medicine, infectious disease, public health, international student services, medical ethics, law, etc.
2. The IEPC appoints a chair to rotate every two years. The IEPC will meet periodically to review the status of the Immunization Plan implementation, review and incorporate any changes to vaccines recommended by CDPH, and review the exemption policy as necessary.

### **G. The UC Immunization Exemption Appeals Committee**

1. The Immunization Appeals Committee (IEAC) will be chaired by the UC Health Medical Director of Student Health and Counseling, who will receive de-identified appeals requests from the campus medical directors. The IEAC Chair will select two to four additional members from the IEPC and/or the SHS Medical Director group to convene the IEAC, review the appeal, and render a decision. If the basis of an appeal merits special consideration, the selection of IEAC members to participate in a review process will be based upon the expertise and backgrounds of the IEPC members or SHS medical directors relative to issues raised in the appeal. The SHS Medical Director who submits an appeal is not eligible to sit on the IEAC to evaluate that appeal.
2. Student members of the IEPC are not eligible to participate on the IEAC. At least three members of the IEAC must participate to render a decision, including the IEAC Chair. Decisions will be communicated to the local campus SHS Medical Director, who will in turn communicate the decision to the student. IEAC decisions shall be rendered within 60 days of receipt by the IEAC Chair.
3. A student who submits an appeal will be allowed to register for classes throughout the academic period in which the appeal is being reviewed, decided and communicated. If the committee denies the student's appeal, the student will not be allowed to register for classes the following term unless the student complies with the immunization requirement.

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## **VI. RELATED INFORMATION**

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California Department of Public Health (CDPH)–Recommendations for Immunization and Screening Requirements for California Colleges & Universities; IMM-1014 (3/16): <http://eziz.org/assets/docs/IMM-1014.pdf>

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American College Health Association (ACHA)–ACHA Guidelines  
Recommendations for Institutional Prematriculation Immunizations, April 2014

California Senate Bill No. 277–An act to amend Sections 120325, 120335, 120370, and 120375 of, to add Section 120338 to, and to repeal Section 120365 of, the Health and Safety Code, relating to public health. Approved by Governor June 30, 2015. Filed with Secretary of State June 30, 2015.

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## VII. FREQUENTLY ASKED QUESTIONS

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1. Q: ***When does the UC Immunization Plan go into effect?***  
A: The UC Immunization Plan begins Fall 2015 with an “Educational” Phase, whereby all Incoming Students, the UC campuses, and the community are notified that vaccination will be required the following year. All Incoming Students are required to submit documentation as of the fall 2016 academic term.
  
2. Q: ***How does UC determine which vaccines and screening to require?***  
A: The UC is following the recommendations of the California Department of Public Health ( C D P H ) Immunization Branch for Colleges and Universities. The current requirements reflect those in place on March 16, 2016: <http://eziz.org/assets/docs/IMM-1014.pdf>. However, UC reserves the right to modify these requirements pending revisions to the recommendations by CDPH. Changes in CDPH’s recommendations, as of February 1 each year, will be incorporated into the requirements affecting the incoming fall class for that year.

In general, these requirements pertain to those vaccine-preventable illnesses that can be spread by respiratory secretions (saliva, coughing, sneezing), and pose a risk to others who might become ill due to classroom or residential contact. These include, measles, mumps, rubella (German measles), diphtheria and pertussis (Whooping cough), varicella (Chickenpox), and meningitis vaccines, as well as screening for tuberculosis.

3. Q: ***Why is UC implementing this policy?***  
A: There has been an increase in outbreaks of vaccine–preventable illnesses over the past five to ten years, and now many illnesses that we thought were disappearing are returning. Although many of these diseases are considered “mild”, they can cause serious illness and death. Pertussis was responsible for hospital stays for hundreds of people in California during the past two years, including intensive care admissions and in a few cases, death. Recent outbreaks of measles also have resulted in hospitalizations, and new cases of mumps across the country threaten the

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health and fertility of non-immune students. Thousands of students have been exposed to active tuberculosis across several campuses.

4. Q: ***Why wasn't this done sooner?***

A: The cost of vaccination was often a barrier to getting all the recommended immunizations. However, the Affordable Care Act has mandated that preventive services such as vaccination be covered at 100%—meaning that these services are now available to all. Another reason that UC did not pursue an immunization policy in the past had to do with the time and cost for staff to gather, review and verify students' immunization records. However, now all of the campuses use the same electronic medical record system that enables students to enter their immunization history directly into their medical record. Each campus may verify some, or all, of these records by obtaining an image, copy of the yellow vaccination record, or another form of proof of documentation. However, we anticipate automating the verification process over the next several years, and thereby limiting additional staff time needed for this process.

5. Q: ***I was not vaccinated as a child. Will I not be admitted to UC until all of the vaccinations have been obtained?***

A: Starting in academic year 2017-18, all UC campuses may begin implementation of registration holds for students who have not documented completion, or who have not begun the process of completing, all of the required vaccines. Several campuses already place registration holds if students have not met the tuberculosis screening requirement. Please check with your campus Student Health Services for information regarding the timeline for registration holds related to immunization requirements.

6. Q: ***My family has concerns regarding the safety of vaccines and has chosen not to be vaccinated. Will I be prevented from attending classes at UC if I do not obtain the required vaccines?***

A: During the initial phases of the Immunization Plan implementation, no registration holds will be placed. However, beginning in academic year 2017-18, students who have not provided evidence of the required vaccinations may not be able to register for classes.

7. Q: ***I had an allergic reaction to a vaccination. Am I still required to be vaccinated to enter UC?***

A: It is very important that the doctor/nurse practitioner/physician assistant who cared for you at that time document what happened to you when you had the problem with vaccination. If you had a true “allergic reaction”, then we will need to know which vaccination caused the problem, and whether you were able to become immune to that illness. You will need to complete a [“Medical Exemption Request Form,”](#) and

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submit it to the Medical Director at your campus Student Health Services (SHS). If your request for a medical exemption is denied by your campus SHS Medical Director, you have a right to appeal the decision to a UC Immunization Exemption Appeals Committee (IEAC) by submitting an appeal request, along with the [Medical Exemption Request Form](#) filled out by your treating medical provider, to the Medical Director of your campus Student Health Services (SHS). Students who have submitted appeals will be able to attend courses during the quarter/semester that their appeals are undergoing review.

8. Q: ***Is there a process to request a personal/religious belief exemption from the UC Immunization Policy?***

A: The UC convened a task force over the summer of 2015 to make recommendations regarding the types of exemptions from the policy that should be considered and the appropriate documentation and appeals process that would be required. This work group included representatives from every campus, as well as a leading medical ethicist and representatives from the California Department of Public Health. The task force, which subsequently was named the [Immunization Exemption Policy Committee \(IEPC\)](#), has recommended that only medical exemptions be allowed. Requests for exemptions for non-medical reasons will be denied and are not eligible for appeal.

9. Q: ***Will I be able to get the vaccines I need from the Student Health Service on my campus?***

A: Yes, though incoming students are strongly encouraged to complete all necessary vaccinations and/or testing prior to arriving at their campus, and to submit their vaccination history and documentation in advance to minimize the chance that they will experience a delay in registration if vaccination requirements have not already been met. Where necessary, students may alternatively obtain the necessary vaccinations/testing at the SHS where they are enrolled. While all of the campus Student Health Services stock and administer the required vaccinations, our expectation is that you receive these vaccines BEFORE arriving at UC. Currently, the campus SHS centers do not bill insurance plans other than their respective Student Health Insurance Plans (SHIP or UC SHIP) available on your campus - which means you would need to pay out-of-pocket for these immunizations. Some campuses may charge you a fee for the administration of the vaccine as it is a pre-entry requirement. Check with your local campus Student Health Services.

10. Q: ***I don't have the SHIP or UC SHIP Insurance Plan, and didn't get my vaccinations or testing done by my regular medical provider at home – how can I request that my outside insurance cover some or all of the costs to get vaccinations or testing done at SHS?***

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- A: If do not have SHIP or UC SHIP, and decide to obtain vaccinations at the SHS on your campus, SHS will provide you with an itemized list of charges for you to send to your insurance company to request reimbursement. While many insurance companies will retroactively reimburse their members for services already obtained, some require prior authorization. If you do not have SHIP or UC SHIP it is important for you to check with your insurance company before receiving services at SHS to verify your coverage.

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## **VIII. REVISION HISTORY**

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(Preliminary: Pre-submission)

10/27/2016: Re-submitted Proposed Policy