



Administrative Policy

Title:	Student Immunization Requirements and Compliance
Source:	Office of the Provost
Prepared by:	CU Denver Anschutz Medical Campus Immunization Policy Committee
Approved by:	Roderick Nairn Provost and Vice Chancellor for Academic and Student Affairs
Effective Date:	January 1, 2013
Replaces:	September 1, 2010
Applies:	All Campuses

A. Introduction

This policy addresses immunization requirements for current and newly enrolled students at the University of Colorado Denver | Anschutz Medical Campus. The State of Colorado has established basic immunization requirements for students at institutions of higher education. The Joint Commission (TJC), using standards established by the Centers for Disease Control (CDC), additionally mandates that all students in health care professions whose training includes clinical settings and patient contact must present evidence of immunization for or immunity to an expanded list of communicable diseases. This policy describes the process for ensuring and certifying compliance with basic and expanded immunization requirements at the CU Denver and CU Anschutz campuses.

B. Policy Statement

1. All continuing and newly enrolled CU Denver students (except those in Extended Studies) must comply with the basic immunization requirements as described in this policy. (See B.4 for exceptions for online students.)
2. Students enrolled in clinically based programs at CU Anschutz (listed below in section D.5) must comply with the expanded immunization certification requirements established by TJC and CDC.
4. Students who do not comply with the immunization requirements described in this policy may not be allowed to enroll in succeeding terms and/or be assigned to clinical sites until the requirements are met.
5. Students enrolled exclusively in online courses or programs must meet the immunization requirement or (at their discretion) sign the exemption clause at the bottom of the Certificate of

Immunization form. (See provision below regarding quarantines and forfeiture of tuition and fees if classes are being attended on campus.)

6. Students required to meet the basic and expanded immunization requirements may be assessed a fee for immunization management services.

7. Student immunization records are protected information under the Family Educational Rights and Privacy Act (FERPA). Health information contained in some immunization records also may be protected information under the Health Insurance and Portability and Accountability Act (HIPAA). These records must, therefore, be stored and maintained in a secure manner.

C. Basic Immunization Requirements for Enrolled Students at CU Denver and Non-Clinical Graduate Students at CU Anschutz

1. All regular enrolled students at CU Denver are required to provide the following documentation by the posted due dates (e.g., November 1 if matriculating in summer or fall terms and March 1 if matriculating in spring term). All regular newly enrolled CU Denver students must comply with these basic immunization requirements.

- a. Signed Meningococcal Disease Information Form
- b. Signed Tuberculosis Screening (Risk Assessment) Form and any additional tests and x-rays required by the health professional who reviews the Tuberculosis Screening form
- c. Proof of immunization
- d. Immunization Form

2. Other degree, non-degree, and certificate students in non-clinical programs at the Anschutz campus may be required to meet the expanded immunization/immunity policy of their program administrators to fulfill student, programmatic, and community health care needs.

3. **Students born after January 1, 1957** must provide documented proof that they have received **two** rubeola (measles), **two** rubella (German measles), and **two** mumps vaccinations **OR two combination** MMR vaccinations (measles, mumps, and rubella).

4. **Students born before January 1, 1957** must provide documented proof that they have received **one** rubeola (measles), **one** rubella (German measles), and **one** mumps vaccination **OR one combination** MMR vaccination (measles, mumps, and rubella).

5. Options for submitting the required proof of immunization or immunity may include:

- Certificate of Immunization signed by a physician, nurse, or school authority.
- Copy of medical records from a physician that outlines a student's immunization history.
- Proof of personal history of measles, mumps, and rubella verified through blood titer tests.
- Official International "Yellow" Certificate of Immunization.

6. Hepatitis B and meningitis vaccines are strongly recommended but not required for CU Denver | CU Anschutz students subject to the basic requirements. In the future these or other forms of vaccination may be required along with MMR immunization and TB screening.

7. Self-identified medical, religious, and personal exemptions to the requirements are allowed by law. Students who submit exemptions on the Certificate of Immunization form are subject to the prevailing state regulations governing quarantines in case of outbreaks and university policies related to forfeiture of tuition and fees.

8. The management of immunization/immunity requirements and compliance will be carried out by campus-based immunization services or outside contracted agencies (e.g., Health Center at Auraria) in a manner best suited to campus needs and resources.

9. CU Anschutz students ~~newly~~ enrolled in non-clinical master's and doctoral Graduate School degree programs are also required to meet the "basic" immunization requirements described above, with the exception of the Meningococcal Disease Information Form, which is recommended but not required.

D. Expanded Immunization Requirements for Graduate and Health Professions Students Enrolled in Clinically Based Programs at CU Anschutz.

1. All students entering clinically-based health care training programs at CU Anschutz have been and will continue to be required to submit documented proof of TB testing and immunization for or immunity to an expanded list of infectious diseases prior to matriculation and the start of their first term. (NOTE: The TB Screening / Risk Assessment Form is not required in addition to the required testing.)

2. The diseases for which immunization or immunity must be documented are described in guidelines issued and periodically revised by the CDC and mandated prior to patient contact by TJC. Diseases covered have included measles, mumps, and rubella (MMR), chicken pox (varicella), polio, hepatitis B, and diphtheria, tetanus, and pertussis (DTaP or Tdap) and may include emergent ones in the future. Annual tuberculin skin testing also is mandatory for all continuing students enrolled in clinical programs and who have not previously tested positive.

3. Influenza vaccines are strongly recommended annually for all those involved in clinical health care training and delivery. Individual programs may, at their option, require annual influenza vaccinations for their students. The Meningococcal Disease Information Form is recommended but not required.

4. Options for submitting the required proof of immunization or immunity may include those listed above in C4.4, but specific requirements may vary by program.

5. Clinically-based health care professions programs administered at CU Anschutz include: Medicine; Pharmacy (traditional and non-traditional); Dental Medicine (including the international and certificate programs); Nursing; Physical Therapy; Child Health Associate-Physician Assistant; Genetic Counseling (Graduate School), and any other clinically-based programs or courses involving patient contact (e.g., certain practicum courses in Colorado School of Public Health programs).

6. CU Anschutz school and college programs are responsible for:

- Updating the Immunization Certification Form when new CDC guidelines are issued;
- Informing new students of the immunization requirements and distributing the certification form (hard copy or electronic format) in admissions materials;

- Setting deadlines for submitting the completed forms -- typically prior to matriculation but no later than the end of the student's first semester;
- Reviewing the submitted immunization forms and following up with non-compliant students;
- Monitoring annual TB testing if required of continuing students.

7. The management of immunization/immunity requirements and compliance at CU Anschutz will be carried out by individual program staff or a centralized immunization services office or outside contracted reviewer(s) in a manner best suited to program guidelines and campus and program resources.

8. Students who do not meet posted deadlines for submitting certification forms and completing any other requirements (e.g., annual TB testing) in a timely fashion will not be allowed to register in their first and/or subsequent term and/or be assigned to clinical settings and responsibilities until the required information has been submitted. A penalty fee may be assessed for processing health holds.

9. Each school or college program with students assigned to clinical settings will determine and monitor if and when new or continuing students need other medical tests, procedures, or equipment to meet compliance requirements related to their training (e.g., annual TB tests, CPR, TB mask fit, etc.). Unless otherwise arranged, students are responsible for obtaining and paying for those medical services not covered by their insurance plans.

10. Clinical training program students in all years of their studies are responsible for complying with immunization regulations and supplying (if requested) to affiliated health care facilities any records of their physical examinations, immunization status, and other medical tests and other forms of required documentation (related to, for instance OSHA, HIPAA, and TJC requirements).

E. References:

Colorado Department of Public Health and Environment rules on student immunizations:
<http://www.cdphe.state.co.us/regulations/diseasecontrol/100902infantimmunizationprogram.pdf>)

Centers for Disease Control Recommendations on Health Care Personnel Immunizations:
<http://www.immunize.org/catg.d/p2017.pdf>

Joint Commission Accreditation and Patient Safety Standards:
<http://www.jointcommission.org/>

Health Center at Auraria immunization requirement website:
<http://www.mscd.edu/healthcenter/immunization/>