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Global Health Institute

July 23, 2024

David Rubin, MD, MSCE
Executive Vice President
University of California, Health & Office of the President
1111 Franklin St., Oakland, Ca 94607

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ACADEMIC COUNCIL CHAIR STEINTRAGER
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Re: Systemwide Review of Proposed Program Attachments #3–7 to the Policy on Vaccination Programs

Dear Colleagues:

Enclosed for systemwide review are proposed revisions to Program Attachments #3–7 to the Policy on Vaccination Programs.

Program Attachments #3–7 include the following mandatory Vaccination and Screening Programs for University of California students: (1) Measles, Mumps, and Rubella Vaccination Program; (2) Meningococcal (Groups A, C, Y, W) Conjugate Vaccination Program; (3) Tetanus, Diphtheria, and Pertussis Vaccination Program; (4) Varicella Vaccination Program; and (5) Tuberculosis Screening Program. These Program Attachments are intended to implement the existing vaccination and screening requirements described in the University’s Student Immunization Policy (first issued in 2016). The Program Attachments were adopted on an interim basis on June 26, 2024, with an immediate effective date, but the 2016 Policy will remain in place until December 31, 2024; the Interim Program Attachments will supersede the 2016 Policy on January 1, 2025, pending any further modifications to the policy documents stemming from this systemwide review process. UC Health is the policy owner and drafter.

The Program Attachments include the following changes to the existing 2016 Student Immunization Policy:

- Students will be required to be Up-To-Date on their MMR, MenACWY, Tdap, and VZV vaccinations, provide proof of immunity for those diseases,

or obtain a University-approved exception, as a condition of Physical Presence at a University Location or in a University Program.

- Students may request exceptions to any of these vaccination requirements premised on medical contraindications, religious objections, or disability. There are no exceptions permitted for students' mandatory completion of a tuberculosis screening questionnaire to evaluate their risk of latent tuberculosis.
- In the event that applicable law or public health orders impose stricter vaccination requirements, students would be required to comply with those stricter requirements.
- Students who are not Up-To-Date with the relevant vaccination requirements (which includes those who have been granted exceptions) or who have not satisfied the tuberculosis screening requirement may be subject to Non-Pharmaceutical Interventions (e.g., masks and testing) above and beyond those who have demonstrated compliance and may be excluded from the Location or site of an outbreak.
- Additionally, students who are not compliant with the vaccination programs and/or screening program must participate in any Vaccine Education required by their Location Vaccine Authority (LVA). Additional Vaccine Education may be required by the LVA in the event of an outbreak or consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

Systemwide Review

Systemwide review is a public review distributed to the Chancellors, the Chair of the Academic Council, the Director of the Lawrence Berkeley National Laboratory, and the Vice President of Agriculture and Natural Resources requesting that they inform the general University community, especially affected employees, about policy proposals. Systemwide review also includes a mandatory, 90-day full Senate review.

Employees should be afforded the opportunity to review and comment on the draft policy. Attached is a Model Communication which may be used to inform non-exclusively represented employees about these proposals. The Labor Relations Office at the Office of the President is responsible for informing the bargaining units representing union membership about policy proposals.

We would appreciate receiving your comments no later than **October 30, 2024**. Please submit your comments and/or any questions to Immunization_Policy_Comment@ucop.edu.

Sincerely,

DocuSigned by:

David M Rubin

D880668F622246F
David Rubin, MD, MSCE

UC Health

Executive Vice President

Enclosures:

- 1) Draft Program Attachments #3–7 to the Policy on Vaccination Programs
- 2) Model Communication

cc: President Drake
Provost and Executive Vice President Newman
Executive Vice Chancellors/Provosts
Executive Vice President and Chief Operating Officer Nava
Executive Vice President Rubin
Senior Vice President Bustamante
Vice President and Vice Provost Gullatt
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Deputy Chief HR Officer and Chief of Staff Henderson
Executive Director Lin
Chief of Staff Beechem
Chief of Staff Levintov
Chief Policy Advisor McAuliffe
Director Anders
Director Chin
Director Weston-Dawkes
Associate Director Dicaprio
Associate Director Garcia
Associate Director Soria
Associate Director Teaford
Associate Director Woolston
Assistant Director LaBriola
Manager Crosson
Policy Analyst Durrin
Administrative Officer Babbitt
Policy Advisory Committee

INTERIM PROGRAM ATTACHMENT #3: Measles, Mumps, and Rubella Vaccination Program

Vaccine(s)	Targeted Disease or Condition
See https://www.fda.gov/vaccines-blood-biologics/vaccines/measles-mumps-and-rubella-virus-vaccine-live for details on the M-M-R II vaccine and https://www.fda.gov/vaccines-blood-biologics/priorix for details on the PRIORIX vaccine.	Measles, Mumps, and Rubella

I. Purpose/Supporting Data

The purpose of this Measles, Mumps, and Rubella (MMR) Vaccination Program is to facilitate protection of the health and safety of the University community, including its Students, Personnel, and all others who work, live, and/or learn in any of the University’s Locations or otherwise participate in person in University Programs. These three vaccine-preventable illnesses are spread by respiratory transmission, and therefore can pose a risk to other individuals, including Covered Individuals, attending classes, living in residence halls, using other University facilities, or attending University events. The University strongly recommends that all members of the University community immediately obtain the MMR vaccine if they have not already.

This MMR Vaccination Program requires any Covered Individual, as defined in this Program Attachment, subject to limited Exceptions and associated Non-Pharmaceutical Interventions (NPIs), to be Up-To-Date on MMR vaccination, or provide proof of immunity for measles, mumps, and rubella by the Compliance Date specified in this Program Attachment as a condition of Physical Presence at a Location or in a University Program. Covered Individuals subject to additional or more restrictive MMR vaccination requirements under applicable law and/or applicable public health directives must also comply with those requirements.

Student Health Services (SHS) at each campus is responsible for collecting evidence of compliance with this MMR Vaccination Program from Covered Individuals and for evaluating any requests for Exceptions as described in this Program Attachment. SHS must submit compliance data to their campus Registrar’s Office, so that these Offices can institute registration holds for any Covered Individual who has not complied with these requirements.

Campus Registrars are responsible for initiating holds that restrict class enrollment and registration for any Covered Individual who has not complied with these requirements. Continued noncompliance with this Program Attachment may result in educational consequences up to and including disciplinary sanctions as outlined in PACAOS 105.00.

Campus IT is responsible for creating and maintaining interfaces between the SHS electronic medical record (EMR) system and the Registrars’ system to facilitate information transfer needed to connect Covered Individuals with the secured data entry set on the EMR, and to place and remove registration holds.

Covered Individuals who are not Up-To-Date must observe any NPIs as directed by the Location Vaccine Authority (LVA) to mitigate risk to members of the University community, patients, and others with whom they may interact. Covered Individuals who initially request an Exception but later decide to become vaccinated may receive the MMR vaccine at any time and may notify the LVA.

Refer to Section XI (Related Information) for linked webpages containing additional information that supports implementation of this program, including the applicable public health recommendations, which are incorporated by reference into this Program Attachment, as those may be amended or updated from time to time.

For purposes of this Program Attachment, Covered Individuals include anyone designated as Students under this policy who Physically Access a University Facility or Program in connection with their education/training. Personnel are not Covered Individuals, but Personnel who are also Students are Covered Individuals in their Student role. A person exclusively accessing a Healthcare Location as a patient, or an art, athletics, entertainment, or other publicly accessible venue at a Location as a member of the public, is not a Covered Individual.

II. Compliance Date

Locations must implement this MMR Vaccination Program by January 1, 2025.

For Covered Individuals matriculating after Fall 2024, the Compliance Date is the first day of instruction for the term for which they first enroll. Any Covered Individual who has not provided proof of compliance on or before the registration period for their second term of enrollment will not be allowed to register unless and until the Covered Individual complies with the vaccination requirement or is granted an Exception. Locations may specify additional deadlines.

Covered Individuals matriculating Fall 2024 or who matriculated prior to Fall 2024 should consult with their local SHS regarding deadlines and requirements for compliance.

III. Program Type: Mandatory (Subject to Exceptions Marked Below) Opt-Out

On or before the applicable Compliance Date, Covered Individuals must: (1) provide proof of the MMR vaccination as required to be Up-To-Date; (2) provide proof of immunity; or (3) submit a request for an Exception.

A. Permitted Exceptions (Refer to Model Forms)

Medical Exemption (Medical Contraindications or Precautions to each Vaccine that would satisfy the vaccination requirement.)

Religious Objection (A Covered Individual's objection to receiving an otherwise required Vaccine based on that person's sincerely held religious belief, practice, or observance.)

☒ *Disability* (A physical or mental disorder or condition that limits a major life activity and any other condition recognized as a disability under applicable law. “Disability” includes pregnancy, childbirth, or a related medical condition where reasonable accommodation is medically advisable.)

B. Exception Requests

A Covered Individual seeking an Exception must, no later than the Compliance Date, submit their request to the Medical Director at the SHS on the Covered Individual’s home campus. While a request is pending and if it is granted, the Covered Individual must, as a condition of Physical Presence, observe NPIs defined by the LVA no less stringent than applicable public health directives and any University or Location guidelines. If an Exception is granted, the LVA must notify the Covered Individual and SHS of the approval and the associated expiration date, if any. If a request for an Exception is denied, the Covered Individual will be notified and, thereafter, unless the Covered Individual appeals the decision or requests a different Exception, the Covered Individual will be expected to promptly provide proof of MMR vaccination as required to be Up-To-Date or proof of immunity or will be denied Physical Presence at the relevant University Location(s) or Program(s).

A Covered Individual has the right to appeal the denial of their Exception request. The Covered Individual must submit an appeal request, along with the relevant Exception request form to the Medical Director of their campus SHS; the appeal request and the accompanying Exception request form will be reviewed by the LVA, and the LVA will subsequently issue a decision. A Covered Individual 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 and may be subject to NPIs during that time. If the LVA denies the Covered Individual’s appeal, the Covered Individual will not be allowed to register for classes the following term unless the Covered Individual complies with the vaccination requirement or subsequently requests and is granted a University-approved Exception.

V. Evidence Required

Covered Individuals must submit proof of vaccination or immunity to measles, mumps, and rubella or of a University-approved Exception to their SHS, by providing either: (i) official documentation issued by a State vaccine registry or an official medical record, or (ii) in the case of one who has received a University-approved Exception, documentation that an Exception has been granted. Proof of immunity and Exceptions may be subject to audit.

All Covered Individuals must enter their vaccination history and/or disease-specific antibody titers directly into their electronic medical record (EMR) via a secure interface on or before the first day of instruction for their first term of enrollment. This is accessed either through a link on the student portal on the campus Registrar’s website or directly via the SHS website. Covered Individuals 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 on or before the first day of

instruction of their first academic term. Verification of Covered Individual-entered immunization history will be performed on some or all of the self-entered data.

VI. Access to Vaccines

Covered Individuals are strongly encouraged to complete MMR vaccination 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. Covered Individuals may have the option to obtain the MMR vaccination at the SHS where they are enrolled or at a community pharmacy or clinic.

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. UC Student Health Insurance Plan (SHIP) covers and pays for vaccinations provided at the SHS or at in-network pharmacies or clinics. However, SHS only bills and collects from UC SHIP directly; SHS does not bill and collect from other health insurance plans. Covered Individuals with health insurance plans other than UC SHIP who obtain vaccinations at SHS may be required to pay out-of-pocket for their vaccinations and then submit requests for reimbursement to their health insurance plans. Covered Individuals with health insurance plans other than SHIP may obtain vaccinations from their primary care provider or a community pharmacy to avoid paying for the cost of these vaccinations up front at the SHS.

VII. Non-Pharmaceutical Interventions (NPIs)

Covered Individuals may be required by applicable public health authorities or the LVA in response to a public health emergency or during a localized outbreak to observe NPIs, including, but not limited to, the following: (i) wearing face-coverings, medical-grade masks, and other protective equipment; (ii) isolation and quarantine; (iii) physical/social distancing; (iv) frequent washing and cleaning; and (v) asymptomatic (surveillance/screening) and symptomatic testing.

Covered Individuals who are not Up-To-Date on the MMR vaccination may be subject to NPIs above and beyond those who have demonstrated compliance. In the event of a disease outbreak, Covered Individuals who are not Up-To-Date on the MMR vaccination may be excluded from the Location or site of the outbreak.

VIII. Vaccine Education

All Covered Individuals who are not Up-To-Date on the MMR vaccination or who have not provided proof of compliance with this MMR Vaccination Program by the Compliance Date must participate in any Vaccine Education required by the LVA. During a public health emergency or during a localized outbreak, all Covered Individuals may be required to participate in additional systemwide or local Vaccine Education programs. Additional Vaccine Education may be required by the LVA consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

IX. Systemwide Implementation Guidelines: Attached None

X. Program Evaluation

This MMR Vaccination Program is intended to maintain the MMR vaccination uptake rate among Covered Individuals in order to preserve herd immunity in the University community. In the event that the uptake rate at a particular University Location drops below the recommended level to preserve herd immunity (as dictated by the local public health authority), or as otherwise recommended or required by the local public health authority in response to a localized outbreak, the University may modify this Program Attachment to protect the health and safety of its Covered Individuals and the University community. Locations are encouraged, but not required, to evaluate Program Participation on an annual and ongoing basis.

XI. Related Information

- [CDC, MMR Vaccination: What Everyone Should Know](#)
- [CDC, MMR Vaccine Information Statement](#)
- [CDC Immunization Schedules](#)
- [CDPH, Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#)
- [American College Health Association \(ACHA\) Guidelines: Immunization Recommendations for College Students](#), April 2023
- [ACIP Vaccine Recommendations and Guidelines](#)
- [FDA, Vaccination is the Best Protection Against Measles](#)

XII. Frequently Asked Questions

1. How does UC determine which vaccines and screening to require?

The University relies on the recommendations of the California Department of Public Health (CDPH) [Recommendations for Immunization and Screening Requirements for California Colleges & Universities](#), the American College Health Association (ACHA) Guidelines: [Immunization Recommendations for College Students](#), and the Centers for Disease Control and Prevention (CDC) Advisory Committee for Immunization Practices (ACIP) [Vaccine Recommendations and Guidelines](#). The current requirements reflect the CDPH [Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#) in place on February 26, 2024. However, the University reserves the right to modify these requirements pending revisions to the recommendations by CDPH, ACHA, or ACIP. Changes in CDPH, ACHA, or ACIP recommendations, as of February each year, will be incorporated into the requirements affecting the incoming fall class for that year. Additional revisions may be made in response to significant public health events, such as a pandemic or other public health emergency. Please see [UC Immunization Requirements and Recommendations](#) for information on required and recommended vaccines. 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.

Note: Covered Individuals may be subject to more restrictive vaccination requirements under applicable law and/or applicable public health directives. In such cases, the more restrictive vaccination requirements will apply in addition to any other requirements under these Vaccination Program Attachments.

2. Why did UC implement the MMR Vaccination Program?

The University's 2016 [Student Immunization Policy](#) was issued in response to an increase in outbreaks of vaccine-preventable illnesses that had occurred on UC campuses and the reemergence of illnesses once thought to have nearly disappeared. In particular, contemporaneous outbreaks of measles had resulted in hospitalizations, and cases of mumps across the country had threatened the health and fertility of non-immune students. Although the three diseases that are the focus of the MMR vaccine are considered "mild," they can cause serious illness, lifelong complications, and even death. This Program Attachment incorporates the MMR vaccination requirement from the 2016 Policy as an addendum to the systemwide Policy on Vaccination Programs.

3. What if the required MMR vaccination was not available in my home country before coming to UC?

Please check with your local campus SHS for information regarding the timeline for registration holds if you were not able to meet MMR vaccination requirements before your arrival to UC for this reason.

4. If 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?

Covered Individuals who have not provided evidence of the required vaccination or immunity to all diseases for which vaccination is required, and who have not received a University-approved Exception, will not be able to register for classes. Locations may impose additional restrictions, so please check with your local campus SHS for more information.

5. I had an allergic reaction to a vaccination. Am I still required to be vaccinated to enter UC?

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 SHS 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 submit it to the Medical Director at your campus SHS.

6. What is the process for requesting an Exception?

Covered Individuals 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 the University's Medical Exemption Request Form. Covered Individuals must then submit the completed form to the Medical Director at the SHS on their home campus. Requests that specify a contraindication or precaution to a Vaccine recognized by the CDC, CDPH, or in the case of internationally administered Vaccines, the World Health Organization, and that indicate the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the vaccine(s) will meet criteria for approval. Medical Exemption requests outside of these categories will be denied.

Covered Individuals should use the Disability Exception Request Form to request an exception based on that Covered Individual's disability or disabilities, and then submit the completed form to the Medical Director at the SHS on their home campus.

Likewise, Covered Individuals should use the Religious Exception Request Form to request an Exception based on Religious Objection, and then submit the completed form to the Medical Director at the SHS on their home campus.

7. My Exception Request was denied. Can I appeal that decision?

If your request for an Exception is denied, you have a right to appeal the decision to the LVA by submitting an appeal request, along with the relevant Exception Request Form, to the Medical Director of your campus SHS. Covered Individuals who have submitted appeals will be able to attend courses during the quarter/semester that their appeals are undergoing review and may be subject to additional NPIs.

8. Will I be able to get the vaccines I need from Student Health Services on my campus?

Covered Individuals 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, Covered Individuals may alternatively request the necessary vaccinations at the SHS where they are enrolled. While all of the campus Student Health Services stock and administer the required vaccinations, the University strongly encourages you to receive these vaccines *before* arriving at UC. Covered Individuals should be prepared to request these vaccines from retail pharmacies or community medical providers.

9. 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?

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. However, 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. 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.

Alternatively, Covered Individuals without SHIP insurance plans may obtain vaccinations from their primary care provider in order to avoid paying the full cost for these vaccinations or tests at the SHS.

XIII. Model Forms and Exhibits

[Link to be inserted: University of California Religious Exception Request Form]

[Link to be inserted: University of California Religious Exception Request Form]

XIV. Revision History

TBD 2024: Initial issuance of Interim Program Attachment requiring Locations to implement this MMR Vaccination Program by January 1, 2025.

**INTERIM PROGRAM ATTACHMENT #4: Meningococcal (Groups A, C, Y, W)
Conjugate Vaccination Program**

Vaccine(s)	Targeted Disease or Condition
See https://www.fda.gov/vaccines-blood-biologics/vaccines/menactra for details on the Menactra vaccine, https://www.fda.gov/vaccines-blood-biologics/vaccines/menveo for details on the Menveo vaccine, and https://www.fda.gov/vaccines-blood-biologics/menquadfi for details on the MenQuadfi vaccine.	Meningococcal (Groups A, C, Y, W) Conjugate (MenACWY)

I. Purpose/Supporting Data

The purpose of this Meningococcal (Groups A, C, Y, W) Conjugate (MenACWY) Vaccination Program is to facilitate protection of the health and safety of the University community, including its Students, Personnel, and all others who work, live, and/or learn in any of the University’s Locations or otherwise participate in person in University Programs. These vaccine-preventable illnesses are spread by respiratory transmission, and therefore can pose a risk to other individuals, including Covered Individuals, attending classes, living in residence halls, using other University facilities, or attending University events. The University strongly recommends that all members of the University community immediately obtain the MenACWY vaccine if they have not already.

This MenACWY Vaccination Program requires any Covered Individual, as defined in this Program Attachment, subject to limited Exceptions and associated Non-Pharmaceutical Interventions (NPIs), to be Up-To-Date on MenACWY vaccination, or provide proof of immunity for meningococcal groups A, C, Y, and W by the Compliance Date specified in this Program Attachment as a condition of Physical Presence at a Location or in a University Program. Covered Individuals subject to additional or more restrictive MenACWY vaccination requirements under applicable law and/or applicable public health directives must also comply with those requirements.

Student Health Services (SHS) at each campus is responsible for collecting evidence of compliance with this MenACWY Vaccination Program from Covered Individuals and for evaluating any requests for Exceptions as described in this Program Attachment. SHS must submit compliance data to their campus Registrar’s Office, so that these Offices can institute registration holds for any Covered Individual who has not complied with these requirements.

Campus Registrars are responsible for initiating holds that restrict class enrollment and registration for any Covered Individual who has not complied with these requirements. Continued noncompliance with this Program Attachment may result in educational consequences up to and including disciplinary sanctions as outlined in PACAOS 105.00.

Campus IT is responsible for creating and maintaining interfaces between the SHS electronic medical record (EMR) system and the Registrars’ system to facilitate

information transfer needed to connect Covered Individuals with the secured data entry set on the EMR, and to place and remove registration holds.

Covered Individuals who are not Up-To-Date must observe any NPIs as directed by the Location Vaccine Authority (LVA) to mitigate risk to members of the University community, patients, and others with whom they may interact. Covered Individuals who initially request an Exception but later decide to become vaccinated may receive the MenACWY vaccine at any time and may notify the LVA.

Refer to Section XI (Related Information) for linked webpages containing additional information that supports implementation of this program, including the applicable public health recommendations, which are incorporated by reference into this Program Attachment, as those may be amended or updated from time to time.

For purposes of this Program Attachment, Covered Individuals include anyone designated as Students under this policy who Physically Access a University Facility or Program in connection with their education/training. Personnel are not Covered Individuals, but Personnel who are also Students are Covered Individuals in their Student role. A person exclusively accessing a Healthcare Location as a patient, or an art, athletics, entertainment, or other publicly accessible venue at a Location as a member of the public, is not a Covered Individual.

II. Compliance Date

Locations must implement this MenACWY Vaccination Program by January 1, 2025.

For Covered Individuals matriculating after Fall 2024, the Compliance Date is the first day of instruction for the term for which they first enroll. Any Covered Individual who has not provided proof of compliance on or before the registration period for their second term of enrollment will not be allowed to register unless and until the Covered Individual complies with the vaccination requirement or is granted an Exception. Locations may specify additional deadlines.

Covered Individuals matriculating Fall 2024 or who matriculated prior to Fall 2024 should consult with their local SHS regarding deadlines and requirements for compliance.

III. Program Type: Mandatory (Subject to Exceptions Marked Below) Opt-Out

On or before the applicable Compliance Date, Covered Individuals must: (1) provide proof of the MenACWY vaccination as required to be Up-To-Date; (2) provide proof of immunity; or (3) submit a request for an Exception.

A. Permitted Exceptions (Refer to Model Forms)

Medical Exemption (Medical Contraindications or Precautions to each Vaccine that would satisfy the vaccination requirement.)

☒ *Religious Objection* (A Covered Individual's objection to receiving an otherwise required Vaccine based on that person's sincerely held religious belief, practice, or observance.)

☒ *Disability* (A physical or mental disorder or condition that limits a major life activity and any other condition recognized as a disability under applicable law. "Disability" includes pregnancy, childbirth, or a related medical condition where reasonable accommodation is medically advisable.)

B. Exception Requests

A Covered Individual seeking an Exception must, no later than the Compliance Date, submit their request to the Medical Director at the SHS on the Covered Individual's home campus. While a request is pending and if it is granted, the Covered Individual must, as a condition of Physical Presence, observe NPIs defined by the LVA no less stringent than applicable public health directives and any University or Location guidelines. If an Exception is granted, the LVA must notify the Covered Individual and SHS of the approval and the associated expiration date, if any. If a request for an Exception is denied, the Covered Individual will be notified and, thereafter, unless the Covered Individual appeals the decision or requests a different Exception, the Covered Individual will be expected to promptly provide proof of MenACWY vaccination as required to be Up-To-Date or proof of immunity or will be denied Physical Presence at the relevant University Location(s) or Program(s).

A Covered Individual has the right to appeal the denial of their Exception request. The Covered Individual must submit an appeal request, along with the relevant Exception request form to the Medical Director of their campus SHS; the appeal request and the accompanying Exception request form will be reviewed by the LVA, and the LVA will subsequently issue a decision. A Covered Individual 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 and may be subject to NPIs during that time. If the LVA denies the Covered Individual's appeal, the Covered Individual will not be allowed to register for classes the following term unless the Covered Individual complies with the vaccination requirement or subsequently requests and is granted a University-approved Exception.

V. Evidence Required

Covered Individuals must submit proof of vaccination or immunity to meningococcal groups A, C, Y, and W or of a University-approved Exception to their SHS, by providing either: (i) official documentation issued by a State vaccine registry or an official medical record, or (ii) in the case of one who has received a University-approved Exception, documentation that an Exception has been granted. Proof of immunity and Exceptions may be subject to audit.

All Covered Individuals must enter their vaccination history and/or disease-specific antibody titers directly into their electronic medical record (EMR) via a secure interface on or before the first day of instruction for their first term of enrollment. This is accessed

either through a link on the student portal on the campus Registrar's website or directly via the SHS website. Covered Individuals 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 on or before the first day of instruction of their first academic term. Verification of Covered Individual-entered immunization history will be performed on some or all of the self-entered data.

VI. Access to Vaccines

Covered Individuals are strongly encouraged to complete MenACWY vaccination 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. Covered Individuals may have the option to obtain the MenACWY vaccination at the SHS where they are enrolled or at a community pharmacy or clinic.

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. UC Student Health Insurance Plan (SHIP) covers and pays for vaccinations provided at the SHS or at in-network pharmacies or clinics. However, SHS only bills and collects from UC SHIP directly; SHS does not bill and collect from other health insurance plans. Covered Individuals with health insurance plans other than UC SHIP who obtain vaccinations at SHS may be required to pay out-of-pocket for their vaccinations and then submit requests for reimbursement to their health insurance plans. Covered Individuals with health insurance plans other than SHIP may obtain vaccinations from their primary care provider or a community pharmacy to avoid paying for the cost of these vaccinations up front at the SHS.

VII. Non-Pharmaceutical Interventions (NPIs)

Covered Individuals may be required by applicable public health authorities or the LVA in response to a public health emergency or during a localized outbreak to observe NPIs, including, but not limited to, the following: (i) wearing face-coverings, medical-grade masks, and other protective equipment; (ii) isolation and quarantine; (iii) physical/social distancing; (iv) frequent washing and cleaning; and (v) asymptomatic (surveillance/screening) and symptomatic testing.

Covered Individuals who are not Up-To-Date on the MenACWY vaccination may be subject to NPIs above and beyond those who have demonstrated compliance. In the event of a disease outbreak, Covered Individuals who are not Up-To-Date on the MenACWY vaccination may be excluded from the Location or site of the outbreak.

VIII. Vaccine Education

All Covered Individuals who are not Up-To-Date on the MenACWY vaccination or who have not provided proof of compliance with this MenACWY Vaccination Program by the Compliance Date must participate in any Vaccine Education required by the LVA. During a public health emergency or during a localized outbreak, all Covered Individuals may be required to participate in additional systemwide or local Vaccine Education programs. Additional Vaccine Education may be required by the LVA consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

IX. Systemwide Implementation Guidelines: Attached None

X. Program Evaluation

This MenACWY Vaccination Program is intended to maintain the MenACWY vaccination uptake rate among Covered Individuals in order to preserve herd immunity in the University community. In the event that the uptake rate at a particular University Location drops below the recommended level to preserve herd immunity (as dictated by the local public health authority), or as otherwise recommended or required by the local public health authority in response to a localized outbreak, the University may modify this Program Attachment to protect the health and safety of its Covered Individuals and the University community. Locations are encouraged, but not required, to evaluate Program Participation on an annual and ongoing basis.

XI. Related Information

- [CDC, Meningococcal Vaccination](#)
- [CDC, Meningococcal ACWY Vaccine Information Statement](#)
- [CDC Immunization Schedules](#)
- [CDPH, Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#)
- [American College Health Association \(ACHA\) Guidelines: Immunization Recommendations for College Students](#), April 2023
- [ACIP Vaccine Recommendations and Guidelines](#)

XII. Frequently Asked Questions

1. How does UC determine which vaccines and screening to require?

The University relies on the recommendations of the California Department of Public Health (CDPH) [Recommendations for Immunization and Screening Requirements for California Colleges & Universities](#), the American College Health Association (ACHA) Guidelines: [Immunization Recommendations for College Students](#), and the Centers for Disease Control and Prevention (CDC) Advisory Committee for Immunization Practices (ACIP) [Vaccine Recommendations and Guidelines](#). The current requirements reflect the CDPH [Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#) in place on February 26, 2024. However, the University reserves the right to modify these requirements pending revisions to the recommendations by CDPH, ACHA, or ACIP. Changes in CDPH, ACHA, or ACIP recommendations, as of February each year, will be incorporated into the requirements affecting the incoming fall class for that year. Additional revisions may be made in response to significant public health events, such as a pandemic or other public health emergency. Please see [UC Immunization Requirements and Recommendations](#) for information on required and recommended vaccines. 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.

Note: Covered Individuals may be subject to more restrictive vaccination requirements under applicable law and/or applicable public health directives. In such cases, the more restrictive vaccination requirements will apply in addition to any other requirements under these Vaccination Program Attachments.

2. Why did UC implement the MenACWY Vaccination Program?

The University's 2016 [Student Immunization Policy](#) was issued in response to an increase in outbreaks of vaccine-preventable illnesses that had occurred on UC campuses and the reemergence of illnesses once thought to have nearly disappeared. The meningococcal diseases that are the focus of the MenACWY vaccine can cause serious illness, lifelong complications, and even death. This Program Attachment incorporates the MenACWY vaccination requirement from the 2016 Policy as an addendum to the systemwide Policy on Vaccination Programs.

3. What if the required MenACWY vaccination was not available in my home country before coming to UC?

Please check with your local campus SHS for information regarding the timeline for registration holds if you were not able to meet MenACWY vaccination requirements before your arrival to UC for this reason.

4. If my family have concerns regarding the safety of vaccines and have chosen not to be vaccinated. Will I be prevented from attending classes at UC if I do not obtain the required vaccines?

Covered Individuals who have not provided evidence of the required vaccination or immunity to all diseases for which vaccination is required, and who have not received a University-approved Exception, will not be able to register for classes. Locations may impose additional restrictions, so please check with your local campus SHS for more information.

5. I had an allergic reaction to a vaccination. Am I still required to be vaccinated to enter UC?

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 SHS 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 submit it to the Medical Director at your campus SHS.

6. What is the process for requesting an Exception?

Covered Individuals 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 the University's Medical Exemption Request Form. Covered Individuals must then submit the completed form to the Medical Director at the SHS on their home campus. Requests that specify a contraindication or precaution to a Vaccine recognized by the CDC, CDPH, or in the case of internationally administered Vaccines, the World Health Organization, and that indicate the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the vaccine(s) will meet criteria for approval. Medical Exemption requests outside of these categories will be denied.

Covered Individuals should use the Disability Exception Request Form to request an exception based on that Covered Individual's disability or disabilities, and then submit the completed form to the Medical Director at the SHS on their home campus.

Likewise, Covered Individuals should use the Religious Exception Request Form to request an Exception based on Religious Objection, and then submit the completed form to the Medical Director at the SHS on their home campus.

7. My Exception Request was denied. Can I appeal that decision?

If your request for an Exception is denied, you have a right to appeal the decision to the LVA by submitting an appeal request, along with the relevant Exception Request Form, to the Medical Director of your campus SHS. Covered Individuals who have submitted appeals will be able to attend courses during the quarter/semester that their appeals are undergoing review and may be subject to additional NPIs.

8. Will I be able to get the vaccines I need from Student Health Services on my campus?

Covered Individuals 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, Covered Individuals may alternatively request the necessary vaccinations at the SHS where they are enrolled. While all of the campus Student Health Services stock and administer the required vaccinations, the University strongly encourages you to receive these vaccines *before* arriving at UC. Covered Individuals should be prepared to request these vaccines from retail pharmacies or community medical providers.

9. 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?

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. However, 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. 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.

Alternatively, Covered Individuals without SHIP insurance plans may obtain vaccinations from their primary care provider in order to avoid paying the full cost for these vaccinations or tests at the SHS.

XIII. Model Forms and Exhibits

[Link to be inserted: University of California Religious Exception Request Form]

[Link to be inserted: University of California Religious Exception Request Form]

XIV. Revision History

TBD 2024: Initial issuance of Interim Program Attachment requiring Locations to implement this MenACWY Vaccination Program by January 1, 2025.

INTERIM PROGRAM ATTACHMENT #5: Tetanus, Diphtheria, and Pertussis Vaccination Program

Vaccine(s)	Targeted Disease or Condition
See https://www.fda.gov/vaccines-blood-biologics/vaccines/adacel for details on the Adacel vaccine and https://www.fda.gov/vaccines-blood-biologics/vaccines/boostrix for details on the Boostrix vaccine.	Tetanus, Diphtheria, and Pertussis

I. Purpose/Supporting Data

The purpose of this Tetanus, Diphtheria, and Pertussis (Tdap) Vaccination Program is to facilitate protection of the health and safety of the University community, including its Students, Personnel, and all others who work, live, and/or learn in any of the University's Locations or otherwise participate in person in University Programs. Two of these three vaccine-preventable illnesses are spread by respiratory transmission, and therefore can pose a risk to other individuals, including Covered Individuals, attending classes, living in residence halls, using other University facilities, or attending University events. The University strongly recommends that all members of the University community immediately obtain the Tdap vaccine if they have not already.

This Tdap Vaccination Program requires any Covered Individual, as defined in this Program Attachment, subject to limited Exceptions and associated Non-Pharmaceutical Interventions (NPIs), to be Up-To-Date on Tdap vaccination, or provide proof of immunity for tetanus, diphtheria, and pertussis by the Compliance Date specified in this Program Attachment as a condition of Physical Presence at a Location or in a University Program. Covered Individuals subject to additional or more restrictive Tdap vaccination requirements under applicable law and/or applicable public health directives must also comply with those requirements.

Student Health Services (SHS) at each campus is responsible for collecting evidence of compliance with this Tdap Vaccination Program from Covered Individuals and for evaluating any requests for Exceptions as described in this Program Attachment. SHS must submit compliance data to their campus Registrar's Office, so that these Offices can institute registration holds for any Covered Individual who has not complied with these requirements.

Campus Registrars are responsible for initiating holds that restrict class enrollment and registration for any Covered Individual who has not complied with these requirements. Continued noncompliance with this Program Attachment may result in educational consequences up to and including disciplinary sanctions as outlined in PACAOS 105.00.

Campus IT is responsible for creating and maintaining interfaces between the SHS electronic medical record (EMR) system and the Registrars' system to facilitate information transfer needed to connect Covered Individuals with the secured data entry set on the EMR, and to place and remove registration holds.

Covered Individuals who are not Up-To-Date must observe any NPIs as directed by the Location Vaccine Authority (LVA) to mitigate risk to members of the University community, patients, and others with whom they may interact. Covered Individuals who initially request an Exception but later decide to become vaccinated may receive the Tdap vaccine at any time and may notify the LVA.

Refer to Section XI (Related Information) for linked webpages containing additional information that supports implementation of this program, including the applicable public health recommendations, which are incorporated by reference into this Program Attachment, as those may be amended or updated from time to time.

For purposes of this Program Attachment, Covered Individuals include anyone designated as Students under this policy who Physically Access a University Facility or Program in connection with their education/training. Personnel are not Covered Individuals, but Personnel who are also Students are Covered Individuals in their Student role. A person exclusively accessing a Healthcare Location as a patient, or an art, athletics, entertainment, or other publicly accessible venue at a Location as a member of the public, is not a Covered Individual.

II. Compliance Date

Locations must implement this Tdap Vaccination Program by January 1, 2025.

For Covered Individuals matriculating after Fall 2024, the Compliance Date is the first day of instruction for the term for which they first enroll. Any Covered Individual who has not provided proof of compliance on or before the registration period for their second term of enrollment will not be allowed to register unless and until the Covered Individual complies with the vaccination requirement or is granted an Exception. Locations may specify additional deadlines.

Covered Individuals matriculating Fall 2024 or who matriculated prior to Fall 2024 should consult with their local SHS regarding deadlines and requirements for compliance.

III. Program Type: Mandatory (Subject to Exceptions Marked Below) Opt-Out

On or before the applicable Compliance Date, Covered Individuals must: (1) provide proof of the Tdap vaccination as required to be Up-To-Date; (2) provide proof of immunity; or (3) submit a request for an Exception.

A. Permitted Exceptions (Refer to Model Forms)

Medical Exemption (Medical Contraindications or Precautions to each Vaccine that would satisfy the vaccination requirement.)

Religious Objection (A Covered Individual's objection to receiving an otherwise required Vaccine based on that person's sincerely held religious belief, practice, or observance.)

☒ *Disability* (A physical or mental disorder or condition that limits a major life activity and any other condition recognized as a disability under applicable law. “Disability” includes pregnancy, childbirth, or a related medical condition where reasonable accommodation is medically advisable.)

B. Exception Requests

A Covered Individual seeking an Exception must, no later than the Compliance Date, submit their request to the Medical Director at the SHS on the Covered Individual’s home campus. While a request is pending and if it is granted, the Covered Individual must, as a condition of Physical Presence, observe NPIs defined by the LVA no less stringent than applicable public health directives and any University or Location guidelines. If an Exception is granted, the LVA must notify the Covered Individual and SHS of the approval and the associated expiration date, if any. If a request for an Exception is denied, the Covered Individual will be notified and, thereafter, unless the Covered Individual appeals the decision or requests a different Exception, the Covered Individual will be expected to promptly provide proof of Tdap vaccination as required to be Up-To-Date or proof of immunity or will be denied Physical Presence at the relevant University Location(s) or Program(s).

A Covered Individual has the right to appeal the denial of their Exception request. The Covered Individual must submit an appeal request, along with the relevant Exception request form to the Medical Director of their campus SHS; the appeal request and the accompanying Exception request form will be reviewed by the LVA, and the LVA will subsequently issue a decision. A Covered Individual 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 and may be subject to NPIs during that time. If the LVA denies the Covered Individual’s appeal, the Covered Individual will not be allowed to register for classes the following term unless the Covered Individual complies with the vaccination requirement or subsequently requests and is granted a University-approved Exception.

V. Evidence Required

Covered Individuals must submit proof of vaccination or immunity to tetanus, diphtheria, and pertussis or of a University-approved Exception to their SHS, by providing either: (i) official documentation issued by a State vaccine registry or an official medical record, or (ii) in the case of one who has received a University-approved Exception, documentation that an Exception has been granted. Proof of immunity and Exceptions may be subject to audit.

All Covered Individuals must enter their vaccination history and/or disease-specific antibody titers directly into their electronic medical record (EMR) via a secure interface on or before the first day of instruction for their first term of enrollment. This is accessed either through a link on the student portal on the campus Registrar’s website or directly via the SHS website. Covered Individuals 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 on or before the first day of

instruction of their first academic term. Verification of Covered Individual-entered immunization history will be performed on some or all of the self-entered data.

VI. Access to Vaccines

Covered Individuals are strongly encouraged to complete Tdap vaccination 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. Covered Individuals may have the option to obtain the Tdap vaccination at the SHS where they are enrolled or at a community pharmacy or clinic.

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. UC Student Health Insurance Plan (SHIP) covers and pays for vaccinations provided at the SHS or at in-network pharmacies or clinics. However, SHS only bills and collects from UC SHIP directly; SHS does not bill and collect from other health insurance plans. Covered Individuals with health insurance plans other than UC SHIP who obtain vaccinations at SHS may be required to pay out-of-pocket for their vaccinations and then submit requests for reimbursement to their health insurance plans. Covered Individuals with health insurance plans other than SHIP may obtain vaccinations from their primary care provider or a community pharmacy to avoid paying for the cost of these vaccinations up front at the SHS.

VII. Non-Pharmaceutical Interventions (NPIs)

Covered Individuals may be required by applicable public health authorities or the LVA in response to a public health emergency or during a localized outbreak to observe NPIs, including, but not limited to, the following: (i) wearing face-coverings, medical-grade masks, and other protective equipment; (ii) isolation and quarantine; (iii) physical/social distancing; (iv) frequent washing and cleaning; and (v) asymptomatic (surveillance/screening) and symptomatic testing.

Covered Individuals who are not Up-To-Date on the Tdap vaccination may be subject to NPIs above and beyond those who have demonstrated compliance. In the event of a disease outbreak, Covered Individuals who are not Up-To-Date on the Tdap vaccination may be excluded from the Location or site of the outbreak.

VIII. Vaccine Education

All Covered Individuals who are not Up-To-Date on the Tdap vaccination or who have not provided proof of compliance with this Tdap Vaccination Program by the Compliance Date must participate in any Vaccine Education required by the LVA. During a public health emergency or during a localized outbreak, all Covered Individuals may be required to participate in additional systemwide or local Vaccine Education programs. Additional Vaccine Education may be required by the LVA consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

IX. Systemwide Implementation Guidelines: Attached None

X. Program Evaluation

This Tdap Vaccination Program is intended to maintain the Tdap vaccination uptake rate among Covered Individuals in order to preserve herd immunity in the University community. In the event that the uptake rate at a particular University Location drops below the recommended level to preserve herd immunity (as dictated by the local public health authority), or as otherwise recommended or required by the local public health authority in response to a localized outbreak, the University may modify this Program Attachment to protect the health and safety of its Covered Individuals and the University community. Locations are encouraged, but not required, to evaluate Program Participation on an annual and ongoing basis.

XI. Related Information

- [CDC, Tetanus Vaccination](#)
- [CDC, Diphtheria Vaccination](#)
- [CDC, Pertussis \(Whooping Cough\) Vaccination](#)
- [CDC, Diphtheria, Tetanus, and Whooping Cough Vaccination: What Everyone Should Know](#)
- [CDC, Tdap \(Tetanus, Diphtheria, Pertussis\) Vaccine Information Statement](#)
- [CDC Immunization Schedules](#)
- [CDPH, Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#)
- [American College Health Association \(ACHA\) Guidelines: Immunization Recommendations for College Students](#), April 2023
- [ACIP Vaccine Recommendations and Guidelines](#)

XII. Frequently Asked Questions

1. How does UC determine which vaccines and screening to require?

The University relies on the recommendations of the California Department of Public Health (CDPH) [Recommendations for Immunization and Screening Requirements for California Colleges & Universities](#), the American College Health Association (ACHA) Guidelines: [Immunization Recommendations for College Students](#), and the Centers for Disease Control and Prevention (CDC) Advisory Committee for Immunization Practices (ACIP) [Vaccine Recommendations and Guidelines](#). The current requirements reflect the CDPH [Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#) in place on February 26, 2024. However, the University reserves the right to modify these requirements pending revisions to the recommendations by CDPH, ACHA, or ACIP. Changes in CDPH, ACHA, or ACIP recommendations, as of February each year, will be incorporated into the requirements affecting the incoming fall class for that year. Additional revisions may be made in response to significant public health events, such as a pandemic or other public health emergency. Please see [UC Immunization Requirements and Recommendations](#) for information on required and recommended vaccines.

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.

Note: Covered Individuals may be subject to more restrictive vaccination requirements under applicable law and/or applicable public health directives. In such cases, the more restrictive vaccination requirements will apply in addition to any other requirements under these Vaccination Program Attachments.

2. Why did UC implement the Tdap Vaccination Program?

The University's 2016 [Student Immunization Policy](#) was issued in response to an increase in outbreaks of vaccine-preventable illnesses that had occurred on UC campuses and the reemergence of illnesses once thought to have nearly disappeared. Although the three diseases that are the focus of the Tdap vaccine are considered "mild," they can cause serious illness, lifelong complications, and even death. This Program Attachment incorporates the Tdap vaccination requirement from the 2016 Policy as an addendum to the systemwide Policy on Vaccination Programs.

3. What if the required Tdap vaccination was not available in my home country before coming to UC?

Please check with your local campus SHS for information regarding the timeline for registration holds if you were not able to meet Tdap vaccination requirements before your arrival to UC for this reason.

4. If my family have concerns regarding the safety of vaccines and have chosen not to be vaccinated. Will I be prevented from attending classes at UC if I do not obtain the required vaccines?

Covered Individuals who have not provided evidence of the required vaccination or immunity to all diseases for which vaccination is required, and who have not received a University-approved Exception, will not be able to register for classes. Locations may impose additional restrictions, so please check with your local campus SHS for more information.

5. I had an allergic reaction to a vaccination. Am I still required to be vaccinated to enter UC?

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 SHS 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 submit it to the Medical Director at your campus SHS.

6. What is the process for requesting an Exception?

Covered Individuals 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 the University's Medical Exemption Request Form. Covered Individuals must then submit the completed form to the Medical Director at the SHS on their home campus. Requests that specify a contraindication or precaution to a Vaccine recognized by the CDC, CDPH, or in the case of internationally administered Vaccines, the World Health Organization, and that indicate the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the vaccine(s) will meet criteria for approval. Medical Exemption requests outside of these categories will be denied.

Covered Individuals should use the Disability Exception Request Form to request an exception based on that Covered Individual's disability or disabilities, and then submit the completed form to the Medical Director at the SHS on their home campus.

Likewise, Covered Individuals should use the Religious Exception Request Form to request an Exception based on Religious Objection, and then submit the completed form to the Medical Director at the SHS on their home campus.

7. My Exception Request was denied. Can I appeal that decision?

If your request for an Exception is denied, you have a right to appeal the decision to the LVA by submitting an appeal request, along with the relevant Exception Request Form, to the Medical Director of your campus SHS. Covered Individuals who have submitted appeals will be able to attend courses during the quarter/semester that their appeals are undergoing review and may be subject to additional NPIs.

8. Will I be able to get the vaccines I need from Student Health Services on my campus?

Covered Individuals 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, Covered Individuals may alternatively request the necessary vaccinations at the SHS where they are enrolled. While all of the campus Student Health Services stock and administer the required vaccinations, the University strongly encourages you to receive these vaccines *before* arriving at UC. Covered Individuals should be prepared to request these vaccines from retail pharmacies or community medical providers.

9. 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?

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. However, 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. 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.

Alternatively, Covered Individuals without SHIP insurance plans may obtain vaccinations from their primary care provider in order to avoid paying the full cost for these vaccinations or tests at the SHS.

XIII. Model Forms and Exhibits

[Link to be inserted: University of California Religious Exception Request Form]

[Link to be inserted: University of California Religious Exception Request Form]

XIV. Revision History

TBD 2024: Initial issuance of Interim Program Attachment requiring Locations to implement this Tdap Vaccination Program by January 1, 2025.

INTERIM PROGRAM ATTACHMENT #6: Varicella Vaccination Program

Vaccine(s)	Targeted Disease or Condition
See https://www.fda.gov/vaccines-blood-biologics/vaccines/varivax-refrigerated-and-frozen-formulations for details on the VARIVAX vaccine.	Varicella (Chickenpox)

I. Purpose/Supporting Data

The purpose of this Varicella (VZV) Vaccination Program is to facilitate protection of the health and safety of the University community, including its Students, Personnel, and all others who work, live, and/or learn in any of the University's Locations or otherwise participate in person in University Programs. These three vaccine-preventable illnesses are spread by respiratory transmission, and therefore can pose a risk to other individuals, including Covered Individuals, attending classes, living in residence halls, using other University facilities, or attending University events. The University strongly recommends that all members of the University community immediately obtain the VZV vaccine if they have not already.

This VZV Vaccination Program requires any Covered Individual, as defined in this Program Attachment, subject to limited Exceptions and associated Non-Pharmaceutical Interventions (NPIs), to be Up-To-Date on VZV vaccination, or provide proof of immunity to varicella by the Compliance Date specified in this Program Attachment as a condition of Physical Presence at a Location or in a University Program. Covered Individuals subject to additional or more restrictive VZV vaccination requirements under applicable law and/or applicable public health directives must also comply with those requirements.

Student Health Services (SHS) at each campus is responsible for collecting evidence of compliance with this VZV Vaccination Program from Covered Individuals and for evaluating any requests for Exceptions as described in this Program Attachment. SHS must submit compliance data to their campus Registrar's Office, so that these Offices can institute registration holds for any Covered Individual who has not complied with these requirements.

Campus Registrars are responsible for initiating holds that restrict class enrollment and registration for any Covered Individual who has not complied with these requirements. Continued noncompliance with this Program Attachment may result in educational consequences up to and including disciplinary sanctions as outlined in PACAOS 105.00.

Campus IT is responsible for creating and maintaining interfaces between the SHS electronic medical record (EMR) system and the Registrars' system to facilitate information transfer needed to connect Covered Individuals with the secured data entry set on the EMR, and to place and remove registration holds.

Covered Individuals who are not Up-To-Date must observe any NPIs as directed by the Location Vaccine Authority (LVA) to mitigate risk to members of the University community, patients, and others with whom they may interact. Covered Individuals who

initially request an Exception but later decide to become vaccinated may receive the VZV vaccine at any time and may notify the LVA.

Refer to Section XI (Related Information) for linked webpages containing additional information that supports implementation of this program, including the applicable public health recommendations, which are incorporated by reference into this Program Attachment, as those may be amended or updated from time to time.

For purposes of this Program Attachment, Covered Individuals include anyone designated as Students under this policy who Physically Access a University Facility or Program in connection with their education/training. Personnel are not Covered Individuals, but Personnel who are also Students are Covered Individuals in their Student role. A person exclusively accessing a Healthcare Location as a patient, or an art, athletics, entertainment, or other publicly accessible venue at a Location as a member of the public, is not a Covered Individual.

II. Compliance Date

Locations must implement this VZV Vaccination Program by January 1, 2025.

For Covered Individuals matriculating after Fall 2024, the Compliance Date is the first day of instruction for the term for which they first enroll. Any Covered Individual who has not provided proof of compliance on or before the registration period for their second term of enrollment will not be allowed to register unless and until the Covered Individual complies with the vaccination requirement or is granted an Exception. Locations may specify additional deadlines.

Covered Individuals matriculating Fall 2024 or who matriculated prior to Fall 2024 should consult with their local SHS regarding deadlines and requirements for compliance.

III. Program Type: Mandatory (Subject to Exceptions Marked Below) Opt-Out

On or before the applicable Compliance Date, Covered Individuals must: (1) provide proof of the VZV vaccination as required to be Up-To-Date; (2) provide proof of immunity; or (3) submit a request for an Exception.

A. Permitted Exceptions (Refer to Model Forms)

Medical Exemption (Medical Contraindications or Precautions to each Vaccine that would satisfy the vaccination requirement.)

Religious Objection (A Covered Individual's objection to receiving an otherwise required Vaccine based on that person's sincerely held religious belief, practice, or observance.)

Disability (A physical or mental disorder or condition that limits a major life activity and any other condition recognized as a disability under applicable law. "Disability"

includes pregnancy, childbirth, or a related medical condition where reasonable accommodation is medically advisable.)

B. Exception Requests

A Covered Individual seeking an Exception must, no later than the Compliance Date, submit their request to the Medical Director at the SHS on the Covered Individual's home campus. While a request is pending and if it is granted, the Covered Individual must, as a condition of Physical Presence, observe NPIs defined by the LVA no less stringent than applicable public health directives and any University or Location guidelines. If an Exception is granted, the LVA must notify the Covered Individual and SHS of the approval and the associated expiration date, if any. If a request for an Exception is denied, the Covered Individual will be notified and, thereafter, unless the Covered Individual appeals the decision or requests a different Exception, the Covered Individual will be expected to promptly provide proof of VZV vaccination as required to be Up-To-Date or proof of immunity or will be denied Physical Presence at the relevant University Location(s) or Program(s).

A Covered Individual has the right to appeal the denial of their Exception request. The Covered Individual must submit an appeal request, along with the relevant Exception request form to the Medical Director of their campus SHS; the appeal request and the accompanying Exception request form will be reviewed by the LVA, and the LVA will subsequently issue a decision. A Covered Individual 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 and may be subject to NPIs during that time. If the LVA denies the Covered Individual's appeal, the Covered Individual will not be allowed to register for classes the following term unless the Covered Individual complies with the vaccination requirement or subsequently requests and is granted a University-approved Exception.

V. Evidence Required

Covered Individuals must submit proof of vaccination or immunity to varicella or of a University-approved Exception to their SHS, by providing either: (i) official documentation issued by a State vaccine registry or an official medical record, or (ii) in the case of one who has received a University-approved Exception, documentation that an Exception has been granted. Proof of immunity and Exceptions may be subject to audit.

All Covered Individuals must enter their vaccination history and/or disease-specific antibody titers directly into their electronic medical record (EMR) via a secure interface on or before the first day of instruction for their first term of enrollment. This is accessed either through a link on the student portal on the campus Registrar's website or directly via the SHS website. Covered Individuals 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 on or before the first day of instruction of their first academic term. Verification of Covered Individual-entered immunization history will be performed on some or all of the self-entered data.

VI. Access to Vaccines

Covered Individuals are strongly encouraged to complete VZV vaccination 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. Covered Individuals may have the option to obtain the VZV vaccination at the SHS where they are enrolled or at a community pharmacy or clinic.

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. UC Student Health Insurance Plan (SHIP) covers and pays for vaccinations provided at the SHS or at in-network pharmacies or clinics. However, SHS only bills and collects from UC SHIP directly; SHS does not bill and collect from other health insurance plans. Covered Individuals with health insurance plans other than UC SHIP who obtain vaccinations at SHS may be required to pay out-of-pocket for their vaccinations and then submit requests for reimbursement to their health insurance plans. Covered Individuals with health insurance plans other than SHIP may obtain vaccinations from their primary care provider or a community pharmacy to avoid paying for the cost of these vaccinations up front at the SHS.

VII. Non-Pharmaceutical Interventions (NPIs)

Covered Individuals may be required by applicable public health authorities or the LVA in response to a public health emergency or during a localized outbreak to observe NPIs, including, but not limited to, the following: (i) wearing face-coverings, medical-grade masks, and other protective equipment; (ii) isolation and quarantine; (iii) physical/social distancing; (iv) frequent washing and cleaning; and (v) asymptomatic (surveillance/screening) and symptomatic testing.

Covered Individuals who are not Up-To-Date on the VZV vaccination may be subject to NPIs above and beyond those who have demonstrated compliance. In the event of a disease outbreak, Covered Individuals who are not Up-To-Date on the VZV vaccination may be excluded from the Location or site of the outbreak.

VIII. Vaccine Education

All Covered Individuals who are not Up-To-Date on the VZV vaccination or who have not provided proof of compliance with this VZV Vaccination Program by the Compliance Date must participate in any Vaccine Education required by the LVA. During a public health emergency or during a localized outbreak, all Covered Individuals may be required to participate in additional systemwide or local Vaccine Education programs. Additional Vaccine Education may be required by the LVA consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

IX. Systemwide Implementation Guidelines: Attached None

X. Program Evaluation

This VZV Vaccination Program is intended to maintain the VZV vaccination uptake rate among Covered Individuals in order to preserve herd immunity in the University community. In the event that the uptake rate at a particular University Location drops

below the recommended level to preserve herd immunity (as dictated by the local public health authority), or as otherwise recommended or required by the local public health authority in response to a localized outbreak, the University may modify this Program Attachment to protect the health and safety of its Covered Individuals and the University community. Locations are encouraged, but not required, to evaluate Program Participation on an annual and ongoing basis.

XI. Related Information

- [CDC, Chickenpox/Varicella Vaccination](#)
- [CDC, Varicella \(Chickenpox\) Vaccine Information Statement](#)
- [CDC Immunization Schedules](#)
- [CDPH, Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#)
- [American College Health Association \(ACHA\) Guidelines: Immunization Recommendations for College Students](#), April 2023
- [ACIP Vaccine Recommendations and Guidelines](#)

XII. Frequently Asked Questions

1. How does UC determine which vaccines and screening to require?

The University relies on the recommendations of the California Department of Public Health (CDPH) [Recommendations for Immunization and Screening Requirements for California Colleges & Universities](#), the American College Health Association (ACHA) Guidelines: [Immunization Recommendations for College Students](#), and the Centers for Disease Control and Prevention (CDC) Advisory Committee for Immunization Practices (ACIP) [Vaccine Recommendations and Guidelines](#). The current requirements reflect the CDPH [Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#) in place on February 26, 2024. However, the University reserves the right to modify these requirements pending revisions to the recommendations by CDPH, ACHA, or ACIP. Changes in CDPH, ACHA, or ACIP recommendations, as of February each year, will be incorporated into the requirements affecting the incoming fall class for that year. Additional revisions may be made in response to significant public health events, such as a pandemic or other public health emergency. Please see [UC Immunization Requirements and Recommendations](#) for information on required and recommended vaccines. 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.

Note: Covered Individuals may be subject to more restrictive vaccination requirements under applicable law and/or applicable public health directives. In

such cases, the more restrictive vaccination requirements will apply in addition to any other requirements under these Vaccination Program Attachments.

2. Why did UC implement the VZV Vaccination Program?

The University's 2016 [Student Immunization Policy](#) was issued in response to an increase in outbreaks of vaccine-preventable illnesses that had occurred on UC campuses and the reemergence of illnesses once thought to have nearly disappeared. Although varicella (chickenpox), the focus of the VZV vaccine, is considered "mild," it can cause serious illness, lifelong complications, and even death. This Program Attachment incorporates the VZV vaccination requirement from the 2016 Policy as an addendum to the systemwide Policy on Vaccination Programs.

3. What if the required VZV vaccination was not available in my home country before coming to UC?

Please check with your local campus SHS for information regarding the timeline for registration holds if you were not able to meet VZV vaccination requirements before your arrival to UC for this reason.

4. If my family have concerns regarding the safety of vaccines and have chosen not to be vaccinated. Will I be prevented from attending classes at UC if I do not obtain the required vaccines?

Covered Individuals who have not provided evidence of the required vaccination or immunity to all diseases for which vaccination is required, and who have not received a University-approved Exception, will not be able to register for classes. Locations may impose additional restrictions, so please check with your local campus SHS for more information.

5. I had an allergic reaction to a vaccination. Am I still required to be vaccinated to enter UC?

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 SHS 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 submit it to the Medical Director at your campus SHS.

6. What is the process for requesting an Exception?

Covered Individuals 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 the University's Medical Exemption Request Form. Covered Individuals must then submit the completed form to the Medical Director at the SHS on their home campus. Requests that specify a contraindication or precaution to a Vaccine recognized by the CDC, CDPH, or in

the case of internationally administered Vaccines, the World Health Organization, and that indicate the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the vaccine(s) will meet criteria for approval. Medical Exemption requests outside of these categories will be denied.

Covered Individuals should use the Disability Exception Request Form to request an exception based on that Covered Individual's disability or disabilities, and then submit the completed form to the Medical Director at the SHS on their home campus.

Likewise, Covered Individuals should use the Religious Exception Request Form to request an Exception based on Religious Objection, and then submit the completed form to the Medical Director at the SHS on their home campus.

7. My Exception Request was denied. Can I appeal that decision?

If your request for an Exception is denied, you have a right to appeal the decision to the LVA by submitting an appeal request, along with the relevant Exception Request Form, to the Medical Director of your campus SHS. Covered Individuals who have submitted appeals will be able to attend courses during the quarter/semester that their appeals are undergoing review and may be subject to additional NPIs.

8. Will I be able to get the vaccines I need from Student Health Services on my campus?

Covered Individuals 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, Covered Individuals may alternatively request the necessary vaccinations at the SHS where they are enrolled. While all of the campus Student Health Services stock and administer the required vaccinations, the University strongly encourages you to receive these vaccines *before* arriving at UC. Covered Individuals should be prepared to request these vaccines from retail pharmacies or community medical providers.

9. 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?

Vaccination costs are covered by all health insurance plans, as required by the Affordable Care Act. However, 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. 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.

Alternatively, Covered Individuals without SHIP insurance plans may obtain vaccinations from their primary care provider in order to avoid paying the full cost for these vaccinations or tests at the SHS.

XIII. Model Forms and Exhibits

[Link to be inserted: University of California Religious Exception Request Form]

[Link to be inserted: University of California Religious Exception Request Form]

XIV. Revision History

TBD 2024: Initial issuance of Interim Program Attachment requiring Locations to implement this VZV Vaccination Program by January 1, 2025.

INTERIM Program Attachment #7: Tuberculosis Screening Program

Vaccine(s)	Targeted Disease or Condition
See https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/TB-Risk-Assessment.aspx for information on the California Department of Public Health (CDPH) California Tuberculosis Risk Assessment for College and University Students.	Tuberculosis

I. Purpose/Supporting Data

The purpose of this Tuberculosis (TB) Screening Program is to facilitate protection of the health and safety of the University community, including its Students, Personnel, and all others who work, live and/or learn in any of the University's Locations or otherwise participate in person in University Programs. This illness is spread by respiratory transmission, and therefore can pose a risk to other individuals, including Covered Individuals, attending classes, living in residence halls, using other University facilities, or attending University events.

This TB Screening Program requires any Covered Individual, as defined in this Program Attachment, to complete an online screening questionnaire for tuberculosis, based on guidance from the California Department of Public Health, by the Compliance Date specified in this Program Attachment as a condition of Physical Presence at a Location or in a University Program. Any Covered Individual who is 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 must be submitted to the Student Health Services (SHS) at the campus where the Covered Individual plans to enroll. Covered Individuals subject to additional or more restrictive TB screening, evaluation, or testing requirements under applicable law and/or applicable public health directives must also comply with those requirements.

SHS at each campus is responsible for collecting evidence of compliance with this TB Screening Program from Covered Individuals. SHS must submit compliance data to their campus Registrar's Office, so that these Offices can institute registration holds for any Covered Individual who has not complied with these requirements.

Campus Registrars are responsible for initiating holds that restrict class enrollment and registration for any Covered Individual who has not complied with these requirements. Continued noncompliance with this Program Attachment may result in educational consequences up to and including disciplinary sanctions as outlined in PACAOS 105.00.

Campus IT is responsible for creating and maintaining interfaces between the SHS electronic medical record (EMR) system and the Registrars' system to facilitate information transfer needed to connect Covered Individuals with the secured data entry set on the EMR, and to place and remove registration holds.

Covered Individuals who are assessed to be at higher risk for TB infection must observe any NPIs as directed by the Location Vaccine Authority (LVA) to mitigate risk to

members of the University community, patients, and others with whom they may interact.

Refer to Section X (Related Information) for linked webpages containing additional information that supports implementation of this program, including the applicable public health recommendations, which are incorporated by reference into this Program Attachment, as those may be amended or updated from time to time.

For purposes of this Program Attachment, Covered Individuals include anyone designated as Students under this Policy who seeks Physically Access to a University Facility or Program in connection with their education/training. Personnel are not Covered Individuals, but Personnel who are also Students are Covered Individuals in their Student role. A person exclusively accessing a Healthcare Location as a patient, or an art, athletics, entertainment, or other publicly accessible venue at a Location as a member of the public, is not a Covered Individual.

II. Compliance Date

Locations must implement this TB Screening Program by January 1, 2025.

For Covered Individuals matriculating after Fall 2024, the Compliance Date is the first day of instruction for the term for which they first enroll. Any Covered Individual who has not provided proof of compliance on or before the registration period for their second term of enrollment will not be allowed to register unless and until the Covered Individual complies with the screening requirement. Locations may specify additional deadlines.

Covered Individuals matriculating Fall 2024 or who matriculated prior to Fall 2024 should consult with their local SHS regarding deadlines and requirements for compliance.

III. Program Type: Mandatory Opt-Out

On or before the applicable Compliance Date, Covered Individuals must complete the online screening questionnaire and provide proof of compliance to their local SHS.

V. Evidence Required

Covered Individuals must submit their completed TB Risk Assessment Questionnaire Form in their electronic medical record (EMR) via a secure interface prior to their first term of enrollment. This is accessed either through a link on the student portal on the campus Registrar's website or directly via the SHS website.

VI. Non-Pharmaceutical Interventions (NPIs)

Covered Individuals may be required by applicable public health authorities or the LVA in response to a public health emergency or during a localized outbreak to observe NPIs, including, but not limited to, the following: (i) wearing face-coverings, medical-grade masks, and other protective equipment; (ii) isolation and quarantine; (iii) physical/social distancing; (iv) frequent washing and cleaning; and (v) asymptomatic (surveillance/screening) and symptomatic testing.

Covered Individuals who are assessed to be at higher risk for TB infection may be subject to NPIs above and beyond those who are assessed to be at lower risk. In the event of a disease outbreak, Covered Individuals who are assessed to be at higher risk for TB infection may be excluded from the Location or site of the outbreak.

VII. Vaccine Education

All Covered Individuals who have not provided proof of compliance with this TB Screening Program by the Compliance Date must participate in any Vaccination Education or other public health education required by the LVA. During a public health emergency or during a localized outbreak, all Covered Individuals may be required to participate in additional systemwide or local Vaccine Education programs. Additional Vaccine Education may be required consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

VIII. Systemwide Implementation Guidelines: Attached None

IX. Program Evaluation

This TB Screening Program is intended to survey the risk of latent TB among Covered Individuals in order to preserve herd immunity in the University community. Based on the results of the TB Risk Assessment Questionnaire Form, each SHS is authorized to identify certain Covered Individuals for latent TB infection (LTBI) testing; questions about this process and the testing itself should be directed to the Covered Individual's respective SHS. Locations are encouraged, but not required, to evaluate Program Participation on an annual and ongoing basis.

X. Related Information

- [Centers for Disease Control and Prevention \(CDC\), About Tuberculosis \(TB\)](#)
- [CDC, Tuberculosis Vaccination](#) (note: not widely used in the United States)
- [World Health Organization \(WHO\), Tuberculosis: Systematic Screening](#)
- [CDC Immunization Schedules](#)
- [CDPH, Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#)
- [American College Health Association \(ACHA\) Guidelines: Immunization Recommendations for College Students](#), April 2023
- [CDC Advisory Committee for Immunization Practice \(ACIP\) Vaccine Recommendations and Guidelines](#)

XI. Frequently Asked Questions

1. How does UC determine which vaccines and screening to require?

The University relies on the recommendations of the California Department of Public Health (CDPH) [Recommendations for Immunization and Screening Requirements for California Colleges & Universities](#), the American College Health Association (ACHA) Guidelines: [Immunization Recommendations for](#)

[College Students](#), and the Centers for Disease Control and Prevention (CDC) Advisory Committee for Immunization Practices (ACIP) [Vaccine Recommendations and Guidelines](#). The current requirements reflect the CDPH [Recommendations for Immunization and Screening Requirements for California Colleges and Universities](#) in place on February 26, 2024. However, the University reserves the right to modify these requirements pending revisions to the recommendations by CDPH, ACHA, or ACIP. Changes in CDPH, ACHA, or ACIP recommendations, as of February each year, will be incorporated into the requirements affecting the incoming fall class for that year. Additional revisions may be made in response to significant public health events, such as a pandemic or other public health emergency. Please see [UC Immunization Requirements and Recommendations](#) for information on required and recommended vaccines. 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.

2. Why did UC implement the Policy on Vaccination Programs and this Program Attachment?

The University's 2016 [Student Immunization Policy](#) was issued in response to an increase in outbreaks of vaccine-preventable illnesses that had occurred on UC campuses and the reemergence of illnesses once thought to have nearly disappeared. In addition, thousands of students were exposed to active tuberculosis (spread by respiratory transmission) across several campuses prior to adoption of the 2016 Policy. Tuberculosis can cause serious illness, lifelong complications, and even death. This Program Attachment incorporates the TB Screening requirement from the 2016 Policy as an addendum to the systemwide Policy on Vaccination Programs.

XII. Revision History

TBD 2024: Initial issuance of Interim Program Attachment requiring Locations to implement this TB Screening Program by January 1, 2025.

ATTACHMENT 1: Systemwide Implementation Guidelines: California Department of Public Health California Tuberculosis Risk Assessment for College and University Students

Link here:

<https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/TBCB-CA-College-Student-TB-Risk-Assessment.pdf>

Screenshots below:



California Tuberculosis Risk Assessment College and University Students



- Use this tool to identify asymptomatic **college or university students** for latent TB infection (LTBI) testing.
- **Do not repeat testing** unless there are **new risk factors** since the last negative test.
- Do not treat for LTBI until active TB has been excluded:
*For patients with TB symptoms or abnormal chest x-ray consistent with active TB disease, evaluate for active TB disease with a chest x-ray, symptom screen, and if indicated, sputum AFB smears, cultures and nucleic acid amplification testing.
A negative tuberculin skin test or interferon gamma release assay does not rule out active TB disease.*

LTBI testing is recommended if any of the 3 boxes below are checked.

- Birth, travel, or residence** in a country with an elevated TB rate for at least 1 month
- Includes any country other than the United States, Canada, Australia, New Zealand, or a country in western or northern Europe
 - Interferon Gamma Release Assay is preferred over Tuberculin Skin Test for non-U.S.-born persons ≥ 2 years old

- Immunosuppression, current or planned**
- HIV infection, organ transplant recipient, treated with TNF-alpha antagonist (e.g., infliximab, etanercept, others), steroids (equivalent of prednisone ≥ 15 mg/day for ≥ 1 month) or other immunosuppressive medication

- Close contact** to someone with infectious TB disease during lifetime

Treat for LTBI if LTBI test result is positive and active TB disease is ruled out.

- None;** no TB testing is indicated at this time

Provider: _____

Assessment Date: _____

Patient Name: _____

Date of Birth: _____

See the **College and University Students Risk Assessment User Guide** for more information about using this tool.
To ensure you have the most current version, go to the **RISK ASSESSMENT** page at <https://www.cdph.ca.gov/tbcb>





CA College and University Students TB Risk Assessment User Guide



Avoid testing persons at low risk

Routine testing of low risk populations is not recommended and may result in unnecessary evaluations and treatment because of falsely positive test results.

Local recommendations and other risk factors

The core elements listed in the College/University TB Risk Assessment are meant to identify students who need screening for TB. These were selected in order to focus testing on patients at highest risk. This risk assessment does not supersede any mandated testing. Examples of these populations include: healthcare workers, residents or employees of correctional institutions, substance abuse treatment facilities, homeless shelters, and others. Local recommendations should also be considered in testing decisions. Local TB control programs can customize this risk assessment according to local recommendations. **Providers should check with local TB control programs for local recommendations.**

United States Preventive Services Task Force (USPSTF)

The USPSTF has recommended testing foreign born persons born-in or former residents of a country with an elevated tuberculosis rate and persons who live in or have lived in high-risk congregate settings such as homeless shelters and correctional facilities. Because the increased risk of exposure to TB in congregate settings varies substantially by facility and local health jurisdiction, clinicians are encouraged to follow local recommendations when considering testing among persons from these congregate settings. USPSTF did not review data supporting testing among close contacts to infectious TB nor among persons who are immunosuppressed because these persons are recommended to be screened by public health programs or by clinical standard of care.

Most patients with LTBI should be treated

Because testing of persons at low risk of TB infection should not be done, persons that test positive for LTBI should generally be treated once active TB disease has been ruled out with a chest radiograph and, if indicated, sputum smears, cultures, and nucleic acid amplification testing (NAAT) have been performed. However, clinicians should not be compelled to treat low risk persons with a positive test for LTBI.

When to repeat a risk assessment testing

Repeat risk assessments should be based on the activities and risk factors specific to the student. Colleges and universities may decide on the need for repeat screening based on the activities and risk factors specific to their student body. Students who volunteer or work in health care settings might require annual testing and should be considered separately.

Re-testing should only be done in persons who previously tested negative, and have new risk factors since the last assessment. In general, this would include new close contact with an infectious TB case or new immunosuppression, but could also include foreign travel in certain circumstances.

Negative test for latent TB does not rule out active TB

It is important to remember that a negative TST or IGRA result does not rule out active TB. In fact, a negative TST or IGRA in a patient with active TB can be a sign of extensive disease and poor outcome.

Previous or inactive tuberculosis

Persons with a previous chest radiograph showing findings consistent with previous or inactive TB should be tested for LTBI and evaluated for active TB disease.

IGRA preference in BCG vaccinated students

Because IGRA has increased specificity for TB infection in persons vaccinated with BCG, IGRA is preferred over the TST tuberculin skin test in these persons.

Emphasis on short course for treatment of LTBI

Shorter regimens for treating LTBI have been shown to be more likely to be completed and the 12-dose regimen has been shown to be as effective as 9 months of isoniazid. Use of these shorter regimens is preferred in most patients. Drug-drug interactions and contact to drug resistant TB are frequent reasons these regimens cannot be used.

Medication	Frequency	Duration
Rifampin	Daily	4 months
Isoniazid + rifapentine*	Weekly	12 weeks

*The CDC currently recommends DOT for this regimen; however, data has shown that SAT is noninferior to DOT in the United States. Many clinicians are using SAT or modified DOT.

CDPH LTBI Treatment Fact Sheets: Fact sheets are available for three treatment regimens on the California Tuberculosis Branch website, on the LTBI Treatment page at: <https://cdph.ca.gov/TB-LTBI-Treatment>

What if students refuse LTBI treatment when indicated?

Refusal should be documented. Offers of treatment should be made at future encounters with medical services if still indicated. Annual chest radiographs are not recommended in asymptomatic students. If treatment is later accepted, TB disease should be excluded and CXR repeated if it has been more than 3 months from the initial evaluation.

Symptoms that should trigger evaluation for active TB

Patients with any of the following symptoms that are otherwise unexplained should be evaluated for active TB: cough for more than 2-3 weeks, fevers, night sweats, weight loss, hemoptysis or excessive fatigue.

No state requirements for LTBI screening in college or university students

These recommendations are considered best practices by the CDPH TCB and are not legally mandated.

Resource: American College Health Association Guidelines on tuberculosis screening available online: http://www.acha.org/documents/resources/guidelines/ACHA_Tuberculosis_Screening_2017.pdf

Abbreviations: DOT=Directly observed therapy; IGRA= Interferon gamma release assay (e.g., QuantiFERON-TB Gold, T-SPOT.TB); BCG=Bacillus Calmette-Guérin; TST= tuberculin skin test; LTBI=latent TB infection



MODEL COMMUNICATION

The University of California Office of the President invites comments on proposed Program Attachments #3–7 to the Policy on Vaccination Programs. The policy is proposed to include the following key issues:

- Students will be required to be Up-To-Date on their MMR, MenACWY, Tdap, and VZV vaccinations, provide proof of immunity for those diseases, or obtain a University-approved exception, as a condition of Physical Presence at a University Location or in a University Program.
- Students may request exceptions to any of these vaccination requirements premised on medical contraindications, religious objections, or disability. There are no exceptions permitted for students' mandatory completion of a tuberculosis screening questionnaire to evaluate their risk of latent tuberculosis.
- In the event that applicable law or public health orders impose stricter vaccination requirements, students would be required to comply with those stricter requirements.
- Students who are not Up-To-Date with the relevant vaccination requirements (which includes those who have been granted exceptions) or who have not satisfied the tuberculosis screening requirement may be subject to Non-Pharmaceutical Interventions (e.g., masks and testing) above and beyond those who have demonstrated compliance and may be excluded from the Location or site of an outbreak.
- Additionally, students who are not compliant with the vaccination programs and/or screening program must participate in any Vaccine Education required by their Location Vaccine Authority (LVA). Additional Vaccine Education may be required by the LVA in the event of an outbreak or consistent with applicable federal, state, or local laws, regulations, or accreditation standards.

If you have any questions or if you wish to comment, please contact _____ at _____, no later than _____, 2024.