

UNIVERSITY OF MINNESOTA

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MEMORANDUM

FROM: Barbara Brandt, Ph.D., Assistant Vice President for Education

TO: AHC Deans
AHC Associate Deans for Education
AHC Experiential Education Directors
AHC Student Service Directors

DATE: August 17, 2005

RE: Response to Requests for Immunization Detail

Auditing processes for Medicare funding and other federal funding for graduate medical education (GME) require hospitals where residents train to have immunization documentation for these residents. In addition, the Joint Commission on Accreditation of Health Care Organizations (JCAHO) standard IC.4.10 is being interpreted by many affiliate sites as a mandate to have appropriate immunization documentation for students and residents on site. As a result, the Academic Health Center (AHC) is aware of an increasing number of requests for residents' and students' immunization status detail from our affiliate sites. This memo outlines the procedure AHC experiential program coordinators and others should follow if they receive a request to disclose immunization status detail to an affiliate site.

To remain compliant with federal laws and University of Minnesota policy, AHC programs that receive requests from affiliate hospitals for student immunization detail should refer the request to each student participating in the relevant program(s). It is the position of the AHC that immunization information should be disclosed to the affiliate sites by the students themselves.

It is imperative that students understand and comply with this responsibility. If students fail to produce documentation of immunization status at the affiliate's request, it is possible the student may be expelled from the clinical experience at the site.

The AHC has implemented a centralized AHC student immunization registry called "AHC-U Track" that provides program coordinators with immunization compliance information. AHC-U Track also produces a printable, personalized immunization status

report for AHC students required to comply with AHC immunization requirements. Students can access this report and other information about their immunization status in the University portal Toolkit at www.myU.umn.edu. These personalized immunization reports can be conveniently accessed and printed by students anytime, anywhere.

AHC program staff should work with site coordinators to ensure immunization detail is obtained directly from the student(s) rotating at an affiliate site. AHC program staff should not disclose immunization status detail to sites for any student. AHC program staff can disclose whether or not a student is compliant with our requirements in general without disclosing health information detail.

Questions regarding this memo and its content can be directed to Ross Janssen, University Privacy and Security Officer, at janss006@umn.edu or 612-626-5844.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Barbara F. Brandt".

Barbara F. Brandt, Ph.D.
Assistant Vice President for Education
University of Minnesota Academic Health Center