



Campus Administrative Policy

Policy Title: COVID-19 Vaccination Requirement and Compliance

Policy Number: 3012A Functional Area: General Administration

Effective: July 1, 2023
Date Last Amended/Reviewed: September 24, 2021
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Supersedes: COVID-19 Vaccination Requirement and Compliance
September 24, 2021

Approved by: Donald M. Elliman, Jr
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Prepared by: Office of University Counsel
Reviewing Office: Office of the Chancellor of the CU Anschutz Medical Campus
Responsible Officer: Executive Vice Chancellor for Administration and Finance |
CFO, University of Colorado Anschutz Medical Campus

Applies to: CU Anschutz Medical Campus

A. INTRODUCTION

On May 11, 2023, the United States Department of Health and Human Services allowed the Public Health Emergency designation declared under Section 319 of the Public Health Service Act to expire.

On June 5, 2023, the Centers for Medicare and Medicaid Services (“CMS”) published a final rule, 88 FR 36485, lifting the requirement that employees at healthcare facilities that receive Medicare and Medicaid be vaccinated against the COVID-19 virus.

B. POLICY STATEMENT

1. Effective July 1, 2023, in light of the designated end of the COVID-19 public health emergency and the revised legal requirements applicable to the University of Colorado’s Anschutz Medical Campus (“CU Anschutz”), including its various clinics and hospital partners, CU Anschutz will not require vaccination against COVID-19 for CU Anschutz’ faculty, staff, students, badged affiliates, persons of interest (POIs), visitors, and volunteers who work, visit, volunteer or are enrolled in educational programs that solely take place in non-clinical settings.

2. CU Anschutz-operated healthcare facilities or clinics (which are not operated by CUAnschutz' hospital partners) that treat patients or involve human study subjects shall follow University of Colorado Hospital's COVID-19 vaccine requirements and guidance.
3. All faculty, staff, badged affiliates, POIs, visitors, and volunteers of CU Anschutz who work, visit, or volunteer in healthcare facilities or clinics operated by CU Anschutz' hospital or clinical partners will be required to comply with the vaccination policies of the facilities or clinics where they work, visit, or volunteer, respectively.
4. All students enrolled in educational programs at CU Anschutz that involve clinical rotations will be required to comply with the vaccination policies of the healthcare facilities or clinics where their School | College | Program's clinical rotations take place.
5. Although CU Anschutz is lifting its vaccination requirement, CU Anschutz continues to strongly encourage vaccination against the COVID-19 virus. In addition, individual CU Anschutz departments, healthcare facilities, clinics, schools, college, or programs may continue to require vaccination against COVID-19 with Chancellor approval.
6. This policy is subject to change in light of any change in epidemiological circumstances or state or federal regulatory guidance.

C. DEFINITIONS

1. The term "employees" includes, but is not limited to, all full and part -time staff, faculty, post-doctoral fellows, medical residents, predoc trainees, and fellows, but excluding adjunct faculty employed by a third party.
2. The term "badged affiliates" includes, but is not limited to, any individual who has a CU Anschutz badge to access CU Anschutz facilities or clinics, whether leased or owned on or off campus, including badged contractors and employees at affiliated institutions who have a CU Anschutz badge and access campus facilities on a regular basis.
3. The term "students" includes, but is not limited to, all students, including part-time, full-time, degree-seeking, non-degree seeking, hybrid (combination of online and in person, either: (i) on campus and/or (ii) in clinical settings), visiting students, undergraduate, or graduate students enrolled at CU Anschutz.

D. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES, AND OTHER RESOURCES

1. Related Administrative Policy Statements (APS) and Other Policies
 - [Campus Policy 7014: Student Immunization Requirements and Compliance](#)