IMPORTANT: These documents should be read together, as they together comprise the compliance implementation plan applicable to students at the UC Irvine School of Law.
August 3, 2021

Howard Gillman, Chancellor  
Hal Stern, Provost and EVC, Chancellor’s Professor, Department of Statistics  
Lars Walton, Associate Chancellor and Chief of Staff, The Chancellor’s Office  
David Leinen, Interim Associate Provost and EVC, The Provost’s Office  
Bernadette Boden-Albala, Director and Founding Dean, Public Health  
David Souleles, Director, Covid-19 Response Team, Public Health  
Sheefteh Khalili, Chief of Staff, VC Health Affairs Administration  
Ramona Agrela, Associate Chancellor and Chief HR Executive, Human Resources  
Tom Andriola, Vice Chancellor, Information Technology and Data, Office of Information Technology  
Ronald Cortez, Chief Financial Officer and Vice Chancellor, The Division of Finance and Administration  
Andrea Gunn Eaton, Chief Campus Counsel, The Chancellor’s Office  
Ria Carlson, Associate Chancellor, Strategic Communications and Public Affairs  
David Ott, Associate Vice Chancellor, DFA Support Services, The Division of Finance and Administration

Re: UC COVID-19 Vaccination Program - UCI Student Compliance Implementation Plan

Enclosed please find the UC COVID-19 Vaccination Program - UCI Student Compliance Implementation Plan. The plan outlines our efforts to gain compliance with the UC COVID-19 Vaccination Program and includes:

- **ZotPass 2.0**: This version of last year’s ZotPass program will monitor compliance by indicating which students have uploaded their vaccination record, which students require masking, or those who still need to submit their documents to gain compliance.  
  **Date of implementation**: September 6

- **WiFi Restriction**: Students who fail to comply with the vaccination program will be restricted from the campus WiFi system UCI MobileAccess. To regain access, students must upload their vaccination record or submit a request for exemption, exception or deferral.  
  **Date of implementation**: September 6

- **Compliance Notification**: The compliance notification process is modeled after the staff notification, providing ample opportunity for students to take steps towards compliance. Failure to comply with the notification will result in disciplinary action.  
  **Date of implementation**: September 6

Student Affairs
405 Aldrich Hall, Irvine, CA 92697-5180
(949)824-4804 | (949)824-2763 fax | vcsa@uci.edu

studentaffairs.uci.edu
• **Winter Registration Hold:** Non-compliant students will be subject to an academic hold on their records affecting their ability to register for classes for Winter 2022.

**Date of implementation:** During Week 6 of Fall 2021; exact date: TBD

Special thanks to the Student Affairs-Department Operations Committee (SA-DOC) and our campus partners including David Souleles, director of the COVID-19 Response Team and the Office of Information Technology for their support and guidance on this implementation plan.

If you have any questions, please feel free to contact me.

Sincerely,

Willie L. Banks Jr., Ph.D.
Vice Chancellor, Student Affairs

Attachment: [UC COVID-19 Vaccination Program - UCI Student Compliance Implementation Plan](#)

CC: Edgar Dormitorio, Assistant Vice Chancellor and Chief of Staff, Student Affairs
Brice Kikuchi, Associate Vice Chancellor, Auxiliary Services and Business Enterprises, Student Affairs
Rameen Talesh, Assistant Vice Chancellor and Dean of Students, Student Life & Leadership, Student Affairs
Marcelle Hayashida, Associate Vice Chancellor, Wellness, Health and Counseling Service, Student Affairs
Dwuena Wyre, Human Resources Business Partner, Student Affairs
Kyle Rowen, Campus Counsel, The Chancellor’s Office, Office of Campus Counsel
Wayne Fields, Assistant Director, Student Affairs IT, Office of Information Technology
UCI Implementation for Students (August 3, 2021)
UC SARS-CoV-2 (COVID-19) Vaccination Program

Vaccination Compliance

This document outlines UC Irvine’s efforts towards gaining student compliance with the UC SARS-CoV-2 (COVID-19) Vaccination Program Policy. This implementation applies to all UCI Students as a condition of Physical Presence at a Location or in a University Program, as those terms are defined in the Policy. Students enrolled in only online courses and who are not physically present at a Location at any point while the Policy is in effect not subject to these requirements. School of Medicine and School of Law students, please refer to your school for information on deadlines and requirements.

ZotPass 2.0

Using OneCard (Atrium), students will be required to show their ZotPass to enter designated spaces. The system will flag students who are non-compliant with the Vaccine Program. The system will also identify students who can enter the space but are required to wear a mask.

Current spaces using ZotPass: Residential Dining Halls, Anteater Recreation Center, FRESH Basic Needs Hub, Housing Offices
Other possible spaces: Libraries, Student Center, student support areas (academic advising, resource centers), study spaces
Implementation Date: September 6 for main campus

Wifi Restriction

Students who fail to upload their vaccination record or do not have an exemption/exception submitted by September 6 will lose their access to the UCI MobileAccess system. Students will still be able to access UCI computer resources, but will need to use an alternate access point (eg. Wifi at home, public wifi, coffee shop, or their personal data plan).
Implementation Date: September 6 for main campus
Compliance Notification

Students who fail to upload their vaccination record or do not have an exemption/exception submitted by September 6 will be notified of the compliance requirement as follows:

**First Notice of Non-Compliance (All Students):** Students subject to the COVID-19 vaccination requirement who fail to provide proof of Full Vaccination and who have not requested an Exception or Deferral by September 6 will receive a First Notice of Non-Compliance from the UCI Student Health Center.

**Three-Day Period Following First Notice of Non-Compliance (All Students):** Once a student has received a First Notice of Non-Compliance, they will have three business days to provide proof of Full Vaccination or to make a request for an Exception or Deferral. During these three business days, the student must, as a condition of Physical Presence, comply with NPIs defined by the Location.

If a student has not responded within three business days, the applicable process begins below:

**Second Notice of Non-Compliance (All Students):** If, after receipt of the First Notice of Non-Compliance, the student does not submit proof of Full Vaccination or make a request for an Exception or Deferral within three business days, they will receive a Second Notice of Non-Compliance that requires them to submit proof that they have received their first shot within 14 calendar days of the date of the Second Notice of Non-Compliance. This proof must include the date of the first shot. The student may also submit a request for an Exception or Deferral. Until the student is Fully Vaccinated or submits their Exception or Deferral, the student must, as a condition of Physical Presence, comply with NPIs defined by the Location. If the student receives the Johnson & Johnson vaccine, the student will be considered Fully Vaccinated two weeks after the date of the first shot. If the student receives the Moderna or Pfizer vaccine, the student will be considered Fully Vaccinated two weeks after the date of the second shot. Proof of Full Vaccination must be provided no later than eight weeks from the date of the Second Notice of Non-Compliance.

**Notice of Continued Non-Compliance:** If a student fails to submit proof of Full Vaccination or make a request for an University of California – Policy SARS-CoV-2 (COVID-19) Vaccination Program Exception or Deferral within the period prescribed in the Second Notice, the student will receive a Notice of Continued Non-Compliance stating that the Office of Academic Integrity and Student
Conduct will commence the disciplinary process under the Policy Applying to Campus Activities, Organizations, and Students (PACAOs):

102.16 Failure to identify oneself to, or comply with the directions of, a University official or other public official acting in the performance of his or her duties while on University property or at official University functions; or resisting or obstructing such University or other public officials in the performance of or the attempt to perform their duties.

During the disciplinary process, the student will be permitted Physical Presence for up to six weeks and must, as a condition of Physical Presence, comply with NPIs defined by the Location. The Chancellor or designee may, on an exceptional basis, choose to briefly extend the six-week period of Physical Presence, such as to provide the student with access to the Student Health Center or other support services that cannot be offered remotely.

Students who do not comply with UC vaccination requirements, including the COVID-19 vaccine mandate, may also be subject to discipline including the actions listed here in addition to probation, suspension, or dismissal from the university.

**Winter Quarter Registration Hold**

Students who fail to comply with the Compliance Notifications mentioned above will be subject to an academic registration hold restricting their ability to register for Winter Quarter 2022 classes; [law school]. The hold will be removed once the student provides proof of Full Vaccination or receives approval for Exception or Deferral of the University of California – Policy SARS-CoV-2 (COVID-19) Vaccination Program. This process is consistent with the current UCOP Immunization Policy (2016).

**Implementation Date:** Week 6 of Fall 2021; exact date is TBD

**Information Access**

Student information is accessed under the authority of the Vice Chancellor, Student Affairs and in accordance with the Electronic Communications Policy. Refer to privacy.uci.edu/access-to-ec.php for more information.
Any student who needs assistance obtaining a COVID-19 vaccine and/or uploading their vaccination record to the appropriate portal may contact Contact Tracing and Vaccine Navigation Services. They can be reached at (949) 824-2300 or contacttracing@uci.edu.
School of Law Addendum to UCI Student Compliance Implementation Plan
August 10, 2021

Background

A. On July 15, 2021, the University of California (“UC”) issued its Policy: SARS-CoV-2 (COVID-19) Vaccination Program (the “UC COVID-19 Vaccination Policy”). To be in compliance with the UC COVID-19 Vaccination Policy, a person must either be “Fully Vaccinated,” or receive a UCI-approved “Exception” or “Deferral,” as those terms are defined in the policy.

B. Under the UC COVID-19 Vaccination Policy, “Students who fail to provide proof of vaccination or apply for an Exception or Deferral by the Implementation Date may...be subject to a registration hold.” The UC COVID-19 Vaccination Policy further states that “[t]hose Covered Individuals who fail to Participate by being Vaccinated or requesting an Exception or Deferral on or before the Implementation Date will be barred from Physical Presence at University Facilities and Programs, and may experience consequences as a result of non-Participation, up to and including dismissal from educational programs or employment.”

C. The August 2, 2021 Student FAQs issued in connection with the UC COVID-19 Vaccination Policy (updated August 2, 2021) state that “Students who choose not to be immunized and who do not receive an approved medical exemption, disability or religious belief exception or a deferral based on pregnancy will not meet UC’s health and safety condition for attending in-person classes or events or access to campus facilities, including housing. Such students may not be allowed to register for classes, or may have their class registration cancelled.”

D. On July 16, 2021, the University of California, Irvine’s (“UCI”) Provost and Executive Vice Chancellor announced that the Implementation Date for the UCI School of Law (“School of Law”) was August 3, 2021, and that compliance by School of Law students, staff, and faculty was required by that date. This date is earlier than the UCI main campus’s September 6 implementation date.
E. The **July 28, 2021 message** to UCI students from the UCI Vice Chancellor for Student Affairs and Medical Director of the Student Health Center provides that “Students who do not comply with UC vaccination requirements, including the COVID-19 vaccine mandate, may be subject to disciplinary action or loss of campus privileges, including but not limited to loss of wifi privileges, restriction from campus resources, restriction of access to campus, and an academic registration hold restricting students from registering for classes. Disciplinary action can include probation, suspension, or dismissal from the university.”

F. On August 3, 2021, the UCI Vice Chancellor for Student Affairs issued the UCI Implementation for Students—UC SARS-CoV-2 (COVID-19) Vaccination Plan that accompanies this School of Law Addendum (the “UCI Student Compliance Implementation Plan”). The UCI Student Compliance Implementation Plan directs School of Medicine and School of Law students to their respective schools for information on deadlines and requirements.

G. This School of Law Addendum to the UCI Student Compliance Implementation Plan (the “Addendum”) provides such information, as well as details about implementation at the School of Law in consideration of the School of Law’s earlier academic calendar and other factors specific to the School of Law. **This Addendum should be read together with the UCI Student Compliance Implementation Plan, as they together comprise the compliance implementation plan applicable to Law Students.**

**Application of UCI Student Compliance Implementation Plan to Law Students**

1. **Scope.** The UCI Student Compliance Implementation Plan applies to all students at the School of Law, including J.D., LL.M., and Graduate Tax students (“Law Students”), subject, however, to the modifications and other provisions of this Addendum.
2. **ZotPass 2.0.** The UCI Student Compliance Implementation Plan’s ZotPass 2.0 provisions apply to Law Students to the same extent they apply to other UCI students.

3. **Key Cards.** Although ZotPass 2.0 is used elsewhere on campus, the School of Law does not currently use it. Thus, in addition to the UCI Student Compliance Implementation Plan’s ZotPass 2.0 provisions, beginning August 15, 2021, Law Students’ key cards may be deactivated if they are not in compliance with the UC COVID-19 Vaccination Policy or if they at any time fail to comply with the Non-Pharmaceutical Interventions required of certain individuals (such as individuals with a UCI-approved Exception or Deferral) under the UC COVID-19 Vaccination Policy. Law Students with deactivated key cards will be unable to access key-card only locations (including, without limitation, the School of Law’s library) as well as locations that are key-card only after the School of Law’s normal operating hours. If a Law Student’s key card is deactivated for noncompliance, it may take up to a week for the key card to be reactivated after the School of Law receives notice from UCI central campus administration that the student has come into compliance.

4. **Wi-Fi Restriction.** Implementation of the UCI Student Compliance Implementation Plan’s Wi-Fi Restriction measures will begin August 15, 2021 (not September 6) for Law Students. Beginning August 15, 2021, Law Students’ UCI Wi-Fi access may be deactivated if they are not in compliance with the UC COVID-19 Vaccination Policy or if they at any time fail to comply with the Non-Pharmaceutical Interventions required of certain individuals (such as individuals with a UCI-approved Exception or Deferral) under the UC COVID-19 Vaccination Policy. If a Law Student’s Wi-Fi access is deactivated for noncompliance, it may take up to a week for access to be reactivated after the School of Law receives notice from UCI central campus administration that the student has come into compliance.

5. **Compliance Notification.** Implementation of the UCI Student Compliance Implementation Plan’s Compliance Notification procedures, including the
notices referred to therein, will begin August 11, 2021 (not September 6) for Law Students. These procedures may be initiated for Law Students who are not in compliance with the UC COVID-19 Vaccination Policy or who at any time fail to comply with the Non-Pharmaceutical Interventions required of certain individuals (such as individuals with a UCI-approved Exception or Deferral) under the UC COVID-19 Vaccination Policy. In each case of Law Student noncompliance, the timing of the First Notice will be based on when noncompliance is ascertained by UCI central administration or the School of Law (rather than based on September 6), and the timing of the subsequent notices and other steps of the Compliance Notification procedures will be based on the date on which that First Notice is sent. Notices sent to a student’s UCI or School of Law email address on record will constitute receipt by the student. These Compliance Notification procedures are separate from and in addition to, not a condition precedent to, implementation of the ZotPass 2.0, Key Cards, and Wi-Fi Restrictions measures.

6. **Registration Hold.** The UCI Student Compliance Implementation Plan’s Registration Hold provisions apply to the School of Law’s Spring 2022 semester classes (including the Spring 2022 School of Law short session), and will restrict students’ ability to register for those classes.

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