



TEXAS ASSOCIATION of COLLEGIATE REGISTRARS and ADMISSIONS OFFICERS

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September 18, 2011

Dr. MacGregor Stephenson
Assistant Commissioner
Texas Higher Education Coordinating Board
P.O. Box 12788
Austin, TX 78711

Dear Assistant Commissioner Stephenson,

Thank you for the opportunity to respond on the rules concerning the vaccination against bacterial meningitis for entering students at public or private or independent institutions of higher education. The Texas Association Collegiate Registrars and Admissions Officers (TACRAO) represent more than 1,100 members who work directly as student service providers at 164 institutions. We respectfully submit to you these comments:

1) Continuing Education: The bill text states that the requirement is for new students and transfer students and refers to Section 51.9191. According to state and federal reporting guidelines, Continuing Education students who are enrolled only in non-credit classes are not considered "new" or "transfer" students. Item #5 "Classification" on the CBM00A states that students enrolled in only Continuing Education courses are to be reported as such according to the CBM Manual. Students seeking to enroll in our institutions are required to complete an application through the ApplyTexas website. Continuing Education students do not apply via ApplyTexas; therefore, these students are not admitted into the institution and are taking non-credit courses on a casual basis. The wording of the bill seems to be directed toward admitted students either as first-time college students, transfer or returning students admitted as regular students who are degree-seeking. There are Continuing Education programs that do fit that bill. But many Continuing Education classes are strictly designed for personal enrichment. Additionally, local businesses contract with Continuing Education departments for job training. With that in mind, we suggest students enrolled only in Continuing Education

coursework that is the equivalent of a class carrying 48-contact-hours or less (i.e. personal enrichment, workforce customized training) be considered exempt from the requirement based on the definitions of a student.

2) Dual Credit: High school students already have to prove to the school district that they are immunized or have received an exemption from the Texas Health Department. We submit that students concurrently enrolled in a Texas public high school be included as an exception. Once they enter as a “first-time in college student” these students would, prior to enrollment, be required to comply.

3) Distance Education: The language in the bill gives an exception to a student enrolled only in online or other distance education courses. We believe courses taught at any correctional facility should be deemed distance education. Students taking courses in a correctional facility never interact with the general student population on our campuses thus making exposure to meningitis bacteria non-existent. Unofficially, several of our institutions have been told the correctional facility would have to stop offering courses should this legislation apply to them.

As it has in the past, TACRAO stands ready and willing to serve our students and facilitate the smooth implementation of laws affecting higher education. There are still many questions we feel will continue to arise as we develop strategies for compliance. Should you desire further input from those who will enforce the requirement, we would be more than happy to assist, in order that we may provide better service to the state’s college-bound population.

Respectfully submitted,



Trey Hattaway, President

Texas Association of Collegiate Registrars and Admissions Officers

On behalf of the TACRAO membership