The Commonwealth of Massachusetts

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Department of Public Health

Bureau of Health Care Safety and Quality

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**Memorandum**

**TO:** Clinic Chief Executive Officers

**FROM:** Elizabeth Daake Kelley, MPH, MBA, Director

Bureau of Health Care Safety and Quality

**SUBJECT:** Clinic Space for Respiratory Virus Testing, Treatment and Vaccine Administration

**DATE:** May 3, 2023

This guidance was updated to:

* Expand permissible alternate space use to all respiratory viruses (previously applied only to COVID-19 and influenza)
* Limit alternate space locations to be on or immediately adjacent to the clinic
* Define an end to alternate space use on May 10, 2024

Through this memorandum and pursuant to 105 CMR 140.025, the Department of Public Health continues to authorize the use of space on or adjacent to the clinic premises selected by the clinic for respiratory virus treatment, screening, vaccination and testing provided that the clinic complies with the below *Guidelines for Use of Alternate Space for Respiratory Virus Treatment Area*, hereinafter referred to as Guidelines, and receives such local approval as may be necessary for the erection and use of temporary structures. Clinics may continue to use alternate space until May 10, 2024.

A respiratory virus treatment area at a clinic may include the following: screening, testing or collecting specimens from patients with possible respiratory virus exposure; administering respiratory virus vaccine; respiratory clinics for respiratory virus patients; and therapeutics delivery. Each clinic should use the guidelines below to identify appropriate space(s), if available.

In addition to the below guidelines, a clinic using space for a patient treatment area must:

* Meet the applicable requirements for collection stations in 105 CMR 180.000, *The Operation, Approval and Licensing of Clinical Laboratories*, if collecting specimens;
* Be in possession of a current, active Massachusetts Controlled Substance Registration that incorporates the alternative space, if administering vaccine, conducting respiratory clinics or providing therapeutics;
* Be in compliance with all state and federal requirements, including for vaccine storage and handling. DPH requirements on storage and handling of vaccines may be found here: <https://www.mass.gov/info-details/vaccine-storage-and-handling-guidance>

***Guidelines for Use of Alternative Space for Respiratory Virus Treatment Area***

*The clinic must have written guidelines that address the following:*

A staffing plan with staff qualifications, including appropriate orientation and training.

* Policy for managing high risk patients, including determining if the area is appropriate space to care for individuals with acute behavioral health needs or pediatric populations.

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* Policy for security of patients, facilities, supplies, pharmaceuticals and for crowd management.
* Patient flow systems addressing screening and testing.
* Policies for ensuring appropriate personal protective equipment (PPE) are available for all staff.
* Protocols for following current standards of practice.

*The physical space must conform to the following requirements:*

* The space must be on or adjacent to the clinic premise locations only.
* Minimum four-foot aisles maintained between patient exam chairs.
* Immediate access to hand wash sinks or other forms of hand hygiene.
* Reasonably sized workspace with privacy considerations for patient screening and vaccination.
* Provision for environmental cleaning, sanitization and appropriate decontamination.
* Space, cabinets or carts for storage of supplies and specimens.
* Provision for medical recordkeeping, including measures to ensure patient confidentiality.
* Signage to direct patients to the space