

The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health  
Bureau of Health Care Safety and Quality

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**Memorandum**

**TO:** Hospital Chief Executive Officers

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

Bureau of Health Care Safety and Quality

**SUBJECT:** Space on Hospital Premises for COVID-19 or Influenza Treatment

**DATE:** October 26, 2021

Through this memorandum and pursuant to 105 CMR 130.051, the Department of Public Health (DPH) continues to authorize the use of alternate space on or off the hospital premises selected by the hospital for a COVID-19 treatment area and newly extends the use of this alternate space for influenza treatment, provided that the hospital complies with the below *Guidelines for Use of Alternate Space for COVID-19 or Influenza Treatment Area*, hereinafter referred to as Guidelines. Hospitals may identify and use existing non-patient care space, or other outpatient or inpatient care space, or other unlicensed space not on the hospital’s campus, as needed for patient care and consistent with this letter and enclosed Guidelines.

A COVID-19 or Influenza treatment area at a hospital may include the following: screening, testing or collecting specimens from patients with possible COVID-19 or Influenza exposure or as otherwise clinically indicated; administering COVID-19 or Influenza vaccine; respiratory clinics for COVID-19 or Influenza patients; and monoclonal antibody therapy delivery.

The Guidelines outline the conditions for temporary use of alternate space and the hospital must comply with the guidelines.

In addition to the below guidelines, a hospital using alternate space for a COVID-19 or Influenza treatment area must:

* Supply its own personal protective equipment;
* Be in possession of a current, active Massachusetts Controlled Substance Registration that incorporates the alternative space, if administering vaccine, conducting respiratory clinics or providing monoclonal antibody therapy;
* 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 COVID-19 or Influenza Treatment Area***

*The hospital 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
* 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, adjacent or reasonably proximate to the hospital premise locations only (for example a nearby but not adjacent school parking lot would be acceptable when reasonably close to the hospital)
* 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

If you have any questions about this information, please contact the Hospital Complaint Unit Supervisor at 617-753-8204.