



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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Circular Letter: DHCQ 10-09-535

TO: Hospital Chief Executive Officers, Infection Preventionists, and
Chief Nursing Officers
Clinic Chief Executive Officers or Practice Managers
Clinic Chief Nursing Officers
Dialysis Center Chief Executive Officers
Dialysis Center Chief Nursing Officers
Long Term Care Facility Administrators
Long Term Care Facility Directors of Nursing

FROM: Alice Bonner, PhD, RN, Director

DATE: September 22, 2010

RE: Reporting and Data Collection Guidelines for Seasonal Influenza Vaccination of
Employees at Massachusetts Health Facilities for the 2010-2011 Influenza Season

The purpose of this letter is to provide guidance and instructions for the mandatory reporting by health facilities of seasonal influenza vaccination rates of employees for the 2010-2011 influenza season.

Background:

Massachusetts Department of Public Health (MDPH) regulations require licensed clinics, dialysis centers, hospitals, and long-term care facilities ("health facilities") to offer all personnel annual vaccination against seasonal influenza. The regulations also require documentation of compliance with the personnel vaccination requirement, in accordance with reporting and data collection guidelines of the Commissioner (105 CMR 130.325(l)). This document summarizes reporting and data collection guidelines for the 2010-2011 influenza season. The regulations 105 CMR 130.000 Hospital Licensure; 105 CMR 140.000 Licensure of Clinics; 105 CMR 150.000 Licensing of Long-Term Care Facilities; and 105 CMR 145.000 Licensing of Out-of-Hospital Dialysis Units are available on the MDPH website at www.mass.gov/dph.

Annual Reporting:

Based on reports received from hospitals for the 2009-2010 season on obtaining accurate seasonal influenza vaccination data for all "personnel," the Department has made changes to expedite reporting for the 2010-2011 season. While the requirement for offering vaccine and documenting declination applies to all "personnel" (independent practitioners, contractors, volunteers, students, etc., as well as employees), the metric to assess compliance will be based on the vaccination of "employees." For the purposes of the vaccination program, employee is defined as:

Individuals, both full-time and part-time, who are on the health facility payroll as of December 31, 2010. This includes, but is not limited to: physicians; nurses; interns/residents; fellows; physician's assistants; physical, occupational, respiratory and speech therapists; laboratory and operating room technicians; central supply staff; pharmacists; maintenance/environmental services staff; dietary; attendants/orderlies, secretarial and administrative staff; contract staff, whether or not such individual(s) provide direct patient care.

No later than April 15, 2011, health facilities are required to report the following to the Department:

- The number of **employees** immunized for seasonal influenza by the health facility from August 1, 2010 through March 31, 2011;
- The number of **employees** immunized for seasonal influenza outside the health facility from August 1, 2010 through March 31, 2011;
- The number of **employees** declining seasonal influenza immunization from August 1, 2010 through March 31, 2011; and
- The total number of health facility **employees** as of December 31, 2010.

The required data elements are included in Attachment A.

The instructions for electronic submission of the data elements in Attachment B will be e-mailed to hospitals prior to April 1, 2011.

The data collected during the 2010-2010 influenza season will be publicly reported during or after August, 2011. Each health facility will have an opportunity to preview their data prior to public release.

Seasonal influenza vaccination is an effective method of preventing influenza virus infection and its potentially serious complications. The Department is committed to working with you to ensure that patients and personnel are protected. Thank you for your ongoing participation in this important initiative.

If you have any questions concerning the reporting requirements, please contact roberta.bernstein@state.ma.us (617-753-8062) or Eileen.mchale@state.ma.us (617-753-7324)

Attachment A

Influenza Vaccination of Employees in Massachusetts Health Facilities Directions for Data Collection

I. General Directions for Data Collection

Report for Seasonal Influenza Vaccination: This reporting process is applicable to vaccination for seasonal influenza for 2010-2011.

Reporting for Institutions with Multiple Campuses:

Hospitals:

Please report on every hospital campus consistent with the way your hospital reports healthcare associated infections to the National Healthcare Safety Network (NHSN). If unsure about this, please consult your hospital's Infection Prevention Program, or call Roberta Bernstein at the Massachusetts Department of Public Health (contact information below).

Clinics:

Please report each clinic location separately.

Reporting for Institutions with Satellite Locations:

Hospitals and Clinics:

For the purposes of this reporting requirement, influenza data for employees in hospital and clinic affiliated satellites such as clinical laboratories, urgent care, radiology, MRI units, etc. must be included in hospital and clinic reported data.

For Questions or to Provide Feedback:

Please contact the Massachusetts Department of Public Health:

roberta.bernstein@state.ma.us (617-753-8062) or Eileen.mchale@state.ma.us (617-753-7324)

II. Required Data:

A. General Information

1. **Facility Name:** Enter the name of your health facility.
2. **Contact Information:** Enter the name, phone number, email address and position/title of the person at your health facility whom MDPH should contact for questions on influenza vaccination data submission.
3. **Date of Data Collection Completion:** Enter the date of data submission.
4. **Massachusetts Department of Public Health Facility Identification Number:** Enter your MDPH issued health facility license number.

B. Seasonal Influenza Vaccination of Employees: 2010-2011 Flu Season

Required Data:

- 5. Number of health facility employees who received seasonal flu vaccination from the health facility:** Enter the number of health facility employees who received the current season's influenza vaccine from the health facility (via health facility vaccination programs or Employee Health) **from August 1, 2010 through March 31, 2011**. For the purposes of the vaccination program, employee is defined as:

Individuals, both full-time and part-time, who are on the health facility payroll as of December 31, 2010. This includes, but is not limited to: physicians; nurses; interns/residents; fellows, physician's assistants; physical, occupational, respiratory and speech therapists; laboratory and operating room technicians; central supply staff; pharmacists; maintenance/environmental services staff; dietary; attendants/orderlies, secretarial and administrative staff; contract staff, whether or not such individual(s) provide direct patient care.

Data for employees such as contractors performing administrative functions, who do not work at or come to the licensed health facility, are not required to be reported.

- 6. Number of health facility employees:** Enter the total number of health facility employees on December 31, 2010.

- 7. Number of health facility employees who received seasonal flu vaccination outside of the health facility:** Enter the number of health facility employees who received the current season's influenza vaccine OUTSIDE the health facility (for example from private physician's office, community clinic, etc.) during the period from August 1, 2010 through March 31, 2011.

- 8. Number of health facility employees who declined the current season's influenza vaccine during the period from August 1, 2010 through March 31, 2011.**

Optional Data:

- 9. Comments**

III. Submitting Data to the Massachusetts Department of Public Health

When to Submit Data to MDPH:

All data must be submitted by April 15, 2011. Items 1- 8 are required fields. Items 9 (Comments) is optional.

How to Submit Data to MDPH:

The electronic data collection instructions will be e-mailed to all health facilities prior to April 1, 2011.

Health Facilities should keep copies of all data submitted in a secure file for future reference.

For Questions or to Provide Feedback:

Please contact the Massachusetts Department of Public Health:
Roberta.bernstein@state.ma.us (617-753-8062) or Eileen.mchale@state.ma.us (617-753-7324)

A Note on Data Collection Methods and Sources

As you vaccinate, keep track of recipients' health facility employment status. Use data collection methods that work with your health facility's systems, FOR EXAMPLE:

- For **number of health facility employees** use your health facility's human resources department or payroll database.
- For **number of employees who received seasonal flu vaccination from the health facility**, use vaccination logs, count vaccination consent forms, extract data from vaccination information forms kept by Employee Health, or review attestation or declination forms.
- For **number of employees who received seasonal flu vaccination OUTSIDE the health facility**, review attestation forms or declination forms, survey personnel, or extract data from vaccination information kept by Employee Health.
- For **number of employees who declined seasonal flu vaccination**, review declination forms or declination tracking forms.

ATTACHMENT B
Sample Form
Seasonal Influenza Vaccination of Employees in Massachusetts
Health Facilities

APRIL 15, 2011: DATE FOR SUBMISSION OF DATA TO MDPH

I. General Information

1. Facility Name: _____
2. Contact Information
Name: _____
Phone Number: _____
Email Address: _____
Position/Title: _____
3. Date of Completion of Data Collection Form: _____
4. Massachusetts Department of Public Health Facility Identification Number:

II. Data: Seasonal Influenza Vaccination of Employees, Data as of March 31, 2011:

Required Data

5. Number of health facility employees who received seasonal flu vaccination (from the health facility) **from 8/1/10 thru 3/31/11.**

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6. Number of health facility employees on **December 31, 2010:**

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7. Number of health facility employees who received seasonal flu vaccination outside of the health facility **from 8/1/10 thru 3/31/11.**

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8. Number of health facility employees who declined seasonal flu vaccination **from 8/1/10 thru 3/31/11.**

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Optional Data

9. Comments

Attachment C

Massachusetts Department of Public Health

Guidelines for the Vaccination of Personnel of Licensed Clinics, Dialysis Centers, Hospitals and Long Term Care Facilities Against Seasonal Influenza and Reporting Requirements for Influenza Vaccination

Effective Date: August 1, 2010

Massachusetts Department of Public Health (MDPH) regulations require licensed clinics, dialysis centers, hospitals, and long-term care facilities (“health facilities”) to offer all personnel annual vaccination against influenza as directed in guidelines of the Commissioner of Public Health (105 CMR 130.325; 105 CMR 140.150; and 105 CMR 150.002(D)(8)). MDPH provides the following updated guidelines for seasonal influenza and influenza vaccination of health facility personnel and describes the data collection and reporting requirements for the 2010-2011 influenza season. These updated guidelines are applicable from September 6, 2010 through June 30, 2011, unless subsequently amended or superseded.

A) Data collection and reporting

1) Although the regulations apply to all “personnel”, the reporting requirements for the 2010-2011 influenza season are restricted to “employees”.

2) For the purposes of reporting influenza data to MDPH, “employee” is defined as:

Individuals, both full-time and part-time, who are on the payroll as of December 31, 2010. This includes, but is not limited to: physicians; nurses; interns/residents; fellows; physician’s assistants; physical, occupational, respiratory and speech therapists; laboratory and operating room technicians; central supply staff; pharmacists, maintenance/environmental services staff, dietary, attendants/orderlies, secretarial and administrative staff; contract employees or staff, whether or not such individual(s) provide direct patient care.

Employees such as contractors performing administrative functions, who do not work at or come to the licensed health facility, are not required to be vaccinated.

3) Each employer shall maintain a count of the total number of employees subject to the vaccination requirement.

4) Each employer shall maintain centrally, data on all vaccinations administered, vaccinations documented from another source, and vaccinations declined, to allow the health facility, and MDPH upon request, to assess the completeness of influenza vaccination coverage.

B) Vaccination program

1) Components of the vaccination program

a) Information to be provided to all personnel. Licensed health facilities shall:

(i) notify all personnel about the vaccination program;

- (ii) provide all personnel with information about the risks and benefits of immunization against influenza; and
 - (iii) provide educational and promotional activities to encourage and improve immunization rates.
- b) Offer vaccine (as described below) to all personnel at no cost to an individual:
- (i) provide each individual with the most current Vaccine Information Statement (VIS) for the vaccine prior to the administration of each dose of vaccine;
 - (ii) provide each individual with written documentation of vaccination on a personal immunization card or by other means; and
 - (iii) an individual may provide proof of current immunization against influenza in lieu of vaccination as part of this program. Proof of vaccination includes, at a minimum, date of vaccination (month and year), and signature of a health care provider.
- c) Declination of influenza vaccination. Personnel may decline vaccination if:
- (i) the vaccine is medically contraindicated (vaccination would likely be detrimental to the individual's health) or
 - (ii) the individual declines the vaccination for any reason.
 - (iii) licensed health facilities must ensure that an individual who declines vaccination sign a statement declining vaccination and certifying that s/he received information about the risks and benefits of influenza vaccination. A health facility may not require an individual to indicate the reason s/he declined vaccination.
- d) Documentation of personnel influenza vaccination status
- (i) Consistent with existing information systems at the facility, a licensed health facility shall maintain a central system to track the influenza vaccination status of all personnel, including declinations. If a licensed health facility is unable to provide or arrange for influenza vaccination for any individual, it must document the reasons vaccination was not provided. A record of the number of all employees subject to the vaccination requirement, as defined in these guidelines, shall be maintained to assess completeness of vaccination coverage.
 - (ii) A licensed health facility shall maintain documentation of each individual's vaccination status in the individual's personnel file. The MDPH interprets the term "personnel file" broadly to include electronic or other individual or aggregate file(s) or document(s) that allow a licensed health facility to easily assess the vaccination status of a particular individual.

C) Vaccines to be administered

- 1) For the 2010-2011 flu season, licensed health facilities shall provide the following seasonal influenza vaccines to all personnel.

a) FDA licensed seasonal influenza vaccine containing the 2010-11 trivalent vaccine virus strains, A/California/7/09 (H1N1)-like virus, A/Perth /16/2009 (H3N2)-like virus, B/Brisbane/60/2008-like virus, either as inactivated influenza vaccine for injection or live attenuated nasal spray influenza vaccine. The 2010-2011 seasonal influenza vaccine will offer protection against the 2009 pandemic H1N1 flu strain.

2) All vaccines shall be administered according to the official package label and insert, and usual clinical practice.

D) Implementation schedule

1) Seasonal trivalent 2010-2011 influenza vaccine. The regulations require licensed health facilities, when feasible, to vaccinate all personnel against seasonal influenza no later than December 15, annually. See Unavailability of Vaccine below.

E) Unavailability of Vaccine

1) A health facility shall not be required to provide or arrange for influenza vaccination during times that the vaccine is unavailable for purchase, shipment, or administration by a third party, or when complying with an order of the Commissioner which restricts the use of the vaccine. A health facility shall obtain and administer influenza vaccine in accordance with the regulations as soon as vaccine becomes available.

F) Written Protocols

1) MDPH's written clinical protocols covering the latest guidance and requirements for vaccine ordering, storage, provision of information and documentation can be found at <http://www.mass.gov/dph/imm> and clicking on "Vaccine Management".

2) Standing orders for vaccines and clinic protocols can be found by going to <http://www.mass.gov/dph/imm> and clicking on "Model Standing Orders."

G) Additional Resources

1) *Prevention and Control of Seasonal Influenza with Vaccines. Recommendations of the Advisory Committee on Immunization Practices (ACIP), 2010* (CDC)

<http://www.cdc.gov/mmwr/pdf/rr/rr5908.pdf>

2) http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5908a1.htm?s_cid=rr5908a1_w

H) The latest information on influenza is available on the following websites:

1) Centers for Disease Control and Prevention's (CDC's) at <http://www.cdc.gov/flu>

2) MDPH at www.mass.gov/dph/flu

Contact Information

If you have any questions concerning the guidelines please contact:

Roberta.bernstein@state.ma.us (617-753-8062) or Eileen.mchale@state.ma.us (617-753-7324)

Questions concerning vaccine administration and management should be directed to the Massachusetts Immunization Program at 617-983-6800.