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:** Clinic Chief Executive Officers or Practice Managers

**FROM:**          Teryl Smith, RN, MPH Director

Bureau of Health Care Safety and Quality

**SUBJECT:**   Clinic Personnel Vaccination for COVID-19 and Influenza

**DATE:** January 31, 2025

The purpose of this memorandum is to inform Massachusetts licensed clinics of the steps needed to fulfill the Massachusetts Department of Public Health (DPH) requirement to vaccinate healthcare personnel (HCP) for influenza and COVID-19 and to submit these data in accordance with DPH guidelines outlined in this memorandum.

**COVID-19 and Influenza Vaccination Requirement**:

As a condition of licensure, under 105 CMR 140.150, DPH clinic licensure regulations require that licensed clinics ensure all HCP are vaccinated annually with seasonal influenza vaccine and are up to date with vaccine doses for COVID-19 as recommended by the Centers for Disease Control and Prevention (CDC), unless an individual is exempt from vaccination. For the purposes of this memorandum, being up to date with vaccine doses for COVID-19 means that HCP must receive one updated 2024-2025 COVID-19 vaccine, at least eight weeks after receiving the last dose of any COVID-19 vaccine.[[1]](#footnote-1)   An individual who has not previously received any doses of COVID-19 vaccine but who receives one dose of the updated COVID-19 vaccine is also up to date.

HCP means an individual or individuals who either work at or come to the licensed clinic site and who are employed by or affiliated with the clinic, whether directly, by contract with another entity, or as an independent contractor, paid or unpaid including, but not limited to, employees, members of the medical staff, contract employees or staff, students, and volunteers, whether or not such individual(s) provide direct care.

All HCP, who are not subject to an exemption, must be up to date with COVID-19 vaccine and have received the 2024-2025 seasonal influenza vaccine no later than March 31, 2025. While clinics are not required to procure vaccines for, or administer vaccines to HCP directly, they are required to ensure that all HCP are vaccinated, unless exempt. Clinics may choose (but are not required) to host a health care provider to administer vaccines to their HCP and may bill health insurance for those HCP that provide their insurance information. Additionally, clinics may direct HCP to a local pharmacy or health care provider for the administration of these vaccines.

For individuals that are subject to the vaccination requirement exemption, the clinic may choose to require that such individual take mitigation measures in addition to continuing to self-assess for any signs or symptoms of illness. Mitigation measures that clinics may require exempt individuals include, but are not limited to:

* Wearing a facemask during all patient care encounters for the duration of the respiratory illness season; and
* Avoiding direct patient care.

DPH continues to recommend that HCP use personal protective equipment (PPE) consistent with the Department’s [Comprehensive PPE Guidance](https://www.mass.gov/doc/updated-comprehensive-personal-protective-equipment-2/download).

**Documentation Requirements**:

The clinic licensure regulations direct that clinics require and maintain for each individual proof of current seasonal influenza vaccination and being up to date with COVID-19 vaccination or the individual’s exemption statement. These records must be maintained via a central system to track the vaccination status of all HCP and must be available to DPH upon request. Examples of individual proof of current vaccination include but are not limited to:

* Copy of CDC Vaccination Card.
* Copy of MA Immunization Information System (MIIS) Vaccination Record.
* Copy of vaccination from an electronic health record.
* COVID-19 SmartHealthcard from the Commonwealth’s MyVaxRecords public portal.

Exemption statements from HCP must include a signed statement certifying they received information about the risks and benefits of COVID-19 and/or influenza vaccination.

**Clinic Reporting Requirements:**

To comply with the clinic licensure regulations, all Massachusetts licensed clinics must annually report their aggregate HCP COVID-19 and influenza data through an online survey in REDCap. To access the online survey, please click on the following link: <https://redcap.link/ma-hcp-covidandfluvaccination>. Only reports submitted through REDCap will be accepted.

* Each licensed clinic is required to report the following no later than **May 15, 2025:** 
  + Number of HCP who worked at the licensed clinic for at least 1 day between October 1, 2024 and March 31, 2025.
  + Number of HCP who received an updated 2024-2025 influenza vaccine as of March 31, 2025.
  + Number of HCP who are exempt from the influenza vaccine (unvaccinated at time of reporting).
  + Number of HCP who are up to date with COVID-19 vaccine as of March 31, 2025 since the updated 2024-2025 COVID-19 vaccine became available.
  + Number of HCP who are exempt from being up to date with COVID-19 vaccine (unvaccinated at time of reporting).

**To assist clinics in documenting, monitoring and tracking HCP COVID-19 & influenza vaccination data throughout the respiratory season, DPH has developed a Facility COVID-19 & Flu Tracking Tool, available at the following link:** [Health Care Personnel Influenza Vaccination References and Resources | Mass.gov](https://www.mass.gov/info-details/health-care-personnel-influenza-vaccination-references-and-resources)

Please note the clinic licensure regulations do not allow reporting an unknown vaccination status.

Please submit questions concerning the reporting and data submission requirements to the Bureau of Health Care Safety and Quality at [dhcq.fludata@state.ma.us](mailto:dhcq.fludata@state.ma.us).

1. Updated COVID-19 vaccine means one dose of the updated Pfizer-BioNTech, Moderna, or Novavax COVID-19 vaccine. https://www.cdc.gov/covid/vaccines/stay-up-to-date.html?CDC\_AAref\_Val=https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html [↑](#footnote-ref-1)