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**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** 105 CMR 130, Hospital Licensure – Vaccination Requirements

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Hello,

I hope this message finds you well. I am writing to express my concerns about the proposed changes that would require all healthcare personnel to be vaccinated against COVID-19 and influenza. While I understand the intention behind these changes is to ensure the safety and well-being of both healthcare workers and patients, I believe there are several factors that need to be considered before implementing such a mandate.

Firstly, it is important to acknowledge the current shortage of healthcare workers that our hospitals are facing. The healthcare industry is already grappling with a significant deficit of personnel, and this proposed mandate could potentially exacerbate the situation. Many healthcare professionals may choose to leave the field rather than comply with the vaccination requirement, further straining our already limited resources. This could lead to a decrease in the quality of care provided to patients due to understaffing.

Secondly, the definition of "fully vaccinated" against COVID-19 seems to be a moving target. Initially, full vaccination was defined as receiving two doses of the Pfizer or Moderna vaccine, or one dose of the Johnson & Johnson vaccine. However, with the introduction of booster shots, this definition is changing. It is unclear how many additional doses will be required in the future to maintain the status of being "fully vaccinated". This lack of clarity can create confusion and resistance among healthcare workers.

Furthermore, there is limited high-quality, randomized controlled trial (RCT) data demonstrating the benefits of COVID-19 booster shots for individuals in the average healthcare worker's age range. Without robust evidence supporting the necessity and efficacy of these additional doses, it is difficult to justify making them a requirement for employment in the healthcare field.

In conclusion, while the safety of our healthcare workers and patients is of utmost importance, it is crucial to consider the potential ramifications of implementing a vaccination mandate. I urge you to consider these points and engage in a dialogue with healthcare professionals before finalizing any decisions.

Thank you for your time and consideration. I look forward to further discussions on this matter.

Best regards,

John Rossman, MS, DABAR Medical Physicist