

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 Patient Treatment

**DATE:** December 10, 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 or influenza treatment area. DPH is now extending the use of this alternate space for patient treatment, provided that the hospital complies with the below *Guidelines for Use of Alternate Space for Patient 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 a patient treatment area, consistent with this letter and enclosed Guidelines.

A patient treatment area at a hospital may continue to 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 patient treatment area at a hospital may now also include the following: screening, assessment, testing or collecting specimens, or administering non-invasive treatments.

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 patient treatment area must:

* Supply its own personal protective equipment;
* Be in possession of a current, active Massachusetts Controlled Substance Registration. If the address of the alternative space is different than the address of the registered hospital, a new MCSR must be issued to authorize storage of medications, or providing monoclonal antibody therapy in the alternative space;
* 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 Patient 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, including determining if the area is appropriate space to care for individuals with acute behavioral health needs or pediatric populations
* 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.