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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 Vaccine Administration

**DATE:** September 24, 2020

During the COVID-19 Public Health Emergency, providing yearly vaccinations to patients in a timely and effective manner may prove to be especially challenging for health care practitioners and facilities with limited space to administer such vaccines. As part of ongoing statewide preparations to ensure that vaccinations are available in a safe environment the Department of Public Health (DPH) is issuing the following guidance to hospitals.

In Circular Letter 20-03-701, published on March 6, 2020 and revised on April 3, 2020, DPH authorized the use of alternate space not currently licensed or approved for patient care, on or off the hospital campus to establish alternative care areas for screening, evaluation, and treatment of patients during the COVID-19 Public Health Emergency. In addition, DPH developed *Guidelines for Use of Alternate Space for Patient Screening, Testing, and Care during the COVID-19 2020 State of Emergency* which conditioned the temporary use of alternate space.

With this memo, DPH will expand the use of this alternate space for administering vaccinations, provided that hospitals comply with requirements found in Circular Letter 20-03-701, and DPH requirements for vaccine storage and handling, including possession of a current, active Massachusetts Controlled Substance Registration that incorporates the alternative space.

Hospitals that intend to use alternative space for administering vaccinations that have already received approval for this purpose, are using space in a building that is already licensed as part of the hospital, or that are offering vaccinations as part of a health promotion screening or other temporary basis (less than one week) are not required to submit an additional attestation form.

DPH requirements on storage and handling of vaccines may be found here:  
<https://www.mass.gov/info-details/vaccine-storage-and-handling-guidance>

A hospital using space for vaccine administration purposes must supply its own personal protective equipment.

### ***Guidelines for Use of Alternative Space for Vaccine Administration***

*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

DPH continues to work with state, federal and local partners on the outbreak of novel Coronavirus 2019 (COVID-19), caused by the virus SARS-CoV-2, and we continue to appreciate the essential role you have in responding to this evolving situation.

DPH strongly encourages all clinics in Massachusetts to monitor the Centers for Medicare & Medicaid Services (CMS) website and the Centers for Disease Control and Prevention (CDC) website for up-to-date information and resources:

- CMS website: <https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>
- CDC website: <https://www.cdc.gov/coronavirus/2019-ncov/healthcare-facilities/index.html>

Additionally, please visit DPH's website that provides up-to-date information on COVID-19 and important resources for fall vaccination clinics in Massachusetts:

- <https://www.mass.gov/2019coronavirus>.
- <https://www.mass.gov/doc/important-resources-for-fall-vaccination-clinics/download>