



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
67 Forest Street, Marlborough MA 01752

MAURA T. HEALEY  
Governor

KIMBERLEY DRISCOLL  
Lieutenant Governor

KATHLEEN E. WALSH  
Secretary

ROBERT GOLDSTEIN, MD, PhD  
Commissioner

Tel: 617-624-6000  
[www.mass.gov/dph](http://www.mass.gov/dph)

### Memorandum

**TO:** Licensed Ambulance Services  
**FROM:** Elizabeth Daake Kelley, MPH, MBA, Director  
Bureau of Health Care Safety and Quality  
**SUBJECT:** Emergency Medical Service Personnel Vaccination for COVID-19 and  
Influenza  
**DATE:** November 27, 2023

The purpose of this memorandum is to inform Massachusetts ambulance services of the steps needed to fulfill the Massachusetts Department of Public Health (DPH) requirement to vaccinate health care 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 170.341 and 170.342, the EMS System regulations require licensed ambulance services to 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 memo, being up to date with vaccine doses for COVID-19 means that HCP must receive one updated COVID-19 vaccine, at least two months after getting the last dose of any COVID-19 vaccine.<sup>1</sup> 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 service or site or EMS vehicle and who are employed by or affiliated with the service, 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 2023-2024 seasonal influenza vaccine no later than December 31, 2023. While ambulance services are not required to procure or administer vaccines to HCP

<sup>1</sup> Updated COVID-19 vaccine means one dose of the updated Pfizer-BioNTech or Moderna COVID-19 vaccine.  
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html>

directly, services are required to ensure that HCP are vaccinated. Ambulance services may choose (but are not required) to host a health care provider to administer vaccine to their HCP, and may bill health insurance for those HCPs that provide their insurance information. Additionally, the ambulance service may direct HCP to a local pharmacy or health care provider for the administration of these vaccines.

For any individual that is subject to the vaccine exemption, the ambulance service may choose to require such individual to take mitigation measures in addition to continuing to self-assess for any signs or symptoms of illness. Mitigation measures that the ambulance service may require an individual to take if they are exempt from vaccination 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 staff using personal protective equipment consistent with the Department's [Comprehensive PPE Guidance](#).

### **Documentation:**

The regulation requires ambulance services maintain for each individual proof of seasonal influenza vaccination and being up-to-date with COVID-19 vaccination or the individual's declination statement should the HCP decline vaccination. This must be maintained via a central system to track the vaccination status of all personnel and 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

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

### **Ambulance Service Reporting:**

To comply with the regulation, all Massachusetts Ambulance Services must annually report its 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 ambulance service is required to report the following no later than **February 15, 2024:**
  - Number of HCP who worked at the ambulance service for at least 1 day between October 1, 2023 and December 31, 2023
  - Number of HCP who received an influenza vaccine as of December 31, 2023 since the influenza vaccine became available this season
  - Number of HCP who are exempt from the influenza vaccine (unvaccinated at time of reporting).

<sup>1</sup> Updated COVID-19 vaccine means one dose of the updated Pfizer-BioNTech or Moderna COVID-19 vaccine. <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html>

- Number of HCP who received an updated COVID-19 vaccine as of December 31, 2023 since the updated COVID-19 vaccine became available this season
- Number of HCP who are exempt from the updated COVID-19 vaccine (unvaccinated at time of reporting).

**To assist ambulance services 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](#)**

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