



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Professions Licensure  
239 Causeway Street, Boston, MA 02114

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**Circular Letter: DCP 17-8-102**

**TO:** Primary Care Providers

**FROM:** Monica Bharel, MD, MPH, Commissioner, Department of Public Health  
James G. Lavery, JD, Director, Bureau of Health Professions Licensure

**CC:** George Zachos, Executive Director, Board of Registration in Medicine

**DATE:** August 10, 2017

**RE:** Immunization Administration by Medical Assistants

The purpose of this Circular Letter is to inform primary care providers, including Physicians, Certified Nurse Practitioners (CNP), Certified Nurse Midwives (CNMs), and Physician Assistants (PAs) about certifications approved by the Department of Public Health (DPH) in addition to those named in M.G.L. c. 112, §265, that permit medical assistants who meet the certification requirements to administer immunizations under the direction of a primary care provider (PCP) acting within his or her designated scope of practice.

As described in Circular Letter DCP 16-12-664 (Attachment 1), a PCP may delegate the administration of immunizations to a medical assistant who:

- (1) has graduated from a post-secondary medical assisting education program accredited by the Commission on Accreditation of Allied Health Education Programs, or the Accrediting Bureau of Health Education Schools;
- (2) is employed in the clinical practice of a licensed primary care provider; and
- (3) performs basic administrative, clerical, and clinical duties upon the specific authorization and under the direct supervision of a licensed primary care provider.

M.G.L. c. 112, §265 also authorizes the Commissioner to recognize other certificate programs or methods as providing an acceptable level of training, authorizing medical assistants to administer immunizations as specified in that chapter. While DPH begins the process to draft regulations for this purpose, this Circular Letter sets forth criteria PCPs may use to assess the adequacy of a

medical assistant's training and/or certifications for the purposes of administering immunizations.

### **Method 1: Formal Education & Certification Examination**

In instances where a medical assistant has graduated from an acceptable post-secondary program, as described below, and passed a certification examination, a primary care provider may accept the certification as authorizing the holder to administer immunizations under supervision, as authorized under M.G.L. c. 112, §265.

An acceptable post-secondary program should include training designed to prepare students to assist in a medical office and lead to the following competencies:

- Understanding of vaccines; their use, general recommendations for handling, storage and administration.
- Understanding of the general anatomy of the arm and thigh, and the position and extent of the deltoid muscles in the arm and the anterolateral thigh muscles.
- Understanding of vaccine products, packaging, correct use and labeling.
- Use of vaccine information statements (VISs) and provision of patient counseling regarding VIS and other relevant information.
- Aseptic technique for drawing up vaccines in a syringe and administering vaccines.
- Use of standard infection control precautions as relates to vaccine administration.
- Correct administration of intramuscular and subcutaneous injections, with the correct use of the safe site and route of administration indicated for the particular vaccine, and use of a needle of the recommended size.
- Correct administration of vaccines given by the oral and nasal routes.
- Safe injection practices and safe disposal of needles, syringes, and other hazardous waste.
- Appropriate response to predictable emergency situations related to vaccine administration (e.g. fainting, allergy, etc.), using established procedures.
- Full documentation of vaccine administration; dose, route, date, time, and person administering.
- Understanding of immunization information systems and their use.
- Understanding of the Vaccine Adverse Event Reporting System (VAERS) and its use.

Primary care providers must obtain and retain sufficient records from a medical assistant to make a reasonable assessment as to whether the above requirements have been met. An appropriate notation should be made in the medical assistant's personnel record reflecting this assessment, and authorizing the medical assistant to administer immunizations under the required conditions of supervision.

### **Method 2: Professional Experience**

PCPs may also authorize medical assistants to administer immunizations according to the experience qualifications below, while the Department begins the process to draft regulations relative to vaccine administration by medical assistants.

Medical assistants may also qualify through 3 years or more of applicable professional experience in the administration of immunizations, as assessed by the primary care provider. The criteria set out above in Method 1, regarding appropriate training and competencies, should be taken into account by a primary care provider when assessing the professional experience of a medical assistant.

Primary care providers who determine a medical assistant may be authorized to administer immunizations through this method must include an appropriate notation in the medical assistant's personnel record reflecting the PCP's assessment of the medical assistant's experience and authorizing the medical assistant to administer immunizations under the required conditions of supervision.

The Department requests that any questions related to this Circular Letter be submitted in writing via email sent to one or more of the below board addresses:

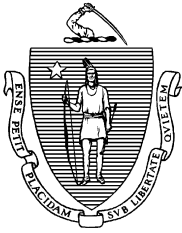
- Board of Registration in Nursing: [nursing.admin@state.ma.us](mailto:nursing.admin@state.ma.us)
- Board of Registration in Physician Assistants: [multiboard.admin@state.ma.us](mailto:multiboard.admin@state.ma.us)
- Board of Registration in Medicine: [borim.info@state.ma.us](mailto:borim.info@state.ma.us)

#### Resources:

- Medical Assistants Vaccine Resources and Training on Immunization (MARTi) website of the Association for Prevention Teaching and Research  
[http://marti-us.org/vaccine\\_administration.shtml](http://marti-us.org/vaccine_administration.shtml)
- Vaccine Administration website of the Centers for Disease Control and Prevention  
<https://www.cdc.gov/vaccines/hcp/admin/recs-guidelines.html>
- Immunization e-Learn website of the Centers for Disease Control and Prevention  
<https://www.cdc.gov/vaccines/ed/courses.html#elearn-vaccadmin>

Other Helpful Websites:

- General Best Practice Guidelines for Immunization from the Centers for Disease Control and Prevention and the Advisory Committee on Immunization Practices  
<https://www.cdc.gov/vaccines/hcp/acip-recs/general-recs/index.html>
- Immunization Action Coalition  
[www.immunize.org](http://www.immunize.org)
- MDPH Immunization Program  
<http://www.mass.gov/eohhs/gov/departments/dph/programs/id/immunization/>



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**Circular Letter: DCP 16-12-664**

**TO:** Primary Care Providers

**FROM:** Monica Bharel, MD, MPH, Commissioner, Department of Public Health

**CC:** George Zachos, Executive Director, Board of Registration in Medicine

**DATE:** December 16, 2016

**RE:** Immunization Administration by Medical Assistants

The purpose of this Circular Letter is to inform primary care providers, including Physicians, Certified Nurse Practitioners (CNPs), Certified Nurse Midwives (CNMs), and Physician Assistants (PAs) about a new law relating to the administration of immunizations by Certified Medical Assistants (CMAs), effective November 8, 2016.

Chapter 234 of the Acts of 2016 creates a new law, Massachusetts General Law Chapter 112, Section 265, that allows a primary care provider (PCP) acting within his or her designated scope of practice to delegate the administration of an immunization of a patient to a CMA who meets specified qualifications. The new law also updates Massachusetts General Law Chapter 94C (Controlled Substances Act) to recognize this new provision.

Under this section, a PCP is defined as a health care provider who is qualified to provide general medical care for common health care problems who:

- (1) supervises, coordinates, prescribes or otherwise provides or proposes health care services;
- (2) initiates referrals for specialist care; and
- (3) maintains continuity of care within the PCP's scope of practice.

This law permits a PCP to delegate the administration of an immunization to a CMA only while the PCP is present in the facility and immediately available to assist and direct the CMA. This oversight does not require a PCP to be present in the room when the procedure is performed.

The PCP may delegate the administration of immunizations to a CMA who:

- (1) has graduated from a post-secondary medical assisting education program accredited by the committee on allied health education and accreditation of the American Medical

## ATTACHMENT A

- Association, the Accrediting Bureau of Health Education Schools or another certificate program that the commissioner of public health may approve;
- (2) is employed in the clinical practice of a licensed primary care provider; and
  - (3) performs basic administrative, clerical, and clinical duties upon the specific authorization and under the direct supervision of a licensed primary care provider.

The new law requires the Department to promulgate regulations governing administration of immunizations by a CMA. This circular letter provides guidance on how the Department interprets and will enforce the new law until such time as regulations are promulgated in accordance with the State Administrative Procedure Act, M.G.L. c. 30A.

Please note that PCPs will be held to existing statutory and regulatory provisions governing their respective scope of practice and the administration of immunizations when delegating the administration of immunizations under the new law. Nothing in this law permits a PCP to exceed their scope of practice to assess, diagnose, prescribe for, and treat patients as set forth in 243 CMR 2.00 for physicians, as set forth in 244 CMR 4.00 for CNPs and CNMs, and as set forth in 263 CMR 5.00 for PAs. Rather, the new law authorizes a PCP, who would be acting within his or her existing scope of practice to prescribe and personally administer an immunization to a patient, to delegate that administration to a qualified CMA. Failure of PCPs to comply with regulations governing their existing scope of practice and the new law may be grounds for discipline against the PCP's professional license.

Please note that PCPs who delegate administration of immunizations are required to report immunization administration data to the [Massachusetts Immunization Information System \(MIIS\)](#) to ensure compliance with 105 CMR 222.000.

The new law does not require a PCP to delegate administration of an immunization, but sets minimum standards that apply in those instances where a PCP elects to do so. A PCP may further limit the circumstances in which he or she chooses to delegate immunization administration to a CMA and may choose not to delegate immunization administration at all. Providers may refer patients to the following website, where additional information regarding the administration of immunizations, is available:

<http://www.mass.gov/eohhs/gov/departments/dph/programs/id/immunization/>

Questions or concerns regarding this information should be directed to the applicable Board:  
Board of Registration in Nursing: [nursing.admin@state.ma.us](mailto:nursing.admin@state.ma.us)  
Board of Registration in Physician Assistants: [multiboard.admin@state.ma.us](mailto:multiboard.admin@state.ma.us)  
Board of Registration in Medicine: [borim.info@state.ma.us](mailto:borim.info@state.ma.us)