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To: Massachusetts School Districts  
Massachusetts Educational Collaboratives  
Massachusetts Local Boards of Health  
Massachusetts School Nurses  
Massachusetts Non-Public Schools

From: Karen Robitaille, MBA, MSN, RN, NCSN, Director of School Health Services

Date: August 19, 2020

Re: Guidance on selected school health regulations during the COVID-19 Public Health  
Emergency

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The purpose of this memo is to provide guidance to all elementary and secondary schools in Massachusetts on school health regulations pertaining to physical examinations, school-based screenings, and immunization.

**This guidance will be updated as needed and as additional information is available. Please regularly check [mass.gov/covid19](http://mass.gov/covid19) for updated guidance.**

105 CMR 200.100: Physical Examinations Required by Primary Care Provider or School Physician

The requirements for physical examination of students pursuant to 105 CMR 200.100 (B) should continue to be followed. An in-person physical exam is required for the following groups of students:

- For students entering school for the first time (typically pre-kindergarten or kindergarten), an in-person physical exam should be conducted one year before or within 90 days of school start. Excluding students from school for lack of documentation of an in-person physical exam during the 90-day grace period is discouraged.
- A student transferring from another school system shall be examined following the school entry recommendation for students entering school for the first time, listed above.
- For students seeking to participate in athletics, an in-person physical exam should be conducted annually prior to a student's participation in competitive athletics. Students who have not had this in-person exam should not be excluded from school, but may not participate in competitive athletics.

The Department encourages in-person physical examination of all students, when possible, to help detect physical and developmental abnormalities. However, given that the current public health emergency has created delays at many medical offices and increased the use of telemedicine, the Department recommends the following flexibility in timing and modality of physical examinations for all other students during the public health emergency:

- A telemedicine well-child visit may be substituted for an in-person physical exam for the purposes of school attendance (with exceptions noted above). Video telemedicine visits are preferred over phone-only visits. However, a telemedicine well-child visit may not substitute for an in-person physical exam if the physical exam on file is older than four years.
- For students submitting documentation of a recent in-person physical exam:
  - For elementary and high school students (typically, 4<sup>th</sup> and 10<sup>th</sup> grade), the exam may be conducted up to two years before or within 120 days of school start.
  - For middle school students (typically, 7<sup>th</sup> grade), the exam should be conducted one year before or within 120 days of school start.
- For all students, exclusion from school for lack of documentation of a well-child visit during the 120-day grace period is discouraged.

105 CMR 200.400: Vision and Hearing Screenings and 105 CMR 200.500: Height and Weight Measurements

At this time, requirements for health screenings pursuant to 105 CMR 200.400 and 105 CMR 200.500 remain suspended, per the [Order of The Commissioner of Public Health Exempting School Committees or Boards of Health from Conducting Health Screenings](#) issued on April 28, 2020. The Commissioner reserves the right to rescind this suspension of screening requirements during the 2020-2021 school year; once the waiver is lifted, screening should resume as soon as possible. The Department will provide guidance for resuming screenings.

105 CMR 220.500: Immunization Requirements for Preschool, Elementary, and Secondary School Students

Immunization requirements should continue to be followed, including the new requirement for flu vaccination for all K-12 students starting with the 2020-2021 school year. Documentation of immunization status should be submitted to schools within 60 days of school start; however, excluding students from school based on immunization status during the 60-day grace period is discouraged except in the case of a documented school-based outbreak of a vaccine-preventable disease.

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