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# Commonwealth of Massachusetts



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## HR/CMS Health and Safety Module Procedure

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### **Executive Summary**

This procedure is issued jointly by the Office of the Comptroller (CTR) and the Human Resources Division (HRD) to provide guidance on the implementation of the HR/CMS Health and Safety (H&S) module for the purpose of securely and confidentially recording employee vaccination or exemption status. Human Resource Directors (HR Directors), Health and Safety Coordinators (H&S Coordinators), Diversity Directors, and ADA Coordinators are responsible for the implementation of this procedure.

### **Vaccination Policy -Executive Departments**

Under [Executive Order No. 595](#), Executive Department employees are required to follow HRD's [COVID-19 Vaccination Verification Policy](#). The executive order and policy require Executive Department employees to acquire, maintain, and document full COVID-19 vaccination as adopted by the Massachusetts Department of Public Health. The HR/CMS H&S module is the designated system for maintaining records of Executive Department employee compliance with Executive Order No. 595.

While non-Executive Department agencies are not bound by Executive Order No. 595, several have opted to implement the same or a similar COVID-19 vaccination policy. HR Directors, H&S Coordinators, Diversity Directors, and ADA Coordinators should refer to the applicable agency vaccination policy when accessing or modifying H&S employee records.

### **Procedure**

#### **Responsibilities for recording and maintaining COVID-19 vaccination or exemption records**

Each department with a COVID-19 vaccination policy for employees is responsible for ensuring that the vaccination or exemption status of all employees is properly recorded and maintained within the H&S module.

An employee's vaccination or exemption status is confidential and should not be shared except with authorized individuals as needed for purposes of implementing a COVID-19 vaccination policy.

Information regarding an employee's vaccination or exemption should not be included in an employee's personnel file or stored in HR/CMS outside of the H&S module.

#### H&S data access restrictions

Vaccination and exemption records are considered confidential medical information. Records including confidential medical information that are stored in the H&S module must be managed with exceptional care to safeguard the medical privacy of Commonwealth employees.

As such, access to H&S module data is governed by the least privileged access standard. Access to H&S records will only be provided to HR/CMS core users as required to enable such core users to perform legitimate, role-based activities.

Authorized core user access is limited to the following roles and activities:

- Diversity Director/Officers: recording or accessing religious exemptions related to employee requests for reasonable accommodations to Executive Order No. 595 or a similar policy
- ADA Coordinator: recording or accessing medical exemptions related to employee requests for reasonable accommodations to Executive Order No. 595 or a similar policy
- H&S Coordinator: running reports or performing employee lookups to ensure compliance with Executive Order No. 595 or a similar policy; entering new hire vaccination records on behalf of new hires who are unable to access a computer at their work location.
- Authorized CTR, HRD, and EOTSS personnel: maintaining the H&S module; supporting departments in ensuring compliance with Executive Order No. 595 or a similar policy

#### Health & Safety (H&S) Coordinator

The H&S Coordinator role is provided to HR/CMS core users who require access to the H&S module for the purpose of running reports or performing employee lookups to ensure compliance with Executive Order No. 595 or a similar policy and for the purpose of entering new hire vaccination records on behalf of new hires who are unable to access a computer at their work location.

Departments are responsible for ensuring that H&S Coordinators access H&S module data only for these purposes and in accordance with this policy, Executive Order No. 595 (or a similar policy), and all other applicable HR/CMS, EOTSS, and Commonwealth policies.

Each department may have only a limited number of H&S Coordinators. One individual may serve as the H&S Coordinator for more than one department where appropriate (e.g., a secretariat HR Director may also serve as the H&S Coordinator for one or more departments in the same secretariat).

#### Requesting H&S module access

The process of designating a Diversity Directors/Officer is by appointing authority to HRD's Office of Diversity and Equal Opportunity (ODEO). The designation of ADA Coordinators is governed by the Massachusetts Office on Disability (MOD) and HRD's ODEO supports the

process of granting access to HR/CMS Disability Panels. Authorized Diversity Directors/Officers and ADA Coordinators as determined by MOD and ODEO are granted access to the H&S module.

The designation of H&S Coordinators is initiated by departments. In designating H&S Coordinators, departments must consider whether the designated core user meets the least privileged access standard outlined above.

Departments must submit an H&S module access request in writing on behalf of the designated H&S Coordinator using [the form provided on the HR/CMS Knowledge Center](#). CTR and HRD jointly review all requests for H&S module access. CTR and HRD may contact the department for more information to evaluate the access request prior to issuing a decision. CTR and HRD reserve the right to reject access requests or to revoke previously granted access as deemed necessary.