Offering and Documenting Vaccines in Long Term Care 2025-2026



MEDICARE REGULATIONS REQUIRE NURSING HOMES TO OFFER AND EDUCATE RESIDENTS ON COVID-19, INFLUENZA AND PNEUMOCOCCAL VACCINATIONS.

Vaccine Information Sheets

One way to provide the resident or resident representative with education regarding the benefits and potential side effects of immunizations is to use the Centers for Disease Control and Prevention (CDC) Vaccine Information Sheets (VIS) for:

- Influenza (Flu)
- Respiratory Syncytial Virus (RSV)
- Pneumonia
- COVID-19

You may consider having a discussion of the risk and benefits of the vaccines with residents and/or their representative at admission or during the annual care plan meeting. This reduces the burden and need to have a discussion each time the vaccine is scheduled to be administered (e.g., annually for influenza). It also helps avoid a delay figuring out when to have a discussion should a resident have a reason to delay vaccine administration (such as a fever or acute illness).

Note: signed consent is not required but is a common practice. Regardless of using a signed consent, you still need to provide information to the residents on the risk and benefits of each vaccine.

CDC recommends informed consent for all vaccinations. It does not require a signature, but recommends:

- Providing Vaccine Information Statement (VIS) before administration
- Documenting date, vaccine type, lot number, manufacturer, site/route, and name/title of vaccinator
- Recording verbal consent or refusal in the record



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Documentation

Facilities are required to document that they offered the vaccine and provided education, as well as the administration or refusal of the vaccine or the medical contraindication to the vaccine. Reasons for not administering the vaccines may include:

- Prior vaccination
- Resident (or resident representative) declines
- End of life comfort measures only
- Contraindication to vaccine

This needs to be documented in the medical record.

Reporting

Nursing homes currently must report COVID-19, influenza, and RSV vaccination information in aggregate to CDC's National Health Safety Network (NHSN). NHSN also allows for reporting of individual resident's vaccination information. Instructions for reporting COVID-19, influenza, or RSV vaccination to CDC NHSN either in aggregate or for individual residents are available here*and for influenza vaccination here*

Use Electronic Medical Records (EMR) vaccine module and make sure all data fields are completed. This will help ensure you have all the data elements needed when reporting resident's immunization information to either CDC NHSN vaccine reporting* or your state-Immunization Registry.

*Note – Continue to monitor CDC links for updates/changes in reporting requirements.

Each state and some cities and counties maintain an IIS (or immunization registry) that are electronic records of immunizations administered to anyone in their jurisdiction. Each IIS has specific requirements on whether administration of vaccines needs to be reported (in some jurisdictions it is mandatory and in others it is voluntary) and what data fields must be completed. To figure out the reporting requirements in your jurisdiction and ensure compliance, look up your IIS and review specific details on submission requirements and information on registering.

