

Clinical Guidance - COVID-19 Vaccine Medical Exemptions

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Background

An increasing number of sectors (e.g. [residential aged care](#), Queensland Health and Queensland Police Service) and other employers are requiring staff to be vaccinated against COVID-19 as a condition of their employment. Completed Covid-19 vaccinations are also becoming mandated in a number of jurisdictions for entry across borders, including international borders.

Individuals may seek assessment for a medical exemption from the Covid-19 Vaccines from specific medical practitioners. As per the [Services Australia immunisation medical exemptions advice](#), a consumer may be able to get an exemption from having a vaccine if there is a valid medical reason.

Granting medical exemptions to these COVID-19 vaccination requirements for reasons outside the ATAGI Guidelines, such as for conscientious objections, creates inequity and increases health risks, particularly to vulnerable Queenslanders.

This guidance clearly sets out the only reasons medical exemptions may be provided, to assist you in conversations with your patients.

Please note that despite a medical exemption being granted, this does not mean that an employer or relevant authority will accept such exemption as vaccination status can be subject to Queensland [Public Health Directions](#).

Queensland Health Staff

Queensland Health employees who are seeking an exemption to the COVID-19 vaccination should refer to the requirements in the Health Employment Directive No. 12/21 ([HED 12/21](#)), Health Employment Directive No. 01/22 ([HED 01/22](#)) and HR Policy B70 Employee COVID-19 vaccination requirements ([QH-POL-486](#)). Further Guidance can be sought from your local hospital and Health Service (HHS) or Departmental Human Resources team.

Who can grant an exemption?

Only specific medical practitioners are authorised to grant medical exemptions. These are:

- general practice registrars on an approved 3GA training placement
- paediatricians
- public health physicians
- infectious disease physicians
- clinical immunologists
- General practitioners as defined by the *Health Insurance Act 1973* as:
 - on Medicare's Vocation Register of General Practitioners
 - a fellow of the Royal Australian College of General Practitioners (RACGP)
 - a fellow of the Australian College of Rural and Remote Medicine (ACRRM).

Authorised medical practitioners should [notify the Australian Immunisation Register \(via this form-IM011\)](#) of an individual who has a vaccine exemption due to medical contraindications, which will be displayed on an individual's [Immunisation History Statement \(IHS\)](#). This includes permanent vaccine exemption or temporary vaccine exemption until a specified date due to acute major illness or significant immunocompromise of short duration.

What is a medical exemption?

General guidance around medical circumstances which qualify as medical exemptions from immunisation can be found on the [Services Australia webpage](#). This resource also provides guidance on what does not count as a medical exemption.

There are a limited number of medical contraindications to the COVID-19 vaccination outlined in the [Australian Technical Advisory Group on Immunisation \(ATAGI\) Clinical Guidelines on use of COVID-19 Vaccine in Australia](#).

ATAGI has also provided specific [guidance on temporary medical exemptions for COVID-19 vaccines](#).

Further information on contraindications to COVID-19 vaccination can be found at [COVID-19 vaccination contraindications and precautions](#).

These reactions do not typically include expected local or systemic reactions known to occur within the first few days after vaccination. Attributing a serious adverse event to a previous dose of a COVID-19 vaccine may require discussion with the consumer's GP, local immunisation service or relevant medical specialist. In Queensland, cases of this severity can be referred for further care and assessment to the [Queensland Adult Specialist Immunisation Service \(for consumers aged 16 years and over\)](#) at the Royal Brisbane & Women's Hospital or the [Queensland Specialist Immunisation Service \(for consumers aged below 16 years\)](#) at the Queensland Children's Hospital. Consumers may also wish to be referred privately if they choose.

Please note that a contraindication to one vaccine does not preclude the consideration and use of another vaccine type. Please refer to the [ATAGI Guidelines on the use of a different COVID-19 vaccine as the second dose in special circumstances](#). A patient must have medical contraindications to all of the COVID-19 vaccines available for use in Australia in order to be exempted from COVID-19 vaccination requirements.

Temporary Exemptions

ATAGI does not recommend that temporary exemptions for longer than 6 months (or 4 months if based on past SARS-CoV-2 infection) should be granted in the first instance. This is so that the illness, treatment plan or clinical situation necessitating a temporary exemption can be reassessed as these are generally time limited indications. Please see the [ATAGI guidance on temporary medical exemptions for Covid-19 Vaccines](#).

Previous SARS-CoV-2 infection

Past confirmed infection with SARS-CoV-2 is not a contraindication to vaccination, however ATAGI recommends deferring COVID-19 vaccination for 3 months after the onset of acute illness. Current evidence suggests that the risk of SARS-CoV-2 re-infection is low in the 3 months after initial infection, but may increase with time due to waning immunity.

ATAGI does not recommend a specific minimum time to defer vaccination due to monoclonal antibody therapy. However, people are still recommended to follow guidance to defer vaccination for 3 months following infection.

Pregnant Women

[RANZCOG medical advice](#) recommends the COVID-19 vaccine for women who are pregnant or breastfeeding. The [ATAGI Guidelines](#) highlight pregnant women as a priority group for vaccination and recommends that either Comirnaty (Pfizer) or Spikevax (Moderna) should be routinely offered to pregnant people at any stage of pregnancy. Given that the COVID-19 vaccine is recommended for pregnant and breastfeeding mothers, they are not recognised as a medical exemption and any requirement to be vaccinated would still apply.

Forms to complete

Authorised medical officers need to complete the [Australian Immunisation Register \(AIR\) - immunisation medical exemption form \(IM011\)](#) for anaphylaxis of permissible temporary exemptions. Other exemptions, as listed above, can be documented in a clinical letter or other appropriate clinical document with relevant exemption details once the medical practitioner has considered the consumer's specific medical history in conjunction with this document and related ATAGI guidance.