

Massachusetts Appeals Court Reinforces Narrow Interpretation of Public Policy Exception to At-Will Employment

Article By:

Lisa Stephanian Burton

On January 20, 2021, an expanded five-judge panel of the Massachusetts Appeals Court issued its opinion in [*Terence Meehan v. Medical Information Technology, Inc.*](#), No. 19-P-1412, and affirmed a lower court decision granting the employer's motion to dismiss the plaintiff's wrongful discharge in violation of public policy claim.

Writing for a three-judge majority of the expanded panel, Justice Meade addressed whether the codified right to rebut documents in a personnel file (and the consequences of doing so) provided by M.G.L. Chapter 149, §52C creates a public policy that is "sufficiently well defined and important such that the exercise of that right brings an employee within the public policy exception to the general rule that an at-will employee may be terminated without cause." The Appeals Court held that it was not, and refused to expand the process set forth in §52C into a public policy protection from discharge.

The Appeals Court relied on well-established Massachusetts law refusing to "protect at-will employees who claim to be fired for their complaints about internal company policies or the violation of company rules, even though the employees' actions may be considered appropriate or even 'socially desirable.'" While reiterating the standard that "[t]o qualify as an exception to the general rule, '[t]he public policy must be well defined, important, and preferably embodied in a textual law source,'" the Appeals Court refused to elevate every law into a public policy "sufficiently important and clearly defined" to justify invoking the public policy exception to at-will employment. The majority recognized that a different decision would open the floodgates for wrongful termination claims, and unlike the dissent, it refused to authorize that result.

© 2025, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., All Rights Reserved.

National Law Review, Volume XI, Number 32

Source URL: <https://natlawreview.com/article/massachusetts-appeals-court-reinforces-narrow-interpretation-public-policy-exception>