

2009

PROTECTING OHIO IN A PUBLIC HEALTH EMERGENCY: OHIO STATEWIDE CLOSED POD GUIDANCE FOR BUSINESSES



Ohio Department of Health

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A CALL TO ACTION

You protect your business by planning for the unexpected. You anticipate events and manage situations at hand. State and local public health agencies take the same approach to protecting the health and safety of their communities. As we build this bridge of mutual communication and alliance, were calling on you, as local business leaders to help protect your business, your employees, their families and your community by making your business, agency or organization a location to dispense medication thru a dispensing site. Dispensing sites, or Points of Dispensing (POD), are locations where medications can be given to people in response to a public health threat or emergency. Taking a few small steps now to prepare for future public health emergencies will not only protect your greatest asset, your employees, but also help prepare the entire community to respond. This guidance document will provide you with the background and the “know-how” to do just that.

The Ohio Department of Health and local public health agencies have the mission to supply medical material, to the population effected, in a very short amount of time. This is why you are needed. This document will help you easily identify how to become a closed POD, responsibilities of a closed POD, resources and information to plan for and operate a closed POD, the type of people needed, how a closed POD is activated and additional support items/personnel needed. This guidance is not a complete closed POD plan, but rather a starting point to help you understand what a closed POD is and how to begin developing your plans that are right for your business. You can use this guidance as a reference document or as a textbook (accompanying training sessions), and as a checklist (assuring all necessary steps are considered). Work in conjunction with your public health agency to fully develop a closed POD plan.

THE STRATEGIC NATIONAL STOCKPILE

Past responses that have utilized SNS supplies:

- *September 11, 2001: World Trade Center Response*
- *October 2001: Anthrax Response*
- *August-September 2005: Hurricane Katrina/Rita*
- *2009 Release of Antivirals to States most at risk of H1N1 including Ohio*

An act of terrorism (or a large scale natural disaster) targeting the U.S. civilian population will require rapid access to large quantities of pharmaceuticals and medical supplies. Such quantities may not be readily available unless special stockpiles are created. No one can anticipate exactly where a terrorist will strike, and few state or local governments have the resources to create sufficient stockpiles on their own. Therefore, a national stockpile has been created as a resource for all. The Strategic National Stockpile (SNS) is a national supply of medications and medical supplies to be used for emergency situations. The Centers for Disease Control and Prevention (CDC) can deploy a large shipment from the SNS to anywhere in the United States or its territories within 12 hours. The Homeland Security Act of 2002 tasked the Department of Homeland Security (DHS) with defining the goals and performance requirements of the SNS program, as well as managing the actual deployment of assets. The Ohio Department of Health and local health agencies have plans in place to receive these shipments and distribute their contents to the community.

Dispensing sites: enhanced protection to meet your needs.....

The dispensing component of planning is complex and very large in scope; the goal is for local public health to provide medications to everyone in a targeted population before they show symptoms. The goal is to dispense to everyone in the state within two days. The best mechanism to perform this function is thru a POD. There are two types of POD that can be operated.

OPEN POD

- (simply called a POD) is a location lead by a local public health agency that is meant to serve the entire public.

CLOSED POD

- is a location operated by a private agency or organization for specific populations and is not open to the public (i.e., only its employees and their families).



A closed POD site is designed to serve only a business, agency or organization and its employees, clients and/or members and their families. In the case of an actual emergency, this would enable the business, agency or organization to continue to operate. In a public health emergency, public health will activate long-standing and well-rehearsed plans; however, even with extensive preparation, there will still be long lines at every site as tens of thousands of people receive their medication at open PODs. Closed PODs are a benefit to public health as they help you become involved in planning efforts and decrease the number of people at open PODs. Agreeing to serve as a closed POD will supply a great benefit to both the community and to those employees, members and clients who will be served more efficiently within the familiar environment of your facility.

.....and benefit your community.

An important role.....

Closed PODs will play an important role in any situation where it is necessary to provide emergency medications to the entire population. Traditional medical providers, such as hospitals and medical clinics will likely be overwhelmed during a large-scale public health emergency. Open POD sites will also be highly stressed in a situation when the entire population needs to be given medications in a short time frame. Closed POD sites can help business ensure their employees are protected-and therefore able to continue working or return to work more quickly. Closed POD sites are an appropriate way to reach certain special populations who might find it difficult to come to an open POD. Ultimately, the need to serve the public during a public health emergency is great. Partnering with your local public health agency to become a closed POD is crucial in protecting the health of Ohioans.

Role of local public health

Local health departments (LHD) should reach out to you and share information about becoming a closed POD. LHDs should begin general training and orientation on what the SNS is, what a closed POD is and what the expectations are for you. Once an agreement is reached to become a closed POD, a signed memorandum of understanding (MOU) or letter of agreement stating all the agreed upon items will be needed. You should work with your legal department to create the agreement. Once an agreement is in place, more detailed education, training, exercising and planning needs to take place. Local public health will need to assist in all these tasks for businesses, agencies or organizations to be successful in closed POD dispensing. Each business, agency or organization should create a specific dispensing plan in collaboration with the local public health agency.

Becoming a closed POD is your opportunity to play an active role in protecting the health of your employees

Resources:

<http://www.odh.ohio.gov>

Free online training is available at:

www.training.fema.gov/EMIWeb/IS

CLOSED POD PLANS



Closed POD plans maintained through regular:

- Review: updates, exercises and evaluations of your plan; assurance that MOUs are valid.
- Training: of the people who will staff the functions of your plan.
- Assessment: of the facilities vital to your infrastructure to ensure they still meet your needs.
- Exercise: plans, staff and sites.

EDUCATE YOUR EMPLOYEES

Everyone who is part of your business, agency or organization needs to understand what he or she must do when the team activates, including where to get medicines for themselves and their families, and where and when to report for duty. Two groups will need to be prepared, trained, educated and exercised:

- The employees and or members who will work your closed POD.
- Those employees and or members who will only receive medications at the POD.

Preparing, training, educating and exercising your employees should be an on-going process as long as your organization continues in an agreement to be a closed POD. All employees, members, and/or clients will need to receive orientation to the overall purpose, function and flow of the clinic. This orientation should include, but is not limited to the following:

- Information on the incident.
- Symptoms and treatment options.
- Dispensing site layout and flow design.
- Functions and responsibilities of all stations.
- Review of job duties through the use of job action sheets.
- Identification of supervisors.
- Location of supplies.
- Relief/break/comfort resources.

Closed POD teams are tasked with dispensing medications to employees, clients and/or members and their family members. You will need to conduct pre-event medical assessments, name, address, phone and health history (NAPH) of everyone whom you plan to provide medication to. These assessments should be maintained and updated at least annually. A closed POD team will need to be able to dispense medications properly with the necessary medical oversight and maintain accurate records of medications dispensed. One of the greatest values of a closed POD is that this paperwork can be completed ahead of time for the employee and their family which will decrease the amount of time a closed POD team works. These records will need to be provided to the LHD, who will then provide them to the Ohio Department of Health (ODH). A closed POD should be able to:

- Provide access to emergency medical services.
- Provide security of medical material delivered.
- Maintain proper temperature control of medicines.
- Return any unused material to the LHD.

First Steps:

- All employees should be informed about the process involved and how it will affect them.
- Identify employees or members within your organization who will assist with the planning.
- Identify key personnel to work with LHD representatives to ensure effective communication.
- Identify who will work at the closed POD
- Identify the individuals your site will serve and define family members.
- Decide if family members will be allowed in the closed PODs to pick up medications.
- Emphasize the benefits to your employees and or members of having access to closed PODs versus having to go to an open POD.

Collecting medical information



What is a NAPH form?

The NAPH form (**N**ame, **A**ddress, **P**hone, **H**ealth history) **is the key tracking method for SNS**. The NAPH form includes:

- Name, address and phone of recipient.
- Health history verification.
- NAPH provides space for the pre-made label from pill bottles.
- NAPH form should be filled out by the employee or family member.
- Multiple family members can be listed on each form for those not coming to the clinic.
- All questions must be answered for everyone listed on the NAPH form.

Staff with closed PODS can provide NAPH forms to employees in advance and keep them on file until they are needed.

Information can be updated periodically, perhaps annually, to reflect a, changes in health status or changes with the family. , One of the greatest values of closed PODS is that paperwork can be completed ahead of time. ODH strongly encourages pre-registration using the NAPH form, because this saves time during an emergency.

Ideally, the NAPH form will already be filled out, not only for the employee, but also for their family. It is recommended that head of household (HOH) be the employee. If your organizations' employees and/or members have not filled out the NAPH form prior to the event, they should be asked to come to the POD with a list of the individuals for whom he /she is receiving medication for. This list should include the following information regarding all household members:

- Name.
- Date of birth.
- Medication allergies.
- Current medications.
- Weight of each child.

THINGS TO REMEMBER:

- Medications prevent disease: If dispensed quickly enough, medications can prevent most disease or lessen its severity.
- Medication for all: Public health will make antibiotics (pills) free and easily available to everyone statewide who may need them.
- Medication for the public: Public health will coordinate and operate PODs in the affected areas to dispense free medications.
- Closed POD dispensing: Organizations, agencies, and/or workplaces can help dispense medications quickly to all parts of an affected area in a community through a closed POD.

Emergency Powers Act: allow individuals, other than pharmacists to hand out prescription drugs during an emergency.

Public Readiness and Emergency Preparedness Act (PREP Act): provides liability protection for activities related to developing, manufacturing, distributing, prescribing, dispensing, administering and using vaccine and pharmaceutical countermeasures in preparation for, and in response to, a potential attack or outbreak.

MANGEMENT OF A CLOSED POD

A major part of your dispensing plan will include managing the closed PODs. Depending on the size of your business, agency or organization, you may have to run more than one POD. Regardless of your number of PODs, each POD must have a person in charge. That person needs to be capable of managing large numbers of people in extenuating circumstances, and should be familiar with the staff and/or members, your community and their needs. The incident command system (ICS) for establishing the response to an event has been established by public health for POD management. ICS is defined as the process that political leadership, emergency management, public health, law enforcement and other groups use to coordinate their response to an emergency. From the time an incident first occurs until the end of the event, ICS provides a uniform system by which all involved can respond at any level of management. At the core is an organizational structure that can be used to coordinate response personnel from more than one organization or team and from more than one department. Closed PODs do not have to utilize the ICS for managing their PODs; however, if they chose to explore this option, they should work with the local public health department to determine a command structure to fit their needs.



STAFF AT A CLOSED POD

You will need several types of people to operate a closed POD. The first type of staff needed is medical and/or pharmacy professionals - they will be in high demand. Ideally, a closed POD would have medical and/or pharmacy professionals present during dispensing, but realistically these staff members may not be available. With the use of the Emergency Powers Act your employees and or members are capable of dispensing while under the supervision of licensed medical professionals. Support staff is the second type of worker needed. These jobs need to be assigned to those familiar with the building and its operations and layout, such as the janitorial staff, maintenance staff, mailroom staff, secretaries or shipping and receiving staff. Closed PODs may need volunteers if sufficient staffing for the closed POD cannot be accomplished with staff or members of your business, agency or organization. Consider asking family members of your employees, members or clients to volunteer if more POD staff is needed. Work with local public health to identify and appoint all staff. The third type of staff that closed PODS need will be security staff. (See security section)



SECURITY NEEDS AT A CLOSED POD

Consider your current security resources and capabilities to determine if additional security will be needed during an emergency. In the event of a bioterrorism attack, the level of threat perceived by the public may be extreme. Security needs will depend on the urgency and size of the event. In some instances, the local sheriff and/or police may be needed elsewhere for other parts of the disaster response. A pre-event agreement with local law enforcement, a private security company or organization is optimal. Each of the dispensing sites must be assessed for security vulnerabilities during the planning process. Work with the local public health department and your security to complete this assessment.

Security staff performs the following functions:

- Maintain orderly clinic operations.
- Protect patients/public.
- Protect staff.
- Protect the medication, vaccine or supplies and the facility property.
- Block building or parking lot entrances as needed.
- Manage belligerent/violent behavior.
- Maintain generalized crowd control.

Security must have the capacity to:

- Manage facilities' security resources;
- Monitor the facility;
- Recognize the potential for mob behavior;
- Control access to the facility;
- Control access to specific areas of the facility (staff only areas, supply storage area);
- Distinguish mass dispensing staff from the general public;
- Update authorized personnel list;
- Remove or detain persons who pose a risk to facility;
- Perform a lock down of the facility quickly.

SUPPORT SERVICES NEEDED AT A CLOSED POD

Planners need to consider services that may be needed during a dispensing campaign. The goal is to have everything prepared so when the medications arrive, the organization can start dispensing right away. The support services that will be addressed include:

- Copy services for forms and information sheets.
- Supplies, forms and information sheets supplied in various languages.
- Transportation.

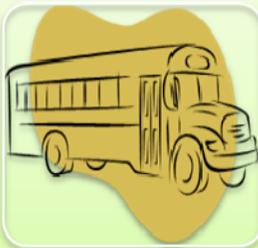
Obtaining written agreements with support services and other agencies and organizations to support closed POD operations is vital to the success of dispensing efforts.

Copy Services



- Arrange to duplicate an adequate number of all forms you should identify all non-English speaking populations that could come to the closed PODS so copies can be made to meet both English-speaking and non-English speaking residents.
- If a copying service is not used, a rapid copy machine is needed as well as a crate of duplicating paper at each closed POD site (with extra toner cartridges).
- It is **recommended** copies be made prior to an event and be stored if a copying service is not used. Consider if your organization has storage space to hold copies.
- A business, agency or organization should not plan to make copies the day of an event due to the volume of copies that will be needed to successfully run a closed POD.

Transportation



- Transportation should be considered for your POD staff or members and/or employees from a centralized parking site to the dispensing site via public buses or school buses.
- Transportation of ill people from a dispensing site to a hospital or treatment center by ambulance, medic transport vans and buses may be needed.
- If adequate parking and bus service is not available at the dispensing/vaccination site, offsite parking at a collection area should be arranged.

Supplies and Forms



- Identify the supplies needed to run an antibiotic dispensing site.
- Obtain contracts with suppliers or organizations that could provide and deliver the product in a timely manner.
- Each clinic must have working phone lines with Internet connectivity. If available, walkie-talkies, cell phones and pagers should be distributed to the clinic staff.
- Replacement batteries and chargers should be available for all devices.
- A list of contact phone numbers should be distributed to all clinic staff.
- The CDC has patient information sheets and dosing instruction/labels in 48 languages. Your local health department will be able to provide you with these information sheets.

SELECTING A CLOSED POD SITE

The selection of closed POD site for mass dispensing needs to be done early in the pre-event planning. You should periodically review the proposed site with local public health. This is essential as situations and planning needs change. The number of staff, clients or members you plan to provide medication to will determine the number of closed POD sites you need. It is recommended that you use facilities that you own and operate. You can consider opening a closed POD at each address in your agency or business, and supplying the staff or members who typically report to that location.

You can also consider combining addresses and those who report there typically would report to that location to receive their medication. If you chose to use a facility that you do not own and/or operate, it is highly recommended that an MOU be signed to secure the use of the facility, and to ensure that no one else is planning to use the facility during an emergency. The event itself could also affect the facility choice. For example, if the facility is within a damaged area making it inaccessible, a back-up facility will be needed.

Number of POD SITES

You must determine the number of PODs for your dispensing campaign well in advance. To have effective dispensing, you must design your campaign to protect your employees and/or members and their families as rapidly as possible to prevent the onset of symptoms. When creating your plan, you should assume a worst-case scenario and plan sufficient sites and the staff to operate the sites. A determination of the number and size of POD needed in any organization or agency will depend on the total number of people whom the organization needs to serve and the type of event. You are

encouraged to consult with your LHD to assist in determining the number and size of PODs needed. The exact POD locations must be determined with the assistance of local public health. An agreement between local public health and your organization needs to be made on how the medication gets to the closed POD. If local public health and you decide that you will be picking up the medications, then an authorized person must be appointed, from your business, and agreed to by the LHD. After each dispensing site has been selected, a notebook containing information specific to each site needs to be developed. Work with your LHD to determine what the notebook should include.

TARGETED POPULATIONS

You need to decide who you will dispense medications to (employees, members, clients and all their household members) and provide an estimated number of that total population. Remember, if you agree to provide for the family members that your total will include both adults and children. The total provided will enable your planner and the LHD planner to determine how many closed PODs will be required. It will allow public health to estimate the number of medications to provide for during an emergency. Public health realizes these numbers may change, but you should provide the best estimate at the time. In addition, the plan should be updated regularly or whenever there is a significant change in the business, agency or organization. If, during an emergency, the estimated numbers do not meet the needs of the organization, a request for more supplies may be made. Work with the local public health agency to determine how requests for more medication or supplies will be done.



To expedite the distribution of medication to the affected population during a bioterrorism event, Ohio allows the head of household (HOH) to obtain medication for up to 20 people in a household without all these individuals being present. The HOH is an adult (18 years of age or older) member of a household or family who has been designated as the HOH for purposes of obtaining medication for the family. This policy will be effective for your employees, clients and/or members to pick up medications for their families.

WRITTEN AGREEMENTS

We recommend obtaining written agreements between your business, agency or organization and any other organizations and/or facilities for security, printing patient information sheets or forms, providing services for transportation, medical services and/or personnel needed for dispensing before the event or emergency occurs. These written agreements may include MOU or interagency agreements depending on your local statutes and practices. Work with local public health to determine what written agreements will be needed. If you have decided NOT to use one of your businesses, agency or organizations own facilities, here are some recommended points to include in an agreement:

- Immediate use of the facility during an event.
- Periodic access to the facility prior to an event for inspection, or for use during an exercise.
- Contact information for all hours, day and night.
- Financial-compensation agreement (if any), liability or indemnification issues.

LEGAL ISSUES



An Emergency Powers Act will allow individuals other than pharmacists to dispense prescription drugs at PODs during an emergency. Every state has pharmacy laws that regulate who may dispense prescription drugs. There are waivers ready for the governor to sign that will allow volunteers, under a pharmacist's supervision, to dispense medicine during an emergency. Closed PODs must

collaborate with local public health to determine the supervision methods being utilized in Ohio. In 2008, U.S Health and Human Services Secretary issued a declaration under the Public Readiness and Emergency Preparedness Act that provides liability protection for activities related to developing, manufacturing, distributing, prescribing, dispensing, administering and using anthrax countermeasures in preparation for, and in response to, a potential anthrax attack. This includes entities, such as large "big-box" retail stores, retail pharmacies and other private sector businesses, which help deliver and distribute medicines. A similar declaration was issued for H1N1 vaccine production and distribution in 2009. Providing liability protection to all involved will help ensure full participation and bolster response efforts.



The Pandemic and All-Hazards Preparedness Act (PAHP Act) was created "to improve the Nation's public health and medical preparedness and response capabilities for emergencies, whether deliberate, accidental, or natural." The PAHP Act provided new authorities for a number of programs including the advanced development and acquisitions of medical countermeasures. To view the PAHP Act visit: <http://www.hhs.gov/aspr/opsp/pahpa/index.html>.