

Kentucky Department for Public Health



Kentucky Public Health
Prevent. Promote. Protect.

PARTNERING WITH PUBLIC HEALTH DEPARTMENTS TO BECOME A CLOSED POINT OF DISPENSING (POD)



Closed POD Planning Guide For Mass Prophylaxis

Introduction

The concept of the Closed POD is to pre-identify businesses that can dispense or 'push' medications to groups of people. These closed points of dispensing (POD) are critical in certain emergencies because they reduce the demand on public (open) dispensing sites and contribute to an effective emergency response. "Push Dispensing" means that medications are pushed out to businesses which provide them to their employees and family members. By participating as a Closed POD, you will provide a valuable service to your employees and their families and to the community overall. It also will increase the likelihood that your employees will come to work, thus improving your organization's ability to continue to function in spite of an emergency. The Closed POD program is essential when traditional providers become overwhelmed and the initiation of a quick medical response becomes necessary. An example when a Closed POD activation might occur is in response to a biological event involving the Category A agent anthrax, which has a response goal of initiating antibiotic treatment within 48 hours after requesting federal assets.

This Guide provides an overall description of how your organization could implement a Closed POD. It provides general guidance on how to become a Closed POD, how to prepare your organization to dispense antibiotics, how you will be notified if your POD needs to be activated, how to obtain the medications from local public health, and what to do during and after the event. With the help of this guide and assistance from your local health department you will be better prepared to assist your employees and the community if the need arises.

Important Public Information: If a public health emergency requires a swift Local Health Dept. antibiotic response campaign and Closed POD activations.

Antibiotic medication can prevent disease

Enough medication will be available for everyone- Public Health will provide antibiotics which will be available at no cost to everyone who needs to be treated.

Medication will be provided in various locations- Public Health will open emergency public dispensing sites all over the county/city to dispense medications (called Open POD's).

Alternate dispensing methods are important (Closed POD's) Workplaces can provide antibiotics quickly to their employees and family members by signing up to be a closed POD site. Using the Head of Household Policy one person can pick up antibiotics for the whole family with properly completed patient intake forms.

Steps of the Closed POD Program

Agree to become a Closed POD- Simply contact your local public health department to indicate your desire to become a Closed POD partner

Create a dispensing plan- The guidance provided will assist you in developing your own organization's dispensing plan. A qualified medical person must provide oversight of the Closed POD medication dispensing plan. However, in a declared emergency, temporary waivers and emergency exemptions of licensing requirements may allow an entity to operate a POD without traditionally licensed healthcare professionals.

You will be notified when to activate- After an emergency that requires mass distribution of antibiotics has been declared, a local public health representative will contact your organization to alert you if your Closed POD should be activated. Your local health department will use the contact information provided in your Closed POD Dispensing Plan. Please keep these records up-to-date. Your organization will be assigned a public health contact who is responsible for facilitating and supporting the Closed POD program during an emergency. Upon activation you should begin to follow the procedures outlined in your Closed POD Dispensing Plan.

Pick up or receive delivery of medication- You will be notified where and when antibiotics will be available for pick up (*Note: in some cases it may be possible for antibiotics to be delivered to you*). A site will be designated for Closed POD organizations to pick up antibiotics and necessary forms. A pre-designated amount of antibiotics for your organization will be determined by the total dispensing population information you provide.

Dispense medications- Set up your dispensing operation. Assemble materials, antibiotics, intake forms, drug information sheets, dispensing algorithm, communicate with your employees and their family members, screen for contraindications, and then dispense the appropriate antibiotic.

Follow up with public health- Provide your assigned public health representative with scheduled status updates of your organization's dispensing operation. Return completed patient screening intake forms (NAPH forms) and any unopened, left over antibiotics to the public health department after you have completed the dispensing of medications.

Dispensing Plan Template for Closed POD

Prepare your organization to dispense antibiotics by creating a dispensing plan that addresses your organization's specific needs. Each organization is unique in the number and type of its employees and in its business operations and/or type of services offered. All of these factors will affect how you dispense antibiotics to your employees and their families.

This template was created to assist organizations to plan for and set up their own Closed POD. Your organization's plan will describe how you will prepare your organization to dispense antibiotics. Your plan should include:

- Your primary and back-up contact information.
- The appropriate Local Health Department contact information
- Your Closed POD Manager designated for each shift
- Your Closed POD staffing needs, duty assignments and how staff will receive training

- To whom you will dispense antibiotics and how many that will be
- The communication methods you will use before, during, and after a Closed POD activation
- How you will pick up (or receive) antibiotics
- Where and how you plan to securely store and manage medical inventory
- How staff will receive training on the use of the medication dispensing algorithm to screen patient intake forms (NAPH forms).
- How you will assure that the appropriate antibiotic was dispensed to each person
- How completed patient intake forms and undistributed antibiotics will be collected and returned to your local health department when the emergency response is over

CLOSED POD NAME

Facility Name:
Street Address:
City:
Zip Code:
Main phone:

FACILITY CONTACT INFORMATION

Primary Contact:
Title:
Daytime Phone:
After Hours Phone:
Cell Phone:
Email Address:

Back-up Contact:
Title:
Daytime Phone:
After Hours Phone:
Cell Phone:
Email Address:

Additional Contact:
Title:
Daytime Phone:
After Hours Phone:
Cell Phone:
Email Address:

HEALTH DEPARTMENT CONTACT INFORMATION

Health Department Name:
Street Address:
City:
Zip Code:
Main phone:

Primary Contact:
Title:
Daytime Phone:
After Hours Phone:
Cell Phone:
Email Address:

Back-up Contact:
Title:
Daytime Phone:
After Hours Phone:
Cell Phone:
Email Address:

Medications will be dispensed to:

Indicate to whom you will be dispensing medications (employees, their families, clients, contractors) and provide an estimate of the numbers of employees and family members. You may want to break down into age groups.

Employees' Family Members Clients

How much will I receive?

The amount of medication needed for your Closed POD must be pre-determined and the total count provided to your Local Health Department (LHD). The amount should be enough to treat your total dispensing population.

_____ Number of employees
_____ Number of family members of employees
_____ Number of clients (if you will be providing to additional persons)
_____ Number of clients family members (if providing to additional persons)

_____ TOTAL Dispensing Population

It is expected that initially, each organization will receive a 10-day supply (one bottle) of pills per person. Some biological therapies may call for 30 or 60 day regimens of antibiotics. If additional therapy is required the local health department will notify the Closed POD when/where they can pick up or receive additional antibiotics as supplies arrive.

Are there potential language barriers?

Identify needed materials in languages other than English if applicable. Disease information sheets, drug information sheets and patient history forms will be provided by public health at the time of the event. Check with your local health department to find out what translations they may have available. Determine if you may need a translator/interpreter to assist persons with form completion. Forms will need to be copied and provided to your employees/families so they can be completed prior to the dispensing of medications.

Estimated number of employees that may need to receive materials in a language other than English:

Language: _____ # _____
Language: _____ # _____
Language: _____ # _____

Communication with your employees:

As a Closed POD site, it is important to communicate with your employees and their families before, during, and after the event.

Before the event, communicate with your employees about:

- Your organization’s participation as a Closed POD - Make them aware that you may be asked to provide medications to them in the event of a large-scale public health emergency.
- Your organization’s dispensing plan - It is important that you share your dispensing plan with all employees, especially those who have been assigned key roles during an emergency.
- The role and responsibility of each employee during a public health emergency that requires your Closed POD to be activated.
- The basics of how antibiotics will be dispensed to employees and their families.
- The information each person must provide (name, date of birth, medication allergies, current medications taken, weight of children) to assist in the screening for possible allergies and/or contraindications and to assure each person gets the best antibiotic for him/her.
- General work force emergency preparedness.

- How employees and their family can keep informed (i.e., radio, TV & work communications)

Describe how you will communicate with your employees before the event (and who is responsible)

During the event, communicate with your employees and family members about the following:

Employees:

- Where and when to report to work
- Where and when they will report to receive their medication
- How to perform their Closed POD duties, if it applies

Employees & Family Members:

- Where and when they will receive their medication
- What information they should have in order to receive their medication
- That drug information sheets will be provided for the medications distributed, which includes what people should do if they have a negative reaction to the antibiotic they are provided
- How and where information will be available to help keep them informed about the emergency (i.e., radio, TV & work communications)

Describe how you will communicate to your employees and clients during the event (and who is responsible):

List all the communication methods that your business plans to use:

Some Examples:

Telephone: _____ email _____
 Electronic: _____ website posting _____
 In Person: _____ Staff meeting/presentation _____
 Other: _____

After the event, communicate with your employees about the following:

- That everyone should take the recommended course of medication they were provided

- The importance for everyone to take all of their pills until they are finished or otherwise directed
- That they will be directed to the appropriate individual or agency to answers any additional questions or concerns that may arise
- The outcome of your organization's dispensing effort will be shared

Describe how you will communicate with your employees and family members after the event (and who is responsible):

Preparing to Receive and Dispense Medications

Once you have been notified that the Closed POD is to be activated, you will be given instructions on when and where to pick up medications (or when they will be delivered to you). It is important that this information not be disclosed to others. If you are to pick up medications, that site may not be chosen until the time of the event.

You will be notified via phone, email, or media reports from public health officials. Your local health department will assign a point of contact to all Closed POD's. That person will be responsible for facilitating the process, assuring inventory, and supporting the Closed POD. This will be accomplished via off site communication methods.

Steps to prepare your organization to receive and dispense medications:

- **Alert Staff** – Use the alert and communication plan that your organization has developed to share Closed POD activation information with your employees
- **Activate the Closed POD Plan & Assign Tasks** – Follow the steps in your Closed POD plan, assign duties and review with your staff how each duty is to be carried out

Select those individuals who best can carry out the screening and dispensing functions. If your organization is small, one or two people may carry out all of the tasks required. Scale staffing according to the number of employees in your organization and how you plan to dispense. There is a table in the appendix that gives suggested staffing ratios based on the number of employees in your organization.

Have a medically qualified person available who can legally dispense medications or a qualified medical person who can provide oversight of the dispensing operation:

You may have medical personnel on staff, or you may use personnel who normally dispense medication in your facility to supervise the distribution process. Under an emergency declaration by the governor, the standards for legally dispensing medications may be relaxed or waived. Under those circumstances a qualified medical person must provide oversight of dispensing operations but is not required to be present.

Describe how you will select and prepare employees to screen for and dispense medications and carry out other Closed POD responsibilities. In some instances, you may pre-assign tasks to certain organizational job titles.

Prepare the dispensing site:

The amount of site preparation will depend on the number of people you plan to dispense medications to at your organization and how you plan your dispensing operation. Choose a site that is large and open and is easily found by users. An ideal site would have a separate entrance and exit, able to accommodate tables, chairs, and large numbers of people, and able to accommodate people with disabilities. A large meeting room or cafeteria may be your best choice. You also need a place to secure medications prior to dispensing.

Identify a dispensing site (include an address if you have multiple buildings):

Identify a medication storage area:

How will the site be arranged? (develop a schematic of POD setup and flow)

POD FLOOR PLAN

Facility's floor flow plan diagram: (Attach)

Include a rough sketch of what your dispensing site will look like after set up and keep the sketch in your plan.

If medication pick up is required

The primary and back-up contact persons listed below are automatically considered “authorized” to pick up medications for your organization. They must present state, federal or organization issued ID in order to pick up the facility medications. If someone other than the two contacts listed is assigned to pick up facility medications, the Closed POD Facility will need to:

- (1) Contact the Local Health Department Closed POD Contact
- (2) Provide the name of the newly authorized individual for pick up

- (3) Have the individual present state, federal or an organization issued ID.
- (4) Sign for transfer of medication to the Closed POD

Primary and back-up contacts provided to the local health department.

Primary: _____
(Name/Title)

Back-up: _____
(Name/Title)

Storing medications

Medications should be stored in a secure location (a locked room or locked cabinet where few individuals have access) kept away from extreme heat or cold and meet the medication label storage requirement.

Location of medication storage: _____

Preparing handout materials for distribution

You should receive all the forms and information sheets from public health when you pick up or receive your medications. However, you may only receive a limited amount. It's important that Closed POD's make enough copies for the number of people to whom you will be dispensing medications. As mentioned earlier the forms provided will include drug information sheets for the antibiotics, patient intake forms and dispensing algorithms. Other forms that may be included are inventory control forms, FAQ sheets, and etc. You will receive all of the same forms that will be handed out at a public dispensing site Open POD.

Is a copier available for making necessary copies? ____ Yes ____ No
If yes, who is responsible for making the copies? _____
If **no**, how will you get the copies made? _____
Estimated number of copies needed for each form _____

Receiving and Managing Inventory

Be sure to store all medical products in a secure location and away from extreme heat or cold. Keep an inventory of all medical items you receive from local public health. If for some reason no inventory forms are provided, you can use your own inventory control forms or

create a simple one on notebook paper. This information, along with any unopened antibiotics, must be returned to your local health department when the response is no longer required.

Take Care of Closed POD staff first

First, you will want to dispense to those staff that are assisting you in carrying out your plan. This will allow employees to dispense to potentially exposed individuals without having to worry about their own risk and to feel confident that their own family members are protected.

Screening for contraindications prior to dispensing medications

Each person receiving medications must complete a patient intake form (Name, Address & Patient History – NAPH form) – your staff may assist clients if needed. Patient intake forms are used to screen for contraindications to medications, determine the appropriate medication, and to track the medication that was dispensed to each person. The patient intake form for every person to whom medication is dispensed needs to be returned to local public health. If employees will be picking up medications for their families, they can simply complete one intake form, but must fill it out completely for each family member. This is called the “Head of Household” model in dispensing. Ask your employees to bring/have ready a list of medications (prescription and over-the-counter drugs, vitamins, minerals, and antacids) they take and to provide any known drug allergies for every person that will get a course of antibiotic.

The dispenser will review the patient intake form for any contraindications and dispense the appropriate medication.

What if someone can't take the available medication?

Any individual reporting to the Closed POD who is unable to take one of the available antibiotics due to either a medical condition or a contraindication needs to be directed to either the Closed POD facility physician or to their primary care physician for appropriate treatment.

Dispensing:

Once you have determined the appropriate antibiotic in the screening process, you will give the patient a 10-day supply bottle of pills. Then give the appropriate drug information sheet (Doxycycline or Ciprofloxacin) for the antibiotic. For employees who are picking up medications for family members, it is only necessary to give one drug information sheet for each drug that they are picking up. Have available the other materials that public health may have provided, such as FAQ sheets, and be ready to answer questions about where they can go for more information (health department, call center, web site, their doctor, etc.).

Advise employees that they should not stop taking the drug unless they are having an allergic reaction to it. In that case, they need to call their primary care provider.

You will Initial the NAPH form, attach the dispensed antibiotic label to it and maintain the form so that it can later be returned to local public health.

Quality Assurance Thoughts

How will you assure that a screening form is completed for each person to whom you give medications?

What will you do to be sure that the correct antibiotic is dispensed to each person getting medications and that they get the correct drug information sheet for the antibiotic dispensed (Doxycycline or Ciprofloxacin)?

Here is a simple step-by-step procedure:

1. The employee fills out the patient intake form (Name, Address and Patient History form)
2. The patient intake form is reviewed for completeness and screened for contraindications to the medications available
3. The appropriate antibiotic is dispensed based upon the dispensing algorithm
 - a. Attach one label from the antibiotic bottle to the patient intake form and one label to the drug information sheet
 - b. Initial the intake form
 - c. Keep the form
4. Give the appropriate drug information sheet(s) to the employee.
5. Instruct the employee to take the first dose right away.
6. Repeat the above steps for antibiotics to be dispensed to family members
7. Keep an accurate inventory of the medications that are being dispensed and what is being maintained in storage
8. Provide regular status updates to your Closed POD Manager
9. Provide status updates to the local health department contact person
10. Return patient intake forms, inventory forms, and all unopened antibiotic bottles to the local health department upon request.

EQUIPMENT LIST

Develop an equipment checklist that includes all the items you will need for dispensing medications in your Closed POD. Establish where items are to be kept and if transportation is required. (Below are just a few suggested items)

*Items can be brought in from an outside location as long as that can be done within a **6-hour** time frame.*

Item Description	# On-site	# Off-site to be brought in
Tables		
Chairs		
Office Supplies		
Pens		
Staplers		
Clip Boards		
Notebooks		
Markers		
Dry Erase Boards		
Pocket Folders		
Hand Sanitizer		
Scales (if weight is unknown)		
Cones or Rope		
Trash Cans & Bags		
Extension Cords		
First Aid Kit		
Signage Material		
Etc.		
Etc.		

KEY POD STAFF LIST

POD Manager 1st Shift (Incident Command) – Main Contact: *Sets the incident objectives, strategies and priorities and has overall responsibility for the Closed POD operations.*

Name:
Home Phone:
Cell:
Pager:

POD Manager 2nd Shift (Incident Command) – Main Contact: *Sets the incident objectives, strategies and priorities and has overall responsibility for the Closed POD operations.*

Name:
Home Phone:
Cell:
Pager:

LIABILITY

What about liability concerns? – Due to the differences between state and local laws, there is currently no ‘blanket’ liability coverage for Closed POD Sites. However, there are various pieces of legislation to help protect agencies from liability concerns in response to a declared emergency. A few are The Federal Volunteer Protection Act of 1997, the Public Readiness and Emergency Preparedness (PREP) Act and the emergency powers the Secretary of Health & Human Services has under a declared Public Health Emergency. There are additional liability protections at the federal, state and local levels depending upon the state of emergency declared in a given jurisdiction. In a declared emergency, temporary waivers and emergency exemptions of licensing requirements may allow an entity to operate a POD without traditionally licensed professionals. It is suggested you examine your business liability and insurance coverage. You may also consider legal counsel throughout your planning process. The link below is an issue brief written by The Network for Public Health Law that discusses private entities serving as Closed POD’s:

<https://www.networkforphl.org/email/asset/2tsy0t/Closed-PODS-legal-issue.pdf>

SECURITY – Security is most likely a part of your daily operations plan. It is also a critical component of a Closed POD. A well-developed security plan should protect your staff, the

family members coming to your POD and the medications which will be dispensed. Consider your current security resources and capabilities and determine if additional security will be needed in an emergency that results in activation of your Closed POD. Then plan accordingly.

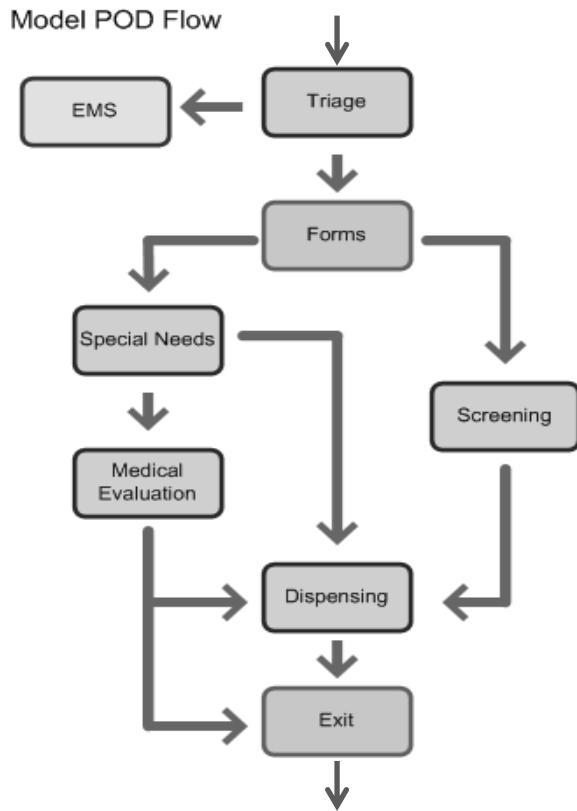
ITEMS PROVIDED IN APPENDIX

Medical Screening Patient In-Take Form (NAPH)
Post Exposure Prophylaxis Dispensing Algorithm (Doxy, Cipro)
Link To POD Job Action Sheets (Basic)
Suggested POD Flow Diagram

ITEMS TO BE PROVIDED AT TIME OF CLOSED POD ACTIVATION

Standing Order from the Prescribing Agency
Disease or Agent Fact Sheet
Inventory Control Form
Additional Information Sheets Will Be Provided as Necessary

EXAMPLE POINT OF DISPENSING FLOW DIAGRAM



Basic Model POD Layout

POD Pocket Version

