

Chapter 1

Overview of Closed Points of Dispensing

Creating a National Framework

Overview of Closed Points of Dispensing

The Department of Health and Human Services (HHS) is the principal federal agency responsible for protecting public health. In 2002, HHS, through the Centers for Disease Control and Prevention (CDC), began awarding funds for public health preparedness activities to states, select cities, the Pacific Islands, the U.S. Virgin Islands and Puerto Rico via a cooperative agreement currently referred to as the Public Health Emergency Preparedness (PHEP) Cooperative Agreement. In addition to a variety of key public health related preparedness activities, cooperative agreement recipients are required to develop plans to receive, distribute and dispense medical countermeasures from the Strategic National Stockpile (SNS) to their affected populations during an emergency. The SNS is a national repository of critical medical countermeasures and supplies that are available to supplement state and local public health officials during public health emergencies. The items in the SNS are capable of supporting all-hazards emergencies, with a great emphasis on acts of bioterrorism.

As a member of the Bio-Defense Network, in partnership with the St. Louis County Department of Health, your organization plays a critical role in our community's public health preparedness activities. Your willingness to operate a Closed Point of Dispensing (**Closed POD**) during an emergency for your employees, members or students and their families and to assist our community demonstrates your organization's commitment to the national preparedness initiative. The St. Louis County Department of Health will match your commitment with equal dedication by providing the necessary technical assistance, planning tools and resources to help you develop your **Closed POD** plan.

Imagine this scenario...

In the event of an accident or as part of intentional attack, a biological agent such as anthrax may be released and thousands of people may be put at risk, including those in St. Louis County. People exposed to the anthrax will need preventive medications immediately, so through the activation of emergency transportation and logistics plans at the federal and state levels, the Centers for Disease Control and Prevention will deliver supplies of antibiotics from the Strategic National Stockpile to local public health agencies. These life-saving medications will be delivered to local public health officials who have activated long-standing and well rehearsed mass prophylaxis plans via "pull and push" methods of dispensing. Most likely given this scenario, local officials will use the traditional "pull" method as its primary dispensing method and encourage the general public, via an extensive public information campaign, to come to identified locations at common areas within the community to receive medications. In St. Louis County, those locations are expected to be public schools, and will be referred to as

Open PODs. But, even with extensive preparation, there could be long lines at every Open POD site as people queue up for their pills. People will be stressed about missing work, will be trying to calm their children as they endure long waits, and tempers are expected to flare. Remember, the St. Louis metropolitan area contains nearly 2.8 million people – one million of whom live in St. Louis County – and many of them may have been exposed to anthrax, so the local health departments will have to provide the necessary medication to the entire population in less than 48 hours.

Setting Expectations – What can you expect?

Current Planning Efforts

Local public health agencies in the St. Louis Metropolitan Area have created plans which identify sites and resources that can support both Open and Closed POD operations during a public health emergency. Each site will have been evaluated to ensure that it is appropriate for such use, facility use agreements have been developed and signed and plans have been made for all aspects of establishing the PODs, including:

- Communicating with the public and those covered by Closed PODs
- Communicating with emergency responders (police, fire and EMS)
- Delivery of medicines and supplies to each site
- Suggested floor plans and client flow patterns for dispensing at each site
- Security and safety precautions
- Staffing needs, including medical professionals and volunteers
- Provision of necessary supplies



The logo for Saint Louis County Health. It features the words "Saint Louis" in a serif font above the word "COUNTY" in a large, bold, sans-serif font. Below "COUNTY" is a horizontal line, and under that line is the word "HEALTH" in a bold, sans-serif font.

The mission of your Department of Health:

The Saint Louis County Department of Health promotes optimal health for people who live, work, or visit the county. This is accomplished by monitoring and assessing the public health status of the county, and by developing programs and/or policies that prevent illness or injury.

How Closed PODs Fit into Mass Prophylaxis

Closed PODs will play an important role in any situation where it is necessary to provide emergency medications to large groups of people. Traditional medical providers, such as hospitals and medical clinics, will likely be overwhelmed during a large-scale public health emergency. The Open PODs established to support the public will also be highly stressed in a situation where the entire population needs medication within a short time frame. **Closed PODs** will help relieve some of the pressure by reaching specific portions of the community. As a result, long lines and public anxiety can be reduced and resources can be used more efficiently.

By partnering with public health and operating a **Closed POD**, you have assured that your employees, members and students and their family members will receive medications at your facility, which reduces the likelihood of them having to visit an Open POD. This will provide peace of mind during this crisis because they know that you have taken the “extra step” and conducted the necessary coordination and planning prior to an event to provide an alternative method to protect them during an anthrax or other bio-medical emergency.

When businesses provide prophylaxis to their employees and their families, both public health and businesses benefit. The burden on Open PODs is reduced and businesses can maintain continuity of operations

Note: throughout this handbook, the term “enrollee” will be used to describe your employees, members, students or any other person you choose to include within your Closed POD population. The decision of who to include is up to you. The term “enrollee” will also include family members of those you have chosen to cover. Again, that decision is up to you, but since the antibiotics that will be distributed are taken orally, they may be picked up at your Closed POD by enrollees and taken home for the remaining members of their families.

Operating a **Closed POD** will ultimately help organizations with their continuity of operations plans by aiding them in becoming more resilient during and after an emergency. Enrollees will be able to return to their normal duties within the organization more quickly, or continue to assist public health officials through volunteering.

Closed PODs provide:

- Ease of access to life-saving medications
- Quick dispensing of medications to your enrollees
- Enhanced continuity of operations for your business
- Reduced traffic and stress at Open PODs
- Government the ability to reach of goal of getting medicine to everyone within 48 hours

Establishing Responsibilities

Public Health Responsibilities

The St. Louis County Department of Health will work closely with your organization to ensure that you have the necessary information and resources to establish a **Closed POD**. As with all preparedness activities, the more we communicate and exercise our response plans now, the better we will respond if an emergency occurs. Your organization has signed a Memorandum of Understanding (MOU) that delineates expected roles and responsibilities. A copy of that MOU should be inserted into this document as an appendix for use as a reference in the future.

In general, the St. Louis County Department of Health has accepted the following Responsibilities:

- Provide pre-event planning and technical assistance, including but not limited to policies, procedures, job aids such as example POD layouts, fact sheets, dispensing algorithms, forms, and other information necessary to successfully operate a **Closed POD**.
- Provide **Closed POD** training/education opportunities to identified staff in your organization.
- Provide medication and forms during an emergency.
- Provide 24-hour emergency contact information for the members of its team.
- Provide your organization with technical assistance and oversight, as needed, to effectively run a **Closed POD** during a public health emergency.
- Promptly notify your organization of the need to activate your **Closed POD** plan.
- Provide media guidance during a public health emergency to ensure consistency of messages between their designated dispensing population and the general public.

The challenge for government officials, working with the private sector, nongovernmental organizations, and individual citizens, is to determine the best way to build capabilities for bolstering preparedness...the "best way" will vary across the Nation.

National Preparedness Guidelines

- Collect any unused medications as well as copies of all medical documentation after the dispensing process has been completed and the **Closed POD** has been deactivated.

Your Organization's Responsibilities

The St. Louis County Department of Health will help you prepare to set up your **Closed POD**, but there are steps you must take to ensure the proper plans are in place to establish and operate a **Closed POD** efficiently.

Your responsibilities include:

- Designating staff to work with the St. Louis County DOH in planning for the operation of a **Closed POD**.
- Providing and regularly updating primary, secondary and tertiary 24-hour emergency points of contact to ensure timely notification and activation of your **Closed POD** during a public health emergency.
- Completing the **Closed POD** Plan template and providing a copy and periodic updates to the St. Louis County DOH.
- Identifying **Closed POD** locations for your organization.
- Assuring the DOH has an accurate count of the number of people who will be covered by your Closed POD (your enrollees). This is important to assure adequate numbers of medications are delivered to your site.
- Maintaining the necessary supplies and equipment needed to operate a **Closed POD**.
- Dispensing medications to your enrollees following protocols and guidance provided by the St. Louis County DOH.
- Participating in predetermined and agreed upon training and exercise opportunities provided by the St. Louis County DOH.

Understanding the Dispensing Process

A report developed by Rand Corporation addresses minimal functions that should be incorporated into mass dispensing operations during emergency operations where time is of the essence. **Recommended Infrastructure Standards for Mass Antibiotic Dispensing** (available at http://www.rand.org/pubs/technical_reports/2008/RAND_TR553.pdf). These minimal functions include:

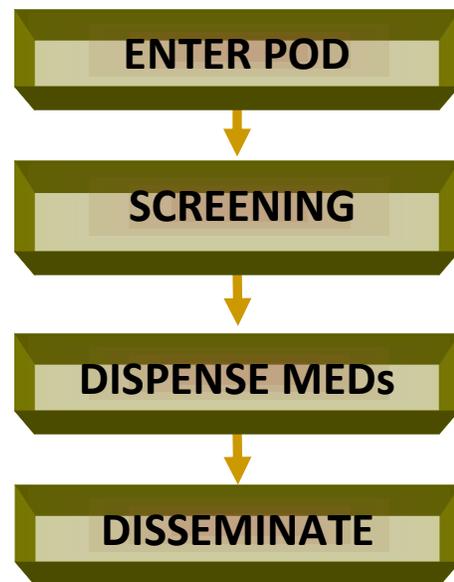
- **Directing** clients through the POD
- **Deciding** which medication to dispense
- **Dispensing** the medication
- **Disseminating** information about the medication

Appendix B of this handbook is a **Closed POD** planning template. Upon reviewing the template, it will become apparent that the majority of the tasks involved in establishing a **Closed POD** support one of these four functions.

a) **Enter POD** – how to get your enrollees to and through the POD.

- 1) Prior to directing enrollees through the POD, there are numerous pre-event planning activities to accomplish. It is important to remember that given the aerosolized release of anthrax scenario, time is the worst enemy and the medication must get into the population as soon as possible. Informing your enrollees that your organization has established a partnership with public health and will

operate a **Closed POD** during an emergency, and soliciting volunteers to assist with operating the facility is one of those key initial activities. Sample information letters are provided in Chapter 11



- 2) **Defining your dispensing population** – Determining how many people comprise your organization’s dispensing population sets the stage for many other planning tasks for your Closed POD, such as facility size and design; the number of staff needed to operate the facility and the amount of medication to be received from the SNS via the St. Louis County DOH. When determining the appropriate

number, in addition to your employees, are there others who should be considered? This might include students (if you are a school or university), residents or patients (for nursing homes or hospitals), tenants in your building and temporary employees or contractors. St. Louis County encourages you to expand your Closed POD to as many individuals and families as is practical. During any emergency, public health officials realize that people are most concerned with the health, safety and protection of their loved ones. Family members will form the support structure that allows your enrollees to continue normal operations to the extent necessary or allowable as the community endures and recovers from a public health emergency. For this reason, we recommend that you plan to provide medications to your direct enrollees' families as well. This is normally referred to as the "Head of Household" model (referred to here as the "Household Representative" model, meaning your enrollees will be able to obtain enough medication from your **Closed POD** for themselves and their family members, as long as all members are accounted for on the necessary Patient Information Forms. The **Closed POD** planning template in Appendix B provides a formula to assist in establishing the baseline population for planning purposes. In general, for every enrollee within your covered population, medications for an additional three people should be planned for. (Some organizations may need more or less, depending upon their special circumstances.)

- 3) **POD throughput** – Directing also requires you to determine your **Closed POD** throughput, which is based on your designated population, the number of dispensing staff available, your dispensing flow and the time available to dispense medication. Keep in mind that operations at your **Closed POD** fit into the larger scheme of the Department of Health's mass dispensing campaign; therefore, it is extremely important that your organization establish a throughput that supports the time available to dispense. You can find more information on developing throughput targets and designing the layout of your **Closed POD** to support your targets in Appendix B.

b) **Screening** – determining which medication is appropriate to dispense.

- 1) **Enrollee Information** – Prior to receiving medication at a POD, regardless of whether it is an open or Closed POD, federal and state laws require certain information for each person receiving medication be obtained and provided at the POD. Given the time constraints in the aerosolized release of anthrax scenario, the medical community understands that time is of the essence and

applicable emergency powers afforded to the Governor, related to mass dispensing, will most likely be enacted. The St. Louis County Department of Health has developed medical screening forms that support the minimal data that needs to be collected during this type of emergency. See a sample form in Chapter 7. These forms must be completed by all enrollees and turned in at the POD prior to receiving medication. A major advantage of being a **Closed POD** is that as a host, your organization already will have blank copies of the screening forms, which may be provided to your enrollees in advance or immediately upon the activation of your Closed POD. This means your enrollees will be able to complete the forms before coming to the site to receive their medications. The forms will still need to be reviewed at the site prior to the dispensing of medications, but experience in exercises has shown that having the forms completed in advance streamlines the overall process.

- 2) **Which medication is appropriate?** - Medical screening is the term that describes the process of determining which medications are appropriate for each individual given their current medical status based on the information provided on the medical screening form. In traditional scenarios, medical screening is conducted by licensed healthcare professionals who will assess the medical screening form and any available medical history to determine the best medication. In the anthrax scenario, again, time is of the essence. The decision of which medication to provide will mostly be based on written and approved protocols which will allow decisions to be made by those without formal medical training. Your public health liaison from the DOH will provide the necessary guidance and training to your **Closed POD** staff involved in the screening process to determine which medication should be dispensed at your facility. Missouri state law requires that you have at least one certified medical professional on-site to oversee the operation of your Closed POD, but properly trained licensed individuals, or volunteers who have registered with the state, will be allowed to physically dispense the medications to your enrollees.
- c) **Dispense Medications** – the actual process of handing the medication over to the client.
- 1) Household Representative Policy – The St. Louis County Department of Health subscribes to a “Household Representative Policy” (sometimes referred to as “Head of Household Policy”). In general, any Closed POD enrollee 18 years or older will be allowed to collect medications for their family members, including siblings, parents, children and others living in their household. The need **not** be the head of a household, but rather a representative of the household for the

purposes of obtaining the medications from your Closed POD and delivering them to their household members.

- 2) **Dispensing Policy** – Under Missouri law, only persons who are licensed to dispense medicine, or who have received state-approved training, may actually dispense medications at a Closed POD. Anyone who will physically hand the medications to an enrollee **must** be licensed or have completed the training **and** must be registered with the Show-Me Response Registry.
- d) **Disseminate** – providing the necessary information/education forms and follow-up information.
- 1) **Drug Information and Instructions** – The Food and Drug Administration (FDA) requires each person who receives medication at your **Closed POD** also receive information about the medication they are taking, dosage instructions and who to call or what to do if they experience adverse reactions to the medication. The latest drug information from the FDA will be provided to you from your public health liaison at the time of activation.
 - 2) **Other Important Information** – It is important to provide accurate and complete information to your enrollees. Let them know why and how the **Closed POD** will be established, and how the medication dispensing process will work. This will give your enrollees confidence in the overall approach, and is an opportunity to present accurate and reassuring information before and during an emergency. In addition to information about the medication, the following topics should be addressed in the information/education process:
 - Possible threatening agents - In a public health emergency it is very important that people are informed of the true nature of the threat. They need to know the answers to questions like:
 - How do I know if I've been exposed?
 - What are the symptoms?
 - Is the disease contagious? If so, what do I need to do to protect myself and my family?
 - What are the long-term implications?

Your public health liaison will explain how this information will also be part of the DOH public information campaign. They will also provide fact sheets about anthrax or other bio-agents which you may disseminate.