Developing and Operating a Closed POD

Updated February 23, 2021

Thank you for partnering with the Lake County Health Department (LCHD) to distribute COVID 19 vaccinations to your staff and other agreed upon persons. It is important that your Closed POD Plan accurately reflects the needs and strengths of your organization to effectively operate. Starting with the basic framework for operating a POD, you can customize the methods of execution to best suit your organization. The basics of successfully planning for a Closed POD are as follows.

1. I-CARE Enrollment
2. Staffing Requirements
3. Logistics- Prepare Facility and Develop Procedures
4. Receiving, Dispensing, and Maintaining Inventory
5. Staff Communications and Training
6. Resources and Information

I-CARE Enrollment

Your organization must complete the State of Illinois' I-CARE enrollment application with your selected vaccine provider. Once the application is approved, vaccine can be transferred to your location for dispensing to your staff and others. All entities interested in administering the COVID-19 vaccine, should contact their occupational health provider to confirm they can provide vaccine. The occupational health program/providers must then sign up for I-CARE, if they are not already. We recommend reviewing the requirements prior to enrolling in I-CARE.

Steps for enrolling in I-CARE

All occupational health COVID-19 vaccine providers must establish an account for each site/location where they will vaccinate.

- Complete the Online Application for Illinois Department of Public Health (IDPH) web portal access (Click 'Register for a Portal Account' at the top-right corner of the page).*
- Establish your Portal Registration Authority (PRA) and complete the Provider Enrollment Form for each site/location.
- Please submit your applications as soon as possible. I-CARE access can take 4 weeks or more. To check on the status of your application, email dph.immunizations@illinois.gov.
- COVID-19 vaccine products will be available only to organizations that sign and agree to the conditions of the IDPH *and* CDC COVID-19 Vaccination Program Provider Agreements. Please review.
- The CDC agreement will be available to you once your I-CARE account is created. Complete and upload both the IDPH Vaccine Provider Agreement and the CDC COVID-19 Vaccination Program Provider Agreement in I-CARE.

*After IDPH has completed your enrollment into I-CARE, you will receive a COVID-19 provider PIN, at which time you will be eligible to receive available vaccines from the Lake County Health Department.

LakeCounty
Health Department and
Community Health Center

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Staffing Requirements

Assemble your Closed POD Planning Team
You should have a team of people in your organization who are responsible for your Closed POD agreements and plans. Your Closed POD Planning Team should consist of individuals in your agency with the authority to make and act on decisions and plans required to execute a Closed POD operation in your organization. Some suggestions for planning team members are security/safety/intelligence managers, medical staff (if available), continuity personnel, human resources, and logistical specialists.

Calculate how much vaccine supply that is needed by determining the number of staff that want the COVID-19 vaccine, and the number of doses in the series. As of this writing, available vaccines are two dose series. This may change if a single dose vaccine regimen is approved in the future.

Determine Organizational Structure
The government uses the Incident Command System (ICS) to organize and manage its all-hazards response operations. ICS has also been adapted by many private sector organizations for emergencies. ICS divides an emergency response into five manageable general staff functions, which will all play an important role in Closed POD operations.

- Command
- Operations
- Planning
- Logistics
- Finance/Administration
- The command staff functions of safety, public information and liaison may also be incorporated in the structure.

Designate three representatives from your organization to serve as the Points of Contact for your agency and LCHD. These individuals will be responsible for the operations of the plan at your organization. Those listed here should be on file with the LCHD.

Primary Agency Contact	
Name:	Position/Title:
Work Phone:	Home Phone:
E-Mail:	Cell/Pager:

Pharmaceutical Distribution Plan Primary Contact	
Name:	Position/Title:
Work Phone:	Home Phone:
E-Mail:	Cell/Pager:

Agency Medical Contact	
Name:	Position/Title:
Work Phone:	Home Phone:
E-Mail:	Cell/Pager:

Determine Staffing Needs

Based on your organizational structure, as you develop your staffing plan for the Closed POD, consider the following:

- *Security needs and capabilities* – Consider your current security resources and capabilities to determine if additional security will be needed to protect your facility and staff.
- *Closed POD Operations Staff* – The number of staff-volunteers needed to staff your Closed POD will be determined by a variety of factors such as the size of your dispensing population, hours of operation, your desired throughput and the design of your Closed POD floor plan. As a Closed POD, you have the advantage of coordinating some functions prior to dispensing vaccines, as there will be a wait time for vaccine to arrive. For example, if you disseminate the patient information forms online for individuals to download and complete prior to arriving at the Closed POD, you may reduce the need to have as many staff covering registration. If you provide an effective public health education campaign and ensure staff understand that if they are sick, they should contact their health provider and not come to the Closed POD, you will decrease the number of staff needed to conduct the triage function.
- *Recruiting Staff –* Mass vaccination operations may rely heavily on volunteers or staff working outside their normal job descriptions or work hours. It may be important to solicit volunteers from within your organization to help staff your Closed POD.

Logistics

Prepare Your Facility – Preparing your facility ahead of time is essential.

Identify a dispensing location

In order to dispense medication to many people in a relatively short time, you may need to identify a location (primary and alternate are recommended) that is capable of certain accommodations. This area should be large and open, preferably a large meeting room, gymnasium, or cafeteria. Some key factors to consider include:

- Separate entrance and exit
- Easily identifiable space
- Space that allows for social distancing
- Place to secure medications and supplies
- Accommodations for people with disabilities
- Space that accommodates tables, chairs, carts, refrigerator, etc.
- Space that allows for moving people through the POD in only one direction to avoid confusion and crossovers
- A separate area for employee break periods

Also consider how you will identify, purchase and store necessary supplies.

Develop Your Procedures

The planning committee should develop procedures directly related to Closed POD operations, in collaboration with LCHD representative. (See the CDC Off-Site Vaccination Checklist and Clinic Supply Checklist for more information).

This will include:

- Determining procedures specifically related to the activation, set-up, operations and deactivation of the vaccination site.
- Determining how vaccines will be administered and observed post-vaccination. Security/safety personnel should always be on-hand when the medications are on the premises.
- Each entity must have their own standing orders for vaccinators to administer the vaccine. Entity must issue a standing order by a licensed physician, to authorize licensed healthcare providers., where allowed by state law, to administer vaccines according to an institution or physician-approved protocol without the need for a physician's examination or direct order. Links to the Moderna and Pfizer standing orders are below.
    - Moderna Standing Orders
    - Pfizer Standing Orders
- Planning for handling equipment to assist with drawing vaccine and transporting around your facility while maintaining proper temperature requirements.
- Developing procedures on how people will receive their vaccines. This may be done by department, shift, name, positions, etc. Agencies must follow the IDPH phased vaccination criteria. See IDPH Vaccine Provider Instructions.
- Developing a plan to maintain all paperwork that is a permanent record of the vaccine received complete with Lot number and dosage.
- Determining which personnel are responsible for entering vaccine data into I-CARE.
- It is possible that there will be some vaccine left over after Closed POD operations are completed. Arrangements will have to be made defining how to account for medications and the return of unused portions to your local public health agency. If the current provider and LHD are unable to find an alternate provider that will accept surplus vaccine before expiration, then all remaining vaccine should be utilized on a standby/wait list not scheduled for the day.
- Considering and planning for:
    - Adverse reactions to the vaccine
    - Needle sticks
    - Minor medical emergencies
    - Communications (phone, cell phone, 2-way radio)
    - Security breach

Receiving, Dispensing, and Maintaining Inventory

LCHD will provide the location and times for pick-up of vaccine two times per week. Contact information for your designated point of contacts and their backups should be provided to LCHD. The pick-up location will be re-verified at the time of notification.

Below are the steps to prepare your organization to receive and dispense medications (this is a guide; this should be modified to fit into your organization):

- ☐ *Alert Staff -* Let staff know that you plan to vaccinate at your facility. Provide any updated information regarding vaccine from LCHD, IDPH, or the CDC.
- ☐ *Assign tasks -* You should have already assigned a Closed POD Coordinator and back-up Coordinators. Now you will need to select who can carry out screening and dispensing functions. If your organization has occupational health, they can carry out the vaccinations or oversee a

contract medical company or pharmacy. Scale staffing according to the number of employees and clients in your organization and how you plan to schedule appointments.

☐ ***Have medical personnel available who can legally vaccinate -*** If you have medical personnel on staff, you may use personnel who normally provide vaccines in your facility to supervise the vaccination process. Vaccinators may be Registered Nurses (RNs), Medical Doctors, Physician Assistants, or Pharmacists. Licensed Practical Nurses may be able to vaccinate but may only do so under the direction of an RN. Emergency Medical Technicians may be able to vaccinate, but this must be approved by their Medical Director.

☐ ***Prepare the dispensing site -*** The amount of site preparation will depend on the number of people you plan to vaccinate at your organization. Choose an area 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, such as a large meeting room or cafeteria. You also need a secure location to place a vaccine refrigerator complete with a data logger with a buffered probe.

☐ ***Prepare vehicles -*** You should include in your plan how and who will pick up vaccine from the LCHD. Additionally, describe how you will keep the vaccine at required temperatures while transporting back to your location. A medical cooler equipped with a data logger may be required.

☐ ***Pick up vaccine and ancillary supplies from designated pick-up site -*** The primary and back-up coordinators provided to the LCHD are automatically considered "authorized" to pick up medications for your organization. They must present an Employee ID as well as a State ID or Driver's License.

☐ ***Storing vaccines -*** Vaccines should be stored in a secure location (a locked room or locked cabinet where few individuals have access) and in a vaccine refrigerator with a data logger that monitors interior temperature. Staff must be assigned to receive alerts if the temperature in the vaccine refrigerator falls above or below acceptable guidelines. Entity must review data-logging equipment logs regularly and upload them to I-CARE to validate compliance.

Entity must also record the minimum and the maximum temperature in the morning and the temperature once in the morning and once in the afternoon.

Entity must upload temperature logs into I-CARE. IDPH will only allow sites to order vaccines if they can guarantee appropriate temperatures are maintained.

All temperature excursions must be reported by next business day to IDPH. Vaccines that have undergone a temperature excursion should be labeled, "Do Not Use" and administration of the vaccine should cease until stability has been determined by the program.

☐ ***Prepare materials -*** This involves copying enough required materials for the number of people for whom you will be dispensing medications. You will receive the initial forms from LCHD when you pick up your medications. Forms provided will include [Emergency Use Authorization (EUA) fact sheets](#) for the COVID-19 vaccines, and the [CDC screening questionnaire](#). Other forms that may be included are inventory control forms, CDC supply checklist, and others. You will receive the same forms that are handed out at the PUBLIC dispensing sites. Provide all vaccine information in languages common to your place of business.

Receiving and Managing Inventory

Your organization will receive vaccine as it is available to distribute. There may be times where inventory falls short and not enough is received by the health department to distribute.

Chain of Custody Form

COVID-19 vaccine is signed for at the drop site location. Any remaining supplies are documented and signed for upon return.

Store vaccines in a secure location and in a vaccine refrigerator with data logger.

Keep an inventory of medication you receive. Keep a log of any vials or doses that are wasted due to temperature violations, drawn incorrectly, etc.

Managing Inventory

Inventory levels should be monitored throughout the event. Once inventory levels reach a critical level (you have less vaccine than the remainder of your dispensing population), you should complete the Re-Supply Request Form provided by the LCHD for additional vaccine and supplies. Vaccine distribution is dependent on available inventory, so it is possible you will not receive supply immediately. All sites will report into VaccineFinder; additional information on VaccineFinder will be provided to sites after they are enrolled. At the end of each clinic day, a designated person must report out numbers to IDPH in vaccine finder. IDPH uses this to determine what will be the next allocation to LCHD.

VaccineFinder: All vaccine providers must daily report vaccine administration and on-hand inventory to IDPH.

Providers are required to submit daily accountability reports to IDPH in the format requested. Reports must be submitted by 8:00 p.m. central standard time daily.

Screening for Contraindications and Dispensing COVID-19 Vaccine

(off-site and/or on-site dispensing)

Initially, you will want to dispense to those staff that are assisting you in the POD.

Screening
- Each person receiving COVID-19 vaccine should complete a medical questionnaire (staff can assist clients who are unable to write). These are used to: screen for contraindications to receiving the vaccine.
- The Screener will review allergies and COVID screening form for any contraindications for either waiting 15- or 30-minutes post vaccine or not receiving vaccine until checking the client's personal medical provider.
- Forms should be signed in the appropriate area.

Dispensing
- Once you have determined the client may be vaccinated, the screening form will go to the vaccinator.

- The form must have name and signature of vaccinator, lot number of vaccine and where the vaccine was administered.
- A CDC vaccine card is given to the client with the date of shot, lot number and brand of vaccine, location of clinic, and date of 2nd dose, if required.
- CDC guidelines for post vaccine care, adverse reaction information, and the V-Safe flyer should be given. V-Safe is a CDC smartphone-based tool that uses text messaging and web surveys to provide personalized health check-ins after receipt of a COVID-19 vaccination.
- Entities must share with vaccine recipients the required EUA fact sheets and/or VIS on the vaccine administered. Provide all recipients, (or in the case of a minor, provide a parent, or legal representative), with a copy of the current federal EUA Fact Sheet for Recipients and Caregivers before each dose of a vaccination. Ensure that the brand-specific Fact Sheet is provided for the vaccine being administered. Document in the recipient's medical record, the date the EUA Fact Sheet was provided.
- Have available an area for client to sit for 15 to 30 minutes after vaccine under medical observation for adverse reactions to the vaccine.

Documentation
- Entities must document vaccination records in I-CARE, EMTrack, or AllVax.
- Entities are required to report vaccination administration errors or adverse reactions to the Vaccine Adverse Event Reporting System (VAERS).

Medical Observation Post-Vaccination/Adverse Reactions
- Use designated healthcare personnel with CPR certification who are comfortable with managing adverse reactions.
- Clients should be observed for 15 or 30 minutes based on allergy history.
- Emergency bag/kit with epinephrine injections and AED should be easily accessible.
- Supply with which to draw blood of clients if there is an accidental needle-stick in staff should also be available on site.

Staff Communications and Training

As a Closed POD site, it is important to communicate with your employees before, during, and after the event. Your messages should be appropriate for each of your designated groups. It may be beneficial for your Command Team to receive detailed information about the plan and general staff to have a concept of the plan.

Determine what mechanisms will be appropriate for communicating with each of the groups you will be dispensing to and what redundant systems are in place for this.

Developing pre-scripted messages for your staff/clients/residents/family members can be beneficial at the time of the event.

Before the event

- Communicate that your organization is acting as a Closed POD site and that you may be able to provide vaccines to them during the pandemic.

- Provide your organization's dispensing plan. It is recommended that you share your dispensing plan with employees who will have key roles in the POD process.
- Communicate roles and responsibilities of employees in the POD.,.
- Provide basics on how vaccine is to be dispensed to the staff and in what order of priority.
- Convey information participants should bring when the vaccines are being dispensed to assist in screenings for possible allergies and/or contradictions.

During the event

- Convey where, when and how they will receive their vaccine.
- Communicate how to perform their Closed POD jobs, if applicable.

After the event

- Report the outcome of your organization's dispensing effort.
- Provide information on how any questions or concerns they may have.

Provide education/information training

Provide staff with as much information about dispensing site operations as much as possible. Much of this can be done pre-event. A well-trained staff will become essential to ensure your designated population receives medication in a timely manner; thereby, promoting continuity of operations for your organization and meeting public health's dispensing time goal. LCHD may assist in the planning of your POD and information needed to safely vaccinate and may coordinate with your agency for planning workshops.

All entities must provide training to staff assigned as vaccinators and to other staff members assigned to assist with vaccine-administration operations. Please see COVID-19 Clinical Training and Resources for Healthcare Providers, Skills Checklist for Injection Training and Vaccine Storage and Handling Toolkit for more information. It is also recommended that medical staff have completed OSHA and blood borne pathogen training.

- Several education and training resources are currently available for POD operations. These include free online training at: FEMA's Emergency Management Institute https://training.fema.gov/IS/

  - IS-100.a: Introduction to the Incident Command System
  - IS-200: ICS for Single Resource and Initial Action Incidents
  - IS-700: National Incident Management System (NIMS), an Introduction
  - IS-26: Guide to Points of Distribution
- University of Albany School of Public Health Mass Dispensing: Working in a Point of Dispensing (POD)
  - http://www.ualbanycphp.org/learning/default.cfm

Resources and Information

Review the following documents prior to developing your POD and refer to them throughout operations.

- I-CARE Provider Enrollment Guide
- COVID-19 Clinical Training and Resources for Healthcare Providers
- Guidance for Planning Vaccination Clinics at Satellite, Temporary, or Off-site Locations
- Skills Checklist for Injection Training
- Vaccine Storage and Handling Toolkit
- Reporting in VAERS
- CDC Off-site Vaccine Checklist
- CDC Vaccine Clinic Supply Checklist
- IDPH SARS-CoV-2/COVID-19 Mass Vaccination Planning Guide
- COVID-19 Vaccine EUA Fact Sheets
- CDC COVID-19 Vaccine Screening Form