

RECEIVED

APR 25 2022

LABOR RELATIONS



April 22, 2022

Mr. Ivan D. Butts
President
National Association of Postal Supervisors
1727 King Street, Suite 400
Alexandria, VA 22314-2753

Dear Mr. Butts:

As a matter of general interest, the Postal Service has created a Management Instruction (MI) regarding locally implementing an Automated External Defibrillator (AED) Program. The new MI is titled EL-810-2022-1, *Locally Implemented Automated External Defibrillator Program*.

This MI establishes Postal Service policy and requirements for implementing and maintaining an AED program within a property owned or operated by the Postal Service. Implementing a locally run AED program can protect the Postal Service workforce by facilitating the timely, appropriate use of AEDs by trained Postal Service personnel while awaiting emergency medical services (EMS) first responders.

Since Occupational Safety and Health Administration (OSHA) standards do not specifically address AEDs and because OSHA does not require AEDs, the implementation of an AED program is optional and will be determined at the local level.

Please contact Bruce Nicholson at extension 7773 if you have questions concerning this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "David E. Mills".

David E. Mills
Director
Labor Relations Policies and Programs

Enclosure

Management Instruction

Locally Implemented Automated External Defibrillator Program

An automated external defibrillator, or AED, is used to help those experiencing sudden cardiac arrest (SCA). An AED is a sophisticated, yet easy-to-use, medical device that can analyze the heart's rhythm and, if necessary, deliver an electric shock, or defibrillation, to help the heart reestablish an effective rhythm.

SCA is a leading cause of death in the United States. More than 350,000 cardiac arrests occur outside of the hospital each year. In such cases, AEDs can prevent unnecessary disability and death when quickly and properly administered. Implementing a locally run AED program can protect the Postal Service™ workforce by facilitating the timely, appropriate use of AEDs by trained Postal Service™ personnel while awaiting emergency medical services (EMS) first responders.

This management instruction (MI) establishes Postal Service policy and requirements for implementing and maintaining an AED program within a Postal Service facility.

Policy – Regulatory Requirements

Occupational Safety and Health Administration (OSHA) standards do not specifically address AEDs. Since OSHA does not require AEDs, the implementation of an AED program is optional. Reliance on local EMS for medical emergencies is of utmost importance.

Beyond relying on EMS, consider the following factors when determining whether to establish an AED program:

- a. Employee willingness to voluntarily respond to an emergency and use an AED.
- b. Installation's proximity to EMS
- c. Approximate EMS response times.

Establishing an AED program requires the close ongoing attention of the installation head. Establishing a locally implemented AED program is a long-term commitment that must be carefully considered.

For installations with AED programs already in place at the publishing of this MI, all elements of this MI must be met and adhered to for those AEDs programs to remain in service. If not met, then the current AED program must be terminated.

Date: April 22, 2022
 Effective: Immediately
 Number: MI EL-810-2022-1
 Obsoletes: N/A
 Unit: Occupational Safety and Health



Simon Storey
 Vice President
 Employee Resource Management

CONTENTS

Policy – Regulatory Requirements . . .	1
Scope	2
Program Elements	2
Administrative Control	2
Medical Direction and Oversight	2
Medical Emergency Response	
Team	3
Training	3
Maintenance	3
Quality Control	4
Legal Consultation	4
Labor Relations Consultation	4
Roles and Responsibilities	4
Headquarters	4
Area and Regions	4
Districts and Divisions	5
Exhibit 1	6
Sample AED Incident Report	
Exhibit 2	8
Minimum Requirements for the	
Procurement of Medical Direction	
and Oversight	
Exhibit 3	10
Sample Program Volunteer	
Sign-Up Sheet	
Exhibit 4	11
Sample AED Program MERT	
Volunteer Training and	
Tracking Tool	
Exhibit 5	12
Sample AED Program Maintenance	
Checklist	
Definitions	13

Scope

This MI applies to all spaces owned and leased by the Postal Service that are considering establishing a locally implemented AED program or have established an AED program.

Program Elements

If an installation chooses to establish and run an AED program, the following program elements are required:

- a. Administrative control.
- b. Medical direction and oversight.
- c. Medical emergency response team.
- d. Training.
- e. Maintenance.
- f. Quality control.
- g. Legal consultation.
- h. Labor Relations consultation.

Administrative Control

The installation head has overall responsibility for the AED program in their installation. Responsibilities include but are not limited to the following:

- a. Establishing or integrating the AED program.
- b. Ensuring all program elements are met on an ongoing basis.
- c. Ensuring all employees are aware of the location of each AED in the installation (to include the workroom floor and administrative offices) using AED location maps.

All elements of the program must be met prior to purchasing the AED and making it available to the installation. In the event an AED is applied/used during a medical emergency, the installation head will be responsible for completing an AED Incident Report (see Exhibit 1 in this MI) and transferring the AED data from the incident, along with the completed incident report, to the District Occupational Health Nurse Administrator (D-OHNA).

Medical Direction and Oversight

Installations choosing to establish a new AED program, or to support an existing AED program, must procure a physician to provide medical direction and oversight (see Exhibit 2 in this MI). The installation must comply with all guidance/recommendations made by the physician providing medical direction and oversight. Medical direction and oversight responsibilities include, but are not limited to, the following:

- a. Making recommendations on AED placement.
- b. Evaluating quality control measures.
- c. Performing a case-by-case review following each use of the AED.

- d. Providing an annual report of AED usage.
- e. Providing policy support to ensure best practices are in place.

Medical Emergency Response Team

A Medical Emergency Response Team (MERT) will be formed from employee volunteers who will be called upon to respond to medical emergencies in which an AED may be needed (e.g., sudden incapacitation, unconsciousness, or complaints of chest pain). Volunteers should be solicited using the AED Program Volunteer Sign Up (see Exhibit 3 in this MI). Give preference to employees with a background in medical training (e.g., emergency medical technician, or paramedic) or with experience in performing cardiopulmonary resuscitation (CPR) and/or using an AED. Recruit enough volunteers that, as much as practicable, there are two MERT members for every AED installed in the facility on duty during each tour of operation.

If an insufficient number of employees volunteer to be on the MERT, a new program cannot be established, an existing program must be terminated, and the AEDs removed from service. MERT members will be the primary responders during a medical emergency in a postal facility and will provide support until EMS arrive on site. For documentation purposes, all MERT volunteers will immediately submit a written statement to the installation head following all medical emergencies. Written statements may be handwritten or typed and must be signed and dated. All written statements must be saved locally by the installation head.

Training

Annually, all MERT volunteers must take the following training courses, via HERO:

- a. First Aid: Automated External Defibrillator.
- b. Bloodborne Pathogens – List A and B Employees.

Additionally, all MERT volunteers must maintain CPR/AED certification through the American Red Cross. The American Red Cross offers a blend of in-person and online coursework which takes approximately 3 to 4 hours to complete. CPR/AED certification must be renewed every 2 years. A copy of each MERT volunteer's CPR/AED certification must be maintained locally by the installation head or their designee.

Monitor MERT volunteer training activities closely to ensure compliance. The installation head may choose to use the AED Program MERT Volunteer Training and Tracking Tool (see Exhibit 4 in this MI) or consult the district manager of employee development on local best practices to ensure training compliance.

The Postal Service will pay for all training and training is conducted on-the-clock.

Maintenance

Monthly visual inspections of the AED must be performed and documented on the AED Inspection Checklist (see Exhibit 5 of this MI). This task must be assigned by the installation head or their designee, and typically is performed by the maintenance department. If

maintenance does not have a presence in the installation, assign the task to a designee of the installation head's choosing.

If an installation has multiple AEDs, a separate AED Inspection Checklist must be completed for each AED. Monthly visual inspections must be certified as complete in the Safety and Health Management Tool. Failure to do so will trigger a program audit by District Safety personnel.

The AED's battery and pads expire typically every 2 to 5 years and must be replaced in accordance with the manufacturer's recommended guidelines. Report any irregularities identified during maintenance activities immediately to the installation head who will address them.

Quality Control

For the AED program to be successful, the installation head must be committed to strict quality control. The installation head must perform quarterly quality control evaluations of the facility's AED program. The quality control evaluation ensures all MERT members are current on the required training and that visual inspections are being completed monthly with all anomalies addressed.

Legal Consultation

Prior to the implementation of a new AED program, the installation head must consult with their USPS® Law Department Field Office. Any recommendations made by the Law Department to comply with local Good Samaritan or other laws must be implemented.

Labor Relations Consultation

Prior to the implementation of a new AED program, the installation head must consult with their local Labor Relations department. Any recommendations made by the local Labor Relations department to comply with contractual provisions or Local Memorandums of Understanding (LMOUs) must be implemented.

Roles and Responsibilities

Headquarters

Occupational Safety and Health	■ Establishes policies and procedures for AEDs and provides technical assistance.
--------------------------------	---

Area and Regions

Director, Field Human Resources	■ Has executive oversight of AED programs within Retail Areas and Districts, and Logistics and Processing Regions and Divisions.
Senior Field Safety Specialist	■ Monitors and evaluates AED programs. ■ When AED programs are deficient and efforts to correct the deficiencies are unsuccessful, has the authority to order the AEDs be removed from service in the installation until the program is brought into compliance.

Regional Occupational Health Nurse Administrator	<ul style="list-style-type: none"> ■ Serves as a subject matter expert (SME) and resource to the District Occupational Health Nurse Administrators. ■ Responds to medical emergencies in their assigned work location.
--	--

Districts and Divisions

Manager, Field Human Resources	<ul style="list-style-type: none"> ■ Provides oversight for AED programs in the District, Logistics and Processing Division.
Manager, Employee Development	<ul style="list-style-type: none"> ■ Is consulted on local best practices for ensuring training compliance.
Manager, Safety	<ul style="list-style-type: none"> ■ Provides oversight to the safety specialists performing AED program audits and will escalate program deficiencies to the manager of field human resources and the area senior field safety specialist as appropriate.
Safety Specialists	<ul style="list-style-type: none"> ■ Provide subject-matter expert (SME) guidance to installation heads and will oversee AED programs in their assigned territory. ■ If auditing functions in the Safety and Health Management tool indicate AED program deficiencies, performs an AED program audit to ensure compliance with this policy. ■ Recommends actions to the installation head to address program deficiencies. If program deficiencies are not rectified within 30 days, escalates the specific program deficiencies to the district manager of Safety.
Occupational Health Nurse Administrator (OHNA)	<ul style="list-style-type: none"> ■ Serves as subject matter experts (SMEs). ■ Responds to medical emergencies in their assigned work location. ■ If an AED program exists in an OHNA's assigned work location, the OHNA will be a member of the MERT. ■ Conducts post-AED-use evaluation and follow-up including coordinating with the physician providing medical oversight to have the AED event data downloaded and analyzed, reviewing the post-AED report and written MERT statements to identify areas of need or opportunities for improvement. ■ May function as certified CPR/AED trainer (will require additional expense, equipment, and training from the American Red Cross).
Occupational Health Nurse (OHN)	<ul style="list-style-type: none"> ■ Responds to medical emergencies in their assigned work location. ■ If an AED program exists in an OHN's assigned work location, the OHN will be a member of the MERT.
Maintenance Manager or Designee	<ul style="list-style-type: none"> ■ Responsible for the installation of AED cabinets and usually perform the monthly visual inspection of the AEDs.

**Exhibit 1
Sample AED Incident Report**

The installation head must complete an AED Incident Report any time an AED is applied to a person in a postal-owned or postal-leased facility. The AED will store data from the incident on an internal hard drive and that data must be transferred, along with the completed AED incident report, to the District Occupational Health Nurse Administrator (OHNA) within 5 days of the AED incident.

Name of Installation:	
Description of Location of Incident (room number, specific piece of equipment, floor, breakroom, etc.):	
Date of Incident:	Time of Incident:
Employee/Person Experiencing Medical Emergency:	Name:
	EIN
	Phone Number:
	Emergency Contact:
	Emergency Contact Phone Number:

Names and EINs of MERT members who responded to the medical emergency:

** Attach written statements by these employees to this completed report when submitted to District OHNA.*

Names and EINs of non-MERT Members who responded to medical emergency:

** Attach written statements by these employees to this completed report when submitted to District OHNA.*

Briefly describe the event, incident, or situation that resulted in an AED being brought to this event:

Details of Medical Emergency	Yes	No
Did the victim collapse (become unresponsive)?	<input type="checkbox"/>	<input type="checkbox"/>
Did anyone witness the victim collapse?	<input type="checkbox"/>	<input type="checkbox"/>
If yes, name(s) of witness(es):		
Name of MERT volunteer who applied the AED:		
Did the AED deliver a shock to the victim?	<input type="checkbox"/>	<input type="checkbox"/>
If yes, was the AED successful in re-establishing an effective cardiac rhythm?	<input type="checkbox"/>	<input type="checkbox"/>

Briefly describe the condition of the victim when EMS arrived on the scene and the events that transpired from the point EMS arrived on site to when the victim was transferred to the ambulance:

Installation Head completing this report:	Name:
	Signature:
	Date:

Exhibit 2

Minimum Requirements for the Procurement of Medical Direction and Oversight

Scope of Work

The United States Postal Service (USPS) requires medical direction and oversight to establish new, and maintain existing, Automated External Defibrillator (AED) programs in Postal Service owned and leased facilities nationally.

The specific objectives of a contract include the following:

- a. To provide medical direction and oversight for existing locally implemented AED programs.
- b. To provide medical direction and oversight for any Postal Service installations establishing a new locally implemented AED program.

The scope of work consists of one task. This task includes information to further understand objectives and deliverables. The supplier will be required to meet all these requirements.

Contract Requirements

Development of a Medical Direction and Oversight Process — The supplier will provide a detailed medical direction and oversight process to support an existing or newly established, locally implemented, AED programs in a Postal Service-owned or Postal Service-leased facility.

The supplier will provide the following tasks and these are not necessarily limited to the following:

- Review of existing AED program, to include a comprehensive audit of all aspects of the programs (equipment, maintenance records, policies, procedures, training compliance, etc.) to determine compliance and deficiencies.
- Annual medical prescription/authorization (per FDA requirements).
- Identification of equipment needs.
- AED placement recommendations.
- Consultant services.
- Review and approval of AED training plan.
- AED Response Protocol and Policy and Procedure Manual and documents.
- Post-event clinical review of event data and rescuer de-briefing.
- Reporting.
- Additional activities as recommended by the supplier.

Deliverables — The supplier will develop a detailed medical oversight process. This deliverable must include a guidance document describing the procedures of the program.

The deliverables must include, at a minimum, the following items:

- a. Quarterly update reports.
- b. AED use reports after each event.
- c. Yearly final report.

Key Personnel — The supplier will provide the names, relevant experience, and qualifications of the key personnel who will be directly involved or associated with this contract. Include length and type of experience that directly relates to the requested services. Include resumes of proposed key personnel.

Note: The contract requires that medical oversight be performed by a medical physician. Current medical licensure is required for at least one member of the supplier's team. The medical provider must provide a copy of their general liability insurance policy, which must cover a minimum of \$1,000,000.

Period of Performance — The base period of performance will begin upon contract execution and continue 365 days (1 year). An additional two (2)-year option period will also be included and will be exercised at the conclusion of the base period upon the determination of acceptable service.

Contract Type — The ensuing contract will be awarded on a Time and Material (Labor Hour) basis. The pricing proposal will set forth each of the labor categories anticipated to be required over the duration of the program along with the corresponding labor rate for the category. The labor rates proposed will be effective for both the base period of performance as well as the one-year option period if/as exercised.

Exhibit 3
Sample Program Volunteer Sign-Up Sheet

This installation is considering establishing an Automated External Defibrillator (AED) program. An AED is a sophisticated easy-to-use medical device that can analyze the heart's rhythm and, if necessary, deliver an electric shock (defibrillation) to help the heart reestablish an effective heart rhythm. An AED is a potentially life-saving tool for an employee experiencing a medical emergency.

The first step in establishing the program is gauging whether employees in this installation are willing to volunteer to be a member of a Medical Emergency Response Team (MERT). MERT volunteers will receive training on cardiopulmonary resuscitation (CPR) and the use of AEDs. All training will be paid for by the Postal Service and will be conducted "on-the-clock."

MERT volunteers will be called upon to respond to medical emergencies within the facility and, if needed, perform CPR, and use an AED until Emergency Medical Services (EMS) arrive on site. If you are willing to volunteer as a MERT member or would like to speak with someone about being on the MERT, please list your name and phone number below.

Name	Phone Number	Medical Training (EMT, Paramedic, CPR, AED Experience, etc.)
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>

Exhibit 4

Sample AED Program MERT Volunteer Training and Tracking Tool

The HERO courses “First Aid: Automated External Defibrillator” and “Bloodborne Pathogens – List A and B Employees” must be completed annually. CPR/AED certification expires every two years.

Name	EIN	Tour	First Aid: AED Training Date	Bloodborne Pathogen Training Date	CPR/AED Expiration Date

Name	EIN	Tour	First Aid: AED Training Date	Bloodborne Pathogen Training Date	CPR/AED Expiration Date

Name	EIN	Tour	First Aid: AED Training Date	Bloodborne Pathogen Training Date	CPR/AED Expiration Date

Name	EIN	Tour	First Aid: AED Training Date	Bloodborne Pathogen Training Date	CPR/AED Expiration Date

Name	EIN	Tour	First Aid: AED Training Date	Bloodborne Pathogen Training Date	CPR/AED Expiration Date

Definitions

Cardiopulmonary Resuscitation (CPR) – An emergency lifesaving procedure performed when the heart stops beating involving repeated chest compressions to restore blood circulation and breathing.

Defibrillation – The stopping of fibrillation (inadequate heartbeat) of the heart by administering a controlled electric shock to restore normal heart rhythm.

Emergency Medical Services (EMS) – A system of coordinated response and emergency medical care, involving multiple people and agencies. EMS is most easily recognized when ambulances or helicopters are seen responding to emergency incidents.

Emergency Medical Technician (EMT) – A specially trained medical technician certified to provide basic emergency services (such as CPR) before and during transportation to a hospital.

Paramedic – A specially trained medical technician licensed to provide a wide range of emergency services (such as defibrillation and the intravenous administration of medication) before or during transportation to a hospital.

Sudden Cardiac Arrest (SCA) – Abrupt loss of heart function.

