

December 12, 2023

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

Dear Ivan:

As a matter of general interest, the Postal Service plans to revise Management Instruction (MI) AS-280-2015-1, *Preparation for and Response to a Biohazard Detection System Alert-Positive Test*.

This revision reflects updates to policies and guidance regarding issues, preparatory activity for, and operational practice in response to a Biohazard Detection System (BDS) Alert-Positive Test. Additional changes were made throughout the document to clarify existing language, correct grammatical and structural errors, and to update organizational titles, roles and responsibilities, and reference materials.

Enclosed is a final draft of the revised Management Instruction (MI) AS-280-2015-1, Preparation for and Response to a Biohazard Detection System Alert-Positive Test one with and one without changes identified.

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

Sincerely,

James Lloyd

Director

Labor Relations Contact Administration (NALC)

enclosures



Management Instruction

Preparation for and Response to a Biohazard Detection System Alert — Positive Test

This management instruction (MI) stipulates Postal Service policy regarding preparatory activity for, and operational practice in response to, a Biohazard Detection System (BDS) Alert — Positive Test. This MI encompasses the following information:

- a. The planning and execution of evacuation.
- b. Personal decontamination and the subsequent administration of post-exposure prophylaxis (PEP).
- c. The roles and responsibilities of functional and field leads.

Background

The development and deployment of Biohazard Detection System (BDS) units were part of the Postal Service Emergency Preparedness Plan submitted to Congress in 2002 in response to the mail-borne anthrax attacks of 2001. BDS units are installed in mail processing facilities (plants). A BDS Alert — Positive Test occurs when a BDS unit's internal test indicates, via visual and audio alarms on the BDS unit, the presence in the collection mail stream of Bacillus anthracis (B. anthracis), the microorganism that causes anthrax.

Policy

The Postal Service is committed to being prepared in the event of a BDS Alert — Positive Test. The policies in this MI are consistent with the guidance in the Centers for Disease Control and Prevention (CDC) report titled "Responding to the Detection of Aerosolized Bacillus anthracis by Autonomous Detection Systems in the Workplace" (see http://www.cdc.gov/mmwr/pdf/rr/rr53e430-2.pdf) and subsequent CDC guidance to public health commissioners allowing for more prompt administration of prophylactic medication.

In the event of a BDS Alert — Positive Test, the Postal Service works with federal, state, and local authorities. The Postal Service coordinates with local first responders (LFRs) on evacuation planning and defers to LFRs concerning the manner in which LFRs provide personal decontamination and PEP to the affected plant employees. For this MI, "employees" includes assigned and visiting Postal Service employees and contractors. The Postal Service is responsible for evacuating customers and identifying them to LFRs for subsequent decontamination and PEP assessments and administration.

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Unit: Organization

Michael Swigart

Executive Director of Continuity and

Preparedness

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Emergency Management Teams (EMTs) consist of core members and resources who prepare for emergent or impending events and exist at three levels of the organization: area, district and plant, as established in MI AS-280-2021-7, Integrated Emergency Management Supporting Field Business Continuity, found at https://blue.usps.gov/cpim/ftp/manage/as280217.pdf. Per that MI, in preparation for an emergent BDS Alert – Positive Test, training and functional exercises at installation and district EMT levels will be conducted annually and facilitated by National Preparedness, to ensure EMT and facility employees at large are familiar with proper response procedures reflective of the policies contained in this MI.

Those procedures are contained in the USPS BDS Preparedness Guide, which is available on the National Preparedness Web site at http://blue.usps.gov/nationalpreparedness/prepare.htm; click on Biohazard Detection System, then Bio-Hazard Detection System Preparedness Guide.

Note that the policies contained in this MI specifically govern preparedness and response actions at an affected plant, but not at upstream or downstream facilities. After a BDS Alert — Positive Test, upstream and downstream facilities continue operations in the manner outlined for them in the BDS Preparedness Guide. The Postal Service independently makes case-by-case determinations about the potential suspension of operations at upstream or downstream facilities, based upon available evidence and the advice of the Postal Inspection Service and our emergency preparedness partners at other government agencies. Generally, absent a determination that contaminated mail has passed through a specific facility, or absent the discovery of some other evidence of contamination at a specific facility, upstream facilities maintain normal operations while downstream facilities follow mail isolation and control (MIC) procedures regarding mail they received from the affected plant.

Scope

This MI applies to Headquarters functions noted in the Roles and Responsibilities section and to all field organizations with existing or planned BDS equipment installations.

Collection Mail Processing

All Advanced Facer Canceler Systems (AFCS) including AFCS (Legacy) and AFCS200, must have the associated BDS cabinet and Ventilation Filtration System (VFS) in place and operational. Plants that operate AFCS must route collection mail through the AFCS/BDS/VFS — they may not use any other means of cancellation. The Postal Service must equip all BDS sites with a spare BDS cabinet ("hot spare") that is staged to be quickly installed in the event of a BDS cabinet failure.

Acceptable Alarms/Announcements

After confirmation that a BDS Alert — Positive Test has actually occurred, the facility must make a scripted, BDS-specific, building-wide announcement through an internal public address system or through alternate means to ensure that all people within the facility receive the announcement.

Facility Evacuation

The Postal Service works with LFRs to complete the following tasks:

- a. Develop procedures to evacuate employees to an outdoor location or, alternatively, to a physically separate building or a space inside the potentially contaminated building that can serve as a place of refuge. If the Postal Service, in consultation with LFRs, has differentiated multiple exposure groups, evacuation routes must not mingle exposure groups, and must not direct evacuees to enter or cross through the production area monitored by the alerting BDS unit. If LFRs request decontamination to be segregated by group as indicated in the CDC guidance, the Postal Service must determine if any plant administrative or ancillary offices are on separate heating, ventilating, and air conditioning (HVAC) systems and have separate egress from the facility.
- b. Develop procedures to notify any customers at the facility, whether in customer service lobbies or business mail entry units and to direct them to evacuate and muster with the appropriate employee group based on the facility's decontamination groupings. USPS then identifies these customers to LFRs for decontamination and PEP assessments and administration.
- c. Evaluate indoor evacuation alternatives and places of refuge, to be used if evacuation to outdoor locations presents a greater immediate risk to life and health due to severe weather conditions, security concerns, or other hazards. Alternative indoor places of refuge for potentially contaminated employees must be on a separate HVAC system than the production area monitored by the alerting BDS unit, must not share an HVAC system with spaces where any unexposed employees are still located, and must not require evacuees to pass through the production area monitored by the alerting BDS unit.

Personal Decontamination

Overview

The Postal Service defers to LFRs concerning the way LFRs provide personal decontamination following evacuation of a facility. The Postal Service recognizes that LFRs may require employees to stay at an appropriate place of refuge.

The Postal Service takes the following steps:

- Conduct pre-event planning and exercises (tabletop and/or simulated) with LFRs.
- 2. Procure disposable clothing kits (DCKs) for all employees at a BDS facility.
- At the start of the decontamination process at an affected BDS facility, defer control of employees to the LFRs on scene.
- Provide DCKs for all employees for whom LFRs determine that personal decontamination is indicated, and provide excess DCKs to affected customers.
- Catalogue any personal property that cannot be decontaminated and must remain onsite.

Decontamination: What Not to Do

Postal Service field organizations do not perform the following tasks:

- a. Procure equipment for personal decontamination (for example, tents, shelters, shower facilities). Postal Service field organizations can utilize existing equipment upon approval by LFRs.
- b. Store LFR decontamination equipment onsite.
- Perform decontamination of personnel.
- d. Agree to compensate LFRs for assets expended during decontamination.

Post-Exposure Prophylaxis

Overview

The Postal Service defers to the appropriate public health authority (i.e., those with jurisdiction for the community in which the facility is located) to apply CDC guidance on PEP.

The Postal Service procures and pre-positions (with the appropriate public health authority or in a USPS-maintained cache) an initial 10-day supply of antibiotics to be dispensed following a BDS Alert — Positive Test. Per CDC guidance, the appropriate public health authority dispenses these antibiotics to all persons in the alerting BDS facility as soon as possible following a positive BDS B. anthracis test result, without requiring delay for Laboratory Response Network (LRN) verification.

If there is a need to extend PEP beyond 10 days, based on a positive culture result at the LRN that received the BDS samples, the appropriate public health agency determines whether local, regional, or state caches could be tapped, and if not, requests the CDC to provide a supply of additional medication from the Strategic National Stockpile through the state. The appropriate public health agency is responsible for obtaining and dispensing the balance of the prophylactic regimen.

The Postal Service works with state and local public health authorities to complete the following tasks:

- a. Coordinate pre-event planning for administration of medication following a BDS Alert — Positive Test.
- Pre-position the initial 10-day supply of antibiotics with state and/or local public health agencies, or in a USPS-maintained cache as directed by the applicable associate medical director.

PEP: What Not to Do

Postal Service field organizations do not perform the following tasks:

- a. Procure antibiotics.
- b. Dispense antibiotics.
- c. Agree to compensate LFRs for assets expended during PEP.

Roles and Responsibilities

Executive Director of Continuity and Preparedness

The executive director of Continuity and Preparedness is responsible for the following:

- a. Establish and institutionalize protocols for notification/activation in the case of a BDS Alert Positive Test.
- Provide guidance on proper coordination of pre-event planning and response activities with appropriate federal, state, and local authorities. Examples include providing public health consultant services and helping in coordinating PEP with local public health officials.
- Fund and maintain a national contract for ordering the Postal Service supply of antibiotics for use at a plant following a BDS Alert — Positive Test.
- Review annually and update as necessary the BDS Preparedness Guide, including MIC procedures, based on lessons learned, new developments, and insights.
- e. Upon a BDS Alert Positive Test, notify the Postmaster General (PMG) and Chief Processing and Distribution Operations Officer (CPDO), activate the HQ Corporate Emergency Management Team (CEMT), coordinate initial HQ and area executive briefings, and facilitate HQ follow-on activities as required.
- f. Coordinate response activities with the U.S. Postal Inspection Service (USPIS) and other Postal Service functional groups.
- g. Coordinate activities with Executive Office of the President National Security Council Staff and national-level agencies, including the CDC and the Department of Homeland Security, following established interagency protocols.

Provide situational awareness to the PMG and the CPDO throughout the response to a BDS Alert — Positive Test.

Vice President of Human Resources

The vice president of Human Resources is responsible for the following:

- a. Through the Sr. Director of Occupational Safety and Health, in conjunction with the Office of National Preparedness, provide overall guidance on the storage, disposition, and management of PEP; administer the Postal Service contract for PEP; and provide an initial 10-day supply of PEP, to be made available to affected plant employees following a BDS Alert Positive Test.
- Upon a BDS Alert Positive Test, provide support to affected Field Human Resources Operations offices in the administration of affected employees.
- c. Provide employee health expertise in support of response and recovery activities.
- d. Through the Sr. Director Occupational Safety and Health, provide employee safety expertise in support of response and recovery activities; coordinate expert industrial hygiene and other technical support services for characterization sampling of Postal Service facilities, vehicles, and other affected assets in support of Facilities; continue to provide technical support in the development of sampling plans for post-decontamination clearance of Postal Service facilities, vehicles, and other affected assets in support of Facilities' restoration efforts.

Vice President of Labor Relations

The vice president of Labor Relations is responsible for the following:

- aUpon a BDS Alert Positive Test, notify national union and management association leadership.
- b. Ensure post-event Employee Assistance Program assistance to affected plant employees.

Chief Postal Inspector

The chief postal inspector is responsible for the following:

- a. Oversee USPIS duties covered in pre-event planning and exercise with LFR (for example, security of the facility and staging areas).
- Coordinate pre-event planning for confirmatory testing with the Association of Public Health Laboratories and the LRN.
- Maintain mapping of BDS Installations to LRN labs and the capability to execute Postal Inspection Service sample collection, transport, and testing protocols.
- Review annually, and update as necessary, the BDS mail tracking (MT) protocols and processes based on lessons learned, new developments, and insights.

- e. Upon a BDS Alert Positive Test, activate Inspection Service Command Center operations, coordinate all law enforcement related activities, and act as liaison with USPS Logistics to assist with the recall of vehicles.
- f. Act as liaison with the Federal Bureau of Investigation Weapons of Mass Destruction Directorate and all state and local law enforcement leads.
- g. Include the onsite USPS emergency manager in responding Postal Inspectors' communications and coordination with LFR.
- h. Oversee Inspection Service evidence recovery (BDS cartridge sample collection) and transport to LRN.
- i. Leverage MT tools and resources to assist with MIC at the affected plant; any downstream recall or isolation; identification of the suspect mail piece(s); and determination of the likely upstream path that suspect piece(s) took to reach the affected plant.
- j. Provide situational awareness to the PMG on related law enforcement activities.
- k. Oversee the resultant USPIS investigation.

Vice President of Delivery Operations

The vice president of Delivery Operations is responsible for the following:

- Upon a BDS Alert Positive Test, continue delivery operations in the field, bypassing the alarming facility.
- b. Coordinate vehicle and collection box decontamination and restoration to service once the recovery stage has been reached.

Vice President of Processing and Maintenance Operations

The vice president of Processing and Maintenance Operations is responsible for the following:

- a. Upon a BDS Alert Positive Test, provide support for USPIS MT.
- b. Coordinate MIC procedures at the national level.
- c. Provide equipment and building systems expertise in support of response and recovery activities.

Vice President of Logistics

The vice president of Logistics is responsible for the following:

- Upon a BDS Alert Positive Test, assist with the recall of any mail dispatched from the facility during the associated sampling/testing period.
- b. Examine air network impacts (FedEx, UPS, commercial air).
- Oversee affected nodes of the surface transportation system (for example – Surface Transportation Centers).
- d. Coordinate Labeling List changes and the output of associated placards needed to divert volumes away from the facility.

e. Coordinate logistics continuity issues through the Network Operations Center.

Vice President of Facilities

The vice president of Facilities is responsible for the following:

Upon a BDS Alert – Positive Test, coordinate CPDO and/or CRDO subordinate functions, USPIS, Continuity and Preparedness, USPS Occupational Safety and Health, Environmental Affairs and Corporate Sustainability, and contracted resources in facility decontamination and restoration efforts once the recovery stage is reached.

Vice President of Corporate Communications

The vice president of Corporate Communications is responsible for the following tasks:

- Maintain the BDS Alert Positive Test Corporate Communications Plan.
- Through the Director Field Communications, assign the Federal Emergency Management Agency's (FEMA) IS-100 online course (Introduction to the Incident Command System) to all strategic communications specialists.
- Upon a BDS Alert Positive Test, implement the BDS Alert Positive Test Corporate Communications Plan.
- d. Participate in Joint Information Center (JIC) activities as necessary and support local communications professionals in their JIC participation.

Vice President of Engineering Systems

The vice president of Engineering Systems is responsible for the following:

- a. Manage BDS hardware deployments.
- Manage the support contracts for BDS supplies, maintenance, and monitoring.
- Upon a BDS Alert Positive Test, coordinate BDS National Site Controller data collection from all BDS sites and the relay of emergency notifications.
- d. Provide equipment and building systems expertise in support of response and recovery activities.

Vice President of Area Retail and Delivery Operations

The vice president of Area Retail and Delivery Operations is responsible for the following:

Upon a BDS Alert – Positive Test, activate the area EMT, then defer the emergency manager role to the vice president of regional processing operations.

Vice President of Regional Processing Operations

The vice president of Regional Processing Operations is responsible for the following:

- a. Upon a BDS Alert Positive Test, assume the emergency manager role for the area EMT.
- b. Identify a single area EMT Continuity of Operations (COOP) lead.
- c. Establish BDS chain of command and communication flows between district, area, and HQ EMTs.
- d. Coordinate immediate network redirection of mail flows with the Vice President of Logistics.
- e. Coordinate BDS response activities between district EMTs, synchronized with HQ CEMT functional representatives.
- f. Support district EMTs as necessary.

District Manager

The district manager is responsible for the following:

- Upon a BDS Alert Positive Test, activate the district EMT, then
 defer the emergency manager role to the senior director division
 processing operations.
- b. Notify local union and management association leadership.
- c. Coordinate MIC procedures for downstream retail and delivery facilities, according to the policy established in this MI.

Senior Director Division Processing Operations

The senior director division processing operations is responsible for the following:

- Maintain Site-specific BDS Response Plans at each BDS facility.
- b. Upon a BDS Alert Positive Test, assume the emergency manager role for the district EMT.
- c. Support the implementation of the affected BDS site COOP plan, including the coordination of site operations off-load/redirection, along with the implementation of COOP plans for any co-located offices.
- d. Coordinate MIC procedures for downstream mail processing facilities, according to the policy established in this MI.

Installation Head at a BDS Facility

The installation head at a BDS facility is responsible for the following tasks:

- a. Comply with Postal Service BDS preparedness and response policies at the installation.
- b. Refine BDS-specific evacuation procedures for their installation.

- Coordinate pre-event with those LFR providing personal decontamination / PEP and develop logistical and resource plans cooperatively.
- Evaluate and select any alternative places of refuge in coordination with LFR.
- e. Develop and maintain a site-specific BDS Alert Positive Test Response Plan in the installation Integrated Emergency Management Plan (IEMP), based on the most current version of the BDS Preparedness Guide available on the National Preparedness web site. At least every 6 months, review and confirm that the plan is current, making any necessary updates to site-specific plan details and protocols. On a monthly basis, review and confirm accuracy of the BDS Site Controller List of Required Contacts. Ensure that hard copies of the most recent version of the plan are readily available both onsite and offsite.
- f. Train any new AFCS operators and supervisors to recognize a BDS
 Alert Positive Test and to initiate the evacuation process.
- Manage BDS-related maintenance activities conducted by USPS staff.
- Order and maintain a stock of response materials (for example, DCK stored in a secure and accessible location outside the BDS facility).
- Upon a BDS Alert Positive Test, follow all procedures captured in the installation's BDS Alert — Positive Test Response Plan, to include providing DCK for use following personal decontamination; cataloging personal property that cannot be decontaminated and that must remain onsite; providing excess DCK to affected customers; and implementing installation-level MIC and COOP procedures.

Definitions

BDS Alert — Positive Test: The BDS unit's signal if its internal test indicates the presence of B. anthracis.

Laboratory Response Network Polymerase Chain Reaction Result: The LRN's initial test (positive or negative) concerning the presence of B. anthracis.

Laboratory Response Network Culture Result: The LRN's final analysis (positive or negative) on the presence of B. anthracis.

Local First Responders: Local fire department, law enforcement, hazmat/hazardous substance teams, public health authorities, and emergency medical services.

HazMat/Hazardous Substance: Substances defined by Section 202(14) of the Comprehensive Environmental Response, Compensation, and Liability Act.

Headquarters Emergency Management Team: A senior-level, crossfunctional HQ team that is activated in response to emergencies such as a BDS Alert — Positive Test or suspicious mail incidents that require HQ coordination.

Acronyms/Abbreviations

AFCS Advanced Facer-Canceller System

BDS Biohazard Detection System

CDC Centers for Disease Control and Prevention

COOP Continuity of Operations DCK Disposable Clothing Kits

EMT Emergency Management Team

FEMA Federal Emergency Management Agency

HazMat Hazardous Material

HVAC Heating, Ventilating, and Air Conditioning
IEMP Integrated Emergency Management Plan

ICS Incident Command System

JIC Joint Information Center

LFRs Local First Responders

LRN Laboratory Response Network

MIC Mail Isolation and Control

NOC National Operations Center (USPS HQ)

OSHA Occupational Safety and Health Administration

PCR Polymerase Chain Reaction
PEP Post-Exposure Prophylaxis

POC Postal Operations Center (USPS Area)

VFS Ventilation Filtration System

Management Instruction

Date Effective Number May-1, 2015 Immediately AS-280-2015-1 MI AS-280-2023-5

Obsoletes

MI AS-280-2023 AS-910-2004-8 AS-280-2015-1

David Williams
Chief Operating Officer and
Executive Vice President

Patrick-Mondonca Senior Director, Office of Postmaster General/Chief-Executive Officer (PMG/CEO)

<u>Michael Swigart - Executive Director</u> <u>of Continuity and Preparedness</u>

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Senior Director of the Office of the PMG and CEO (National Preparedness

Oversight)

Executive Director of Continuity and

Preparedness

Vice President of Information

Technology

Vice President Human Resources

Vice President of Labor Relations

Chief Postal Inspector

Vice President of Delivery Operations

Vice President Processing and

Maintenance Operations

Vice President Logistics

Vice President of Facilities

Vice President of Corporate

Communications

Vice President of Engineering Systems

Vice President Area Retail & Delivery

Operations

Vice President Regional Processing

<u>Operations</u>

Vice President of Employee Resource

Management

Vice President of Network Operations

Area Vice President

District Manager

Senior Director Division Processing

<u>Operations</u>

Installation Head at BDS Facilities

Definitions

Acronyms/Abbreviations

Preparation for and Response to a Biohazard Detection System Alert — Positive Test

This management instruction (MI) stipulates Postal Service policy regarding preparatory activity for, and operational practice in response to, a Biohazard Detection System (BDS) Alert — Positive Test. In particular, this This MI encompasses the following information:

- a. The planning and execution of evacuation.
- b. Personal decontamination and the subsequent administration of post-exposure prophylaxis (PEP).
- c. The roles and responsibilities of functional and field leads.

Background

The development and deployment of Biohazard Detection System (BDS) units were part of the Postal Service Emergency Preparedness Plan submitted to Congress in 2002 in response to the mail-borne anthrax attacks of 2001. BDS units are installed in mail processing facilities (plants). A BDS Alert — Positive Test occurs when a BDS unit's internal test indicates, via visual and audio alarms on the BDS unit, the presence in the collection mail stream of Bacillus anthracis (B. anthracis), the microorganism that causes anthrax.

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The Postal Service is committed to being prepared in the event of a BDS Alert — Positive Test. The policies in this MI are consistent with the guidance in the Centers for Disease Control and Prevention (CDC) report titled "Responding to the Detection of Aerosolized Bacillus anthracis by Autonomous Detection Systems in the Workplace" (see http://www.cdc.gov/mmwr/pdf/rr/rr53e430-2.pdf) and subsequent CDC guidance to public health commissioners allowing for more prompt administration of prophylactic medication.

In the event of a BDS Alert — Positive Test, the Postal Service works with federal, state, and local authorities. The Postal Service coordinates with local first responders (LFRs) on evacuation planning and defers to LFRs concerning the manner in which way LFRs provide personal decontamination and PEP to the affected plant employees. For this MI, "employees" includes assigned and visiting Postal Service employees and contractors. The Postal Service is responsible for evacuating customers and identifying them to LFRs for subsequent decontamination and PEP assessments and administration.

Emergency Management Teams (EMTs) consist of core members and resources who prepare for emergent or impending events and exist at three levels of the organization: area, district and plant, as established in MI AS-280-2021-7 Integrated Emergency Management Supporting Field Business Continuity, found at https://blue.usps.gov/cpim/ftp/manage/as280217.pdf. Per that MI, in preparation for an emergent BDS Alert – Positive Test, training and functional exercises at installation and district EMT levels will be conducted annually and facilitated by National Preparedness, to ensure EMTs and facility employees at large are familiar with proper response procedures reflective of the policies contained in this MI.

The procedures that support these policies <u>Those procedures</u> are contained in the USPS BDS Preparedness Guide, which is available on the National Preparedness Web site at http://blue.usps.gov/nationalpreparedness/prepare.htm; elick on <u>Preparedness Guidance</u> <u>click on Biohazard Detection System</u>, then <u>Bio-Hazard Detection System</u>
Preparedness Guidance

Note that the policies contained in this MI specifically govern preparedness and response actions at an affected plant, but not at upstream or downstream facilities. After a BDS Alert — Positive Test, upstream and downstream facilities continue operations in the manner outlined for them in the BDS Preparedness Guide. The Postal Service independently makes case-by-case determinations about the potential suspension of operations at upstream or downstream facilities, based upon available evidence and the advice of the Postal Inspection Service and our emergency preparedness partners at other government agencies. Generally, absent a determination that contaminated mail has passed through a specific facility, or absent the discovery of some other evidence of contamination at a specific facility, upstream facilities maintain normal operations while downstream facilities follow mail isolation and control (MIC) procedures regarding mail they received from the affected plant.

Scope

This MI applies to Headquarters functions noted in the Roles and Responsibilities section and to all field organizations with existing or planned BDS equipment installations.

Collection Mail Processing

All Advanced Facer Canceler Systems (AFCS), including AFCS (Legacy) and AFCS200, and AFCS 200s must have the associated BDS <u>cabinet</u> and Ventilation Filtration System (VFS) in place and operational. Plants that operate AFCS must route collection mail through the AFCS/BDS/VFS — they may not use any other means of cancellation. The Postal Service must equip all BDS sites with a spare BDS cabinet ("hot spare") that is staged to be quickly installed in the event of a BDS cabinet failure.

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After confirmation that a BDS Alert — Positive Test has actually occurred, the facility must make a scripted, BDS-specific, building-wide announcement through an internal public address system or through alternate means to ensure that all people within the facility receive the announcement.

Facility Evacuation

The Postal Service works with LFRs to complete the following tasks:

- a. Develop procedures to evacuate employees to an outdoor location or, alternatively, to a physically separate building or a space inside the potentially contaminated building that can serve as a place of refuge. If the Postal Service, in consultation with LFRs, has differentiated multiple exposure groups, evacuation routes must not mingle exposure groups, and must not direct evacuees to enter or cross through the production area monitored by the alerting BDS unit. If LFRs request decontamination to be segregated by group as indicated in the CDC guidance, the Postal Service must determine if any plant administrative or ancillary offices are on separate heating, ventilating, and air conditioning (HVAC) systems and have separate egress from the facility.
- b. Develop procedures to notify any customers at the facility, whether in customer service lobbies or business mail entry units (BMEUs), and to direct them to evacuate and muster with the appropriate employee group based on the facility's decontamination groupings. USPS then identifies these customers to LFRs for decontamination and PEP assessments and administration.
- c. In the event that evacuation to outdoor locations presents a greater immediate risk to life and health due to severe weather conditions, security concerns, or other hazards, evaluate indoor evacuation alternatives and places of refuge. Evaluate indoor evacuation alternatives and places of refuge, to be used if evacuation to outdoor locations presents a greater immediate risk to life and health due to severe weather conditions, security concerns, or other hazards. Alternative indoor places of refuge for potentially contaminated employees must be on a separate HVAC system than the production area monitored by the alerting BDS unit, must not share an HVAC system with spaces where any unexposed employees are still located, and must not require evacuees to pass through the production area monitored by the alerting BDS unit.

Personal Decontamination

Overview

The Postal Service defers to LFRs concerning the manner in which way LFRs provide personal decontamination following evacuation of a facility. The Postal Service recognizes that LFRs may require employees to stay at an appropriate place of refuge.

The Postal Service takes the following steps:

- Conduct pre-event planning and exercises (tabletop and/or simulated) with LFRs.
- 2. Procure disposable clothing kits (DCKs) for all employees at a BDS facility.
- 3. At the start of the decontamination process at an affected BDS facility, defer control of employees to the LFRs on scene.
- 4. At an affected BDS facility, provide Provide DCKs for all employees for whom LFRs determine that personal decontamination is indicated, and provide excess DCKs to affected customers.
- 5. Catalogue any personal property that cannot be decontaminated and must remain onsite.

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- a. Procure equipment for personal decontamination (for example, tents, shelters, shower facilities). Postal Service field organizations can utilize existing equipment upon approval by LFRs).
- b. Store LFR decontamination equipment onsite.
- c. Perform decontamination of personnel.

d. Agree to compensate LFRs for assets expended during decontamination.

Post-Exposure Prophylaxis

Overview

The Postal Service defers to the appropriate public health authority (i.e., those with jurisdiction for the community in which the facility is located) to apply CDC guidance on PEP.

The Postal Service procures and pre-positions (with the appropriate public health authority or in a USPS-maintained cache) an initial 10-day supply of antibiotics to be dispensed following a BDS Alert — Positive Test. Per CDC guidance, the appropriate public health authority dispenses these antibiotics to all persons in the alerting BDS facility as soon as possible following a positive BDS B. anthracis test result, without requiring delay for Laboratory Response Network (LRN) verification.

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The Postal Service works with state and local public health authorities to complete the following tasks:

- a. Coordinate pre-event planning for administration of medication following a BDS Alert Positive Test.
- b. Pre-position the initial 10-day supply of antibiotics with state and/or local public health agencies, or in a USPS-maintained cache as directed by the USPS-national applicable associate medical director.

PEP: What Not to Do

Postal Service field organizations do not perform the following tasks:

- a. Procure antibiotics.
- b. Dispense antibiotics.
- Agree to compensate LFRs for assets expended during PEP.

Roles and Responsibilities

Senior Director of the Office of the PMG & CEO (National Preparedness Oversight) Executive Director of Continuity and Preparedness

The Senior Director of the Office of the Office of Postmaster General/Chief Executive Officer (PMG/CEO) (National Preparedness Oversight) executive director of Continuity and Preparedness is responsible for the following tasks:

- a. Ensure that an Emergency Management Team (EMT) is resident at Headquarters (HQ), and e Establish and institutionalize protocols for notification/activation in the case of a BDS Alert Positive Test.
- b. Support all BDS-related emergency management activities preparedness, response, recovery, and mitigation in the field and at HQ.
- b. Provide guidance to Postal Service functional and field organizations to ensure that on proper coordination of pre-event planning and response activities are properly coordinated with appropriate federal, state, and local authorities. Examples; examples include providing public health consultant services and offering assistance to the USPS national medical director helping in coordinating PEP with local public health officials. [moved from letter c. to b. with edited language]
- Fund and maintain a national contract for ordering the Postal Service supply of antibiotics for use at a plant following a BDS Alert — Positive Test. [moved from letter d. to letter c.]
- d. Review annually and update as necessary the BDS Preparedness Guide, including MIC procedures, based on lessons learned, new developments, and insights. **[moved from letter e. to letter d.]**
- e. Provide training and exercise materials to installation, district, area, and HQ EMT.

- e. Upon a BDS Alert Positive Test, notify the Postmaster General (PMG) and Chief Processing and Distribution Operations Officer (CPDO), activate the HQ EMT Corporate Emergency Management Team (CEMT), coordinate initial HQ and area executive briefings, and facilitate HQ follow-on activities as required. [moved from letter g. to letter e. and edited language]
- f. Coordinate <u>response</u> activities with the U.S. Postal Inspection Service (<u>USPIS</u>) and other Postal Service functional groups (through the HQ EMT) during implementation of response actions communicated through the Postal Operations Center and National Operations Center (<u>POC/NOC</u>) email channel, through the HQ <u>CEMT</u>. [moved from letter h. to letter f. and edited language]
- g. Coordinate activities with Executive Office of the President (EOP) National Security Council Staff and national-level agencies, including the CDC and the Department of Homeland Security (DHS), following established interagency protocols, such as the Biological Threat Assessment Response (BATR) protocol. [moved from letter i. to letter g. and language deleted]
- h. Provide situational awareness to the postmaster general and the chief operating officer PMG and the CPDO throughout the response to a BDS Alert Positive Test. [moved from letter j. to letter h. and edited language]

Vice President of Information Technology

The vice president of Information Technology is responsible for the following tasks:

- a. Upon a BDS-Alert Positive Test, support BDS National Site Controller operations, which provide for the collection of all BDS data and the relay of emergency notifications.
- b. Support the networks used for BDS data transmission and access.
- c. Support the Postal Alert Notification System (PANS). [this section deleted]

<u>Vice President of Human Resources [added this section, but deleted section "Vice President Employee Resource Management"]</u>

The vice president of Human Resources is responsible for the following:

- a. Through the Sr. Director of Occupational Safety and Health, in conjunction with the Office of National Preparedness, provide overall guidance on the storage, disposition, and management of PEP; administer the Postal Service contract for PEP; and provide an initial 10-day supply of PEP, to be made available to affected plant employees following a BDS Alert Positive Test.
- b. <u>Upon a BDS Alert Positive Test, provide support to affected Field Human Resources Operations offices in the administration of affected employees.</u>
- c. Provide employee health expertise in support of response and recovery activities.
- d. Through the Sr. Director Occupational Safety and Health, provide employee safety expertise in support of response and recovery activities; coordinate expert industrial hygiene and other technical support services for characterization sampling of Postal Service facilities, vehicles, and other affected assets in support of Facilities; continue to provide technical support in the development of sampling plans for post-decontamination clearance of Postal Service facilities, vehicles, and other affected assets in support of Facilities' restoration efforts

[Vice President of Labor Relations (this section moved to follow VP-HR)]

The vice president of Labor Relations is responsible for the following tasks:

- a. Upon a BDS Alert Positive Test, notify national union and management association leadership.
- <u>b.</u> Ensure post-event employee assistance program (EAP) facilitation Employee Assistance Program assistance to affected plant employees.

<u>Vice President of Employee Resource Management [deleted this section, but added Vice President of Human Resources" to follow Executive Director of Continuity and Preparedness</u>

The vice president of Employee Resource Management is responsible for the following tasks:

- Through the USPS national medical director, provide overall guidance on the storage, disposition, and management of antibiotics.
- b. Through the USPS national medical director, administer the Postal Service contract for antibiotics.
- c. Through the USPS national medical director, ensure that an initial 10-day supply of antibiotics is available to affected plant employees following a BDS Alert — Positive Test.
- d. Develop and institute BDS site procedures for cataloguing any personal property that cannot be decontaminated and must remain onsite.
- e. Upon a BDS Alert Positive Test, provide support to affected district and area Human Resources offices in the administration of affected employees.
- f.—Through the USPS national medical director, provide employee health expertise in support of response and recovery activities.
- g. Through the manager of Safety and OSHA Compliance, provide employee safety expertise in support of response and recovery activities.
- h. Through the manager of Safety and OSHA Compliance, coordinate and provide technical support for characterization sampling of Postal Service facilities, vehicles, and other affected assets.
- i. Through the manager of Safety and OSHA Compliance, provide technical support in the development of sampling plans for post-decontamination clearance of Postal Service facilities, vehicles, and other affected assets.

Vice President of Network Operations [delete this section]

The vice president of Network Operations is responsible for the following tasks:

- a. Manage BDS-related maintenance activities conducted by USPS staff.
- b. Upon a BDS-Alert -- Positive Test, provide support for Postal Inspection Service mail flow tracing.
- c. Ensure national-level-coordination of MIC procedures.
- d. Provide oversight of affected nodes of the transportation system.
- e. Coordinate site off-load and network continuity issues.
- f. Provide equipment and building systems expertise in support of response and recovery activities.

[Chief Postal Inspector (this section moved <u>from following Vice President Corporate Communications</u> to follow VP-LR)]

The chief postal inspector is responsible for the following tasks:

- a. Provide oversight of Inspection Service activities during Oversee USPIS duties covered in pre-event planning and exercise activities with LFRs (for example, security of the facility and staging areas).
- b. Coordinate pre-event planning for confirmatory testing with the Association of Public Health Laboratories and the LRN.
- c. Ensure that the Maintain mapping of BDS Installations to LRN labs is current and that and the capabilities are in-place capability to execute Postal Inspection Service sample collection, transport, and testing (SCTT) protocols.

- d. Review annually, and update as necessary, the BDS mail flow tracing tracking (MT) protocols and processes based on lessons learned, new developments, and insights.
- e. Upon a BDS Alert Positive Test, activate Inspection Service Command Center operations, coordinate all law enforcement related activities, and act as liaison with USPS Transportation Logistics to assist with the recall of vehicles.
- f. Act as liaison with the Federal Bureau of Investigation (FBI) Weapons of Mass Destruction Directorate (WMDD) and all state and local law enforcement leads.
- g. Ensure that postal inspectors Include the onsite USPS emergency manager in responding to the scene of a BDS Alert Positive Test include the onsite USPS emergency manager in their Postal Inspectors' communications and coordination with LFRs.
- h. Provide oversight of Oversee Inspection Service evidence recovery (BDS cartridge sample collection) and transport to LRN.
- i. Leverage mail-flow-tracing <u>MT</u> tools and resources to assist with mail isolation and control <u>MIC</u> at the affected plant and with ; any downstream recall or isolation, with identifying; identification of the suspect mallplece(s), and with determining; and determination of the likely upstream path that suspect piece(s) took to reach the affected plant.
- j. Provide situational awareness to the postmaster general PMG on related law enforcement activities.
- k. Provide oversight of Oversee the resultant Inspection Service investigation.

[Vice President of Delivery Operations (this section moved to follow Chief Postal Inspector)]

The vice president of Delivery Operations is responsible for the following tasks:

- a. Upon a BDS Alert Positive Test, continue delivery operations in the field, bypassing the alarming facility.
- b. Coordinate vehicle and collection box decontamination and restoration to service <u>once the recovery stage has been reached.</u>

Vice President of Processing and Maintenance Operations

The vice president of Processing and Maintenance Operations is responsible for the following:

- g. Upon a BDS Alert Positive Test, provide support for USPIS MT.
- h. Coordinate MIC procedures at the national level.
- i. Provide equipment and building systems expertise in support of response and recovery activities.

Vice President of Logistics

The vice president of Logistics is responsible for the following:

- a. <u>Upon a BDS Alert Positive Test, assist with the recall of any mail dispatched from the facility during the associated sampling/testing period.</u>
- b. Examine air network impacts (FedEx, UPS, commercial air).
- c. Oversee affected nodes of the surface transportation system (for example Surface Transportation Centers).
- d. Coordinate Labeling List changes and the output of associated placards needed to divert volumes away from the facility.
- e. Coordinate logistics continuity issues through the Network Operations Center.

Vice President of Facilities

The vice president of Facilities is responsible for the following:

a. Upon a BDS Alert — Positive Test, the vice president of Facilities is responsible for coordinating facility decontamination and restoration. coordinate CPDO and/or CRDO subordinate functions, USPIS, Continuity and Preparedness, USPS Occupational Safety and Health, Environmental Affairs and Corporate Sustainability, and contracted resources in facility decontamination and restoration efforts once the recovery stage is reached.

[added the letter a. and edited the language]

Vice President of Corporate Communications

The vice president of Corporate Communications is responsible for the following tasks:

- a. Ensure the proper deployment, maintenance, and implementation of <u>Maintain</u> the BDS Alert Positive Test Corporate Communications Plan.
- b. Through the Director Field Communications, assign the Federal Emergency Management Agency's (FEMA) IS-100 online course (Introduction to the Incident Command System) to all strategic communications specialists.
- c. Upon a BDS Alert Positive Test, implement the BDS Alert Positive Test Corporate Communications Plan.
- d. Upon a BDS Alert Positive Test, participate <u>Participate</u> in Joint Information Center (JIC) activities as necessary and support local communications professionals in their JIC participation. [moved wording from section b. to section d.; added letters c. and d. (unable to underline)]

[Vice President of Engineering Systems (this section moved <u>from Vice President of Employee Resource Management</u> to follow VP-CC)]

The vice president of Engineering Systems is responsible for the following tasks:

- a. Manage BDS hardware deployments.
- b. Manage the support contracts for BDS supplies, maintenance, and monitoring.
- Upon a BDS Alert Positive Test, coordinate BDS National Site Controller data collection from all BDS sites
 and the relay of emergency notifications.
- d. Provide equipment and building systems expertise in support of response and recovery activities.

Area Vice President

The area vice president is responsible for the following tasks:

- a. Ensure global area compliance with Postal Service BDS preparedness and response policies.
- b. Ensure that each area office has a resident EMT who can, along with the area's assigned Corporate Communications manager, coordinate BDS preparedness and response activities between area and district levels, synchronized with HQ EMT representatives.
- c. Ensure the identification of a single area EMT point-of-contact so that continuity of operations decisions are comprehensive in scope.
- d. Ensure that site-specific BDS emergency management plans are in place at each BDS facility.
- e. Upon a BDS Alert Positive Test, activate the area EMT to ensure the execution of all installation-level and district-level response activities that have been recognized during readiness as essential.
- f. Notify regional union and management association leadership.
- g. Facilitate standardized BDS chain of command and communications flows among districts, the area, and HQ.
- h. Support-district emergency operations centers if needed.
- i.—Support district and installation continuity of operations (COOP) plans if needed.
- j. Ensure area-level coordination of MIC procedures, according to the policy established in this MI.

Vice President of Area Retail and Delivery Operations

The vice president of Area Retail and Delivery Operations is responsible for the following:

a. <u>Upon a BDS Alert – Positive Test, activate the area EMT, then defer the emergency manager role to the vice president of regional processing operations.</u>

Vice President of Regional Processing Operations

The vice president of Regional Processing Operations is responsible for the following:

- a. Upon a BDS Alert Positive Test, assume the emergency manager role for the area EMT.
- Identify a single area EMT Continuity of Operations (COOP) lead.
- c. Establish BDS chain of command and communication flows between district, area, and HQ EMTs.
- d. Coordinate immediate network redirection of mail flows with the Vice President of Logistics.
- e. <u>Coordinate BDS response activities between district EMTs, synchronized with HQ CEMT functional representatives.</u>
- f. Support district EMTs as necessary.

District Manager

The district manager is responsible for the following tasks:

- a. Ensure global district compliance with Postal Service BDS preparedness and response policies.
- b. Ensure that an EMT is resident at each district office.
- c. Ensure that the communications programs specialist assigned to the district is trained in Incident Command System (ICS) methodology through Federal Emergency Management Agency's (FEMA's) IS-100 online course.
- d. Ensure an EMT is resident at each BDS facility.
- e. Ensure that Integrated Emergency Management Plan (IEMP) response training is conducted annually at each BDS facility for installation EMT and the associated district EMT, facilitated by National Preparedness staff.
- f. Ensure that BDS Alert Positive Test functional exercises, including BDS-oriented facility evacuation drills, are conducted annually at each BDS facility, facilitated by National Preparedness staff utilizing National Preparedness standardized formats. One of these exercises each year must incorporate district EMT participation.
- g. Upon a BDS Alert Positive Test, activate the district EMT and implement installation COOP plans throughout the district as necessary.
- h. Notify local-union and management association leadership.
- i. Ensure district-level coordination of MIC procedures, including notification to downstream and upstream facilities, according to the policy established in this MI.
- <u>a.</u> <u>Upon a BDS Alert Positive Test, activate the district EMT, then defer the emergency manager role to the senior director division processing operations.</u>
- b. Notify local union and management association leadership.
- c. Coordinate MIC procedures for downstream retail and delivery facilities, according to the policy established in this MI.

Senior Director Division Processing Operations

The senior director division processing operations is responsible for the following:

- Maintain Site-specific BDS Response Plans at each BDS facility.
- b. Upon a BDS Alert Positive Test, assume the emergency manager role for the district EMT.

- c. Support the implementation of the affected BDS site COOP plan, including the coordination of site operations off-load / redirection, along with the implementation of COOP plans for any co-located offices.
- d. Coordinate MIC procedures for downstream mail processing facilities, according to the policy established in this MI.

Installation Head at a BDS Facility

The installation head at a BDS facility is responsible for the following tasks:

- a. Ensure installation compliance Comply with Postal Service BDS preparedness and response policies at the installation.
- b. Ensure that an EMT is resident at the installation.
- c. Ensure that the Distribution Operations and Maintenance primaries are trained in ICS methodology, through the FEMA's IS-100 online course.
- b. Develop or r Refine BDS-specific evacuation procedures for their installation. [moved from letter e. to b. and edited language]
- c. Coordinate pre-event with those LFRs providing personal decontamination and post-exposure prophylaxis, *[PEP]* and develop logistical and resource plans cooperatively. **[moved from letter g. to c. and edited language]**
- d. Evaluate and select any alternative places of refuge in coordination with LFRs. [moved from letter f. to d.]
- e. Develop and maintain a site-specific BDS Alert Positive Test Response Plan in the installation-IEMP Integrated Emergency Management Plan (IEMP), based on the most current version of the BDS Preparedness Guide available on the National Preparedness web site. At least every 6 months, review and confirm that the plan is current, making any necessary updates to site-specific plan details, contacts-(including the BDS-Site Controller List of Required Contacts), and protocols. On a monthly basis, review and confirm accuracy of the BDS Site Controller List of Required Contacts. Ensure that hard copies of the most recent version of the plan are readily available both onsite and offsite. [moved from letter h. to e. and edited language]
- f. Ensure that <u>Train</u> any new AFCS operators and supervisors are trained to recognize a BDS Alert Positive Test and to initiate the evacuation process. [moved from letter d. to f. and edited language]
- g. Manage BDS-related maintenance activities conducted by USPS staff.
- h. Order and maintain a stock of response materials (for example, DCKs stored in a secure and accessible location outside the BDS facility). [moved from letter j. to h.; delete letter j.]
- i. Upon a BDS Alert Positive Test, follow all procedures captured in the installation's BDS Alert Positive Test Response Plan, to include providing DCKs for use following personal decontamination; cataloging personal property that cannot be decontaminated and that must remain onsite; providing excess DCKs to affected customers; and implementing installation-level MIC and COOP procedures. [moved from letter k. to i. and edited language; delete letter k.]
- i. Conduct appropriate and timely BDS training and exercises (annual IEMP-based response training for the EMT, and annual BDS Alert Positive Test functional exercises including BDS-oriented facility evacuation drills) facilitated by National Preparedness staff utilizing National Preparedness standardized training and exercise materials, to ensure that facility employees are familiar with response procedures in the event of a BDS Alert Positive Test.
- I. Provide DCKs for use following personal decontamination, and catalogue personal property that cannot be decontaminated and that must remain onsite. Provide excess DCKs to affected customers.
- m. Implement installation-level MIC procedures.

Definitions

BDS Alert — Positive Test: The BDS unit's signal if its internal test indicates the presence of B. anthracis.

Laboratory Response Network Polymerase Chain Reaction Result: The LRN's initial test (positive or negative) concerning the presence of B. anthracis.

Laboratory Response Network Culture Result: The LRN's final analysis (positive or negative) on the presence of B, anthracis.

Local First Responders: Local fire department, law enforcement, hazmat/hazardous substance teams, public health authorities, and emergency medical services.

HazMat/Hazardous Substance: Substances defined by Section 202(14) of the Comprehensive Environmental Response, Compensation, and Liability Act.

Headquarters <u>Corporate Emergency Management Team</u>: A senior-level, cross-functional HQ team that is activated in response to emergencies such as a BDS Alert — Positive Test or suspicious mail incidents that require HQ coordination.

Acronyms/Abbreviations

AFCS Advanced Facer-Canceller System

BDS Biohazard Detection System

CDC Centers for Disease Control and Prevention

CEMT Corporate Emergency Management Team

COOP Continuity of Operations

CPDO Chief Processing and Distribution Officer and Executive Vice President

DCK Disposable Clothing Kit

EMT Emergency Management Team

FEMA Federal Emergency Management Agency

HazMat Hazardous Material

HVAC Heating, Ventilating, and Air Conditioning

IEMP Integrated Emergency Management Plan

ICS Incident Command System

JIC Joint Information Center

LFRs Local First Responders

LRN Laboratory Response Network

MI Management Instruction

MIC Mail Isolation and Control

MT Mail Tracking

NOC National Operations Center (USPS-HQ)

OSHA Occupational Safety and Health Administration

PCR Polymerase Chain Reaction

PEP Post-Exposure Prophylaxis

PMG Postmaster General

POC Postal Operations Center (USPS Area)

USPIS United States Postal Inspection Service

VFS Ventilation Filtration System