



## ESTABLISHING A CPOD MODEL: 5 INITIAL STEPS FOR EMPLOYERS

A “closed point of dispensing” (CPOD) is emerging as a valuable model for employers working to make vaccines more broadly available as the US moves towards mass vaccination efforts. A CPOD is, essentially, a public-private partnership where a state or other local government allocates the vaccine (or other product) to an employer and the employer convenes the necessary services (including the healthcare provider) to inoculate the employer’s workforce.

As vaccine availability and eligibility increases nationwide, employers should consider whether a CPOD model might be right for them. A CPOD could be an effective strategy either as part of a state’s effort to vaccinate “essential workers” (if the relevant workforce largely falls within the relevant “essential workers” category for that jurisdiction) or as part of an effort focused on the general population. States’ vaccine priority phases vary and are updated frequently; you can monitor these changes [here](#).

**Establishing a CPOD requires a deliberate strategy but can be done efficiently and proactively by taking a few initial steps.**



**Questions about  
vaccine strategies?**

**GET IN TOUCH**

**1**

### LEARN ABOUT YOUR STATE’S CPOD REQUIREMENTS AND PLANS

- Each state will have a vaccine plan (an evolving document describing policies, standards, and other requirements). Many states are also establishing help-lines, interactive FAQ portals, and other resources to help facilitate, among other things, CPOD discussions.
- Begin a dialogue with the relevant government authorities to make sure you have the information necessary to determine if you would be a good CPOD partner and the timetable to establish those partnerships.



2

## ESTABLISH A VACCINATION PLANNING & EDUCATION COMMITTEE

- Convene key workplace stakeholders, including management, human resources, employees, and labor representatives and solicit their input.
- Plan all aspects of the vaccination program and document that plan in writing. Some states may require you to submit this for review and/or approval.
- Develop an education plan for the vaccination program to educate your employees and help them make informed choices about receiving the vaccine.
- Provide opportunities for all employees to ask questions and communicate with leadership about the vaccine plan.
- Monitor state and local changes to vaccine eligibility.
- Help build vaccine confidence among the workforce.

3

## IDENTIFY YOUR PROVIDER

- You will need licensed professionals to deliver the vaccine and those professionals may need to register with the applicable state authorities.
- Many states have expanded the classes of licensed practitioners who can assist with vaccinations.
- You will also need a provider that can provide on-site monitoring and, in the rare case, emergency response.
- Many employers may already have relationships with providers that offer workplace clinic services or other services that may be able to play this role.
- The vaccine provider must sign a [CDC COVID-19 Vaccination Program Provider Agreement](#). Identifying a provider with such an agreement or who can enter such an agreement expeditiously is essential to executing the work plan efficiently

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## ASSESS WORKFORCE INTEREST

- Decide the scope of the offering, for example:
  - Only employees enrolled in the existing employer health plan
  - Only employees enrolled in the employer medical plan + eligible dependents covered under that plan
  - All employees, regardless of whether they have elected medical coverage
  - All employees + their spouses and dependents, regardless of whether they have elected medical coverage



- Employees + their spouses, dependents, and household members
- Employees + their spouses, dependents, household members, and household 1099 workers
- All of the above + the workforce of the employer's independent contractors
- All of the above + a subset of the general public
- Each of these options has distinct ERISA and tax consequences that you can manage efficiently ahead of time.
- Decide whether the vaccine will be voluntary or mandatory (if the latter, there are additional employment steps you need to consider regardless of whether you host a CPOD).
- Determine workforce interest with an appropriately structured, secured, and messaged polling effort.
- If the vaccine will be voluntary, stay abreast of federal guidance on whether you can offer incentives to increase vaccination (again, this will be an important step whether or not you offer a CPOD).
- Consider whether, consistent with the state's vaccination roll-out plan, you want to collaborate with other companies on a combined CPOD effort.

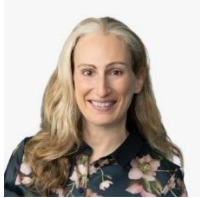
## 5

### CONVENE VENDORS

- Select an onsite location for vaccination, keeping in mind social distancing/infection control procedures, and a place for medical observation (for example, for 15 minutes) after inoculation.
- Choose timeframes within work hours to operate the vaccination program.
- Confer with the applicable provider on how adjacent vendors (such as a scheduling app, medical record retention vendor, and emergency services) will be engaged; engage such vendors consistent with state and applicable law if necessary.
- Develop, negotiate, and execute necessary agreements.



## GET IN TOUCH



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