ESF-19

DONATIONS MANAGEMENT

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ESF-19

DONATIONS MANAGEMENT

PRIMARY AGENCY: **Office of Emergency Management**

SUPPORT AGENCIES: **Convoy of Hope**
Salvation Army
American Red Cross

I. PURPOSE

In order to deal with the many types of disasters that could affect Springfield-Greene County, donated resources must be managed in a timely manner. These resources may include such things as goods and materials, services, personnel, financial resources, facilities and other resources. These resources may come from a variety of sources, both solicited and unsolicited. This ESF was designed to give the local officials the ability to accept, manage, and distribute donations from concerned groups or citizens during the aftermath of a catastrophic disaster or emergency situation occurring in Springfield-Greene County.

II. SITUATIONS AND ASSUMPTIONS

A. Situations

1. Springfield-Greene County is subject to many types of occurrences that create the potential for a major disaster (**see Hazard Mitigation Plan**)

2. Disasters have the potential to trigger large amounts of media coverage which can overwhelm the abilities of local agencies to coordinate and control donated goods and services.

3. The management of unsolicited goods and services is crucial to an efficient response and recovery operation.

4. Local government acknowledges the outpouring of donations can overwhelm the ability of local agencies and organizations to be effective responders.

5. Local government has the responsibility in a disaster to respond to offers of unsolicited donated goods or services in order to ensure an efficient response and recovery operation.

B. Assumptions

1. People as a whole are kind and want to do something to help disaster victims.

2. Unsolicited donations of goods and services potentially could come in from around the State, the Country or the World, should a disaster affect the city/county.

3. In a disaster local government and local agencies and organizations may be adversely affected and may not be able to cope with a sizable flow of donated goods and services.

4. Goods may be donated that are not needed by disaster victims or responders. Receiving and sorting unneeded goods or services or disposing of large quantities of unneeded goods can be a lengthy and costly process.

5. In some cases the amount of donated goods and services may be more affected by the media attention than the magnitude of the disaster.

6. Most personal donations are given with little expectation of return other than the personal satisfaction of giving. However, some donations and services may be unusable, have "strings attached" or not really be donations at all. They may:

   a. Be given with an expectation of compensation, publicity, or tax write-off.
   b. Be items that are out-of-date (i.e. expired food stuffs or pharmaceuticals) unusable (broken furniture, dirty or torn clothing) or unsuitable (food that requires refrigeration, winter coats in August, etc.)
   c. Be provided illegally as a ruse in a fraudulent process to obtain money from disaster victims.
   d. Be offered at a "discount" to disaster victims, with no real savings.
   e. Be offered in limited quantity as a deception to simply show an "association" with government or disaster relief as a basis for future advertising claims.

7. Donated goods may arrive in an area day or night without warning. Upon arrival, delivery drivers will want to know where they should off-load their cargo and will most likely expect personnel to be provided for unloading.

8. Donations will frequently arrive unsorted and with minimal packaging and markings. Donations may be packed in boxes, crates, barrels, garbage bags, pallets or bins.

9. Cash donations allow responders flexibility to address the most urgent needs and serves to stimulate the local economy and eliminate the logistical problems associated with in-kind or tangible donations.

10. Donors may want to:

    a. Know what is needed in the disaster area–cash, goods, and/or services.
    b. Know how they should transport their donation to the local area, or it there is someone who can transport it for them.
    c. Start a "drive for donations" to help disaster victims, but have no knowledge of what to do and how to do it.
    d. Earmark their donation for a specific local group or organization, such as a church, fraternal society, or social service agency, or want to know to whom, specifically, received their donation.
    e. Have their donation received by a local official and/or receive a letter of appreciation or public recognition.
    f. Want to be fed and provided with lodging if they are providing volunteers.

11. Disaster victims may:

    a. Desire immediate access to donations before they are sorted and ready to be disseminated at appropriate distribution points.
    b. Believe that the donations have not been or are not being distributed fairly if they do not have information on the process of distributing donations.
    c. Have unmet needs which can be satisfied by additional donations.

III. CONCEPT OF OPERATIONS

A. General

1. Local Government does not intend to supervise the process by which donations are collected. Voluntary agencies are considered the primary recipients, managers, and distributors of donated goods and services. However local government has the ultimate responsibility for managing disaster response and recovery.

2. The Springfield-Greene County will stress to the donor the preference for cash donations; however, if the donor wants to donate an in-kind good, local government will provide a system to connect the donor with the organization needing that particular donation.

3. The ultimate goal for local government in managing donated good is to prevent transportation arteries from becoming clogged, prevent voluntary agencies from being overwhelmed with donations, and to prevent worthwhile materials and goods, donated out of kindness, from being unnecessarily destroyed.

4. The goals in donation management are as follows:

    a. The Donations Coordinator (DC), will determine, with advice and consultation from support agencies, what the areas and categories of greatest need for donations and services are.
    b. Determine which phase of activation will be required.
    c. Work with Public Information (**ESF-15**) to communicate clearly and effectively to the public that unsolicited goods should not be shipped directly to the disaster site; mass quantities of unneeded items serve to clog transportation arteries that are already seriously stressed.
    d. With the advice and consultation from support agencies, publicize items that are needed during the disaster and provide a hotline for those seeking to donate.
    e. Working with support agencies, maintain a complete database to assure: prompt response to donors; prompt allocation of donations; and tracking of donations until it is received by the disaster victim or response agency.

B. Organizational Strategy: Donations Management

The Emergency Operations Center (EOC) and the DC will determine the level of staffing needed based upon the level of donations. The DC will advise the EOC with ongoing donation activities, levels, staff, space and other requirements.

1. **Activation of Donations Management Function**

    During activation of the EOC, the DC will serve as the liaison to the EOC from the Donations Coordination Team. The DC will:

    a. Represent and speak on behalf of donations policy in all EOC decisions;
    b. Communicate all policy decisions to the team;
    c. Represent the team in all EOC coordination issues;
    d. Work with EOC Management to produce appropriate news releases;
    e. Communicate needs identified in the EOC to the Needs group;
    f. Communicate and coordinate with the SEMA Donations Coordinator, and chair all coordination meetings with VOAD groups.

Donations management will remain flexible to appropriately address different sizes of disasters. Three phases of donations management, each suited to the particular scope of the disaster, allows the necessary flexibility. These phases are as follows.

a. **Donations Management - Phase I:** This phase will be used in disasters that are small, limited or localized in nature. This would correspond generally with a Level III activation of the Emergency Operation Center (EOC). Donations are few and sporadic. In this phase, the DC or an Emergency Management Official would handle any matters regarding donations or provide donations management guidance to Emergency Management Director if necessary.

b. **Donations Management - Phase II:** This phase is for disasters that range from small to large. The EOC is activated to a Level II or II. A state declaration and a federal declaration of a disaster are very possible. Based on the activity of donations, one to several people can manage the donations process without activating the entire plan. Some functions and or positions may be combined within this plan to fit the needs of the disaster or personnel on hand. See below for a brief description of Phase III operations.

c. **Donations Management - Phase III:** This phase is for very large or catastrophic disasters or disasters that generate a great amount of media attention or public interest.

2. **Acceptance of Donations**

a. **Unsolicited or unneeded donations**
Springfield-Greene County and the DC will attempt to limit the amount of unsolicited or unneeded donations being accepted. Receiving and sorting unneeded goods or services or disposing of large quantities of unneeded goods can be a lengthy and costly process.

b. **Goods and Materials**

- Donated goods may arrive in an area day or night without warning. Upon arrival, delivery drivers will want to know where they should off-load their cargo and will most likely expect personnel to be provided for unloading. Oftentimes it will be impossible to initially identify if the goods and materials arriving are solicited or unsolicited. As a result, it may be very difficult not to receive or accept some unsolicited goods and materials.
- Upon activation of the Donations Management ESF, the DC will establish a facility early for staging and/or warehousing anticipated donated items. The primary facility for Greene County is Convoy of Hope.
- All goods and materials that arrive in Springfield-Greene County, both solicited and unsolicited will be accepted and received by the Donations Coordination Team at Convoy of Hope or other established facility.
- This facility will act as the central location to receive, sort, organize, inventory, repackage if necessary, and temporarily store donated items and other goods.
- An inventory list of donated goods will be created and submitted to the Operations Section of the EOC at minimum daily.

c. **Services**

- During a disaster event there is a high likelihood that offers for donated services, both solicited and unsolicited will arrive from across the region and possibly the country.
- **Unsolicited Services**
  - Offers for unsolicited services will be passed to the Operations Section of the EOC.
  - The Operations Section will coordinate with all Springfield-Greene County ESFs to determine if the service is a valid need that should be accepted.
  - If the Operations section determines that the service is not needed, the offer for donated service will not be accepted.
  - The vendor/organization offering the donated service will be tracked in the Finance/Admin Section of the EOC so that they can be contacted if the need arises in the future for this service.

- **Solicited Services**
  - Offers for solicited services will be passed to the Operations Section of the EOC which will accept the offer if it is determined that the service adequately meets the need that was requested.
    The Operations Section will coordinate with the organization/vendor offering to donate the services requested and assign them to a lead agency from the corresponding ESF to perform the service.

d. **Personnel**

Volunteer personnel, both solicited and unsolicited, willing to donate their time could potentially come in from around the State, the Country or the World, should a disaster affect Springfield-Greene County. The type of disaster or event will determine the number of volunteers needed for an effective response. In an event where a large number of volunteer personnel are needed, the Springfield-Greene County Office of Emergency Management will activate the Volunteer Coordination Center (VCC). (**see ESF-20, Volunteer Management for additional information on personnel donations**)

e. **Financial Resources**

- The Springfield-Greene County emphasizes the preference for financial/cash donations.
- Springfield-Greene County makes no distinction between solicited and unsolicited financial donations and will facilitate acceptance of all financial resources that may be donated.
- Springfield-Greene County will connect the donor with one of the ESF partner non-profit organizations that assist with local response/recovery operations.

f. **Facilities**

- During a disaster Springfield-Greene County may be presented with offers of donated facilities.
- **Unsolicited Facility Donations**
  - Unsolicited offers for donated facility use will be passed to the Operations Section of the EOC.
  - The Operations Section will coordinate with all Springfield-Greene County ESFs to determine if the facility is suitable to meet an identified need.
  - If the Operations section determines that the facility is not needed, the offer for the donated facility will not be accepted.
  - The vendor/organization offering to donate the facility will be tracked in the Finance/Admin Section of the EOC so that they can be contacted if the need arises in the future for use of this facility

- **Solicited Services**
  - Solicited offers for donated facility use will be passed to the Operations Section of the EOC which will accept the offer if it is determined that the facility adequately meets the need that was requested.
  - The Operations Section will coordinate with the organization/vendor offering to donate the facility requested and connect them to a lead agency from the corresponding ESF that needs the facility.
  - The EOC Finance/Admin Section will coordinate with Springfield and/or Greene County legal services on any contracts that may be required for usage of the donated facility.

3. **Management of Donations**

a. **Goods and Materials**

- All goods and materials that arrive in Springfield-Greene County, both solicited and unsolicited will be accepted and received by the Donations Coordination Team at the established facility.
- This facility will act as the central location to receive, sort, organize, inventory, repackage if necessary, and temporarily store donated items and other goods.
- The Donations Coordination Team will maintain a database for the tracking and inventory of all donated goods and materials.
- An inventory list of donated goods will be created and submitted to the Operations Section of the EOC at minimum daily.
- All requests for distribution of donated goods and services will be routed through the DC and the Donations Coordination Team.
- The Donations Coordination Team will work with support agencies, to maintain a complete database to assure:
  - prompt response to donors;
  - prompt allocation of donations; and
  - tracking of donations until it is received by the disaster victim or response agency

b. **Services**

- Services that are donated to Springfield-Greene County will be managed by the corresponding ESF to which that service has been assigned.
- ESF agencies utilizing donated services will be required to track and monitor the services performed and submit all applicable documentation associated with that service to the EOC (i.e. duty logs, injury reports, personnel associated with that service, consumables used)

c. **Personnel**

- Personnel donations will be managed by the VCC, which will handle the coordination of professional, traditional, affiliated, and spontaneous volunteer personnel.
- The VCC will be responsible for effectively organizing all types of volunteers identified above, registering them and assigning them to a local participating volunteer agency. **(see ESF-20, Volunteer Management for additional information on management of personnel donations)**

d. **Financial Resources**

- Neither Springfield, nor Greene County will have direct control or management of financial resources that are donated.
- Donations of Financial Resources will be managed by the ESF partner non-profit organizations that assist with local response/recovery operations according to their policies and standard operating procedures.

f. **Facilities**

- Facilities that are donated to Springfield or Greene County will be managed by the corresponding ESF agency to which that facility has been assigned.
- ESF agencies utilizing donated facilities will be required to track and monitor all applicable costs that may be associated with the facility and submit all documentation to the EOC (i.e. utility costs, repairs, renovations).
- The responsible ESF may be required to assign a facility manager to ensure that operations at the donated facility are in compliance with any contracts or regulatory codes that may be in place.

4. **Distribution of Donations**

a. **Goods and Materials**

- All goods and materials that arrive in Springfield-Greene County, both solicited and unsolicited will be accepted and received by the Donations Coordination Team at the established facility.
- This facility will act as the central location to distribute goods and materials as assigned by the EOC which will be coordinate with ESFs to assess unmet needs.

- **Bulk Distribution:**
  Bulk distribution refers to items that are acquired in bulk or large quantities and given to disaster victims. Examples may include ice, water, canned goods, dry goods, grains, fresh produce, toiletry items, first aid supplies, work gloves, cleaning supplies, clothes, essential household items such as dishes, pots, pans, lanterns, water containers, blankets, cots, linens and tents.
  - The system for bulk distribution must be coordinated with donations management because bulk distribution largely relies upon donated goods to sustain itself.
  - Distribution sites, and to a lesser degree staging areas, are the prime locations for bulk distribution items. There are various methods for physically handing over bulk items to people in a disaster area.
  - The best method for doing so should be determined by the current situation and the agencies assigned to bulk distribution.
  - The EOC and the DC will help coordinate bulk distribution and donations management operations.

b. **Services**

- Services that are donated to Springfield or Greene County will be distributed to ESFs through the Operations Section of the EOC.
- Distribution of donated services will be prioritized by need.

c. **Personnel**

Personnel donations will be distributed through the VCC to local non-profit partnering agencies. **(see ESF-20, Volunteer Management for additional information on management of personnel donations).**

d. **Financial Resources**

- Neither Springfield nor Greene County will have direct control or management of financial resources that are donated.
- Donations of Financial Resources will be distributed to and managed by the ESF partner non-profit organizations that assist with local response/recovery operations according to their policies and standard operating procedures.

e. **Facilities**

- Facilities that are donated to Springfield or Greene County will be distributed to ESFs through the Operations Section of the EOC.
- Distribution of donated services will be prioritized by need.

5. **Additional Planning Considerations**

a. **Planning Components for Managing Goods**

Other components that must be considered as the Donations Management operation is established are as follows:

- Administration
- Risk management
- Receiving and unloading
- Materials handling
- Storage
- Shipping
- Accountability
- Security

Donations management officials should have expertise in planning and training in these components.

b. **Transportation**

The DC will work closely with **ESF-1**.Transportation schemes will be developed in the State Emergency Operations Center and the local EOC. Critical needs items should not be delayed. Other less critical items if designated and belonging to a voluntary agency, should be allowed to proceed to their destination. Pending special direction by local government, voluntary agencies expecting relief items they have solicited, purchased, or for which they have coordinated delivery should be allowed to immediately direct their shipments to their own established facilities. These goods should be treated like other shipments of goods being directed to the disaster area with specific and urgent missions.

Drivers should have contact with personnel at their destinations and should be carrying support documentation. Sponsors of designated goods should also be responsible for recruiting labor to unload their shipments. Shipments of designated relief goods should be well marked with the name of the voluntary agency.

State control over traffic traveling to the disaster area will affect vehicles shipping relief goods. Control/check points can be used to regulate trucks entering the disaster area through inspection of the cargo manifest and to check to see if the shipment is needed and expected by a particular voluntary agency. Trucks will be expected to have name and contact information for recipients of the shipment. The State may direct relief good shipments to a particular staging or distribution areas. Escort support may be needed.

6. **Phone Bank**

a. The EOC, American Red Cross, and 211 will coordinate management of donor phone calls through their respective phone banks.

b. Calls can generally be classed into four types:

- Donors providing a donation, starting a "drive", or wanting to know how best to donate.
- Vendors wanting to provide services or materials at a reduced cost to the disaster victim.
- Drivers, en route to the disaster area, desiring to know where they should deliver their cargo, and who will off-load it.
- Persons, including disaster victims, seeking disaster related information.

7. **Unmet Needs**

a. During the recovery process, after all the disaster relief organizations, state and/or federal government have provided monetary and other assistance to disaster victims, there still may be individuals and families who, for various reasons need additional help in recovering from the disaster.

b. The Greene County Long-Term Recovery Committee a sub-committee under the Greene County COAD. This is a group of representatives (from community based relief organizations, established disaster relief agencies, clergy, council of churches, local foundations, local business, etc.) who meet together to consider individual cases where the victims' needs are significantly greater than the assistance already provided.

c. An "unmet needs request" is submitted to the committee by an "advocate agency" for that particular unmet needs case.

Once the advocate agency has submitted the request, that agency will present the individual case to the committee. The committee will review the case and decide whether his or her agency can provide additional assistance on top of what has already been provided.

C. Actions to be Taken by Operating Time Frames

1. **Mitigation**

a. Primary and support agencies will work to develop and maintain a list of available support services.

b. Primary and support agency personnel will participate in disaster operations training, including training in donations management.

2. **Preparedness**

a. Create and maintain a database for managing available resources and donations.

b. Develop a mechanism by which to control transportation of goods into the city/county and transportation to the Staging and Distribution areas.

c. Pre-develop or maintain a list of known items needed for each type of risk.

d. Develop plan for proper disposal of unwanted/unused items. Review what was disposed of last time and determine if the waste could have been minimized.

3. **Response**

a, Activate plan and notify all voluntary agencies of activation.
b. Contact ESF- 18 team members and place on stand-by.
c. Activate the phone bank and other local or “800” numbers.
d. Maintain records of expenditures and in-kind donations received.

4. **Recovery**

a. Start drawing back response operations and initiate the preparations for demobilization.
b. Continue the hotline and warehouse/distribution operations until needs are met for all disaster victims.
c. Work with the Long-Term Recovery Committee to assess continuing needs of agencies involved in recovery and work with PIO to communicate those needs.

5. **Demobilization**

a. Demobilization is an issue of obvious timing. Throughout the disaster the Donations Management operation will be gearing up or winding down. As calls for donations begin to come in less and less, hours will naturally be reduced. As donations drop off, the large reception center can be closed and consolidated with the staging areas or even the distribution centers. It is important, however, not to "dump" unwanted useless items on to the distribution centers.
b. As demobilization gets well underway survey the inventory and determine where items can be used most quickly and efficiently. If an item is unwanted or unneeded evaluate whether the item is worth storing for the future or if proper disposal is best. Additionally, remember that just because a disaster relief organization cannot use the item, it does not mean the item is unusable.

IV. ORGANIZATION AND ASSIGNMENT RESPONSIBILITIES

A. Primary Agency:

Office of Emergency Management

1. Review and assess damage information to establish priorities of supplies.
2. Arrange for distribution of goods with help from Resource Management (**ESF-7)** and Transportation **(ESF-1).**
3. Keep an accurate accounting of the flow of goods from donors to recipients.
4. Establish other staging areas as needed.
5. Coordinate with Public Information **(ESF-15)** for the development of public information announcements including providing instructions for private individuals and groups desiring to donate items or services, and location of distribution points for pick-up of donated goods by victims.
6. Review and revise priority area designations as needed.
7. Coordinate with liaison from Convoy of Hope.

B. Support Agencies:

Convoy of Hope

1. Provide support for agencies on solicited and unsolicited goods and volunteers.
2. Provide a liaison between the EOC and donating agencies.
3. Provide EOC with donations status and availability.
4. Coordinate the warehousing and distribution of donated durable and non-durable items, including food. Coordinate with Food & Water **(ESF-18)**
5. Coordinate with private and public agencies to receive donated items.

Salvation Army

1. Coordinate with warehousing and distribution points for durable and non-durable goods.
2.. Establish and maintain liaison with EOC.

American Red Cross:

Implement procedures and staff a telephone call in point for information concerning volunteers and donations of goods if requested.

C. State Support Agency:

State Emergency Management Agency

Works with the Statewide Volunteer Coordinator to assess the need for donations management and work with the MOVOAD organization to provide assistance.

D. Federal Support Agency:

Federal Emergency Management Agency

FEMA supports the State Donations Coordinator and voluntary organizations through:

a. Assisting with the Donations Coordination Team and Donations Coordination Center.
b. Assisting with technical and managerial support.
c. A national network of information and contacts to assist donations specialists.
d. Providing donations management software and communications support.

V. DIRECTION AND CONTROL

A. For incidents that have reached an emergency classification (**Basic Plan, Appendix 2**), overall direction and control will be from the EOC, however, the Convoy of Hope will staff this ESF, including the position of Donations Coordinator.

B. When a classified emergency occurs, normal operating procedures will be altered as necessary to ensure adequate direction and control.

VI. CONTINUITY OF OPERATIONS

The key purpose of Continuity of Operations planning is to provide a framework for the continued operation of critical functions. When implemented, these plans will determine response, recovery, resumption, and restoration of Department/Agency services.

COOP Plans for the Departments/Agencies present a manageable framework, establish operational procedures to sustain essential activities if normal operations are not feasible, and guide the restoration of the critical functions of the Department/Agencies functions. The plan provides for attaining operational capability within 12 hours and sustaining operations for 30 days or longer in the event of a catastrophic event or an emergency affecting the department.

VII. ADMINISTRATION AND LOGISTICS

A. Record Keeping

1. All requests for assistance, all general messages, and all reports will be handled using the procedures and format set forth in this ESF. The use of reports will vary according to the type of emergency involved.
2. Federal resources will be needed to execute this donations management plan. Donations Coordination Team Requests for Federal Assistance (RFAs) are likely. The costs of RFAs are split among Federal, State and local government. The proportions of cost sharing vary. Typically the Federal share of the cost is 75%. When such RFAs are needed, the Donations Coordination Team will develop an RFA based upon policy, operational needs and available Federal Resources. The Donations Coordination Team Leader will endorse the RFA and forward it on through the SEMA chain of command for processing.
3. Records of purchases, rentals, agreements, loans, etc., will be maintained, organized and monitored by the DCT.
4. Each agency is responsible for maintaining its own records of expenditures for later reimbursement.

B. Operational Equipment Supplies and Transportation

1. OEM will provide "normal" amounts of office supplies to personnel of other agencies assigned to work in the EOC and the Donations Coordination Center. Unusual or extraordinary amounts must be secured by the individual organization.
2. The EOC has been adequately equipped to meet the needs of the procedures outlined in this ESF. If the equipment or physical capabilities of the EOC are not sufficient for a particular organization to meet its mission, this fact will need to be brought to the attention of the OEM Director.
3. Each organization is responsible for furnishing its own transportation requirements for direction and control activities.

C. Logistical Support

Logistical support for the Donations Coordination Center must be coordinated through the Donations Coordination Team Leader.

VIII. ESF DEVELOPMENT AND MAINTENANCE

A. This ESF was developed by the Office of Emergency Management with the supporting documentation developed by American Red Cross, FEMA, SEMA and the participating departments/agencies.

B. This ESF will be reviewed and updated annually. The Office of Emergency Management and the Donations Coordinator will instigate this review. Necessary updates will be accomplished by the responsible agencies.

C. Tests, exercise and drills will be conducted regularly. The results of these activities will be incorporated in this ESF when so indicated.

IX. REFERENCES

A. FEMA: FEMA 278, Donations Management Guidance Manual.
B. American Red Cross: In-Kind Donations Information Packet, ARC 4039D (May 2005).
C. American Red Cross, Gifts of Goods & Services for Disaster Relief Volunteers Brochure
D. American Red Cross: Local Disaster Volunteers, ARC 30-3054 (September 1999).
E. American Red Cross: Disaster Services Spontaneous Volunteer Management, ARC 30-3054, Annex M (July 2003)
F. American Red Cross: Coordinator of Disaster Volunteers, ARC 30-3054 Annex L (November 2000)
G. Missouri Revised Statutes: Chapter 44.
H. State Emergency Operations Plan, as amended (2005).

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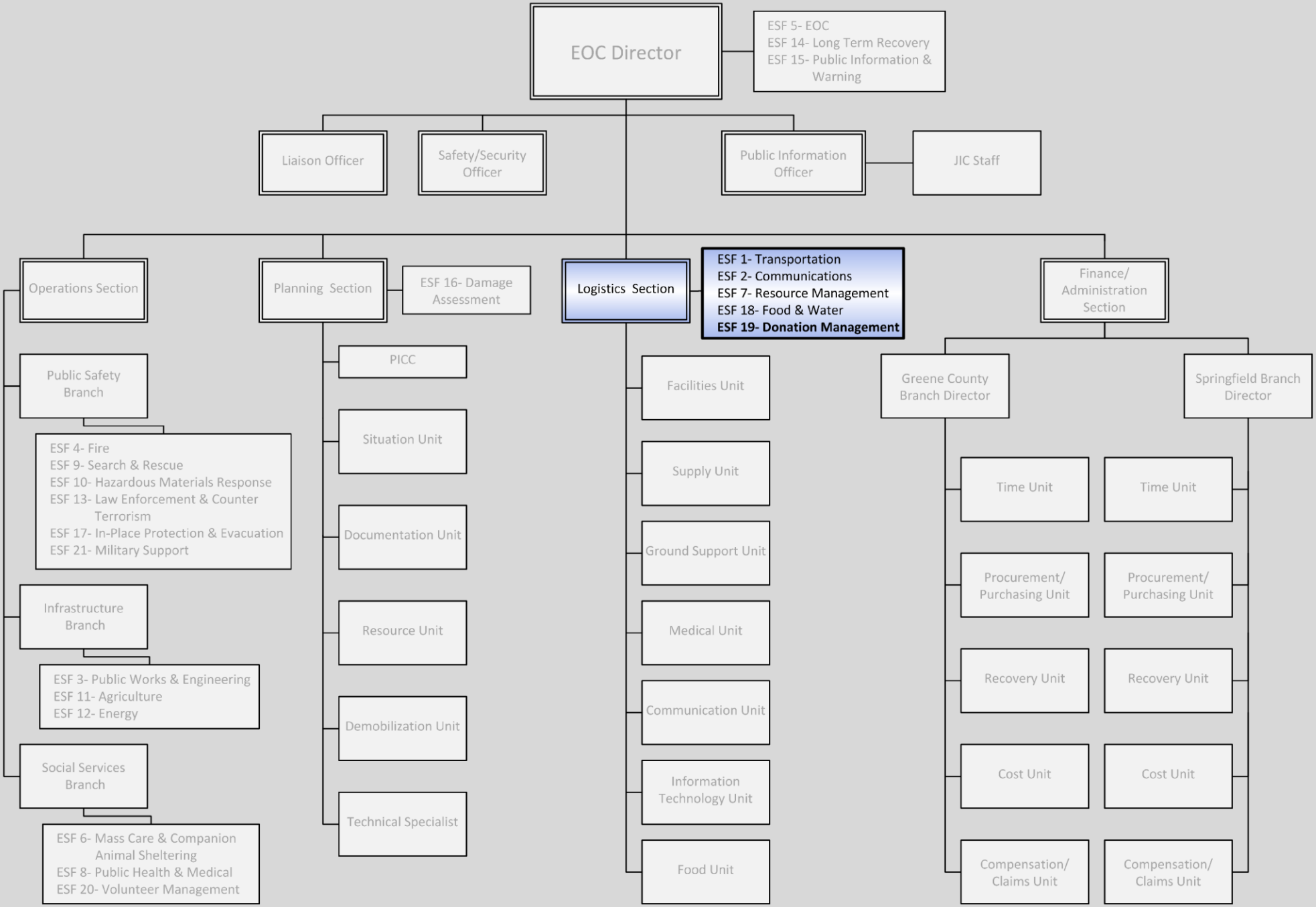
APPENDIX 1

ACTIVATION LIST

This is a restricted document

APPENDIX 2
ORGANIZATIONAL CHART

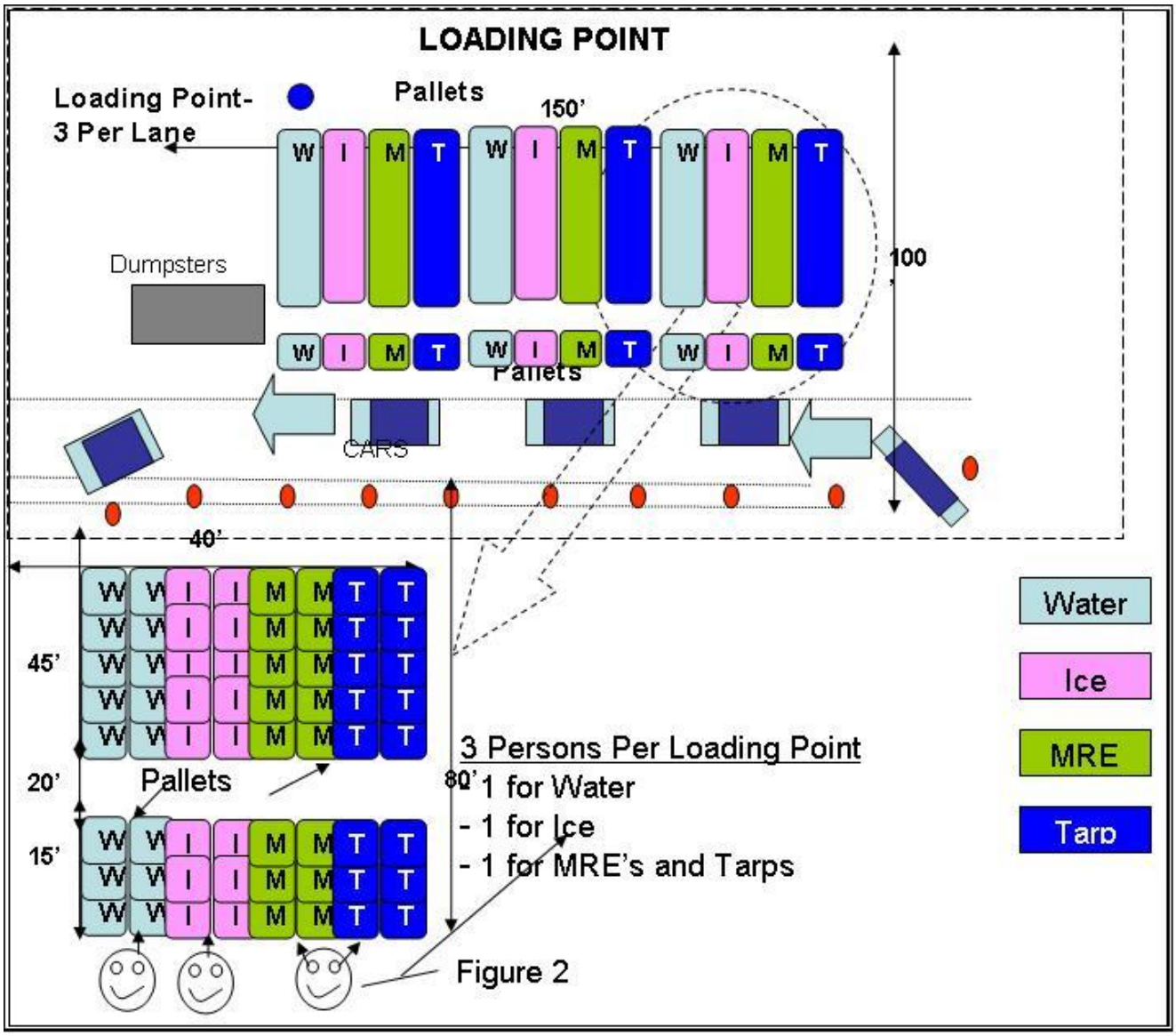


APPENDIX 3

POINTS OF DISTRIBUTION (POD)

- The critical planning factor for ordering commodities is **"distribution"** capability, not people without power.
- Distribution planning must be a priority with local governments for the commodities mission to be successful.
- All levels of government must understand the distribution point concept.
- A Type III distribution point (DP) with one supply lane can serve 1,660 cars or 5000 people in one day.
- A Type II Distribution Point has two lanes
- A Type I Distribution Point has four lanes

APPENDIX 3

ATTACHMENT A

POINTS OF DISTRIBUTION (POD) FOOTPRINT