

Public Health Emergency Preparedness (PHEP) Budget Period 2: COVID-19 Effects on PHEP Requirements

June 2021

Budget Period 2 changes are in red.

Summary of Modifications to BP2 PHEP Program Requirements

CDC has adjusted PHEP Budget Period 2 (BP2) program requirements in light of the continuing COVID-19 pandemic response. To support this critical work and reduce recipient burden, CDC has integrated PHEP planning requirements with COVID-19 pandemic response activities, allowing recipients to use their response to the current public health incident to meet PHEP program requirements. The following information describes BP2 program adjustments and provides additional guidance for documenting COVID-19 activities to meet PHEP requirements. Please consult the updated [At-a-Glance: Public Health Emergency Preparedness \(PHEP\) Budget Period 2 Requirement Updates](#) for a summary of the key changes.

CDC will continue to provide updated guidance as the COVID-19 pandemic response evolves to further clarify BP2 exercise requirements. CDC intends to broadly apply this review criteria to balance the intent of PHEP program exercise requirements with the realities of the COVID-19 pandemic response. CDC may further amend this guidance based on the characteristics of the event and to accommodate the needs of PHEP recipients.

Wherever possible, to increase efficiency and avoid duplication, it is completely acceptable for recipients to plan and design training and exercise events that combine PHEP requirements.

CDC has **waived** the following BP2 requirements.

- All drill requirements, including the staff notification (formerly PHEP 3.1) and the 24/7 emergency contact drills
- CDC Operational Readiness Review (ORR) site visits
- Cities Readiness Initiative (CRI) ORR site visits and data reporting to CDC
- All other ORR forms except for critical contact sheets (CCS)
- Annual submission of revised multiyear training and exercise plans (MYTEP)
- Annual Inventory Data Exchange (IDE) tests
- Attendance at annual preparedness summit
- Attendance at the Pacific Islands Preparedness and Emergency Response (PIPER) Summit

CDC has **not waived** the following requirements.

- Annual Requirements:
 - Critical contact sheet (CCS) updates and validation
 - Annual PHEP exercise (vulnerable populations) (extension to Budget Period 3 [BP3])
 - Medical countermeasure (MCM) action plans
 - PHEP technical assistance action plans
 - PHEP Performance Measures
 - All LRN-B and LRN-C requirements
- Five-Year Requirements:
 - Jurisdictional risk assessments (JRAs) (extension to Budget Period 4 [BP4])
 - Administrative preparedness plans (extension to BP4)
 - Tabletop exercise (TTX): pandemic influenza/emerging infectious diseases (extension to BP4)
 - TTX: administrative preparedness (extension to BP4)
 - TTX: continuity of operations (extension to BP4)
 - TTX: laboratory continuity of operations (extension to BP4)



- Full-scale exercise (FSE): pandemic influenza/emerging infectious diseases (extension to BP3)
- FSE for CRI jurisdictions: pandemic influenza/emerging infectious diseases (extension to BP4)
- FSE: anthrax distribution (extension to BP3)
- FSE: anthrax dispensing (extension to BP3)
- Functional exercise (FE): pandemic influenza/emerging infectious diseases for critical workforce (extension to BP3)
- Joint exercise (FE or FSE) with Hospital Preparedness Program (HPP) and emergency management (extension to BP3)

Please see the following additional details regarding select PHEP BP2 requirements. For further clarification, recipients should contact their PHEP project officers.

Requirements Waived for BP2

ORR Forms

All ORR forms, with the exception of the critical contact sheets, are **not** required for BP2. PHEP recipients may continue to work with their PHEP project officers to advance operational readiness and are encouraged to submit progress updates verbally or in writing if feasible. CDC encourages state MCM planners to continue working with their CRI jurisdictions to advance their MCM action plan objectives for operational readiness. While states are not required to report CRI progress to CDC, CRI jurisdictions should submit to their state MCM planners progress updates verbally and in writing if feasible.

Attendance at Annual Preparedness Summit

NACCHO converted the 2021 Preparedness Summit to an entirely virtual format. CDC waived the attendance requirement for BP2. The joint HPP-PHEP recipient meeting, normally scheduled for the day preceding the annual Preparedness Summit, was rescheduled to a virtual format on May 26. Participation was highly encouraged but not required.

Attendance at Pacific Islands Preparedness and Emergency Response (PIPER) Summit

CDC has waived the PIPER Summit attendance requirement for BP2.

Requirements Not Waived for BP2

CCS Updates

Method of Submission: Contact PHEP project officers to validate the CCS information is accurate.

Recipients must validate the CCS information at a minimum of every six months, even if there are no changes in personnel. Recipients should contact their PHEP project officers as soon as possible if there is a change in any information for listed staff.

Annual PHEP Exercise (Vulnerable Populations)

Method of Submission: New online ORR tool scheduled to open in BP3.

All recipients may use their COVID-19 response activities to meet the annual PHEP exercise with vulnerable populations requirement if there is verification of inclusion of vulnerable population partners in their response. Jurisdictions may submit evidence for consideration to meet this requirement **any time after the new ORR IT system opens until October 31, 2022. Jurisdictions should ensure that these AAR/IP documents reflect activities that were completed during BP2, even though jurisdictions will report them to CDC after the conclusion of BP2. CDC will also add relevant questions to the PHEP BP2 annual progress report due in PERFORMS no later than October 29, 2021.**

MCM Action Plans

Method of Submission: Contact PHEP project officers to document progress.

Recipients should continue advancing MCM action plan activities as reasonable and feasible. Quarterly calls with CDC are voluntary and may be scheduled and conducted at the request of the recipient. Jurisdictions where advancement of MCM action plan activities is not feasible at this time must notify their PHEP project officers via email and indicate “Response to COVID-19 – No New Activity.”

CDC encourages recipients to discuss adjustments to work plans with their PHEP project officers based on the intensity of their COVID-19 response efforts and to align MCM activities with current COVID-19 response activities.

PHEP Technical Assistance Action Plans

Method of Submission: Contact PHEP project officers to document progress.

PHEP recipients should discuss adjustments to technical assistance action plans with their project officers based on the intensity of their COVID-19 response efforts and to align activities with current COVID-19 response activities. Jurisdictions where advancement of action plan activities is not feasible at this time must notify their PHEP project officers via email and indicate “Response to COVID-19 – No New Activity.”

Jurisdictional Risk Assessments (JRAs)

Method of Submission: New online ORR tool scheduled to open in BP3.

The JRA program requirements will not be required in BP2 or BP3. Recipients whose five-year window for completing the JRA has expired or is set to expire during BP2 or BP3 will receive an extension into BP4. Recipients will be able to meet this requirement through participation in the ORR. The ORR implementation plan will provide training on each module, and CDC will assist recipients in sequentially submitting information and supporting evidence that will enable recipients to meet this requirement by the end of BP3, June 30, 2022.

Administrative Preparedness Plans

Method of Submission: New online ORR tool scheduled to open in BP3.

Submitting updated administrative preparedness plans will not be required in BP2 or BP3. Recipients whose five-year window for completing the plan has expired or is set to expire during BP2 or BP3 will receive an extension into BP4. Recipients will be able to meet this requirement through participation in the ORR. The ORR implementation plan will provide training on each module, and CDC will assist recipients in sequentially submitting information and supporting evidence that will enable recipients to meet this requirement by the end of BP3, June 30, 2022.

LRN-B and LRN-C Requirements

Method of Submission: PERFORMS

All BP2 LRN-B requirements outlined in the 2019-2024 PHEP notice of funding opportunity remain in place, along with all program requirements for the LRN-C laboratories.

All Five-year TTX Requirements Waived for BP2 (Extension Granted to BP4)

Method of Submission: Online ORR tool scheduled to open in BP3.

TTX: Pandemic Influenza/Emerging Infectious Diseases

TTX: Administrative Preparedness

TTX: Continuity of Operations

TTX: Laboratory Continuity of Operations

FE: Pandemic Influenza/Emerging Infectious Diseases for Critical Workforce)

Method of Submission: New online ORR tool scheduled to open in BP3.

Recipients whose five-year window for completing this exercise requirement has expired or is set to expire during BP2 will receive an extension into BP3. All recipients may use COVID-19 response activity to meet the FE (pandemic influenza scenario for critical workforce) if there is documentation verifying identified critical workforce groups were administered vaccine. Refer to [CDC's recommendations](#) for guidance on prioritizing vaccination administration.

FSE: Pandemic Influenza/Emerging Infectious Diseases

Method of Submission: New online ORR tool scheduled to open in BP3.

All recipients may use the COVID-19 response to meet the pandemic FSE requirements. During BP2, CDC referenced the [Key Components of Pandemic Influenza Operational Readiness](#) as preliminary guidance and indicated that additional information would be forthcoming. The [PHEP ORR interim guidance](#) expands on that document and provides detailed information about this program requirement. Satisfactory submissions will restart the five-year cycle regardless of current expiration status. A minimum of one area of improvement must be submitted for each FSE and must align with corresponding AARs/IPs.

FSE for CRI Jurisdictions: Pandemic Influenza/Emerging Infectious Diseases

Method of Submission: Coordinate with state jurisdictions.

Recipients whose five-year window for completing this exercise requirement has already expired or is set to expire during BP2 will receive an extension into BP4. CRI local planning jurisdictions that must demonstrate readiness for pandemic influenza or other emerging infectious diseases may meet exercise requirements if their public health emergency operations centers (EOCs) are activated to support the COVID-19 response. CDC encourages local planning jurisdictions to submit each activation of their EOCs, but they should coordinate their local efforts with their state partners. Once interim AAR/IPs are available, local jurisdictions may submit their activities for states to review. CDC encourages jurisdictions to submit AAR/IPs describing all relevant activities outlined in the [Key Components for Pandemic Influenza Operational Readiness](#) that are related to this response. CDC recommends that CRI jurisdictions develop interim AAR/IPs based on [CDC's pandemic influenza framework phases](#). Jurisdictions should refer to the [PHEP ORR interim guidance](#) for additional details regarding the minimum requirements to receive credit.

Distribution FSE: Anthrax

Method of Submission: New online ORR tool scheduled to open in BP3.

Recipients whose five-year window for completing this exercise requirement has already expired or is set to expire during BP2 will receive an extension into BP3. Recipients can receive full credit toward the FSE requirement for the COVID-19 response in lieu of the anthrax scenario. Credit will be given if jurisdictions submit an AAR documenting all relevant activities outlined in the [Key Components for Pandemic Influenza Operational Readiness](#) that are related to this response. CDC recommends that PHEP recipients develop interim AARs based on [CDC's pandemic influenza framework phases](#). Jurisdictions may submit interim AARs addressing PHEP requirements within each submission for an initial assessment by the PHEP project officers. Recipients should refer to the [PHEP ORR interim guidance](#) for additional details regarding the minimum requirements to receive credit.

Dispensing FSE: Anthrax

Method of Submission: New online ORR tool scheduled to open in BP3.

Recipients whose five-year window for completing this exercise requirement has already expired or is set to expire during BP2 will receive an extension into BP3. Recipients can receive full credit toward the FSE requirement for the COVID-19 response in lieu of the anthrax scenario. CDC will grant credit if jurisdictions submit AAR/IPs documenting all relevant activities outlined in the [Key Components for Pandemic Influenza Operational Readiness](#) that are related to this response. CDC recommends that PHEP recipients develop interim AAR/IPs based on [CDC's pandemic influenza framework phases](#). Jurisdictions may submit interim AAR/IPs addressing PHEP requirements within each submission for an initial assessment by PHEP project officers. Jurisdictions should refer to the [PHEP ORR interim guidance](#) for additional details regarding the minimum requirements to receive credit.

Joint Exercise: FE with HPP

Method of Submission: New online ORR tool scheduled to open in BP3.

Recipients whose five-year window for completing this exercise requirement has already expired or is set to expire during BP2 will receive an extension into BP3. Jurisdictions may use the COVID-19 response to meet the joint exercise requirement with HPP provided recipients are coordinating response activities with emergency management and health care coalition partners. For these to be considered, recipients must document in the AAR/IPs descriptions of how these activities are coordinated. The AAR/IPs submitted in support of the exercise requirement must demonstrate and indicate the inclusion of healthcare and emergency management partners. Jurisdictions that are using this incident to meet this requirement and are still activated for this response at the time of submission should submit interim AAR/IPs in lieu of final AAR/IPs to receive credit.

To demonstrate partner involvement, recipients must demonstrate within the AAR these elements:

- Total number of all types of EOCs activated;
- All joint partners engaged during the activation (at least one each for emergency management and health care coalition for joint exercise requirement); and
- Address roles and coordination with joint exercise partners.

For jurisdictions whose five-year windows to meet the joint exercise requirement expire during BP2, CDC and ASPR are offering an extension to the end of BP3, June 30, 2022. The documentation for receiving FSE credit is due October 31, 2022.

Receiving PHEP Exercise Credit for COVID-19 Response Activities

Method of Submission: New online ORR tool scheduled to open in BP3.

CDC will allow jurisdictions to use COVID-19 response activities to meet one or more of the PHEP exercise requirements. To request PHEP exercise credit for COVID-19 response activities, jurisdictions must submit AAR/IP documentation.

Jurisdictions will have until October 31, 2022, to submit these documents to request credit for PHEP exercise requirements.

If jurisdictions deactivate their EOCs and develop their complete AAR/IPs during BP2 to submit for credit toward one or more exercise requirements prior to the launch of the new online ORR tool, jurisdictions should provide the AAR/IP documentation for initial review by their PHEP project officers. However, jurisdictions should delay submission for final review until CDC opens the new online ORR tool. Regardless of when a jurisdiction may have deactivated during BP2, documentation for exercise credit is due, **October 31, 2022**.

Documenting Progress toward Operational Readiness

During the period prior to the opening of the new online ORR tool, jurisdictions may consult with their PHEP project officers and submit preliminary documents, to record progress toward operational readiness. Jurisdictions should coordinate with their project officers and use the ad hoc attachment section of PERFORMS to share supporting documentation for this purpose.

PHEP project officers will review these documents and provide recipients with an initial assessment regarding whether they are on track to meet one or more exercise requirements. Project officers will make recommendations and share any specific observations regarding areas for further development to document progress toward operational readiness. CDC will determine if recipients have met the requirement(s) upon submission of their BP2 response documentation into the new online ORR tool. CDC will not update jurisdictional operational readiness status levels during BP2.

Special Considerations for Jurisdictions whose Five-Year Requirements Expire in BP2

For any jurisdictions whose five-year window to complete exercise or other PHEP requirements expires during BP2, CDC is offering an extension to the end of BP3, June 30, 2022. This applies to the joint HPP exercise requirement as well. To receive consideration for credit toward these requirements, the submissions of documentation is due October 31, 2022.