

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

August 14, 2020

Summary of Modifications to BP2 PHEP program requirements

CDC has adjusted PHEP Budget Period 2 (BP2) program requirements in light of the 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 demonstrate their preparedness capabilities. The following information describes the BP2 changes and provides additional guidance on documenting COVID-19 activities to receive credit for PHEP requirements. Please consult the [At-a-Glance: Public Health Emergency Preparedness \(PHEP\) Budget Period 2 Requirement Updates](#) for a summary of the key changes.

CDC will 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 the exercise requirements with the realities of the COVID-19 pandemic response. CDC may amend this guidance based on the characteristics of the event and to accommodate the needs of PHEP recipients.

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 with the exception of the critical contact sheets
- 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)
 - MCM action plans
 - PHEP technical assistance action plans
 - All LRN-B and LRN-C requirements
- Five-Year Requirements:
 - Jurisdictional risk assessments (JRAs)
 - Administrative preparedness plans
 - Tabletop exercise (TTX): pandemic influenza/emerging infectious diseases
 - TTX: administrative preparedness
 - TTX: continuity of operations
 - TTX: laboratory continuity of operations
 - Functional exercise (FE): pandemic influenza/emerging infectious diseases for critical workforce
 - Full-scale exercise (FSE): pandemic influenza/emerging infectious diseases



- FSE for CRI jurisdictions: pandemic influenza/emerging infectious diseases
- FSE: anthrax distribution
- FSE: anthrax dispensing
- Joint exercise (FE or FSE) with Hospital Preparedness Program (HPP)

Please see the following additional details regarding select PHEP BP2 requirements. For further clarification, recipients should contact their DSLR 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 DSLR 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 has rescheduled the 2020 Preparedness Summit for August 25-27 and converted the conference to an entirely virtual format. CDC encourages recipients to attend if feasible; however, CDC has waived the attendance requirement for BP2. The joint HPP-PHEP recipient meeting, normally scheduled for the day preceding the annual Preparedness Summit, will be rescheduled in a virtual format for a later date. Participation is highly encouraged but not required.

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

The 2020 Pacific Island Preparedness and Emergency Response (PIPER) Summit originally planned for February, then postponed until May 2020, has been canceled. Planners are currently discussing rescheduling the event, possibly as an entirely virtual conference. CDC has waived the PIPER Summit attendance requirement.

Requirements Not Waived for BP2

Critical Contact Sheet (CCS) Updates

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

Recipients must validate the CCS information at minimum every six months, even if there are no changes in personnel. Recipients should contact their DSLR 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 system scheduled to open in Budget Period 3 (BP3).

All recipients may use their COVID-19 response activities to meet the annual PHEP exercise (vulnerable population) requirement if there is verification of inclusion of vulnerable populations based on forthcoming COVID-19 parameters set by CDC. In addition, when a vaccination campaign is underway, recipients must submit evidence of inclusion of priority populations. CDC will provide additional guidance on priority populations. If jurisdictions are still activated for COVID-19 at the conclusion of BP2, they must submit interim AAR/IPs no later than **Friday, October 29, 2021**, to document activities and receive credit for this exercise requirement.

MCM Action Plans

Method of Submission: Contact DSLR 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 DSLR project officers via email and indicate, “Response to COVID-19 – No New Activity.”

CDC encourages recipients to discuss adjustments to work plans with their DSLR 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 DSLR 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 DSLR project officers via email and indicate, “Response to COVID-19 – No New Activity.”

Jurisdictional Risk Assessments (JRA)

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

Recipients may contact their project officers to request an extension if their five-year window for completing the JRA is set to expire during BP2.

Administrative Preparedness Plans

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

Award recipients may contact their project officers to request an extension if their five-year window for completing the plan is set to expire during BP2.

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 chemical laboratories.

Tabletop Exercise (TTX): Pandemic Influenza/Emerging Infectious Diseases

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

CDC will grant credit for any TTX or focused discussions on “hot topics” evolving from the COVID-19 response to meet the pandemic influenza TTX requirement. Documentation must demonstrate discussion-based scenarios are based on evolving topics, such as outbreaks at meat processing facilities or correctional facilities, school reopening, etc., and attendance by relevant personnel, partners, and agencies.

TTX: Administrative Preparedness

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

CDC will grant credit for any TTX or focused discussions on administrative preparedness topics evolving from the

COVID-19 response to meet the administrative preparedness TTX requirement. Documentation must demonstrate discussion-based scenarios are based on evolving topics and attendance by relevant personnel, partners, and agencies.

TTX: Continuity of Operations

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

CDC will grant credit for any TTX or focused discussions on continuity of operations topics, such as alternate or virtual worksites, human capital management, and essential services, evolving from the COVID-19 response to meet the continuity of operations TTX requirement. Documentation must demonstrate discussion-based scenarios are based on evolving topics and attendance by relevant personnel, partners, and agencies.

TTX: Laboratory Continuity of Operations

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

CDC will grant credit for any TTX or focused discussions on laboratory continuity of operations topics evolving from the COVID-19 response to meet the laboratory continuity of operations TTX requirement. Documentation must demonstrate discussion-based scenarios are based on evolving topics and attendance by relevant personnel, partners, and agencies.

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

Method of Submission: New online ORR system scheduled to open in 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. Recipients should also consider applying seasonal influenza vaccination campaign activities to meet this requirement should a COVID-19 vaccine not become available in time to meet a jurisdiction's five-year submission cycle.

Full-Scale Exercise FSE: Pandemic Influenza/Emerging Infectious Diseases

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

PHEP recipients can receive full credit toward the FSE requirement for the COVID-19 response. 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 DSLR project officers. CDC will provide at a later date additional guidance on minimum requirements to receive credit.

FSE for CRI Jurisdictions: Pandemic Influenza/Emerging Infectious Diseases

Method of Submission: Coordinate with state jurisdictions.

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 center (EOCs) is 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](#). CDC will provide at a later date additional guidance on minimum requirements to receive credit.

Distribution FSE: Anthrax

Method of Submission: New online ORR system scheduled to open in 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 DSLR project officer. Additional guidance on minimum requirements to receive credit will be provided.

Dispensing FSE: Anthrax

Method of Submission: New online ORR system scheduled to open in 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 DSLR project officers. CDC will provide at a later date additional guidance on minimum requirements to receive credit.

Joint Exercise: FE or FSE with HPP

Method of Submission: New online ORR system scheduled to open in 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:

- Include total number of all types of EOCs activated within jurisdiction
- Include all joint partners engaged during the activation (at least one each for emergency management and health care coalition for joint exercise requirement)
- 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 BP2, June 30, 2021. Jurisdictions should submit requests for extensions to their DSLR project officers and HPP field project officers (FPO). The documentation for receiving FSE credit is due by **October 29, 2021**.

Receiving PHEP Exercise Credit for COVID-19 Response Activities

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 after-action report/improvement plan (AAR/IP) documentation (or interim AARs if still activated for the response). Since CDC will close the DCIPHER ORR online data collection system on August 28, 2020, PHEP recipients will be not be able to submit the AAR/IP documentation until after the new online reporting system opens. CDC expects to activate the new system in BP3. Jurisdictions will have until **Friday, October 29, 2021**, to submit these

documents to request credit for PHEP exercise requirements.

If jurisdictions deactivate their emergency operations center (EOC) and develops their complete AAR/IP during BP2 to submit for credit toward one or more exercise requirements prior to the launch of the new online reporting system, jurisdictions should provide the AAR/IP documentation for initial review by their DSLR project officers. However, jurisdictions should delay submission for final review until CDC opens the new online system. Regardless of when a jurisdiction may have deactivated during BP2, documentation for exercise credit is due **Friday, October 29, 2021**.

Documenting Progress toward Operational Readiness

During the period prior to the opening of the new online reporting system, jurisdictions may consult with their DSLR project officers and submit preliminary documents, such as interim AARs, to document progress toward operational readiness. Jurisdictions should coordinate with their DSLR project officers and use the ad hoc attachment section of PERFORMS to share supporting documentation for this purpose.

DSLR 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. DSLR 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 a recipient has met the requirement(s) upon submission of their BP2 response documentation into the new online reporting system. 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 BP2, June 30, 2021. Jurisdictions should submit a request for extension to their DSLR project officers. This applies to the joint HPP exercise requirement as well. To receive consideration for credit toward these requirements, the submissions of documentation is due by **Friday, October 29, 2021**.

CDC recommends that those jurisdictions who have scheduled or are planning to conduct an FSE during BP2, but whose five-year window does not expire during BP2, postpone their FSEs and related planning activities. This will enable those jurisdictions to focus on their COVID-19 response activities.