Modified Requirements for U.S. Territories and Freely Associated States

CDC recognizes the unique infrastructure and geographic challenges faced by the U.S. territories and freely associated states. Public health preparedness efforts in those locations face many challenges. These include geographical isolation, supply, transportation, public health and health care system configuration, Internet availability, and other distinctive infrastructure capacities. Because of these differences, CDC modified the 2019-2024 Public Health Emergency Preparedness (PHEP) cooperative agreement requirements for American Samoa, Commonwealth of the Northern Mariana Islands (CNMI), Guam, Federated States of Micronesia, Republic of the Marshall Islands, Republic of Palau and U.S. Virgin Islands (territories and freely associated states). These modified requirements do not apply to Puerto Rico.

Many of the PHEP requirements remain intact for the seven territories and freely associated states. However, CDC has modified PHEP Budget Period 4 programmatic and financial requirements to account for differences in geography and infrastructure. For detailed information on each respective requirement, see the Strategies and Activities section of the 2019-2024 PHEP cooperative agreement notice of funding opportunity (NOFO).

Financial Modifications

The HHS Grants Policy Statement (HHS GPS) provides the terms and conditions for all CDC grants and cooperative agreements. The policies contained in the HHS GPS apply to all PHEP recipients, including the requirements of 45 CFR part 74 or 45 CFR part 92. However, the seven territories and freely associated states are not required to comply with requirements for matching funds.

Territories and freely associated states must comply with the terms and conditions set forth in their Notices of Award.

Administrative Requirements

The following programmatic requirements apply to the seven territories and freely associated states.

Participate in Program Monitoring Activities

Irrespective of technological and geographic challenges, recipients must ensure their participation in the following activities.

• Required regularly scheduled calls with PHEP project officer to provide updates on current work plan activities, action plans, and unobligated program funding amounts.
• Identification and development of technical assistance needs that can bolster preparedness planning efforts.
• Fully participate in site visits. CDC is updating its site visit requirements and any modifications for territories and freely associated states. Currently, the territories and freely associated states have fiscal and programmatic systems in place to document accountability and quality improvement.
• Maintain all program documentation for purposes of data verification and validation.
• Participation in regularly scheduled Pacific Islands Preparedness Emergency Response (PIPER) calls.
• Quarterly reconciliation of the PHEP program’s financial records in the Payment Management System. Recipients must ensure accurate accounting and timely expenditures of funds. CDC suggests regular meetings between program and fiscal staff be held to ensure funds are being liquidated as program activities are being conducted.

Comply with Program Administration and Reporting Requirements

All PHEP recipients are required to submit mandatory programmatic documents and deliverables according to program instructions. All PHEP recipients also must comply with other requirements associated with statute and HHS GPS. Failure to submit required documentation or deliverables in a timely manner may adversely affect future funding. With consideration to the technological and geographic challenges territories and freely associated states face, the following concessions may be available upon request.
• If required documentation cannot be provided by the due date, the recipient must contact the CDC Office of Grants Services (OGS) 10 business days prior to the submission date to request an extension. This request must be submitted via email to the grants management officer and the PHEP project officer, including a reason for the requested extension and the new requested submission date.
• Only with prior approval from OGS and the PHEP project officer can recipients submit deliverables outside of the designated information technology (IT) system.
• Corrective action plans or financial penalties may be instituted for recipients that miss submission deadlines.
• Corrective action plans and financial penalties may be instituted for recipients that do not meet PHEP benchmarks.

Participate in Essential Meetings and Trainings
The following meetings are mandatory for the seven territories and freely associated states in Budget Period 4. Recipients should budget travel funds accordingly. Virtual attendance if available, is acceptable.
• Participation in the Directors of Public Health Preparedness Annual Meeting sponsored by the Association of State and Territorial Health Officials (ASTHO);
• Participation in the PIPER Summit.

Programmatic Requirements
The following information represents only the modifications made to the requirements. For complete details of each requirement, please refer to the Strategies and Activities section of the PHEP NOFO.

Domain 1: Community Resilience

Plan for the Whole Community
Recipients must continue to build and sustain state and community partnerships to ensure that activities have the widest possible reach with the strongest possible ties to the community. Since first receiving PHEP funding, the U.S. territories and freely associated states in the Pacific have planned regionally with their island neighbors. Consistent regional planning is now considered an expectation of effective whole community planning for the seven territories and freely associated states. To meet this requirement, CDC recommends recipients identify community partners with established relationships with diverse at-risk populations and use available tools to better anticipate the potential access and functional needs of at-risk community members before, during, and after an emergency. All PHEP recipients are required to address the unique needs of at-risk populations in their plans, training, exercises, and responses. Recipients must continue to build and sustain community partnerships to ensure that activities have the widest possible reach with the strongest possible ties to the community.

In addition to the list of applicable partners listed in the 2019-2024 NOFO, whole community planning for the territories and freely associated states must include engagement with the following offices or organizations.
• State Unit on Aging or equivalent office
• Child and Youth Education and Child Care Organizations
• Persons with Disabilities
• Seniors
• Pregnant Women
• Tourism Industry
• Fishing Industry
• Office of Cultural Heritage or equivalent office
• Other at-risk populations as identified by jurisdictional risk assessment
• World Health Organization (WHO) and U.S. Department of State, when applicable

Domain 2: Incident Management
There are no modified requirements for Domain 2.
Domain 3: Information Management
There are no modified requirements for Domain 3.

Domain 4: Countermeasures and Mitigation

Conduct Inventory Management Tracking System Tests
All PHEP recipients must provide inventory counts to ASPR during a public health emergency. To document compliance, territories and freely associated states may submit the CDC Excel spreadsheet template (if ASPR’s Inventory Management and Tracking System is unavailable to the jurisdiction) to respond to ASPR inventory requests.

Update Receipt, Stage, and Store (RSS) Site Surveys
Territories and freely associated states must maintain at least one RSS site, instead of two. However, two sites are encouraged. RSS sites must be validated every three years by the Strategic National Stockpile by contacting SNSRSSValidation@cdc.gov.

Domain 5: Surge Management
There are no modified requirements for Domain 5.

Domain 6: Biosurveillance
Territories and freely associated states do not have Laboratory Response Network-Biological or Laboratory Response Network-Chemical requirements.

For additional information, please refer to the 2019-2024 PHEP NOFO, contact the respective PHEP project officer for assistance, or send an inquiry to preparedness@cdc.gov.