

Public Health Emergency Preparedness (PHEP) Cooperative Agreement Budget Period 3: COVID-19 Effects on PHEP Requirements

June 2021

Summary of Modifications to BP3 PHEP Program Requirements

CDC is allowing PHEP cooperative agreement recipients to leverage COVID-19 pandemic response activities to meet PHEP cooperative agreement program requirements. The following information describes changes to PHEP Budget Period 3 (BP3) requirement and provides additional guidance for documenting COVID-19 activities to receive credit for PHEP program requirements.

Update to Operational Readiness Review (ORR) Implementation: In BP3, CDC will expand the ORR evaluation to assess all-hazards readiness across the 15 public health emergency preparedness and response capabilities and has developed interim guidance that outlines the associated reporting requirements and evaluation criteria. CDC will conduct a series of orientation sessions that provides recipients with an overview of the [PHEP ORR interim guidance](#), the review criteria for data collection, and acceptable evidence. CDC training sessions will also introduce the new PHEP ORR online data collection tool and demonstrate key features and familiarize users with essential functions of the tool. CDC provided a brief overview April 21, 2021, and will provide additional orientation sessions during BP3. CDC will provide further details on the ORR implementation and orientation schedule in separate documents.

Cities Readiness Initiative (CRI) Program Requirements

CDC has waived all BP3 exercise requirements and data submissions for CRI jurisdictions. CRI participation in the ORR process will begin in Budget Period 4 (BP4).

Due to the ongoing COVID-19 response, CDC has modified the following BP3 ORR reporting requirements. Several of the following forms listed below are new, and recipients will receive instruction on the proper use of the forms during the PHEP ORR orientation sessions.

PHEP BP3 Requirements

- Jurisdictional structure sheets – ORR form
- Critical contact sheets – ORR form
- Partner planning sheets – ORR form
- Workforce development and training – ORR form
- Emergency operations center activation data
- Annual PHEP exercise and data submissions
- Joint functional exercise with emergency management agencies and health care coalitions and data submissions
- Pandemic influenza critical workforce group functional exercise and data submissions
- Pandemic influenza full-scale exercise and data submissions
- Laboratory Response Network for Biological Threats (LRN-B) biological sample testing – PHEP benchmark
- LRN for Chemical Threats (LRN-C) chemical sample testing using core and additional methods – PHEP benchmark
- LRN-C specimen packaging and shipping exercise – PHEP benchmark
- Attendance at annual Preparedness Summit (2022)
- Attendance at Pacific Island Preparedness and Emergency Response (PIPER) Summit (2022)
- Integrated medical countermeasure (MCM) and PHEP technical assistance action plans

PHEP Program Requirements Waived for BP3

- All ORR planning requirements for all 15 capabilities
- All annual drill requirements
- Annual Inventory Data Exchange (IDE) tests
- All CRI and other local jurisdiction exercise requirements and data submissions

Deadline Extensions for Five-Year Requirements

Recipients whose five-year deadlines have expired or will expire during BP3 will not be required to submit the following PHEP program requirements. CDC has extended the reporting deadline to BP4.

- Jurisdictional risk assessments
- All tabletop exercise requirements
- Updated administrative preparedness plans

Additional Deadlines

- Jurisdictional structure sheets must be completed by all 62 PHEP recipients **when the new ORR online tool opens in BP3.**
- Critical contact sheets must be updated or resubmitted by **December 31, 2021**, and again on **June 30, 2022.**
- All other information and supporting evidence to be reviewed for credit toward BP3 program requirements must be submitted to CDC via the new online ORR data collection tool by **Monday, October 31, 2022.**

CDC will provide further information on recommended target dates for submitting information and supporting evidence to meet BP3 requirements.

CDC intends to apply the PHEP exercise requirements in balance with the realities of the ongoing COVID-19 response activities in all jurisdictions. CDC may amend this guidance based on the characteristics of the COVID-19 pandemic and to accommodate the needs of PHEP recipients.

Please see the following additional details regarding **select PHEP BP3 requirements**. For further clarification, recipients should contact their PHEP project officers.

Adjustments for BP3 Requirements

Jurisdictional Structure Sheet (JSS)

Method of Submission: New online ORR tool when available in BP3.

Completing the JSS is a prerequisite for all 62 PHEP recipients accessing the new online ORR data collection tool and therefore must be completed **as soon as the new ORR online tool opens in BP3.**

Critical Contact Sheet (CCS)

Method of Submission: New online ORR tool when available in BP3.

The CCS is required to be reviewed and submitted every six months within the new online ORR tool. The deadlines for completing the CCS are **December 31, 2021**, and **June 30, 2022.**

Annual PHEP Exercise with Access and Functional Needs (AFN) Partners

Method of Submission: New online ORR tool when available in BP3.

All recipients may use their COVID-19 response activities to meet the annual PHEP exercise requirement if there is verification of inclusion of higher risk and vulnerable populations based on [CDC recommendations](#) for prioritized administration of COVID-19 vaccine. As the COVID-19 vaccination campaign continues, CDC will

provide updated guidance as necessary regarding expanding the list of priority populations. Additionally, recipients may use their COVID-19 response activities to meet this requirement through efforts to reach populations with access and functional needs throughout their vaccination campaigns. Recipients will be able to meet this requirement through participation in the expanded PHEP ORR. Jurisdictions may submit evidence for consideration to this requirement any time after the new ORR online system opens until October 31, 2022.

Also note that the BP3 continuation guidance states that beginning in BP3 CRI jurisdictions must also meet the annual PHEP exercise requirement incorporating AFN partners. Due to the ongoing COVID-19 response, this requirement will be waived for BP3, but CDC expects that vaccination sites account for populations with AFN requirements.

Joint Functional Exercise (FE) or Full-Scale Exercise (FSE) with Hospital Preparedness Program (HPP) and Emergency Management

Method of Submission: New online ORR tool when available in BP3.

Jurisdictions may use the COVID-19 response to meet the joint exercise requirement with HPP health care coalitions (HCCs) and emergency management agencies provided recipients are coordinating response activities with these partners. Satisfactory submissions will restart the five-year cycle for PHEP recipients regardless of current expiration status. A minimum of one area of improvement must be submitted for each FE and must align with corresponding after-action reports/improvement plans (AARs/IPs).

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

- Include all joint partners engaged during the activation (at least one each for emergency management and HCCs)
- Address roles and coordination with joint exercise partners

For jurisdictions whose five-year windows to meet the joint exercise requirement expired during Budget Period 2 or will expire during BP3, CDC and ASPR are offering an extension to the end of BP3.

Pandemic Influenza Critical Workforce Group (CWG) FE

Method of Submission: New online ORR tool when available 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 refer to the [COVID-19 Vaccination site](#) for additional information on critical work vaccination and the [PHEP ORR interim guidance](#) for additional details on the criteria for meeting this requirement. Recipients A minimum of one area of improvement must be submitted for each FE and must align with corresponding AARs/IPs.

Pandemic Influenza FSE

Method of Submission: New online ORR tool when available in BP3.

All recipients may use the COVID-19 response to meet the pandemic influenza FSE. 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.

Anthrax Distribution FSE and Anthrax Dispensing FSE

Method of Submission: New online ORR tool when available in BP3.

Credit toward these requirements is allowed for COVID-19 medical countermeasure (MCM) activities in lieu of

the anthrax scenario. All recipients may use COVID-19 response activity to meet this FSE requirement using the FSE for Pandemic Influenza section of the [PHEP ORR interim guidance](#) that provides detail regarding the minimum requirements for receiving credit. 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.

PHEP Technical Assistance (TA) Action Plans and MCM Action Plans

Method of Submission: Contact PHEP project officers to document progress until the new online ORR system is available in BP3.

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.” In BP3, when the new online ORR system is ready, PHEP recipients will no longer be required to track MCM and PHEP technical assistance action plans using stand-alone forms. PHEP recipients will submit via the new ORR tool an integrated action plan, which replaces the PHEP technical assistance and MCM action plans. Recipients will be informed when these adjustments to technical assistance action plans are complete and the integrated action plan is ready for use.