



Continuity of Operation Plan Guidance

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Continuity of Operations Plan Guidance Purpose

The purpose of this document is to provide local government agencies guidance for developing continuity of operations plans. The purpose of continuity planning is to:

- Reduce the consequences of any disruptive event to a manageable level;
- Enable rapid response to the incident; and
- Ensure that essential services can be sustained during/following an emergency or disaster.

References:

FEMA Continuity of Operations Plan Template and Instructions for Federal Departments and Agencies, Dated April 2013. www.fema.gov/media-library-data/5c4896dd74fd2b18bc900e60935debe9/COOP_Planning_Template.pdf

FEMA Continuity Guidance Circular 1 (CGC 1): Continuity Guidance for Non-Federal Entities (States, Territories, Tribal, and Local Government Jurisdictions, and Private Sector Organizations), Dated July 2013. www.fema.gov/media-library-data/44876e4a34c9b25086532be26954b1b2/CGC_1_Signed_July_2013.pdf

FEMA Continuity Guidance Circular 2 (CGC 2): Continuity Guidance for Non-Federal Entities: Mission Essential Functions Identification Process (States, Territories, Tribal, and Local Government Jurisdictions, and Private Sector Organizations), Dated July 22, 2010. www.fema.gov/pdf/about/org/ncp/coop/cont_guidance2.pdf

FEMA Continuity Guidance Circular 2 (CGC 2): Continuity Guidance for Non-Federal Entities: Mission Essential Functions Identification Process (States, Territories, Tribal, and Local Government Jurisdictions, and Private Sector Organizations), FEMA P-789 Dated October 2013. www.fema.gov/media-library-data/1384435934615-7eeac7d0b4f189839f396a3c64eeac7a/Continuity+Guidance+Circular+2.pdf

Federal Continuity Directive 1 (FCD 1): Federal Executive Branch National Continuity Program and Requirements, Dated February 23, 2013. www.fema.gov/media-library-data/089b16a5dfc87c402f1bc6ccd2d82675/2012_Federal_Continuity_Directive_1.pdf

Federal Continuity Directive 2 (FCD 2): Federal Executive Branch Mission Essential Function and Primary Mission Essential Function Identification and Submission Process, Dated July 2013. www.fema.gov/media-library-data/1386609058811-b084a7230663249ab1d6da4b6472e691/FCD2-Signed-July-2013.pdf

FEMA Independent Study 546.A: Continuity of Operations Awareness <https://training.fema.gov/is/courseoverview.aspx?code=is-546.a>

FEMA Independent Study 547.A: Intro to Continuity of Operations <https://training.fema.gov/is/courseoverview.aspx?code=is-547.a>

National Security Presidential Directive - 51 (NSPD-51) & Homeland Security Presidential Directive – 20 (HSPD- 20): National Continuity Policy, Dated May 9, 2007. www.fas.org/irp/offdocs/nspd/nspd-51.htm

Overview of Continuity Planning

Continuity of operations is the ability to continue essential services during and following an emergency or disaster. Continuity planning will improve an organization's ability to recover from a disaster. Planning will help to:

- Minimize loss of life, injury, and property damage
- Reduce or mitigate the length and severity of disruptions that do occur
- Achieve timely and orderly resumption of essential functions and the return to normal operations
- Protect essential facilities, equipment, records, and assets

Risk Management

Risk management is the process of identifying, controlling, minimizing and/or eliminating potential consequences of an emergency or disaster. Organizations should complete a hazard analysis to evaluate:

- The types of hazards that could disrupt operations
- The likelihood that the disruption(s) will occur
- The vulnerability to the relevant disruption(s)
- The impact if the disruption would occur
- The consequences of not protecting assets or not performing essential functions

Organizations should then identify strategies to reduce or eliminate the vulnerability and/or consequences of the disruption. Agencies will have to weigh the cost to implement mitigation measures versus the potential impacts of a disruption.

Some continuity mitigation measures include: creating geographically dispersed operations or establishing back up facilities to ensure that if one area is impacted or inaccessible, that essential services can be performed at alternate work locations. Organizations may consider instituting security strategies to protect plans, personnel, facilities, and information systems. Creating redundant systems, remote access capabilities, and alternate work locations will ensure that the organization can resume essential functions in a timely manner.

Critical Elements of Continuity Planning

There are 10 key elements that should be addressed in the continuity plan.

1. **Essential Functions/Services** – enable an organization to provide vital services, exercise civil authority, maintain public safety, and sustain the industrial or economic base.
2. **Orders of Succession** – provide for orderly assumption of leadership roles, during an emergency, in the event that officials are unavailable to fulfill their legal duties. Orders of succession should be three deep.
3. **Delegation of Authority** – formal documents that specify the activities that can be performed by those authorized to act on behalf of the key officials during a continuity event. Organizations should have a clear *line of succession* in the absence of existing leadership and the necessary *delegation of authority* to ensure that succeeding leadership has the legal and other authorities to carry out their duties.
4. **Continuity Facilities** – alternate or back up facilities that sustain essential functions or services. Organizations should identify adequate locations to ensure continuity of operations.

5. **Communications** – the capability (including: hardware, software, and trained personnel) to communicate critical information with staff, external stakeholders and media and the technology requirements to sustain essential services. Communication strategies should be redundant, operational within 12 hours, and sustainable for up 30 day or until normal operations are resumed.
6. **Vital Records Management** – the ability to identify, protect and access electronic and hardcopy documents, references, and records required for the sustainment of essential services.
7. **Human Capital** – the people required to sustain essential services. Personnel should be cross-trained and vertically trained to be able to perform the functions of their peers and those above and below them in an emergency. Planning considerations include: identifying essential personnel; identifying roles for non-essential employees; establishing alternate work procedures (e.g. teleworking); communicating information to employees; and establishing management practices for continuity events.
8. **Training and Exercises** – educating staff on continuity plans and procedures will reduce confusion and anxiety during a real-world event.
9. **Devolution** – is the capability to transfer statutory authority and responsibility from the agency’s primary operating staff/facilities to alternate employees/facilities in the event that the continuity personnel/facilities are unavailable.
10. **Reconstitution** – the process of restoring normal operations at a permanent location.

Phases of Continuity of Operations

Phase 1: Readiness and Preparedness

In this phase, organizations should establish a core planning team and develop a continuity of operations plan (COOP). During the planning process, the team should:

- Identify essential services and functions that must be sustained. Essential Services are those functions that enable the organization to provide vital services, exercise civil authority, maintain public safety, and sustain the industrial or economic base.
- Evaluate the resources needed to sustain essential functions, including but not limited to leadership, staff, facilities, and communications.
- Develop the COOP
- Provide staff training
- Practice. Drills and exercise provide an opportunity to identify strengths and weaknesses of the plan. The lessons learned should drive updating the plan to address gaps and shortfalls.

Phase 2: Activation and Relocation (0-12 hours)

Immediately following an incident, the plan should be activated and operational within 12 hours. Planning considerations include:

- Authority to activate the plan
- Staff notification and recall procedures
- Role of essential staff versus non-essential staff
- Communication with staff, media and public
- Resources required to support continuity of essential services

- Alternate facility locations

Phase 3: Continuity of Operations (12 hours - 30 days)

This phase focuses on the period from 12 hours to 30 days or until normal operations have been resumed.

Planning considerations include:

- In-processing, orientation, and accounting for personnel
- Transition of responsibilities to the relocated operations
- Guidance for personnel (essential, non-essential, and temporary staff)
- Rotation of Staff – identification of replacement staff
- Operations at the alternate facility
- Procurement processes
- Notification to customers, stakeholders, and media
- Demobilization - transition back to normal operations at primary facility

Phase 4: Reconstitution

This phase outlines how the organization will transition to normal operations at a permanent facility. Planning considerations include:

- Identification of a permanent facility if the original facility is unavailable
- Resources needed to make the facility operational
- Communication with staff, external stakeholders, and the media
- Documentation procedures for the transfer of vital information and materials
- After-Action Report and Corrective Action Planning

Continuity Planning Process

The planning process is as vital as the final plan. It will provide an opportunity to discuss processes, identify areas for improvement, and develop creative and innovative solutions. It has the potential to improve day-to-day organizational processes, create unity amongst employees, and strengthen relationships with internal and external stakeholders. Successful continuity planning will require the support and buy-in of leadership and staff.

Step 1: Initiate the Planning Process

Continuity plans cannot be created in a vacuum. A collaborative planning team should be created engaging key stakeholders from the following functional areas:

- | | | |
|---|--|---|
| <input type="checkbox"/> Information Technology | <input type="checkbox"/> Finance/Procurement | <input type="checkbox"/> Emergency Management |
| <input type="checkbox"/> Human Resources | <input type="checkbox"/> Public Information | <input type="checkbox"/> Critical Vendors/Suppliers |
| <input type="checkbox"/> Facilities Management | <input type="checkbox"/> Operations | <input type="checkbox"/> Legal |

Step 2: Identify Essential Functions

Essential functions are critical services or activities that must be performed by the organization such as:

- Providing vital services to the public (e.g. water, power, health care, sanitation, transportation)
- Exercising civil authority (e.g. courts, detention facilities)
- Maintaining public safety (e.g. communication, police, fire/EMS)
- Sustaining the economic base (e.g. commerce)

Once the essential functions have been established, the planning team should prioritize them based on criticality, consequences of not providing the service, and timeframe requirements. [See Essential Function Identification Tool]. The planning team may also have to consider the expectations of leadership, internal stakeholders, and external partners. There may be functions that do not rank high internally, but are critical to the continuity of external organizations, the general public, and the economy (e.g. payroll, social service programs, sanitation services, etc.).

Step 3: Conduct a Risk Analysis

A risk analysis helps to identify potential disruptions to operations. Planners should consider any hazard that could affect the facility or personnel. Planning considerations include:

Potential hazards:

Natural: flooding, severe storms (summer and winter), tornadoes, derecho, drought, landslide, earthquake, pandemic and epidemic (human/animal);

Technological: hazardous materials/chemical release or spill, fire/explosion, building/structural collapse, dam/levee failure, power/utility failure, and transportation accident;

Human-Caused: economic emergency, riot, strike, demonstration, terrorism, sabotage, hostage situation, active shooter, violence, shut-down by a regulatory agency, supply vendor unavailability, fraud, embezzlement, or financial negligence.

- Frequency and likelihood of a disruption
- Vulnerability to the disruption
- Consequences of the disruption
- Timeframe – Will there be advance warning, no warning? How long with the disruption last?
- Geography – Will the incident affect a wide geographic area? Will this impact access to resources that are necessary for the organizations’ continuity.

Step 4: Building the Plan

The Continuity of Operation Plans should address the basic questions of:

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|---------------|---|
| Who? | Who has authority to activate the plan? Who has authority to act on leadership’s behalf if leadership is unavailable? Who will be responsible for implementing plan and components of the plan? |
| What? | What is the process for delegating responsibilities, should contingencies not be available? What activities and/or actions are required to sustain essential functions? What resources are required? [See resource requirements tool] |
| When? | When will continuity activities be implemented? |
| Where? | Where will continuity activities be relocated to? |
| How? | How the activities and actions will be implemented? |

Continuity Plans should:

- Document the resources required to sustain essential services (e.g. personnel, equipment, space, etc.)
- Be executable with or without warning
- Be operational within 12-hours of activation.
- Support sustained operations for up to 30-days.
- Consider other relevant organizational, governmental, and private sector continuity plans.

Step 5: Train and Exercise the Plan

Training and exercising a plan is almost more challenging than writing the plan. However, it is one of the most critical components to the process. It provides an opportunity to:

- Educate staff - Providing personnel with information and resources will alleviate some anxiety when a real-world incident occurs. It will also increase the probability that staff will respond to assist the organization during a continuity event. It has the potential to boost morale and build team unity if staff feel included and valued in the process.
- Test continuity plans in a low stressful environment - Exercising plans in low stress environment will allow the organization to evaluate the feasibility of processes and procedures outlined in the plan. Identifying areas for improvement will drive reworking processes and procedures. This process could potentially improve day-to-day processes and create more redundancy in the workforce.

Training can be done on an individual basis or in a group setting. It is important to integrate annual refresher training to ensure all personnel understand their responsibilities and role in a continuity event.

Exercises should be designed to test components of the plan, not to test personnel. Exercises can be discussion-based or operations-based. Discussion-Based exercises provide an opportunity for participants to talk through a particular process or procedure. It is a good way to familiarize staff with current plans and to develop new processes or procedures. Operations-based exercises involve role players who must articulate their actions and/or physically move assets based on the exercise scenario.

Following an exercise, an after action meeting should be held to identify strengths and areas for improvement. This information should drive the planning team to go back and modify processes and procedures within the plan.

Step 6: Distributing and Maintaining the Plan

Organizations are constantly evolving, so it is important the Plan be reviewed and updated on an annual basis. Agencies will have staff turnover due to retirements and employee vacancies. Critical resource suppliers may move, go out of business, and/or no longer provide the resources needed. It is important to review procedures, equipment, systems, personnel, and resource rosters routinely.

Conclusion

Every emergency or disaster is unique. There is no way to plan for every possible scenario, but by having a plan your organization can potentially:

- Reduce the damage to life, property and the environment;
- Reduce or mitigate the consequences;
- Reduce the length of time it takes to return to normal operations;
- Lessen the stress on staff, customers, and the general public; and
- Reduce the economic impact on your organization.

Essential Function Identification Tool

This template is designed to assist the Agency/Department answer the following questions:

- What are the essential functions of the Agency/Department (e.g. vital public services, civil authority, public safety, and/or economic base)?
- Are the functions formally mandated (e.g. codified in law or ordinance) or informally mandated (e.g. institutional norms or expectations)?
- What are the critical requirements/supporting activities necessary to sustain the function?
- What are the impacts if the function is not sustained (e.g. internal/countywide consequences and/or external stakeholder impact)?
- How critical is the function (e.g. High, Medium, Low, or Not Applicable)?
- What is the timeframe that the function needs to be operational following the disruption?

| Function | Mandates | Requirements & Activities | Impacts | Criticality | Timeframe |
|----------|----------|---------------------------|---------|---|-----------|
| | | | | <input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low <input type="checkbox"/> NA | |
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Resource Requirements Tool

During the planning process, the agency/department should identify the resources required to implement their COOP. Consider the quantity needed, when resource would be needed, the cost, and liabilities associated with a resource.

| Category | Function / Purpose | Quantity | Response Time | Cost | Liabilities | Comments |
|---|----------------------|----------|---------------|------|-------------|----------|
| Equipment Loss or Failure | Radio communication | | | | | |
| | PCs & peripherals | | | | | |
| | Software | | | | | |
| | Telephones | | | | | |
| | Cell Phones | | | | | |
| | Vehicles | | | | | |
| | Generator | | | | | |
| | Other | | | | | |
| Facility Loss | Alternate Locations | | | | | |
| | Space (sq. ft.) | | | | | |
| | Data Jacks | | | | | |
| | Voice lines | | | | | |
| | Bathrooms | | | | | |
| | Kitchen / Break Area | | | | | |
| | Secure Areas | | | | | |
| | Security | | | | | |
| Critical Vendor Supply Issues | | | | | | |
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| Vital Records Damage or Loss | | | | | | |
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| Materials & Supplies to implement COOP | Office Furniture | | | | | |
| | Office Supplies | | | | | |
| | Food & Water | | | | | |
| | Janitorial Supplies | | | | | |
| | Relocation Supplies | | | | | |
| | Other | | | | | |
| Other | | | | | | |
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