Continuity of Operations (COOP)

Continuity planning is simply the good business practice of ensuring the execution of essential functions through all circumstances, and is a fundamental responsibility of public and private entities to their stakeholders.

The Continuity Plan is the roadmap for the implementation and management of the Continuity Program. The plan could be activated in response to a wide range of events or situations – from a fire in the building; to a natural disaster; to the threat or occurrence of a terrorist attack. Any event that makes it impossible for employees to work in their regular facility could result in the activation of the Continuity plan.

The objectives of continuity planning include:
a) Ensuring the continuous performance of an agency's essential functions/operations during an emergency.
b) Protecting essential facilities, equipment, records and other assets.
c) Reducing or mitigating disruptions to operations.
d) Reducing loss of life and minimizing damage and losses.
e) Achieving a timely and orderly recovery from an emergency and resumption of operations.

The ultimate goal of continuity planning is to ensure that the State of California is able to continue its vital governmental services and operations under all conditions. For this to take place, state agencies must have plans in place to carry out their departmental essential functions without interruption.

COOP Background

Continuity of Operations is a federal planning concept that focuses on government's ability to continue essential functions. In order to ensure the continuity of essential functions under all circumstances, all federal agencies were directed to develop a COOP capability.

COOP planning guidelines were provided to federal agencies via a number of Federal Preparedness Circulars (FPCs). In June 2004, the Federal Emergency Management Agency (FEMA) updated the five-year old Federal Preparedness Circular #65, which superseded previous FPCs on COOP planning. This newer version expanded continuity of operations planning to reflect new COOP procedures since 9/11.

National Continuity Policy

On March 30, 2011, President Obama issued National Security Presidential Directive (PPD) 8. This directive is aimed at strengthening the security and resilience of the United States through an integrated, all-of-Nation, capabilities-based approach to preparedness.

National Continuity Policy (Continued)

On May 9, 2007, President Bush issued National Security Presidential Directive (NSPD) 51 / Homeland Security Presidential Directive (HSPD) 20 on National Continuity Policy (NCP). This directive updates longstanding directives designed to assure that governing entities are able to recover from a wide range of potential interruptions.

The National Continuity Policy Implementation Plan (NCPIP), mandated by the National Continuity Policy, was published in August 2007. It focuses on critical actions to ensure the effectiveness and survivability of our national continuity capability through any circumstance.

Federal Continuity Directives

To provide the operational guidance to implement the NCP, the Department of Homeland Security (DHS) developed Federal Continuity Directives (FCDs). The purpose of the FCDs is to provide direction for the development of continuity plans and programs for the Federal executive branch.

Continuity Guidance Circular (CGC 1 & 2)

CGC 1 published by DHS in July 2013, provides guidance and direction for the development of continuity plans and programs for non-federal entities. CGC 2 published in December 2013, focuses on Mission Essential Functions (MEFs) identification.

State Planning Requirements

Executive Order S-04-06, released by Governor Schwarzenegger on April 18, 2006, directed the Office of Emergency Services (Cal OES) to promulgate continuity guidelines by June 1, 2006 for use by state and local agencies to update their Continuity of Operations/Continuity of Government Plans. The on-going expectation is that State agencies will use the guidance developed by Cal OES to update and maintain their Continuity Plans.

Preparing the State: State Continuity Planning Guidance

State continuity planning guidance was recently revised to ensure consistency with the new federal model. The updated *California Continuity Planning Guidance and Plan Template* (2013) provide direction to the State executive branch agencies for developing all-hazard continuity plans and programs. It includes a listing of the State Continuity Planning Objectives and State Essential Functions. The guidance is available for download on the Cal OES website.

Elements of Continuity Planning

The Continuity Plan is the roadmap for the implementation and management of the Continuity Program. PPD-8/NSPD-51/HSPD-20, the NCPIP, Federal Continuity Directive 1 (FCD 1), and Continuity Guidance Circular 1 (CGC 1) outline the following overarching continuity requirements for agencies and organizations.

Essential Functions – Functions that enable the agency or department, on behalf of the State, to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial/economic base in an emergency.

Lines of Succession – Provisions for the assumption of senior agency offices and other key positions during an emergency in the event that any of those officials are unavailable to execute their legal and/or essential duties.

Delegations of Authority – Establishes who has the right to make key decisions during a continuity event.

Continuity Facilities – Alternate facilities from which an agency and organization can perform its essential functions in a threat-free environment.

Continuity Communications – The availability and redundancy of critical communications systems to support connectivity to internal and external organizations, customers, and the public.

Essential Records Management – The identification, protection and ready availability of electronic and hard copy documents, references, records, information systems, data management software, and equipment needed to support essential functions during a continuity situation.

Human Resources – Guidelines for the management of an agency's human resources. This includes designated continuity personnel and non-designated employees who will nevertheless be affected by a continuity event.

Tests, Training, and Exercises (TT&E) – Measures to ensure that an agency's continuity program is capable of supporting the continued execution of its essential or mission critical functions throughout the duration of a continuity situation.

Devolution of Control and Direction – Capability to transfer statutory authority and responsibility for essential functions from an agency's primary operating staff and facilities to another organization's employees and facilities, and to sustain that operational capability for an extended period.

Reconstitution – The process by which agency personnel transition back to normal agency operations from the alternate location back to the primary or replacement primary facility.

Identification and Prioritization of Essential Functions

The identification of agency essential functions is the foundation for continuity planning. The identification of mission critical government functions focuses on defining the activities that are conducted to accomplish the agency's mission, serve its stakeholders, and ensure the continuation of the State Essential Functions.

An agency should carefully review all of its missions and functions before determining those that are essential. Improperly identifying functions as "essential" or not identifying as "essential" those functions that are, can impair the effectiveness of the entire continuity program, because other aspects of the plan are designed around supporting these functions. If an agency fails to identify a function as essential, that agency will not identify the requirements and resources to support that function in an emergency and will not make the necessary arrangements and coordination to perform that function. If an agency identifies too many functions as essential, the agency risks being unable to adequately address all of them. In either case, the agency increases the risk that it will not be able to perform all of its essential functions during a continuity event.

Planning related to essential functions must also include identifying those agency partners who are critical to program delivery and testing the effectiveness of data exchange among the organization's partners. There must be careful consideration of agency and other partner interdependencies to ensure the continued delivery and performance of essential functions across a broad spectrum of threats and all-hazards emergencies.

Planning for continuity usually cannot address all of an organization's vital functions. Some functions must be judged to be more important than others, and some will not be covered by continuity plans since the values at risk do not justify the costs of coverage. The Continuity Plan should offer a *priority*, i.e., the best assessment of what operations are most important.

Recovery Time Objectives (RTO) – One method of prioritization is to adopt a 24 hour or one business day recovery time objective, or RTO. The goal is to encourage all managers to examine their operations and identify those functions that, if are disrupted for more than one business day, will cause serious harm. If so, they are labeled "essential", a term that implies for continuity planners both high value-add and a time-critical requirement for performance.

Once an organization has correctly identified and prioritized its essential functions, the next step to consider is the minimum resources needed to continue the essential functions in an emergency.

Resource requirements to consider include:
☐ Alternate Facilities or Work Sites
☐ Communications Systems
☐ Key Personnel
☐ Essential/Vital Records and Databases
☐ Critical Systems and Equipment
☐ Key Vendors
☐ Supporting Government Agencies/Departments

Protecting Essential Records and Databases

The identification, protection, and ready availability of vital records and databases are critical elements of a successful continuity plan and program. This includes electronic and hardcopy documents, references, records and information systems needed to support the agency's essential functions.

There are two types of essential records:
☐ **Emergency Operating Records**—Examples include emergency plans and directives, lines of succession, staffing assignments.
☐ **Rights and Interests Records**—Examples include official personnel records, Social Security, contracting and acquisition files.

Each agency needs to determine whether they could access the critical information they need to perform their key functions in the case of an emergency? Does the agency have contingency plans in place for protecting its essential records and databases?

The key to being adequately prepared is to establish and maintain a essential records protection program for your organization. The following five steps are recommended:

☐ Step 1 – Identify the agency's essential records.
☐ Step 2 – Prepare an inventory of the essential records.
☐ Step 3 – Determine how the records will be protected.
☐ Step 4 – Designate an offsite storage location.
☐ Step 5 – Protect the records.

Ensuring the Operations of Critical Functions at Alternate Facilities

The primary goal of continuity planning is to assure that the capability exists to continue essential agency functions across a wide range of potential situations or emergencies. This includes the loss of the primary operations facility. The identification of a continuity or alternate facility that is capable of supporting essential operations, positions, and personnel is critical. These facilities must be capable of supporting operations in a threat-free environment, as determined by the geographical location of the facility and the collective protective characteristics of the facility.

The following planning considerations should be used when selecting appropriate alternate facilities:

☐ **Location** – Select a site that provides a risk-free environment and is geographically dispersed from the primary work location.
☐ **Construction** – The alternate facility should be constructed so that it is relatively safe from the high-risk hazards in the area.
☐ **Space** – The site must have enough space to house the personnel, equipment, and systems required to support all of the organization's essential elements.
☐ **Billeting and Site Transportation** – Billeting (hotels) and public transportation should be available at or near the alternate facility.
☐ **Communication** – The alternate facility will need to support the organization's COOP information technology and communication requirements. The agency will need to acquire any capabilities not already in place.
☐ **Security** – Security measures, such as controlled access, should be an inherent part of the facility.
☐ **Life Support Measures** – Access to life support measures--food, water, and other necessities--is also important. If they are not available on site, they should be nearby.
☐ **Preparation** – How much time, effort, and cost will be required to make the facility suitable for the organization's needs? The more "turnkey" the facility is, the better.
☐ **Maintenance** – How much maintenance will be required to keep the facility ready for COOP operations? Lower-maintenance facilities offer a distinct advantage in case of no-warning continuity activation.

It is advisable to select at least two alternate facilities in case the first selection is unavailable during the emergency. Organizations should include a list of these pre-identified alternate sites in their Continuity Plan.

Creating a Continuity Strategy for Catastrophic Events

Another important aspect of the overall continuity program is devolution planning. Devolution planning supports overall continuity planning and addresses catastrophes and other all-hazard emergencies that render an agency's leadership and key staff unavailable to or incapable of performing its essential functions from either the agency's primary or alternate facilities. Devolution planning also addresses notice and no notice events. A continuity plan's devolution option should be developed so that it addresses how an agency will identify and transfer its essential functions and/or leadership authorities away from the primary facility or facilities, to a location that offers a safe and secure environment in which essential functions can be performed.

Testing, Training and Exercises (TT&E)

The testing, training, and exercising of continuity capabilities is essential to demonstrating, assessing, and improving an agency's ability to execute its continuity program, plans and procedures. Training familiarizes continuity personnel with their roles and responsibilities in support of the performance of an agency's essential functions during a continuity event. Periodic testing also ensures that equipment and procedures are kept in a state of readiness.

An agency's continuity exercise program focuses primarily on evaluating capabilities or an element of a capability, such as a plan or policy, in a simulated situation.

The goal of testing, training and exercises is to improve operational readiness. Therefore, all continuity related events should be conducted for the purpose of validating elements, both individually and collectively, of an organization's planning assumptions and the effectiveness of associated training objectives.

Testing, training and exercises are the primary ways to:

☐ Reveal planning weaknesses or faulty assumptions.
☐ Identify resource gaps.
☐ Improve intradepartmental and interagency coordination.
☐ Clarify or refine roles and responsibilities.
☐ Improve individual performance.

Achieving Continuity of Operations Keys for Success

Organizations must adopt a multi-year strategy and program management plan (MYSPMP) to sustain a viable continuity program. As continuity managers know, continuity plans and programs are dynamic and require regular updates to reflect any changes in the organization (e.g., staffing, structure, functions, equipment, communications, leadership, resources and changing policy).

The multi-year strategy section of the organization's continuity plan should address short and long term continuity objectives, timelines, budgetary requirements, planning and preparedness considerations, and planning milestones or tracking systems to monitor accomplishments. It should also include a prioritized list of vulnerabilities that have been identified for the agency.

Continuity Plans are living documents which must be routinely refined and improved to reflect lessons learned through both training exercises and real-world events. These plans are continuously updated to ensure that essential functions will be maintained under all circumstances.

Continuity Planning For Pandemic Influenza

Pandemic influenza demands an additional set of continuity planning considerations. Unlike traditional continuity planning, pandemic influenza may be widely dispersed geographically and will potentially arrive in waves that could last several months at a time. While a pandemic will not directly damage facilities, power lines, banks or computer networks, it will ultimately threaten all critical infrastructure by removing essential personnel from the workplace for weeks or months. This makes a pandemic a unique circumstance necessitating a strategy that extends well beyond the public health and medical considerations, to include the sustainment of critical infrastructure, private-sector activities, the movement of goods and services across the nation and the globe, and economic and security factors.

State agencies are encouraged to develop an annex to their existing continuity plans that adequately address issues such as increased absenteeism, social distancing procedures, and impacts on interdependencies.

For addition information about building a comprehensive Continuity Plan, please visit Cal OES Continuity website at:
http://www.caloes.ca.gov/cal-oes-divisions/planning-preparedness/continuity-planning
or
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