



DISCUSSION PAPER

Topic: Continuity Planning Program –
A Consolidated Approach



1.0 INTRODUCTION

The changing threat environment has shifted our awareness to the need for Continuity of Government (COG) and Continuity of Operations (COOP) capabilities that enable state and local governments to continue their essential functions across a broad spectrum of emergencies.

This discussion paper describes the concept of Continuity of Government, outlines the federal Continuity of Operations model, and introduces the concept of a consolidated COOP/COG capability, referred to as Continuity Planning. The goal is to develop a plan that clearly addresses elements of both COG and COOP, or to ensure these elements are added to existing plans.

The principles and practices of COG are imbedded into existing California law and emergency plans. Existing plans that address COG may lack the new emphasis contained in COOP for ensuring operational capability of essential functions through tests, training, exercises and interoperable communications. Incorporating both COG and COOP elements into plans and procedures can result in more integrated, comprehensive, and workable emergency plans.

2.0 CONTINUITY OF GOVERNMENT (COG)

--Continuity of Government: A coordinated effort with the Federal Government's executive branch to ensure that State Essential Functions continue to be performed during a catastrophic emergency.

--Continuity of Government planning is the preservation, maintenance, or reconstitution of the institution of government. It is the ability to carry out an organization's constitutional responsibilities. This is accomplished through succession of leadership, the pre-delegation of emergency authority and active command and control.

Background

In anticipation of major catastrophic disasters, governmental units must be prepared to maintain operations throughout all types of destructive events including enemy attack by any method. Continuity of Government has been defined as the preservation, maintenance, or reconstitution of the civil government's ability to carry out its constitutional responsibilities.



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It is essential to maintain the fabric of our constitutional form of government and to ensure that Californians have faith in their governments' capability to provide for their health, safety and welfare and to contribute to the common defense of the United States. Continuity of Government is concerned with the full range of governmental services including the three branches of government (judicial, legislative, and executive) and all levels of government (federal, state, and local).

Established in California Laws and Plans

Continuity of Government is addressed and well established through a variety of State laws, plans, and in emergency and administrative procedures.

The Emergency Services Act, Section 8650, states: "Emergency plans means those official and approved documents, which describe the principles and methods to be applied in carrying out emergency operations or rendering mutual aid during emergencies. These plans include such elements as **continuity of government**, the emergency services of governmental agencies, mobilization of resources, mutual aid, and public information."

In Executive Order W-9-91, numbers 4 and 5 respectively state: "The head of each department, bureau, board, commission and independent institution of state government, hereinafter referred to as an agency, is responsible for the emergency planning, preparedness, and training of his or her agency;" and "Each agency shall establish a line of succession which includes at least three persons for each position that is assigned essential emergency functions, for both headquarters and major field division, as defined by agency director. The agency plan shall define the conditions to be met to shift responsibility to the next successor..."

COG is critical to providing rapid and effective response to a truly catastrophic disaster and is identified as an element of the *California Emergency Plan* by the Emergency Services Act. (Gov. Code § 8560)

The *California State Emergency Plan* contains a brief description of the seven elements of COG that must be considered by all branches of government in California through development of appropriate emergency plans and related procedures.

3.0 CONTINUITY OF OPERATIONS (COOP)

--Continuity of Operations: An effort within individual executive d/a to ensure primary mission essential functions continue to be performed during a wide range of emergencies.



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--Continuity of Operations planning is an effort within individual departments and agencies to ensure the continued performance of minimum essential functions during a wide range of potential emergencies. Essentially, it is the capability of maintaining the business of government under all eventualities. This is accomplished through the development of plans, comprehensive procedures, and provisions for alternative facilities, personnel, resources, interoperable communications, and vital records/databases.

Background

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

COOP planning guidelines were provided to federal agencies via a number of Federal Preparedness Circulars (FPCs). In June 2004, the Department of Homeland Security's 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.

COOP planning is simply a "good business practice"—part of the fundamental mission of agencies as responsible and reliable public institutions. For years, COOP planning activities have been an individual agency responsibility conducted primarily in response to the threat of emergencies within the confines of the organization.

The elements of a viable COOP capability are almost identical to the components of COG. COOP encompasses and enhances COG elements to establish a baseline of preparedness for the full range of potential emergencies.

4.0 CONSOLIDATION OF COG AND COOP – CONTINUITY PLANNING

--State Continuity Policy: It is the policy of the State to maintain a comprehensive and effective continuity capability composed of the key elements of Continuity of Operations and Continuity of Government programs in order to ensure the preservation of our form of government under the Constitution and the continuing performance of State Essential Functions under all conditions.



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--New Continuity Philosophy: Transforming stovepipes to fully integrated activities -- Continuity of Operations, Continuity of Government and Enduring Constitutional Government (ECG) under one CONTINUITY planning program.

The State has relied on a variety of documents, such as departmental emergency operations plans, business continuity or business resumption plans, to accomplish many of the same planning objectives as those of COG and COOP. To maintain consistency among federal, state, and local plans, this document recommends that all levels of California government develop an integrated COOP/COG capability, which is a consolidation of all the planning elements included in COG and COOP (see table below for list of elements). This involves ensuring that all the elements of continuity of operations and continuity of government have been addressed and/or are incorporated in agency emergency plans and procedures. This effort would support coordinated planning at all governmental levels, thereby providing for a more effective emergency response.

The COOP and COG concepts that are listed below are consistent with the federal guidance for all levels of government to develop or update their continuity plans.

CONTINUITY PLANNING PROGRAM	
<i>Consolidated Elements of Continuity of Operations/Continuity of Government</i>	
1.	Identification and prioritization of essential functions
2.	Line of succession to essential positions required in an emergency
3.	Delegation of authority and pre-delegation of emergency authorities to key officials
4.	Continuity facilities -- Alternate work-sites and alternate emergency operations centers
5.	Continuity communications
6.	Human capital -- Protection of government resources, facilities and personnel
7.	Vital records management
8.	Tests, training and exercises
9.	Devolution of control and direction
10.	Reconstitution

5.0 CONSOLIDATION OF CONTINUITY PLANNING

Objectives

Continuity planning is an effort to assure that the capability exists to continue essential agency functions throughout any potential emergency. The objectives of Continuity include:



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- Ensuring the continuous performance of an agency or department's essential functions/operations during an emergency;
- Protecting essential facilities, equipment, records, and other assets;
- Reducing or mitigating disruptions to operations;
- Reducing loss of life, minimizing damage and losses; and,
- Achieving a timely and orderly recovery from an emergency and resumption of full service to customers.

Planning Considerations

In accordance with federal guidance, Continuity Planning:

- Must be maintained at a high level of readiness;
- Must be capable of implementation, both with and without warning;
- Must be operational no later than 12 hours after activation;
- Must maintain sustained operations for up to 30 days; and,
- Should take maximum advantage of existing agency field infrastructures.

Planning Approaches

There are several possible approaches to addressing both COOP and COG. They include:

1. Developing a separate plan, using the COOP/COG template, to address the ten elements of COOP/COG and incorporating it into the EOP as an annex or by reference.
2. Updating existing business continuity plans and business resumption plans to address COOP/COG elements and incorporate those documents by reference into the emergency operations plan (EOP).
3. Consolidating documents containing the required elements by reference into an organization's emergency operations plan.