




U.S. Department of Education
REMS TA Center
WA School Safety Center



Continuity of Operations (COOP) Planning






Presentation Goals

- I. Define a Continuity of Operations (COOP) Plan
- II. Connect a COOP to the five phases of emergency management: Prevention, Mitigation, Protection, Response and Recovery
- III. Highlight COOP-planning considerations
- IV. Describe the nine elements of a viable COOP plan
- V. Outline potential impacts of a COOP situation
- VI. Provide resources for further planning

2

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Presentation Goals

- I. Define a Continuity of Operations (COOP) Plan

3

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I. Define Continuity of Operations (COOP) Plan

- A COOP is a process that **ensures continued performance** of essential functions across a full range of potential emergencies, be they natural, technological, biological or man-made/adversarial.
- A COOP plan provides **guidance and establishes responsibilities and procedures** to ensure that business resilience is developed and maintained.
- A COOP is **not the same** as an Emergency Operations/Safety Plan. It supplements it.
- It's a **Functional Annex** to a district EOP/Safety Plan.

4

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I. Define Continuity of Operations (COOP) Plan (Cont'd.)

A COOP provides a continuity infrastructure through careful planning. It ensures:


- Emergency delegation of authority and an orderly line of succession, as necessary;
- Safekeeping of essential personnel, resources, facilities, and vital records;
- Emergency acquisition of resources necessary for business resumption; and
- The capability to perform critical functions remotely until resumption of normal operations.


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II. Connection to the Four Phases of Emergency Management


COOP-planning:

- Can **Prevent or Mitigate** loss of essential functions;
- Helps **Protect** a district or individual school by minimizing disruptions due to unusual operational requirements;
- Provides the ability to **Respond** to a wide range of functional impacts; and
- Defines a process to **Recover** and return to normal operations.



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7




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- Highlight COOP-planning considerations**

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8




III. COOP-planning Considerations

A school district's COOP plan should:

- Allow for its implementation at any time, with or without warning, during duty and non-duty hours;
- Provide full operational capability for **essential functions** no later than 12 hours after activation; and
- Sustain essential functions for up to 30 days.


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III. COOP-planning Considerations (Cont'd.)

A COOP plan is utilized when:

- An incident impacts the ability to carry out essential functions (e.g., employee safety, equipment, records and other assets protection) and missions via normal operations; and
- Facilities and human resources are compromised (e.g., administrative building is damaged/destroyed or personnel are unavailable for duty during a pandemic event).
- **NOTE:** Incidents may require full COOP plan implementation in which essential functions are carried out at a remote site or incidents may best be addressed through a modified COOP on-site.


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III. COOP-planning Considerations (Cont'd.)

Key Leadership and Personnel in a COOP


- Leadership and personnel who know the status of their functionality
- Leadership and personnel must be familiar with their assigned essential functions
- Leadership and personnel must be aware of COOP capabilities
- Leadership and personnel must be able to make a decision or recommendation for implementing COOP


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IV. Elements of a Viable COOP Plan


- Essential functions
- Delegations of authority
- Alternate facilities
- Interoperable communications
- Vital records and databases
- Human capital management
- Testing, training and exercise
- Devolution
- Reconstitution

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IV. Element 1: Essential Functions

- Identification of essential functions are the beginning stage of COOP-planning.
- Essential functions must be determined *before* other COOP processes.
- Essential functions are based on district and school needs and supporting emergency management roles.
- Identification of nonessential functions allows for recognition of which services will cease in an emergency situation.

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IV. Element 1: Essential Functions (Cont'd.)

Examples of essential functions:

- Transportation—of students or evacuees
- Communications—internal and external audiences
- Instructional services—distance learning
- Facility use—accessible main buildings or alternative locations
- Data and Technology – of records and network infrastructure

15




IV. Element 1: Essential Functions (Cont'd.)

- School districts may benefit from considering essential functions during different operational scenarios.
- Essential functions may be different when schools are open vs. when schools are closed.
- Districts should identify and recognize *school* roles in emergency support functions related to the local community Emergency Operations Plan.

16







IV. Element 1: Essential Functions (Cont'd.)

Those functions that must continue with no or minimal disruption include:

- Provision of safety and security;
- Facilitation of emergency response operations;
- Provision of critical educational and support services; and
- Restoration of normal operations.


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IV. Element 2: Delegations of Authority

Specify who is authorized to make decisions or act on behalf of:

- The district superintendent/administrative head;
- District leadership;
- Other key individuals associated with essential functions performance; and
- School board members.


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IV. Element 2: Delegations of Authority (Cont'd.)


Delegations of authority should:

- Be predetermined;
- Be documented in writing;
- Specify at least two alternate authorities; and
- Address limitations on the delegated authority.



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19



IV. Element 2: Delegations of Authority (Cont'd.)


Delegations of authority have several purposes:

- Approving emergency policy changes
- Approving changes of Standard Operating Procedures
- Empowering designee(s) to act on behalf of district in interagency response
- Making personnel management decisions
- Approving commitment of resources
- Signing contracts and authorizing procurement



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20





IV. Element 2: Delegations of Authority (Cont'd.)

- Legal counsel should review delegations of authority to identify possible legal restrictions.
- State laws may impact school board issues (e.g., during a natural disaster schools should know who has the authority to close schools - mayors, governors, superintendents).
- Recent COOP-related legislation:
 - **RCW 38.52.030** - Continuity of Operations Plan, 2015;
 - **HB 1003** – LEA COOP Planning, 2016.

21

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IV. Element 2: Delegations of Authority (Cont'd.)


Orders of Succession

- Provides for the assumption of senior leadership during an emergency if/when the incumbents are unable or unavailable to execute their duties
- Allows for an orderly and predefined transition of authority

22

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IV. Element 3: Alternate Facilities

- Districts should identify locations other than their normal facilities (which include administrative buildings, schools, alternative facilities) to carry out essential functions in a COOP situation.


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IV. Element 3: Alternate Facilities (Cont'd.)

- Determine if relocation within the district is feasible or if other arrangements must be made with other school districts, agencies or partners
- Provide for reliable logistical support, services and infrastructure systems
- Keep in mind the need to sustain operations for 30 days
- Consider prepositioning assets and resources at alternate facility (e.g., computers, servers, etc.)
- Determine which essential functions and services can be conducted from a remote location (e.g., home) and those that need to be performed at a predesignated alternate facility

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IV. Element 4: Interoperable Communications

Alternate facilities must provide interoperable communications in order to:

- Communicate externally with relevant teachers, staff and partners
- Communicate internally with leadership and staff
- Ensure connectivity between internal and external parties even if primary means of communication fails


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IV. Element 4: Interoperable Communications (Cont'd.)

Districts should consider:


- Alternate means of communicating with the local emergency operations center, first responders, or local and state authorities in the event cell towers and phone land lines are affected;
- Access to county and state radio frequency;
- Access to satellite phones; and
- Linkage to National Oceanic and Atmospheric Administration (NOAA) radios.


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IV. Element 5: Vital Records

- Vital records are electronic and hard copy documents, references and records needed to support essential functions during a COOP situation.
- Two types of vital records:
 1. Emergency operating records
 2. Legal and financial records


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IV. Element 5: Vital Records (Cont'd.)

Emergency Operating Records

- Emergency operations plans and directives
- Orders of succession
- Delegations of authority
- References for those who perform which essential functions

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IV. Element 5: Vital Records (Cont'd.)

Legal and Financial Records

- Personnel Records
- Social Security Records
- Payroll Records
- Retirement Records
- Insurance Records
- Contract Records
- Student Records

29

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IV. Element 6: Human Capital Management


• Human capital management:

- Is the sum of talent, energy, knowledge, and enthusiasm that people invest in their work
- Places the most qualified people in the right jobs to perform essential functions most effectively
- Considers reassignment of personnel from nonessential functions

30

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IV. Element 6: Human Capital Management (Cont'd.)

Human Capital Management:


- Ensures that all employees have a clear understanding of what they are supposed to do in an emergency
- Includes specific protocols for identifying and assisting employees with disabilities


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IV. Element 6: Human Capital Management (Cont'd.)

- All employees need to be informed prior to and during the course of an emergency so they can be ready to go back to work when recalled or to support their agencies' efforts from home.
- Management is responsible for accounting for all staff.
- During a COOP situation most employees will:
 - Fulfill their predesignated emergency support function, or
 - Go home, or
 - Remain available, or
 - Wait for further direction.


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IV. Element 7: Tests, Training and Exercises

Tests, training and exercises of the COOP plan ensure that:

- The COOP plan is capable of supporting operations of essential functions.
- All equipment and systems work as required.
- A gap analysis addresses identified deficiencies.
- The plan identifies interdependencies, supply chain issues and infrastructure capabilities.


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IV. Element 7: Tests, Training and Exercises (Cont'd.)

Tests, training and exercises ensure that:

- All employees are able to deploy to the alternate facility within the required time frame (12 hours).
- The alternate facility includes everything that is needed for the response team to perform the essential functions.

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IV. Element 8: Devolution

Devolution is:

- The capability to transfer statutory authority and responsibility for essential functions from an agency's primary operating staff and facility to other employees and facilities for an extended period.
- A way of ensuring a COOP capability in the event COOP personnel are unable to perform their mission or if the alternate facility is unavailable to support it.

35

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IV. Element 8: Devolution (Cont'd.)


COOP planning should:

- Identify likely triggers and authorities for devolution implementation.
- Describe how and when devolution will occur.
- Identify the resources that will be required to continue essential functions under a devolution scenario.

36

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IV. Element 9: Reconstitution

Reconstitution is:


The process by which teachers, staff and, ultimately, students resume normal operations (which must be identified and outlined in a plan) from the original or a replacement primary operating facility.


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IV. Element 9: Reconstitution (Cont'd.)


- Reconstitution may be complex.
- Recognition of minimum staffing requirements required to return to normal operations.
- Districts may need to appoint a reconstitution manager to handle the reconstitution process.


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V. Potential COOP Situation Impacts


- Disrupted lines of direction and control
- Confusion over who is in charge
- Disrupted operations for brief or extended periods of time
- Compromised security of students and staff
- Disruption of normal communication links and methods
- Disruption to supply chain


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V. Potential COOP Situation Impacts (Cont'd.)


- Period of uncertainty about what is happening, extent of severity, and what to do to protect yourself and your loved ones
- Possible threat to job security
- School concern about financial and human resource policy implications
- Instructional delivery measures that may affect special education requirements


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VII. Resources

FEMA:

- Guidance: <http://www.fema.gov/guidance-directives>
- Templates: <http://www.fema.gov/media-library/assets/documents/90025>
- Training: IS 546: <http://training.fema.gov/is/courseoverview.aspx?code=IS-546.a>
- Training: IS-547.A: <https://training.fema.gov/is/courseoverview.aspx?code=is-547.a>

Colorado: <https://www.colorado.gov/pacific/cssrc/continuity-operations-coop-planning>



Pennsylvania: <http://www.portal>

Virginia: <http://www.vaemergency.gov/em-community/plans/coop>


Washington: <http://www.k12.wa.us/Safetycenter/A-Z.aspx>

43

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Questions



44

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