Unit V – Continuity of Operations Preparation, Implementation, and Validation

This Unit presents techniques and methods to assist in preparing, implementing, and validating a COOP plan. The unit presents a step-by-step process for establishing a planning team and ensuring that it has the appropriate mechanisms for successful plan preparation. Some processes to effectively implement the organization’s COOP plan are presented. Finally, the components for establishing a comprehensive test, training, and exercise program are provided which will assist in the validation of COOP capabilities.
Unit Objectives

At the conclusion of this unit, participants will be able to:

1. Describe the steps necessary for COOP plan preparation.

2. Outline processes to effectively implement the organization’s COOP plan.

3. Illustrate components of a comprehensive test, training, and exercise program to validate COOP capability.
Preparation

This unit provides advice on how to create and maintain a viable COOP program. To be successful, COOP planning requires upper management support – the organization’s leader sets the tone by authorizing planning to take place and directing senior management to get involved. Developing the COOP program is a dynamic process, planning although critical, is not the only component. Other important functions are implementation and validation.

An in-depth knowledge of emergency management is not required – what is required is the authority to create the plan, the visibility with the organization, and the commitment from management to ensure active participation at all levels. Since the COOP plan establishes the operational framework for an effective alternate operations capability for the entire organization, it will require considerable effort in the development phase and continued diligence to maintain the program.

Activities in the development of a COOP plan cannot be explicitly defined altogether – but it is key to remember the PROCESS of planning is invaluable. The process should involve all organizational units and levels of personnel working in concert. Coordination amongst all functions and organizational levels is important, it implies a willingness to share responsibility and eliminates duplication of efforts. The preparation process should include:

- Establishment of planning team
- Assignment of authority
- Development of plan
- Preparation for challenges
Establish a Planning Team

The planning team should be selected from different organizational units and disparate functional areas. There should be one individual in charge of the planning process. This individual should serve as the chairperson and have overall responsibility for developing and coordinating the COOP plan.

The size of the planning team will depend on the organization’s operations, requirements, and resources. The benefits of utilizing a planning team include: encourages participation by getting multiple people involved in process; increases attention and performance of team members; enhances organizational visibility and stature of planning process; and provides for a broader perspective. The personnel should be selected based on their knowledge and skills. The team should include personnel who can be active members and those that will serve in an advisory capacity. In most cases, one or two people will do the majority of the actual planning and documentation. Each member should be appointed in writing by management.

It is important to include members from all functional areas – upper management, middle management, staff, human resources, safety, security, public information, information technology, telecommunications, finance and administration, labor union(s), and facility management. Finally, establish various sub-committees based on the essential COOP elements. This will also assist when it is time to implement the plan by building and coordinating the capability.

- Select team members from organizational units and functional areas
- Assign one individual to serve as chairperson who has overall responsibility for developing and coordinating the COOP plan
- Ensure the size of the team is commensurate with the organizational size, structure, operations, and functions
- Determine personnel who can be active members and those that will serve in an advisory capacity
- Ensure members are appointed in writing by management
Assign Authority

Senior management should demonstrate its commitment to the COOP program by authorizing the planning team to take all the steps necessary to develop, implement, and validate the plan/capability. The team chairperson should be someone who has sufficient stature and visibility within organization to ensure the planning team is effective. Clear lines of authority should be established but provisions should be made to allow flexibility in coordination and free flow of information from all levels.

The team should issue a mission statement to demonstrate its commitment. The statement should include the team’s purpose, indicate organizational involvement at all levels, and define the team’s authority. The team in coordination with senior management should establish a project schedule and budget. The project schedule should include performance milestones – the timelines can be modified as priorities become more clearly defined during the process. Additionally, an initial budget should be prepared by the team and approved by senior management. The budget should include such things as research, printing, seminars/workshops/meetings, consulting services, and other expenses that may be necessary during the preparation phase.
Develop the Plan

The development of the plan is best done by utilizing a multi-step approach. Each organization should begin the plan development by analyzing its current capabilities and performing a vulnerability assessment to determine potential hazards. This step entails gathering information about current capabilities and about possible hazards/emergencies, conducting a vulnerability assessment, and determining the organization’s capacity to handle the emergency.

The planning team should review internal plans and policies including any applicable guidance or regulations. Examples include: building evacuation plan, security procedures, mutual aid agreements, information technology/telecommunications schematics, employee manuals, facility closure policies, orders of succession, delegations of authority., safety/health program, record/file retention procedures, finance and accounting policies, and human resource documents. The team should identify codes and regulations with impact on planning process. Be sure to coordinate with the general counsel to ensure all applicable guidance and regulations are included. Some examples include: Occupational Safety and Health Administration (OSHA), human resources, and labor organizations. Also review applicable Federal, State, and local regulations.

Next, the team should determine the organization's mission essential functions in coordination with all applicable work unit. This process is very demanding and requires special consideration by senior management. In accordance with the mission essential functions – roster staff, assign resources and capabilities, select an alternate facility, and identify internal and external customers. The team is now ready to begin the documentation phase by developing a concept of operations for the COOP plan. The plan should assign specific responsibilities, establish procedures, and utilize a time-phase operational approach – Activation, Operations, and Reconstitution and Termination.
FOLLOW A PROCESS

- Prepare first draft
- Coordinate review by each organizational unit on first draft
- Incorporate changes, develop second draft
- Seek external review by expert(s) and management
- Incorporate changes, develop final draft
- Present to agency head for approval and signature
- Finalize plan
- Print and Distribute
- Review and update plan annually or as major changes occur

Follow a Process

The process for documenting the COOP plan may vary depending on organizational practices however, the methodology is typical. It is important to seek constructive criticism and review. Request the State or local emergency management office to review the plan and provide comments and suggestions. Coordination of the plan is also vital to the plan’s success – it implies cooperation and a willingness to share responsibility. This step will also reduce the duplication of efforts, provide a means for assigning scarce resources, and enhance the overall planning process.

Each organization should:

- Prepare first draft
- Coordinate review by each organizational unit on first draft
- Incorporate changes, develop second draft
- Seek external review by expert(s) and management
- Incorporate changes, develop final draft
- Present to agency head for approval and signature
- Finalize plan
- Print and Distribute
- Review and update plan annually or as major changes occur
Prepare for Challenges

To reduce the impact of the inevitable problems that arise during the planning process, the team should prepare for challenges. The utilization of program management techniques is recommended. Organizations should:

- Establish specific goals and milestones
- Prepare lists of tasks to be performed
- Assign responsibility for each task
- Select schedule for task completion
- Determine how to address problem areas and resource shortfalls

Some suggestions for possible COOP planning objections/resistance are listed below:

*COOP plan will never be required.* Describe the changing threat paradigm and the probability of low impact emergencies and explain their impact on organization’s ability to fulfill its mission.

*COOP plans duplicate plans already in place.* Examine the scope of existing plans. If necessary, explain that the focus of the COOP plan is the organization itself, not its customers.

*COOP plans need to address only significant events.* Explain the overall disruption over time caused by less critical but more probable event.

*Why allocate resources to COOP planning.* Document the costs in terms of finances, community impact, reputation, and long term consequences for failing to prepare. It is the duty of the government to remain actively serving its customers regardless of the circumstances. Citizens have the right to expect their government will take reasonable measures to continue vital services at reasonable costs.
Implementation

Implementation involves developing the capability and maintaining the program described in the COOP plan. This process entails more than simply writing the plan – it requires developing the capability and maintaining the program at a high-level of readiness. COOP planning should be integrated into daily organizational operations. The COOP program should become part of the organizational culture. This requires internal and external coordination to assure that plan and supporting procedures are executable. The implementation process should:

- Survey current resources and capabilities
- Develop a multi-year strategic and program management plan
- Employ working groups
- Investigate opportunities to achieve minimum capability
Survey Current Resources/Capabilities

This step is simplistic in nature, but significant because it will allow the organization to develop a capability which is specific to its operations. This step will ensure effective resource management and mitigate against unnecessary duplication. The capability survey will enable the organization to better determine what resources will be required to continue its operations. This step will also serve as an assessment of the overall readiness of the organization to handle any emergency situation regardless of whether it requires a COOP activation. Each organization should:

- Analyze capabilities
- Inventory resources
- Examine personnel assignments
- Determine vulnerabilities
- Review internal plans and policies
- Evaluate lines of coordination
Develop a Multi-Year Strategy and Program Management Plan

The Multi-Year Strategy and Program Management Plan is critical to developing and managing a viable COOP capability. This is an essential element of the COOP program more specific information is presented in Unit III. At a minimum the plan should:

• Outline agency process for capability development

• Define short and long-term goals and objectives

• Include discussion on each of the COOP essential elements

• Forecast budgetary requirements

• Anticipate and address issues and potential obstacles

• Address internal coordination of related activities

• Establish program milestones

• Facilitate analysis of information
Employ Working Groups

As stated previously in the previous section in this unit on establishing teams, working groups enable the organization to leverage the knowledge and skills of its personnel. The recommendations and benefits of the team concept are also invaluable during the implementation phase. Each organization should establish working groups based on functional areas: alternate facilities, information technology/telecommunications, plans and procedures, vital records/databases, TT&E, etc. The members should be selected based on their requisite knowledge and skills. One individual should be assigned to serve as the leader of each working group. To ensure consistency the working groups should report regularly to the COOP planning team chairperson. It is also recommended that each work unit within the organization assign one person to serve as the COOP point-of-contact.
Investigate Opportunities to Achieve Minimum Capability

The COOP planning team should investigate opportunities to achieve a minimum COOP capability now. There are practical techniques which will enable an organization to develop a basic capability with little resources. Each organization should examine the possibility of sharing resources and facilities and employing dual-use capabilities. This will require the development of Memorandums of Agreement/Understanding and coordination with external entities. Organizations should also investigate opportunities to obtain resources and capabilities through mutual aid and assistance.

In addition, each organization should identify resources currently available and will be required in a COOP activation. These resources should be stored off-site. Other methods for implementing a capability now are pre-positioning available resources, vital records (hardcopy and electronic if applicable) and tape back-ups of databases. Each organization should prepare for drive-away kits and invest in mobile communication capabilities such as cellular and satellite phones, electronic pagers, palm pilots, and laptop computers. Most of these items currently exist within each organization, it is more a matter of leveraging the capability for dual-use – non-emergency and emergency.

Organizations can also implement a baseline of preparedness by updating and maintaining:

- Orders of Succession
- Basic Vital Records (see Unit III)
- Staff Rosters
- Personnel Contact Information
Validation

Each organization should develop a comprehensive Test, Training and Exercise Program to continuously improve their ability to effectively manage and execute their COOP plans. It is recommended that organization’s:

- Establish a working group to develop the program
- Assign overall program responsibility to one person
- Consider training needs of managers and staff
- Determine for a 12-month period:
  - What types of activities will be used – training, tests and exercises
  - Who will be trained
  - Who will attend exercises
  - Who will conduct the activities
  - When and where each session will occur
  - How frequent will tests occur
  - How will activities be evaluated and documented

The program should contain a mixture of activities including training, tests, and exercises. Each activity should be evaluated and the results incorporated into a formal remedial action process. The results are recommended for use as performance measurements to rate the overall effectiveness of the COOP program. The definitions of each activity are:

*Training* – instruction in individual or organizational functions, procedures, and responsibilities.

*Test* – demonstration of correct operation of equipment, procedures, processes, and systems that support the organization.

*Exercise* – evaluation of individual or organizational performance against a set of standards or objectives.
Prepare Comprehensive Test, Training and Exercise Program

The TT&E program should be progressive in nature, building from simple, individual tasks to complex, multi-organizational interactions. An effective program is built on the successful integration of tests, training, and exercises and should:

- Incorporate all levels of the organization including regions and field locations
- Establish policy, guidance and standards
- Include training courses and materials
- Involve exercises of varying types and scopes, including interagency and joint activities
- Establish activity schedules
- Include activity evaluations and a remedial action process

The TT&E plan should maintain roster of fully equipped and trained emergency personnel with the authority to perform essential functions and activities. The plan should develop activities that test their alert and notification plan quarterly, with and without warning, during duty and non-duty hours; train all members of their team and ensure their knowledge and skills are current; exercise COOP plans and procedures annually; and identify and incorporate lessons learned/remedial action plan into annual revisions of the COOP Plan.

The TT&E requirements should also be included in the organization's multi-year strategy and program management plan. The organization should include a budgeting plan for identifying resource requirements necessary to support its TT&E program.
Develop Training and Orientation Curriculum

Each organization should regularly schedule training for personnel. Everyone who works in the organization should participate in a COOP orientation as part of their new employee training at the work unit level. This orientation should include the review of procedures, measures to assure personal and family preparedness, and a summarization of the organization’s COOP capability. In addition the training program should include:

- COOP awareness program for entire workforce
- Readiness program for personnel assigned to team(s)
- Preparedness program for managers and key decision-makers
- A mixture of hands-on activities, seminars, orientations, workshops, on-line or interactive programs, briefings and lectures

Training plans should be developed and implemented to prepare individuals and groups to accomplish certain tasks, using selected equipment, under specific scenarios. COOP training should not address the competencies required for “normal” tasks and operations. The purpose of the training is to prepare agency personnel to institute emergency operations at an alternate facility, to use equipment and procedures and to work with individuals with whom they have little contact during normal day-to-day operations. The length of the training and the depth of the coverage of the information provided and discussed will vary based on the audience and method of training selected. Major topics or components of the training syllabus could include: COOP definition; essential elements; criteria for a COOP event; and major operational elements of the specific organization’s COOP – leadership, impact of a COOP event on the individual employee, implementation, COOP phases, mission essential functions, operations at an alternate facility.
Prepare Schedules for Process and Equipment Tests

Each organization should regularly schedule tests of agency equipment, systems, processes, and procedures. The testing program validates that the equipment and systems conform to specifications and operate in the required environments, and that procedures and processes are viable. Testing is used as verification and validation to confirm that backup equipment and systems closely approximate the operations of the primary equipment and systems. The testing program should:

- Provide for quarterly evaluations of alert and notification procedures and systems
- Evaluate the ability to access current vital records, systems, and data management software
- Assess the interoperability of communications
- Evaluate logistical support, services, and infrastructure systems

Based on the measures and benchmarks desired, there are a variety of methods that can be used to test the functionality of backup environments. Examples of tests include:

Static tests – determine if all essential components of the equipment and systems are in place and meet specification and design requirements of the organization.

Dynamic tests – verify that all of required equipment and systems function independently of each other, function in consort with each other and satisfy the operational requirements of the organization.

Functional tests – verify that procedures for operating the equipment and systems in the backup environment are correct. This testing assures that when trained and qualified personnel are required to utilize the backup equipment and systems, the instructions for operation are clear and complete.
Develop Exercising Program

An exercise should be a realistic rehearsal or simulation of an emergency, in which individuals and organizations demonstrate the tasks that would be expected of them in a real emergency. The purpose of an exercise is to validate elements, both individually and collectively, of the organization’s COOP. Exercises should provide emergency simulations that promote preparedness, improve the response capability of individuals and organizations, validate plans and procedures. Each organization should regularly schedule exercising of their COOP plans.

The exercise program should:

- Consists of a variety of potential hazards
- Incorporate deployment of personnel to alternate facility
- Provide for continuation of operations through all phases of event (Activation, Operations, Reconstitution and Termination)
- Include participation from multiple agencies and provide for interaction with Federal and local governments when applicable

Exercises may vary in size and complexity to achieve their respective purposes. Examples of emergency exercises include:

*Tabletop Exercises* – simulate an emergency situation in an informal, stress-free environment.

*Drills* – are a coordinated, supervised activity normally used to exercise a single specific operation or function in a single agency.

*Functional Exercises* – are fully simulated interactive exercises.

*Full-Scale Exercises* – simulate actual emergency conditions.
Develop a Remedial Action Process

A remedial action process should be established by each organization. This plan should include input from all TT&E activities and any available post-incident reports. Organizations should establish procedures to ensure that the information obtained from the TT&E program is incorporated into a remedial action process. The remedial action plan should identify deficiencies and propose corrective actions/solutions. This evaluation process should include an annual review/update of the COOP plan and all support documents. Organizations should:

- Conduct a formal audit of the entire plan annually.
- Evaluate all areas of the program and develop corrective actions based on this data.
- Identify systematic weaknesses and provide suggestions for correction after each exercise.
- Conduct a debriefing and develop and after action report after each exercise.

The proof is in the planning – validation through the development of a comprehensive TT&E program is vital. Just as in all areas of emergency management, a plan which is untested is UNRELIABLE. And a plan which is not vigorously maintained easily becomes outdated.

COOP planning requires a comprehensive TT&E program partly because non-emergency organizations are involved to a greater extent. A change in the organization’s operations can significantly change the COOP plan. Additionally, the viability and execution of the COOP plan is dependent upon current and reliable information on personnel. The TT&E program will ensure that staff are aware of their roles and responsibilities in the execution of the COOP plan.