

Continuity of Operations Planning

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It is the policy of the United States to have in place a comprehensive and effective program to ensure that the delivery of essential services remain uninterrupted across a wide range of potential emergencies, and to provide a mechanism for the resumption of all functions as resources become available. For Federal Executive Branch Departments and Agencies, this is referred to as Continuity of Operations (COOP) planning.

Many people think of COOP plans as a relic of the Cold War, something that's been around since the 80's and dusted off after September 11, 2001. They are partially correct. COOP has been around since the 80's... the 1780's. In the early 1780's the Congress relocated from the then Capitol of United States in Philadelphia to Trenton, NJ due to a possible mutiny of soldiers who hadn't been paid and were headed to Philadelphia. Later in the 1780's and 90's Federal workers had to relocate due to Yellow Fever outbreaks. Being able to continue to operate, no matter what the hazard has been a planning consideration for our government from the very beginning.

Presidential Decision Directive (PDD) 67 titled Enduring Constitutional Government and Continuity of Government Operations, dated October 21, 1998 requires that the Executive Branch Departments and Agencies plan, train for, and be ready to deliver their essential services across a broad spectrum of hazards that may impact them. Continuity of Government (COG) is achieved when the different Departments and Agencies are all able to deliver their essential services, and Enduring Constitutional Government is all three Federal branches continuing to be able to deliver services. PDD 67 is a Top Secret document that does not have a summary published by the White House. What is known is that it designates the Federal Emergency Management Agency (FEMA) as the Lead Agent for COOP planning, and assigns the US General Services Administration responsibility for conducting training and maintaining a database of alternate operating facilities. Each Department and Agency must establish their own COOP programs. FEMA provides guidance through a series of documents known as Federal Preparedness Circulars (FPC). The newest, a rewrite of FPC 65, was just published in June.

September 11, 2001 and Y2K before it did lead to a renaissance in Continuity planning efforts. The fact is that COOP planning is simply good business practice. Identifying what it is we do, what resources are needed to deliver those products and services, and who is impacted by our operations is the basis for good planning whether for emergencies or day to day operations. COOP planning pays big dividends to organization in terms of planning, budgeting, and resource management every day. Heard of an office losing an A-76 study only to have the contractor come back and ask for more money? If they had really outlined what their functions were, and COOP planning would have been the foundation of that effort, might those Federal personnel still be in place? For those SESer's out there, did you know that COOP is one of the few programs you can be involved with that satisfies accomplishments in all the Executive Core Qualifications?

When it comes to the "all-hazards" approach to COOP, one hazard is often overlooked... the hazard of complacency, of failing to plan.

Our primary objective when planning is to ensure the delivery of essential services. We do this in an effort to reduce the loss of life, minimize damage, and mitigate losses. Planning is done to ensure that successors exist for agency leadership, that alternate operating facilities are available, that vital records are protected, and that the agency will be able to achieve a timely and orderly recovery.

COOP plans must be able to be implemented with no notice; be operational in all cases with-in 12 hours of activation; and be capable of maintaining sustained operations for up to 30 days. We may know days in advance of a hurricane reaching landfall, however there may be no warning of a terrorist attack, electrical power grid outage, fire, or tornado. Agencies are required to provide for a regular risk analysis of their current operating facilities and alternate operating locations. Agencies must regularly review their essential functions and resources, determine short and long-term program goals, and forecast budgetary requirements.

The elements of a viable COOP capability are covered in-depth in FPC 65 and include: delineating essential functions and activities; establishing delegations and orders of succession; providing for alternate operating locations; identifying vital records; maintaining test, training, and exercise programs; and much more.

It is impossible to create a successful COOP plan with out identifying what it is that must be continued. In the private sector, COOP efforts are often referred to as Business Continuity and the starting point of that effort is the Business Impact Analysis. Private industry looks at the dollar value effect of component interruptions and can make a case based on the financial impact. The Federal government impacts people's lives, the security of our country, and the world economy. We can not necessarily outline the dollar cost impact of our programs, but there is still a need to identify what is "essential".

There has been a lot written lately on determining "essential functions" correctly. It seems hard, but really isn't if the agency is willing to sit down and think it through. The problem is that most planners start a few steps late in the process, by trying to figure out essential functions. Start by looking at the agency's mission statement. This is what must be continued. Then take a look at the key objectives in the agency performance plan and budget. Are you starting to get the picture of what is required of the agency by law or other authority? Now, prioritize those goals and objectives in order of importance, not only by time that the function can be deferred, but also other factors such as who else is relying on that service. It might be that a function isn't done day to day, but in an emergency situation is required to be done with more effort, such as in support to the National Response Plan, or maybe another agency's top priority function is dependant on something from your agency. Only then can the planner sit down and determine what functions are essential and what are "not immediately essential". If it was not essential, we wouldn't be doing it at all, so try and stay away from the term non-essential. We all want to be non-essential on a snow day, but otherwise the term can be discouraging to some. One pitfall... when identifying persons and missions, don't just look at "first responders". One might not consider, for instance, a statistical organization or report as being something that couldn't be deferred indefinitely, but that may not be the case. Think about that government report due at a specific time on a specific date to the financial markets. If it didn't get there, what sort of statement might we be making to the world? That the Federal government was not continuing to function? Think of the global impact of that. COOP isn't just for saving lives, but for preserving our economy and way of life.

Once you know what has to be done it is relatively easy to then determine how many people you need to do that function. Remember that COOP isn't an effort to house everyone in an alternate location and do tasks that can't be deferred. Now that you know how many people you need, just make a column to the right and note down the amount of workspace for each; equipment; what records they will need; what other paperwork is needed such as delegations of authority and orders of succession; and what training is needed.

Many people find themselves assigned COOP responsibilities as a secondary duty. What those and others soon find is that COOP can be the most satisfying program that they will be associated with their entire career. Find out who is responsible for COOP in your organization, get involved, and enjoy being able to contribute to the success of your organization when you are needed most.

About the author:

David Dolinsky currently serves as an expert and advisor to the Administrator of the Regional Office of a major Federal Agency in Chicago for the development and implementation of concepts, policy guidance, and critical operations planning for the Regional Emergency Preparedness and the Regional Continuity of Operations Plans. As the Regional Emergency Coordinator, he is also responsible for managing the regional National Security Emergency Preparedness Program and the Disaster Assistance Program. Immediately prior to working in his current position, David worked for FEMA Region V starting at the end of 2001 in the Weapons of Mass Destruction Terrorism Program and then as the Continuity of Operations Plan Manager for the region. David is a former Army Staff Sergeant / Explosive Ordnance Disposal (EOD) Team Leader. He returned to college in 1991 and graduated in 1995. David worked in administrative, sales and compliance jobs in the Financial Services sector while in college and until his employment with FEMA in 2001.