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Office of Superintendent of Public Instruction
Diane M. Douglas

CONTINUITY OF OPERATIONS PLANNING

COOP Functional Annex Guidelines

The Arizona Department of Education developed this guidance document in good faith as a preparedness tool for Arizona districts and schools. Guidance contained within this document utilizes state and federal planning resources; US Department of Education REMS COOP; Guide for Developing High-Quality Emergency Operations Plans for K-12 Schools; FEMA's Developing and Maintaining Emergency Operations Plans, Comprehensive Preparedness Guide (CPG101), and the Arizona Department of Emergency and Military Affairs COOP guidance. In the current format, this guidance is public information; however, districts and schools should be aware of the need to protect specific emergency planning information and should redact information as necessary for the safety of the district or school.



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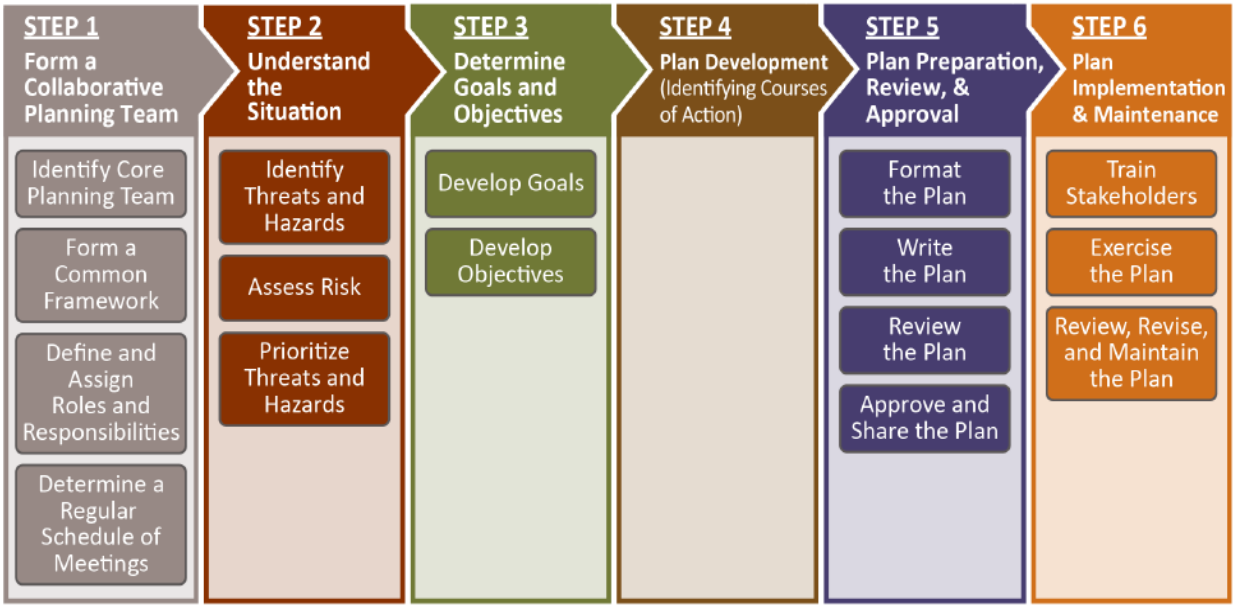
DEVELOPING A CONTINUITY OF OPERATIONS FUNCTIONAL ANNEX

INTRODUCTION:

A Continuity of Operations Plan (COOP) Functional Annex is developed to ensure that essential functions continue during an emergency and its immediate aftermath. Essential functions include business services (payroll and purchasing), communication (internal and external), computer and systems support, facilities maintenance, safety and security, and continuity of teaching and learning. The COOP planning team should consider the following when developing its goals, objectives, and courses of action: how the COOP annex is designed, so that it can be activated at any time, and sustained for up to 30 days; how the COOP annex will set priorities for re-establishing essential functions, such as restoration of school operations, and maintaining the safety and well-being of students and the learning environment; and how the COOP annex will ensure students receive applicable related services in the event of a prolonged closure.
See more at: http://rems.ed.gov/K12COOPAnnex.

DEVELOPMENT AND DESIGN OF YOUR COOP ANNEX:

The Arizona Department of Education supports the utilization of state and federal planning resources such as the following graphic which depicts a six step planning process as demonstrated in FEMA's *Comprehensive Preparedness Guide 101 (CPG 101) and also in the U.S. Department of Education's Guide for Developing High Quality School EOPs documents.* This planning process may be used to create new planning documents and annexes, as well as to revise and update existing plans, while aligning emergency planning practices with those at the local, state, and national levels.



FUNCTIONAL ANNEX:

Functional annexes in the district/school ERP are individual chapters that focus on missions (e.g., communications, damage assessment). These annexes describe actions, roles, and responsibilities, and discuss how the school manages the function before, during, and after the incident. (CPG 101)

A COOP FUNCTIONAL ANNEX IS:

- A COOP Annex describes how a school and district will ensure that essential functions continue during an emergency and its aftermath.
- When possible restores essential functions within 12 hours of activation
- Sustains restored essential functions for up to 30 days or until full operational status is achieved

The COOP Annex is located in the Functional Annexes section of your district/school Emergency Response Plan (ERP)



WHEN DEVELOPING A COOP ANNEX CONSIDER THESE NINE ELEMENTS:

1. Define essential functions
2. Create orders of succession
3. Create delegations of authority
4. Identify alternate facilities/locations
5. Establish communications plans
6. Plan for accessing vital records
7. Plan for human capital management
8. Plan for devolution (When an extreme situation causes incapacitation, the delegation of responsibilities or transfer of power is devolution)
9. Develop your comprehensive recovery plan

KEY CONSIDERATIONS FOR DEVELOPING THE COOP ANNEX

- How the COOP Annex will be designed so that it can be activated at any time and sustained for up to 30 days
- How the COOP Annex will set priorities for re-establishing essential functions, such as restoring school and business operations and maintaining the safety and well-being of students and the learning environment
- How the COOP Annex will ensure students receive applicable related services in the event of a prolonged closure

ESSENTIAL AND NON-ESSENTIAL FUNCTIONS

Essential functions are those organizational functions and activities that must continue under all circumstances, including when there is a school closure due to an emergency.

Non-essential functions are those services and activities that can cease in an emergency.

ESSENTIAL AND NON-ESSENTIAL FUNCTIONS cont.

Two approaches for *determining* essential functions include:

1. Identify broad functional areas and then prioritize services and tasks related to those functional areas; or
2. Identify non-essential functions.

Truly essential functions are those organizational functions and activities that must be continued under all circumstances, including when school is closed. If some services or activities can cease during an emergency, they are likely non-essential functions. Knowing the difference between essential and non-essential functions reduces debate during an emergency event and focuses resources on what is most important.

Approach for *identifying* essentials include:

Another approach to identification of essential functions is to identify the non-essential functions, in essence those services that could cease during an emergency.

CATEGORIES OF ESSENTIAL FUNCTIONS INCLUDE

- **Learning -** Learning activities, the core mission of the school
- **Business Services such as** – Payroll, record-keeping, financial operations, and support to the information technology systems
- **Transportation** - Transfer of students to the school or to alternative facilities used during an emergency
- **Support** - Food services, facilities management, fleet management, and office services
- **Communication** - Communication capabilities with students, parents/guardians, teachers, staff, and school and local communities

EXAMPLES OF ESSENTIAL FUNCTIONS

- Continuity of teaching and learning
- Communications (internal and external)
- Computer and systems support
- Facility use/Maintenance
- Business services
- Provision of safety and security

EXAMPLES OF NON-ESSENTIAL FUNCTIONS

- After-school activities
- Professional development/ Educator training
- Sporting events
- Field trips

ROLE OF SCHOOLS IN SUPPORTING CRITICAL EMERGENCY MANAGEMENT FUNCTIONS IN COMMUNITY, INCLUDING

- Provision of health, safety, and security
- Facilitation of emergency response operations
- Provision of educational and critical support services
- Developing Memorandums of Understanding (MOU) through the AZ Mutual Aid Compact
- Restoration of normal operations and the learning environment

Schools are often called upon by local emergency management to perform functions outside of their normal operations, therefore these additional responsibilities should be considered when a school or district is creating a COOP Annex: School sites serving as emergency shelters; and school buses used for evacuation procedures.

CREATE ORDERS OF SUCCESSION

- Define who will play an active leadership role when regular leadership is unavailable and provide at least two back-up personnel for each assigned individual.
- Allow for an orderly and predefined transition of authority by developing orders of succession that defines who will play an active leadership role when regular leadership is unavailable.
- The first step in creating orders of succession is to create a list of alternates who would serve in an interim or acting capacity in the event a manager is not available. The school board and district administration should approve the list of alternates.

Examples of order of succession may look like these:

- A school district order of succession: "Superintendent; Assistant Superintendents of Finance and Instruction; and District Directors
- A school order of succession: Principal; Assistant Principal; Dean; and Head teacher

CREATE DELEGATIONS OF AUTHORITY

Districts may decide to grant authority to individuals who step into a role or title during an emergency. Empowerment of designee may include items such as:

- Authorize closing or opening of schools
- Approve policy changes during emergencies
- Approve standard operating procedure changes during emergencies
- Act on behalf of district in interagency response
- Make personnel management decisions
- Sign contracts, authorize procurement, and commit resources

Delegations of authority identify what can and cannot be done by an acting leader based on his or her role or title.

The making of critical decisions cannot be delayed as a result of confusion over authority and responsibility. No one is irreplaceable. Therefore, a definitive plan of delegation should be in place.

In determining delegations of authority, individuals with unique skills and knowledge associated with essential functions should be considered.

It is important that the delegation of authority document have been reviewed by the district's legal team to identify possible restrictions, such as state law or district and/or local policies.

IDENTIFY ALTERNATE FACILITIES AND LOCATIONS

- Establish any necessary MOUs, MOAs, and collaborate agreements in advance.
- Determine if relocation within the district is feasible.
- Provide for reliable logistical support, services, and infrastructure systems.
- Ensure operations sustainability for 30 days or until normal operations resumes.
- Having the ability to transport assets and resources to alternative facilities.
- Determine which essential functions and services can be conducted from a remote location.
- Allow essential functions to be accomplished using virtual options (e.g., working from home, telecommuting, distance learning, mobile offices).

ESTABLISH PLANS FOR COMMUNICATIONS CONTINUITY

- Establish alternative system of internal communication (leadership and key personnel) and external communication (community partners and school community) if primary means of communication fails.
- Include multiple methods for communicating with the whole school community.
- Establish an emergency notification system (ENS) with call-down rosters.
- Consider county and state radio frequency satellite phones as alternative communication methods.

Adequate communication is a critical factor of any successful COOP Annex. It allows for relevant persons to be kept up-to-date on the actions the district takes and what is required of all personnel. Develop redundant capabilities to ensure that connectivity is feasible even if one method of communication, such as using cell phones, fails.

Special considerations include:

- It is essential to test communications prior enactment of the COOP Annex.
- How does the school communicate with the local emergency operations center, first responders, or even the state authority in the event cellular towers and phone landlines are affected?
- Are your systems capable of operating in the event of a power outage?

CREATE A PLAN FOR ACCESSING VITAL RECORDS

Emergency Operation's Record May Include:

- Parent and student contact information
- EOPs and directives
- Orders of succession
- Staff contact information
- Delegations of authority
- References for those who perform essential functions

Legal and Financial Records

- Personnel records
- Social security records
- Payroll records
- Retirement records
- Insurance records
- Contract records
- Student education records

Vital Records May Be Organized Into Two Categories:

- Emergency operations records should consist of the contact information and level of education for management staff, as well as for operational, safety and security, and risk management personnel and general employees.
- Legal and financial records can include business and procurement information, payroll records, and student data information.

Additional Considerations for Accessing Vital Records

- Districts and Schools should take preventive measures to protect key documents and/or ensure alternative versions are available during and after an emergency, such as:
- Create duplicate hard copies that are readily accessible by leadership and available in alternate locations.
- Encourage families and guardians to keep their own copies of critical education documents for their children, including IEPs.
- Encourage educators to keep back-up copies of key planning materials and records of achievement.
- Create portable electronic files on flash drives, external drives, CD-ROMs, or all three.
- On a nightly basis, back-up and store vital electronic records and soft copies of your EOP on local servers and on servers in another location (e.g., a neighboring district or even a neighboring state).
- Although almost all records today are located on servers, consider having hard copy in addition to the electronic copy available on-site and at a remote location.
- Make advance provisions for emergency procurement procedures when establishing vendor contracts.
- If available, use cloud computing to provide highly available systems and redundancy, and to ensure alternative versions of files are available during and after an emergency.
- Conduct semi-annual tests to determine whether offsite information can be functional within 12-16 hours.

ESTABLISH PLAN FOR HUMAN CAPITAL MANAGEMENT

- Address considerations when assigning staff to essential functions (operations)
- Set expectations about human capital during an emergency
- Ensure staff have advanced training regarding their assigned essential functions

Does the district/school practice orders of succession on a routine basis by putting out a memorandum when the superintendent or even principal is out of the area indicating the person who is acting in their place?

Knowing staff's abilities and key skills becomes critical when creating and implementing a COOP Annex. Review human capital policies and union contracts for reassignment potential for declared emergencies.

SET EXPECTATIONS ABOUT HUMAN CAPITAL DURING AN EMERGENCY:

- Staff should be clear about their role in an emergency.
- Students and families should be clear about continuity of instruction.
- Provisions and accommodations should be provided for students who have IEPs.
- Eligible students should have continued medical and food service during prolonged school dismissals.
- Specific procedures provide all employees with information and expectations.

Plans must address Individualized Education Programs (IEP) of students with disabilities. IEPs outline the individual educational accommodations needed by students, and are legally binding.
Please see "Guidance on Providing Services to Children with Disabilities during an H1N1 Outbreak" for more information on this topic.
http://www2.ed.gov/admins/lead/safety/emergencyplan/pandemic/index.html

Plans should also outline how eligible students will access food and medical services in the event of a prolonged school dismissal.

ENSURE STAFF RECEIVE ADVANCED TRAINING REGARDING THEIR ASSIGNED ESSENTIAL FUNCTIONS

- Train staff with "essential function" responsibilities in advance.
- After activating a COOP Annex, keep all staff informed about expectations for work, such as when they may be returning to work or how to support work efforts from home.
- Leadership must account for all staff. Management is responsible for knowing the location and status of all staff.
- Convey clear expectations of employees before, during, and after an incident.

ESTABLISH PLANS FOR DEVOLUTION (*Utilized in Extreme Scenarios*):

Per the Federal Emergency Management Agency, devolution planning supports overall continuity of operations planning, and provides procedures, guidance, and organizational structure to ensure the continuation of essential functions in the event that the primary operating facility is incapacitated and that personnel are unavailable or incapable of responding. In this situation, management, leadership responsibility, and essential functions will devolve to the designated devolution of operations sites, along with several other satellite or subcomponent offices.

ESTABLISH PLANS FOR DEVOLUTION *(Utilized in Extreme Scenarios)*: cont.

Devolution of control and direction is the transfer from an agency's primary operating staff and facility to other employees and facilities for an extended period. Devolution involves:

- The capability to transfer statutory authority and responsibility for essential functions
- A way of ensuring a COOP capability in the event COOP personnel are unable to perform their mission or if the continuity facility is unavailable to support it.

It must be clear who will order the devolution and under what conditions. Minimum staffing and key personnel must be identified for determining the "tipping point" for performance of essential functions (i.e., the number of staff necessary for any continued adequate operations). It is important to know how many people you need to perform any given function.

For example, likely triggers could include how many bus drivers and vehicles you will need to provide transportation services for all students. At what point do you "fail to operate?" How many IT personnel do you need to run your network operations before you "fail to operate?" How many teachers do you require to provide instruction at a school?

- What are likely triggers to activate devolution?
- How many people are required to perform other identified essential functions?
- Who has the authority to order devolution and under what conditions?
- What resources will be required to assist should devolution occur?

ESTABLISH PLAN FOR RECONSTITUTION

Involves recognition of minimum requirements needed to return to normal operations and restore the learning environment, including:

- Sufficient number of students and staff
- Adequate number of safe and healthy facilities
- Sufficient business and financial systems operating

Reconstitution is the process by which teachers, staff and, ultimately, students resume normal operations and restore the learning environment. This process can be very complex. It must be identified and outlined in a plan and it can be implemented from the original or a replacement primary operating facility.

Reconstitution folds into recovery efforts. The COOP Annex should be developed to re-implement general operations of the school district in a timely and pre-designated manner. Knowing what it takes, in terms of resources, to return to normalcy is paramount to COOP success.

REVISE THE PLAN, AS NEEDED, AND SHARE WITH STAKEHOLDERS, INCLUDING:

- School and district officials;
- Personnel from key departments with roles in COOP implementation (e.g., IT, HR); and
- Community partners, including law enforcement, emergency management and public health personnel.

TRAIN AND EXERCISE THE PLAN

To validate COOP and ensure essential functions are supported, check for the following:

- Staff's understanding of their roles;
- Equipment and systems work as required;
- Timeliness of deployment is appropriate;
- Alternate facility's supplies and capabilities are adequate;
- Interdependencies, supply chain issues, and infrastructure capabilities are addressed; and
- Deficiencies and vulnerabilities have been identified.

NEXT STEPS: DEVELOP YOUR COOP ANNEX

Seek COOP development assistance and training from local or state emergency management resources, and consider taking on-line COOP training at www.training.FEMA.gov/IS/COOP or http://rems.ed.gov/K12COOPAnnex.

Follow the six-step planning process and address the following nine elements:

1. Define essential functions
2. Create orders of succession.
3. Create delegations of authority.
4. Identify alternate facilities/locations.
5. Establish communications plans.
6. Plan for accessing vital records
7. Plan for human capital management
8. Plan for devolution (When an extreme situation causes incapacitation, the delegation of responsibilities or transfer of power is known as the devolution process)
9. Develop your comprehensive recovery plan

Please contact the Arizona Department of Education, School Safety and Prevention Unit at 602.542.8730, if you have questions on this guidance.

ADDITIONAL INFORMATION:

National preparedness efforts, including planning, are now informed by Presidential Policy Directive (PPD) 8, which was signed by the president in March 2011 and describes the nation's approach to preparedness. This directive represents an evolution in our collective understanding of national preparedness, based on the lessons learned from school incidents, wild land fires, terrorist events, and other experiences. PPD-8 defines preparedness around five mission areas:

1. ***Prevention -*** *for the purposes of this guide, means the capabilities necessary to avoid, deter, or stop an imminent crime, or threatened or actual mass casualty incident. Prevention is the action schools take to prevent a threatened or actual incident from occurring.*
2. ***Protection -*** *means the capabilities to secure schools against acts of violence and manmade or natural disasters. Protection focuses on ongoing actions that protect students, teachers, staff, visitors, networks, and property from a threat or hazard.*
3. ***Mitigation -*** *means the capabilities necessary to eliminate or reduce the loss of life and property damage by lessening the impact of an event or emergency. In this document, "mitigation" also means reducing the likelihood that threats and hazards will happen.*
4. ***Response -*** *means the capabilities necessary to stabilize an emergency once it has already happened or is certain to happen in an unpreventable way; establish a safe and secure environment; save lives and property; and facilitate the transition to recovery.*
5. ***Recovery -*** *means the capabilities necessary to assist schools affected by an event or emergency in restoring the learning environment.*

In the broader PPD-8 construct, the term "prevention" refers to those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. The term "prevention" also refers to preventing imminent threats. Emergency management officials and emergency responders engaging with schools are familiar with this terminology. These mission areas generally align with the three timeframes associated with an incident: ***before, during, and after.*** *To help avoid confusion over terms and allow for ease of reference, this guide uses "before," "during," and "after."*

The majority of Prevention, Protection, and Mitigation activities generally occur before an incident, although these three mission areas do have ongoing activities that can occur throughout an incident. Response activities occur during an incident, and Recovery activities can begin during an incident and occur after an incident. Development of a COOP Functional Annex is a vital part of preparedness.

It is important as districts/schools plan for and execute response and recovery activities through their emergency response plan; they should use the concepts and principles of Homeland Security Presidential Directive (HSPD) 5, National Incident Management System (NIMS). One component of NIMS is the Incident Command System (ICS), which provides a standardized approach for incident management, regardless of cause, size, location, or complexity. By using ICS during an exercise or incident, schools will be able to effectively work with the responders in their communities. (For more information on NIMS and ICS, visit www.DHS.gov/NIMS.)