

# Department on Disability Services Emergency Plan Continuity of Operations Plan (COOP)

January 2013 Laura Nuss Director Bill Davidson, DDS Risk Officer [This page intentionally left blank.]

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## **RECORD OF CHANGES**

Date	Page Number	Brief Description of Change Made	Person(s) Making Change

## SECTION 1 COOP BACKGROUND INFORMATION

#### **1.1EXECUTIVE SUMMARY**

The Department on Disability Services provides vital services to the citizens of Washington DC with that have physical and mental disabilities. As a result, reliability is the fundamental mission of every department within the Department on Disability Services. Should a crisis disrupt essential departmental operations, the agency would not be able to fulfill its fundamental mission in the absence of continuity of operations planning. For years, such planning had been an individual department's responsibility. The content and structure of Continuity of Operations Plans (COOP), operational standards, and coordination with other agencies, were left to the discretion of individual agencies.

This COOP was developed for Department on Disability Services and is designed to be a major component of a comprehensive and effective program to ensure the continuity of essential functions and governance under all circumstances.

The District of Columbia already has an Emergency Operations Plan (EOP) that is used to prepare for, respond to, and recover from major disasters. This COOP will serve as a supplemental tool designed to help the Department on Disability Services effectively resume day-to-day core services and functions following a disaster.

This COOP documents the basic information, procedures, and guidance, which will enable Department on Disability Services to resume its essential functions within 12 hours of an emergency, with or without advance warning, and to sustain continuous operations for the entire cycle of the incident. This plan addresses the emergencies from an all-hazards approach.

This COOP:

- Delineates Essential Functions and Activities;
- Delegates Authority;
- Establishes Orders of Succession;
- Identifies Vital Records, Files, Databases, Systems, and Equipment;
- Identifies Requirements for Interoperable Communications;
- Identifies Alternate Locations;
- Identifies COOP Maintenance Requirements and Responsibilities;
- Outlines Tests, Training, and Exercises for COOP Capabilities; and
- Contains Operational Checklists.

## **1.2INTRODUCTION**

Local governments today face challenges unlike any that have been seen before. Disasters from many causes are on the rise, not only in frequency, but also in severity. In addition to natural disasters, man-made incidents such as terrorism, transportation accidents, and technology failures caused major disruption to both public and private operations throughout the nation in recent years.

The surrounding jurisdictions around Washington, DC is vulnerable to a host of hazards, including radiation releases, hazardous materials spills, civil unrest, terrorism, transportation disasters, and disease pandemics.

Continuity of operations planning is part of the fundamental mission of local, State, and Federal governments. The changing threat environment and the severity of recent natural and man-made emergencies in the United States highlighted the need for careful continuity of operations planning that enables governments at all levels to continue their essential functions across a broad spectrum of emergencies disrupting normal operations.

## **1.3PURPOSE**

The purpose of this document is to ensure that the capability exists to continue the Department on Disability Services essential governmental functions across a wide range of potential emergencies.

The objectives of this COOP include:

- Ensuring safety of department's employees and customers;
- Ensuring the continuous performance of a department's essential functions/operations during an emergency;
- Protecting essential facilities, equipment, records, and other assets;
- Reducing or mitigating disruptions to operations;
- Achieving a timely and orderly recovery from an emergency and resumption of full service to customers;
- Providing foundation for the continued survival of leadership; and
- Complying with legal and statutory requirements.

Although when and how a disaster will occur is unknown, the fact that future disasters will happen is certain. How well a COOP is designed and implemented will determine the success of response, resumption, recovery, and restoration operations following an emergency.

## **1.4APPLICABILITY AND SCOPE**

In accordance with Federal, State, and local laws, executive orders, plans, and administrative guidance, all government entities must be prepared to respond to emergencies and disasters even when their personnel, facilities, and equipment are affected. The Department on Disability Services has elected to use the Homeland Security Emergency Management Agency's (HSEMA) as well as Federal Preparedness Circular 65 as the basis for the development of this COOP.

This plan applies to all employees of Department on Disability Services for the full spectrum of man-made, natural, and technological emergencies and threats. This plan will be activated and implemented when an event impacts a significant number of employees or could force the relocation of a significant number of employees in Department on Disability Services.

#### **1.5 AUTHORITIES AND REFERENCES**

Below is a list of authorities and references applicable to Department on Disability Services:

- Government of the District of Columbia Emergency Operations Plan
- Department of Homeland Security (DHS) and FEMA Interim Guidance on Continuity of Operations Planning for State and Local Governments, May 2004
- FEMA Federal Preparedness Circular 65, Federal Executive Branch Business Continuity, June 15, 2004
- Health Insurance Portability and Accountability Act of 1996 (HIPAA), 45CFR Parts 160, 162, 164
- National Incident Management System, U.S. Department of Homeland Security, March 2004

## **1.6 COOP MAINTENANCE**

The Department on Disability Services Risk Management Officer will oversee the agency maintenance of the COOP and record changes to the COOP in the Record of Changes table on page 1 of this document. Suggested maintenance activities are described in the table below.

Activity	Tasks	Frequency
<ul> <li>Review entire plan for accuracy</li> <li>Incorporate lessons learned and changes in policy and philosophy</li> <li>Update Orders of Succession</li> <li>Manage distribution of plan updates</li> </ul>		Annually and as major changes occur
Checklists	<ul> <li>Update and revise checklists</li> </ul>	Annually
Maintain alternate work site readiness	<ul> <li>Check all systems</li> <li>Verify access codes and systems</li> <li>Cycle supplies and equipment as needed</li> <li>Ensure alternate facility/location availability</li> <li>Review and update supporting Memoranda of Understanding/Agreements</li> </ul>	Annually

#### **COOP** Maintenance Responsibilities

## 1.7 COOP TEST, TRAINING, AND EXERCISES

Testing and exercising COOP capabilities are essential to demonstrating and improving the ability of departments to execute their COOPs. They serve to validate or to identify improvements to the COOP's policies, procedures, systems, and locations. Periodic testing and exercising also help to ensure that equipment and procedures are maintained in a constant state of readiness.

After exercising a COOP, departments will complete an After Action Report (AAR) (refer to Annex E for an After Action Report procedure and template) to identify issues found during the exercise and identify recommendations as to how those issues can be resolved. The COOP will then be reviewed and modified to reflect any necessary changes.

The table below outlines a COOP Exercise Program Plan developed for the Department on Disability Services.

#### **INSTRUCTIONS:**

The table below has suggested exercise requirements. Additional department-specific exercises can be added as appropriate. Insert locations where exercises will occur.

Exercise Type	Location	Frequency
All Employees COOP Orientation Seminar		Initial COOP Plan Orientation
COOP Refresher		Annually
Department Tabletop		Annually
Drill		Annually
Notification Procedure Test		Quarterly
Department Functional Exercise		Every 3 years
City-wide Tabletop		Every 3 years
Orientation for New Staff Members		Within 90 days of hire or transfer date

#### **COOP Training and Exercise Program**

## SECTION 2 COOP INFORMATION

#### **2.1REQUIREMENTS**

COOP planning is an effort to ensure the continued performance of minimum essential functions during a wide range of potential emergencies. This is accomplished through the development of plans, comprehensive procedures, and provisions for alternate facilities/locations, personnel, resources, and interoperable communications, and vital records/ databases back-up and duplication.

Each department in the Department on Disability Services, at a minimum:

- Must be able to implement COOP plan with and without warning;
- Must be operational within a minimal period of disruption for essential functions, but in all cases within 12 hours of COOP activation;
- Must be capable of maintaining sustained operations for up to 30 days;
- During a Pandemic must be capable of sustaining operations with staff reduction of up to 30 percent for up to18 months.
- Must regularly test, train, and exercise department's personnel, equipment, systems, processes, and procedures used to support the agency during a COOP event;
- Must conduct a risk analysis of current and alternate operating facilities/locations;
- Must locate alternate operating facilities/locations in areas where the ability to initiate, maintain, and terminate continuity of operations is maximized;
- Should consider locating alternate operating facilities/locations in areas where power, telecommunications, and internet grid would be distinct from those of the primary facility;
- Should take maximum advantage of existing agency infrastructures and give consideration to other options, such as telecommuting locations, work-at-home, virtual offices, and joint and shared facilities;

- Must consider the distance of alternate operating facilities/locations from the primary facility and from the threat of any other facilities/locations (e.g., nuclear power plants or areas subject to frequent natural disasters);
- Must include the development, maintenance, and annual review of department's COOP capabilities using a multi-year strategy and program management plan; and

Each department in the city must be prepared to handle three types of emergencies: localized emergency requiring relocation to an alternate site; widespread emergency requiring relocation to an alternate site; and widespread emergency NOT requiring relocation to an alternate site.

These emergencies and corresponding COOP considerations are outlined below:

- 1. <u>Localized Emergency Requiring Relocation to Alternate Site</u> (e.g., structural, fire, water damage, etc.)
  - A city government building sustained damage
  - All other city government buildings are not affected
  - COOP alternate sites are available
  - The building is currently closed for normal business activities, but the incident has not affected surrounding buildings, utilities, or transportation systems
  - Operations can shift to an alternate COOP location in the jurisdiction
  - Will require continuity of all Critical essential functions (defined in Section 2.2.1)
- 2. <u>Widespread Emergency Requiring Relocation to Alternate Site</u> (earthquake, localized power outage, toxic chemical spill, wildfire, etc.)
  - A city government building sustained damage
  - Surrounding area is affected
  - COOP alternate sites may or may not be available
  - Parts of major infrastructures (power, sewage, transportation, etc.) may have sustained damage
  - Operations can shift to an alternate location within the jurisdiction or a neighboring jurisdiction
  - Will require continuity of all Critical essential functions (defined in Section 2.2.1)

- 3. <u>Widespread Emergency NOT Requiring Relocation to Alternate Site</u> (pandemic influenza outbreak)
  - A city government building did not sustain damage and remains open
  - One or more departments of the city government experiences high levels of employee absenteeism
  - COOP operations will be conducted from the primary location
  - Will require continuity of all Critical essential functions as well as Long-term essential functions (defined in Section 2.2.1)

## **2.2ESSENTIAL FUNCTIONS**

**Essential Functions** are defined as those functions, stated or implied, that City departments are required to perform by statute, executive order, or City policy **AND** are necessary to provide vital services, exercise civil authority, maintain the safety and wellbeing of the general populace, and sustain the industrial/economic base in an emergency.

Essential functions are further delineated into Critical essential functions and Long-term essential functions.

**Critical Essential Functions** are those essential functions that **cannot** be interrupted or can be only minimally interrupted following an incident.

Long-term Essential Functions are those essential functions that can be interrupted for the first 30 days following an incident, but must be resumed thereafter. LONG-TERM ESSENTIAL FUNCTIONS ARE MOSTLY APPLICABLE FOR INCIDENTS RESULTING IN HIGH RATES OF EMPLOYEES ABSCENTEEISM OVER A LONG PERIOD OF TIME SUCH AS A DISEASE PANDEMIC.

#### 2.2.1 IDENTIFYING ESSENTIAL FUNCTIONS

Essential functions encompass those critical areas of business functions that must continue even in the event of an emergency. Table 1 below provides a comprehensive list of all functions performed by Department on Disability Services

 Table 1: Functions Performed by Department

1. Division	2. Section	3. Function	4. Critical Essential Function Y/N	5. Long-term Essential Function Y/N
DDA	Service Coordination	Client Services	Y	Y
DDS	Contracting and Procurement	Goods and Services	Y	Y
DDA / RSA	Quality Assurance	Monitoring – Incident Management	Y	Y
RSA	Vocational Rehabilitation	Intake – Eligibility Determination – Placement	Y	Y
DDA	Resource Management	Waiver	Y	Y
DDS	Human Resources	Payroll – Communication	Y	Y
DDS	IT	MCIS – CRIS	Y	Y
DDS	Support Services	Records Management – Facilities – Internal Transportation	Y	Y
DDA	Intake	Eligibility	Y	Y
OAG	Legal	Compliance with laws and regulations	Y	Y
CFO	Budget	Management of DDS Financial Affairs	Y	Y
DDS	Risk Management	Manage risk to the agency	Y	Y
DDS	Policy	Ensure DDS policies are current relevant	Y	Y
RSA	Management Support	Bill Payment	Y	Y
RSA	Randolph Sheppard Program	Blind Vendors	Y	Y
DDA	Waiver Unit	Prior Authorization	Y	Y

1. Division	2. Section	3. Function	4. Critical Essential Function Y/N	5. Long-term Essential Function Y/N
DDA / RSA	Clients Benefits	Services	Y	Y

#### 2.2.2 PRIORITIZING ESSENTIAL FUNCTIONS

Table 2 below outlines each essential function identified by Department on Disability Services and its critical resumption time, priority ranking, and departmental dependencies.

1. Essential Function	2. Critical Time to Resume the Function	3. Priority Ranking	4. Department(s) Dependent on This Essential Function	5. Department(s) This Essential Function Is Dependent on
Service Coordination	1 day		DDA	IT
Contracts and Procurement	8 days		DDS	OCFO
Medicaid Payments	8 days		DDA	Federal Government
IT	1 day		DDS	OCTO – Support Services
Provider Management	1 day		DDA	
Vocational Day Care	8 days		DDA	Providers
Eligibility	8 days		DDA / RSA	IT – Support Services
Human Resources	1 day		DDS	IT – Support Services
CFO	1 day		Contracts	OCFO

#### **Table 2: Essential Functions Priority Rankings and Departmental Dependencies**

Section 2 – COOP Information

1. Essential Function	2. Critical Time to Resume the Function	3. Priority Ranking	4. Department(s) Dependent on This Essential Function	5. Department(s) This Essential Function Is Dependent on
Records Management	1 day		DDA / RSA	IT – Support Services
Transportation - DDS Internal	1 days		Office of Director DDS	Support Services
Facilities – Recovery and Reconstitution	1 day		DDS	DRES
Communications	1 day		DDS	ОСТО
Management Support	8 days		RSA	DDS
Quality Assurance	2 days		DDA	DDS
Randolph Sheppard Program	2 days		DDA	DDS
Waiver	2 days		DDA	DDS
Clients Benefits	8 days		DDA / RSA	DDS

## 2.3 ORDERS OF SUCCESSION AND DELEGATION OF AUTHORITY

One of the fundamental principles of continuity planning is to maintain leadership in the event of an emergency by establishing an order of succession.

During a COOP event, departmental operations and activities will not be "business as usual." Under normal circumstances, Department Heads would be in charge of making major decisions affecting their departments. However, immediately following an event, City officials, including Department Heads, may be a part of an Emergency/Department Operations Center (EOC/DOC) Management Team engaged in immediate incident management; may be incapacitated, or unavailable for other reasons. As a result, these Department Heads may not be available to oversee the continuity of operations process and execution of essential functions. However, COOP activities and essential functions must proceed without interruption regardless of the availability of any individual.

Table 3 designates the order of succession in the event the Department Head is unavailable to ensure that the Department is capable of responding rapidly to emergency situations requiring COOP implementation. <u>Unless otherwise stated, the persons listed in Table 3 are designated to accept and maintain full authority and responsibilities of the Department Head.</u>

1. Department	2. Order of Succession	3. Job Title	4. Authority Limitations
Department On Disability Services	Laura Nuss	Director	Full Authority
Department On Disability Services	Cathy Anderson	Deputy Director DDA	Full Authority upon assignment
Department On Disability Services	Andrew Reese	Deputy Director RSA	Full Authority upon assignment
Department On Disability Services	Deborah Bonsack	Chief of Staff	Limited Authority upon assignment

 Table 3: Order of Succession

## ALTERNATE FACILITIES/LOCATIONS

Emergencies or potential emergencies can affect the ability of departments to perform essential functions from their primary facilities/locations. A critical element in COOP Planning is the identification and preparation of alternate facilities/locations. The purpose of an alternate facility/location is to provide each department with means of accomplishing its essential functions in the event if the organization's primary location is unavailable due to an emergency. Department on Real Estate Services will determine appropriate alternate facilities/locations for DDS

#### 2.3.1 CURRENT (PRIMARY) FACILITIES/LOCATIONS

The first step in selecting alternate facilities/locations is identifying all facilities/locations a agency currently utilizes. An in-depth knowledge about the current (primary) facilities will aid departments in formulating requirements for alternate facilities/locations. Each department has performed a thorough inventory of facilities currently in use by that department.

Table 4 below identifies the primary facilities/locations utilized by the Department on Disability Services.

1. Division	2. Section	3. Current Location Address	4. Essential Functions Performed at This Location Y/N	5. Number of Employees at This Location	6. Natural Hazards Risk Factors
RSA	All	1125 15 <sup>th</sup> Street, NW	Y	130	
DDA	All	1125 15 <sup>th</sup> Street, NW	Y	160	
DDS	Office of Director, HR, Contracts, Supports Services, CFO, OAG	1125 15 <sup>th</sup> Street, NW	Y	56	
DDD	All	1227 25 <sup>th</sup> Street, NW	Y	40	

**Table 4: Current Departmental Facilities/Locations** 

#### 2.3.2 SELECTING ALTERNATE FACILITIES/LOCATIONS

The term alternate facility/location can include anything from a borrowed conference room for a few key people on a temporary basis, to a complete facility used to house the entire Department. In most cases, it will probably be something in between depending on the circumstances of any given event and available resources. It is recommended that each department should select at least two alternate sites.

The following criteria were used to identify suitable alternate facilities/locations for continuity of operations for departments within the City of Washington, DC:

- Must not share the same natural hazard risk(s) as the primary location;
- Sufficient space and equipment to sustain the relocating department;
- Availability of interoperable communications with all identified essential internal and external organizations, other departments, critical customers, and the public;
- Reliable logistical support, services, and infrastructure systems, including water, electrical power, heating and air conditioning, etc.;
- Ability to sustain operations for up to 30 days;
- Consideration for the health, safety, and emotional well-being of relocated employees; and
- Appropriate physical security and access controls (e.g., fencing, 24/7 security personnel, cipher locks, key cards secured entrance, etc.).

Generally, there are **four common alternate facilities options** each department must consider: existing department-controlled space; co-location with another department; shared alternate facility occupancy agreement; and acquiring space exclusively for an alternate facility.

#### Existing Department-Controlled Space

A department may have space that is currently utilized for other purposes (e.g., training facilities, conferencing facilities, etc.) which will be available for a reasonable length of time sufficient to designate it as their alternate facility. This space should be set up to accommodate the emergency operation to allow for fast implementation of COOP activities. This can be done by prewiring and staging of resources.

#### Co-location with Another Department

Departments may be able to make arrangements to move in with another department temporarily or to share otherwise available space with other departments. The departments would need to establish a written agreement such as a Memorandum of Understanding/Memorandum of Agreement (MOU/MOA) (see Annex F for a sample MOU/MOA). Under this agreement, the relocated department affected by the emergency could have a certain number of workstations or space within the unaffected department. This space could be either open areas or it could be occupied space that could be made available during an emergency. Any special requirements for security or other services should be addressed before the MOU is signed, so that both departments understand the potential impact on their operations.

#### Participating in a Shared Alternate Facility Agreement

Several departments may select to participate in an agreement, where departments share the cost of occupying a rental facility on the premise that one (or some), but not all may need it at a particular time. Under this premise, if only one (or some) department needs to utilize the alternate facility, it would be able to get the necessary space. If all participants should need to use the facility at the same time, each would have a minimum guaranteed space based on the percentage of funding contributed by each department.

#### Acquiring Independent Space Exclusively for an Alternate Facility

Although this seems to be an expensive alternative, some departments may find it necessary due to their mission or other circumstances. The new space would likely be only a small percentage of the currently occupied space.

Tables 5 below lists the proposed alternate facilities/locations identified by Department on Disability Services.

Table 5.1.1: Alternate Facility/Lo	ocation 1 for the Department of	on Disability Services at 1125 15 <sup>th</sup> Street NV	N

1. Division	2. Section	3. Alternate Location 1 Address	<b>4. POC</b>	5. Security Controls	6. Owned/ Leased by Department Y/N	7. MOU/MOA in Place Y/N	8. Number of Employees
DDS	ALL	TBD by DGS	Bill Davidson	Yes	Ν	Ν	346

 Table 5.1.2: Alternate Facility/Location 2 for the Department on Disability Services at 1227 25<sup>th</sup> Street, NW

1. Division	2. Section	3. Alternate Location 2 Address	<b>4. POC</b>	5. Security Controls	6. Owned/ Leased by Department Y/N	7. MOU/MOA in Place Y/N	8. Number of Employees
DDD	All	1125 15 <sup>th</sup> Street, NW	Bill Davidson	Yes	Y	Y	40

## 2.4 VITAL RECORDS, FILES, DATABASES, SYSTEMS, AND EQUIPMENT

Identification and protection of vital records, files, databases necessary to perform essential functions and activities and to reconstitute normal department operations following an emergency are critical to successful continuity of operations.

The protection of vital records begins with the identification of those records that are "vital" – records that support the essential functions of a department. Vital records, files, and databases represent a small fraction of the records most departments retain and they can be in any form, but are usually either paper or electronic.

To the greatest extend possible, departments should back-up electronic records, files, and databases and pre-position them at alternate facilities/locations. If these items are not available at the alternate facility/location, departments should develop a procedure to access these items from the alternate facility/location.

Extensive protective measures can sometimes be prohibitively expensive. Departments should consider the following options for protecting and backing up vital records, files, and databases:

- Replicate department server in an off-site facility/location;
- Scan paper records and files and store on a secure computer;
- Store duplicate records and files in fireproof filing cabinets, vaults, and safes at the primary facility;
- Identify specific individuals in your department responsible for maintenance, retrieval, and security of vital records, files, and databases;
- Back server up using tape or disk back-up systems; and
- WORK WITH YOUR INFORMATION TECHNOLOGY (IT) PERSONNEL TO IDENTIFY BACK-UP AND REDUNDANCY PROCEDURES FOR VITAL FILES, RECORDS, AND DATABASES IN YOUR DEPARTMENT.

Table 6: Vital Files, Records, and Database Inventory	Table 6: Vi	tal Files,	Records,	and Database	Inventory
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1. Name of Vital File, Record, or Database	2. Current Location	3. Primary Format	4. Back-up/ Redundancy Information	5. Person(s) Responsible for Maintenance, Retrieval, and Security	6. Accessible from Alternate Location Y/N	7. Security Considerations
Clients Records	Records Room	Documents	None	Records Manager	N	
Individual Service Plan (ISP)	MCIS & Records Room	Electronic	ОСТО	IT Supervisor	Y	HIPPA
MCIS	Network	Electronic	ОСТО	IT Supervisor	Y	HIPPA
CHRIS	Network	Electronic	ОСТО	IT Supervisor	N	HIPPA
Pass System	Network	Electronic	OCFO	OCFO	N	
Peoplesoft	Network	Electronic	DCHR	DCHR	Ν	

## 2.5 VITAL SYSTEMS, APPLICATIONS, AND EQUIPMENT

Just as records are vital to a department's essential functions, the systems, computer applications, and equipment are essential for departments to maintain critical services. A system, application, or piece of equipment is vital if it is necessary to perform essential functions as identified in Table 1. Many critical systems, applications, and equipment support essential department functions. However, not every system, application, or piece of equipment is vital, even if it is important.

In addition to IT systems, each department may use other equipment unique to this department. For example, Telecommunications Device for the Deaf (TDD) equipment may be used by an employee in a department. If that employee is supporting an essential departmental function and is asked to relocate to an alternate facility/location, the TDD equipment will have to be available at an alternate facility/location in order for that employee to successfully complete his/her work assignments. Each department must take the time to evaluate and document its unique equipment needs and requirements.

Table 7 below outlines the vital systems and equipment identified by the Department on Disability Services

1. Vital System/Application/Equipment	2. Essential Function Supported	3. Current Location	4. Back-Up/Redundancy
MCIS	Network	Electronic	ОСТО
CHRIS	Network	Electronic	ОСТО
Pass System	Network	Electronic	OCFO
Peoplesoft	Network	Electronic	DCHR

 Table 7: Vital Systems and Equipment

## 2.6 INTEROPERABLE COMMUNICATIONS

The success of operations at an alternate facility/location depends on the availability and redundancy of critical communications systems to support connectivity to internal and external organizations, other departments, and the public. Interoperable communications should provide the following:

- Capability to adequately support essential functions;
- Ability to communicate with Key COOP staff, Contingency staff, management, and other City departments;
- Ability to communicate with other organizations and emergency personnel;
- Access to data and systems necessary to conduct essential functions;

Ability to operate in the alternate facility/location within 12 hours, and for up to 30 days.

Generally, only those employees who support essential functions will be asked to report to an alternate location. These employees are responsible for essential functions and are often called "Contingency Staff." Each Department should identify its Contingency Staff

Table 8 below outlines interoperable communications available at each primary (current) location and at each proposed alternate facility/location selected by the Department on Disability Services

#### Table 8.1: Interoperable Communications for the Department on Disability Services

			-		
1. Communication Equipment/System	2. Number Currently Available at Primary Location	3. Current Provider at Primary Location	4. Number Needed at Alternate Location	5. Number Available at Alternate Location 1	6. Number Available at Alternate Location 2
Landline Phones	245	ОСТО	245		
Faxes	22	ОСТО	22		
Cellular Phones					
Pagers					
Blackberries	150	VERIZON	150		
Videoconferencing Equipment	1	ОСТО	1		
Network Connectivity	400	ОСТО	400		
Data Lines/Jacks	400	ОСТО	400		
Computers (laptops, PCs, etc.)	400	ОСТО	400		
Printers	50	ОСТО	50		
E-mail	350	ОСТО	350		
Internet/Wireless/ Broadband	350	VERIZON	350		

## Continuity of Operations Plan

## Section 2 – COOP Information

		I		I	Γ
1. Communication Equipment/System	2. Number Currently Available at Primary Location	3. Current Provider at Primary Location	4. Number Needed at Alternate Location	5. Number Available at Alternate Location 1	6. Number Available at Alternate Location 2
Radio (i.e. 800MHz)					
Other					

Section 2 – COOP Information

Table 8.2: Interoperable C	communications for Department	on Disability Services

Alternate location TBD by DRES						
1. Communication Equipment/System	2. Number Currently Available at Primary Location	3. Current Provider at Primary Location	4. Number Needed at Alternate Location	5. Number Available at Alternate Location 1	6. Number Available at Alternate Location 2	
Landline Phones						
Faxes						
Cellular Phones						
Pagers						
Blackberries						
Videoconferencing Equipment						
Network Connectivity						
Data Lines/Jacks						
Computers (laptops, PCs, etc.)						
Printers						
E-mail						
Internet/Wireless/ Broadband						
Radio (i.e. 800MHz)						
Other						

## 2.7 INITIAL COOP CONTINGENCY STAFF AND RESPONSIBILITIES

A number of critical tasks must be initiated and completed as part of the initial COOP activation and implementation process. Such critical tasks as employee notification and communication, retrieval of essential records and equipment, and prompt relocation will ultimately ensure the continuity of operations and minimal disruption of essential functions. Each department has identified the COOP contingency staff and the critical tasks these staff must complete as part of the initial COOP activation and implementation process.



Table 9 below lists the COOP Contingency Staff and their responsibilities identified by Department on Disability Services. These responsibilities are not meant to be all-inclusive, but outline the basic actions which MUST be completed by contingency staff to ensure successful COOP activation and implementation.

Section 2 – COOP Information



Individuals assigned to complete critical tasks must be aware of their responsibilities and receive necessary training and tools prior to an emergency requiring COOP plan activation.

#### **INSTRUCTIONS:**

Review critical tasks listed in column 1. THESE TASKS ARE ONLY SUGGESTIONS AND MUST BE CUSTOMIZED FOR EACH DEPARTMENT. Use your knowledge of the internal workings of your Department to identify additional critical tasks which must be accomplished by your Department's Contingency Staff in order to continuously perform your Department's essential functions from another location and/or with reduced number of employees.

Assign individuals from your Department who will be responsible for completing these critical tasks. IN COLUMNS 2 and 3, LIST POSITION TITLE INSTEAD OF AN INDIVIDUAL'S NAME.

1. Critical Tasks	2. Contingency Staff Assigned	3. Alternate Staff Assigned
Notify Department's employees of COOP activation.	Deborah Bonsack	Gria Hernandez
Notify the point of contact at the alternate facility/location of impending activation and actual relocation requirements.	Bill Davidson	Deborah Bonsack
Notify the appropriate internal and external organizations of relocation status.	Cathy Anderson / Andrew Reese	Deborah Bonsack / Gria Hernandez
Back-up, secure, and retrieve vital records, files, and databases.	Srinivas Bheem	Byron Brown
Implement plans, procedures, and schedules to transfer essential functions, personnel, records, and equipment to alternate facilities/locations.	Bill Davidson	Deborah Bonsack
Provide guidance to Contingency staff and other departmental staff.	Deborah Bonsack	Gria Hernandez

#### Table 9: Key COOP Staff and Assigned Responsibilities

## Continuity of Operations Plan

## Section 2 – COOP Information

1. Critical Tasks	2. Contingency Staff Assigned	3. Alternate Staff Assigned
Assemble necessary documents and equipment required to continue performance of essential operations at alternate facilities/locations.	Bill Davidson	Charles Kellam
Transport vital records and files, supporting communications, IT framework and other necessary equipment to the alternate facilities/locations.	Charles Kellam	Joe Randall
Arrange security for abandoned primary facility/location and non-moveable equipment and records, to the extent possible.	Bill Davidson	Janice Watson

## 2.8 ESSENTIAL FUNCTIONS STAFF AND RESPONSIBILITIES

In addition to completing critical tasks associated with COOP notification and relocation, each department must continue to perform its essential functions. Departments have identified personnel responsible for each essential function and one alternate to ensure that each essential function is performed regardless of any one person's availability.



In an emergency requiring a COOP Plan activation, COOP Contingency Staff will be concentrating on critical tasks outlined in Table 9 of this document, and may not be available to oversee the essential functions' continuity in the initial stages of the incident. Therefore, it is important to ensure that Contingency Staff assigned to perform critical COOP tasks following an incident are not also responsible for direct oversight of essential functions.

Table 10 below lists the essential functions identified by Department on Disability Services and persons, including alternates, responsible for ensuring these functions' continuity.
1. Essential Function	2. Primary Staff Assigned	3. Alternate Staff Assigned
		U
DDS Leadership	Laura Nuss	Cathy Anderson / Mathew Bachand
DDS Leadership and Troubleshooting	Deborah Bonsack	
DDA Leadership and Troubleshooting	Cathy Anderson	Cathy Yademec
RSA Leadership and Troubleshooting	Andrew Reese	Sharon Vaughn-Roach
Facility, Risk Management Coordination	William Davidson	Charles Kellam
IT Troubleshooting and Communication	Srinivas Bheem	Byron Brown
DDA Incident Management	Bryan Chase	Cathy Yademec
DDA Service Coordination and Consumer Issues	Winslow Woodland	Mary Bolling / Robin Exton
Health and Consumer Issues	Winslow Woodland	Cathy Anderson
Provider Communications and Issues	Shasta Brown	Cathy Anderson
RSA / VR Communications	Andrew Reese	Sharon Vaughn-Roach

# Table 10: Essential Functions and Assigned Personnel

# **2.9 DEVOLUTION**

In some cases, it may be necessary to implement the COOP through devolution. Devolution is the capability to transfer statutory authority and responsibility for essential functions from a department's primary operating staff and facilities to employees and facilities of other departments within the City and even from another jurisdiction.

Table 11 lists the devolution options for Department on Disability Services.

Departments identified as those supporting your Department's devolution, must have personnel that are trained to perform the essential functions to the same or nearly the same level of proficiency as your Department's personnel.

# **INSTRUCTIONS:**

Identify other departments in your City that can fill your Department's role and identify any additional training that personnel would require to perform/maintain essential functions. If none then indicate in column 1.

## Table 11: Devolution

1. Division	2. Section	<b>3. Other Department that Can</b> Fill Your Department's Role	4. Additional Training Necessary
All	All	Department of Health	Yes
All	All	Department of Human Services	Yes

# SECTION 3 PANDEMIC WORKBOOK

# SUMMARY

A pandemic is a global outbreak of disease that occurs when an infectious agent emerges in the human population, causes serious illness, and then spreads easily from person to person worldwide. The most probable pandemic that could threaten Washington, DC is an influenza pandemic that would occur when a new influenza A virus emerges in the human population. Widespread illness throughout the County poses not only severe health risks; it is a major threat to the human infrastructure staffing critical facilities and essential functions. It can also have severe economic and social consequences. The timeframe for a pandemic outbreak could range from several months to more than a year. The virus will come in "waves." Each wave will last between six to eight weeks and will occur every 3 to 12 months following the peak of the previous wave.

Continuity of operations planning for a pandemic influenza is different than preparations for a time-specific event: there is no definitive beginning and end, it is somewhat predictable, more people will potentially be affected over a larger area, and there will be no damage to physical infrastructure.

Devolution, the capability to transfer authority and responsibility for essential functions from a department's primary operating staff to other employees and to sustain that operational capability for an extended period, and may be particularly critical in the event of a pandemic.

This Section focuses on the following topics:

- Essential Functions;
- Assessment of telecommuting capabilities;
- Projected 30% reduction in staffing levels; and
- Social distancing techniques.

These are only four of several critical components to continuity of operations planning for an event like pandemic influenza. They were chosen because of their importance, the need for evaluation by individual departments, and their applicability to other events that would result in high levels of prolonged absenteeism.

The procurement of personal protective equipment (PPE), flexibility in leave policy, and recovery issues should be addressed in future planning efforts.

# ASSUMPTIONS

This Section was developed based on the following assumptions about the influenza pandemic:

- Projected 30% reduction in staff across all levels and
- Duration of 18 months with 6 to 8 week "waves" of illness

# ASSESSMENT OF TELECOMMUTING CAPABILITIES

During a pandemic, high rates of employee absenteeism are anticipated. Staff absences can be expected for many reasons:

- Illness/incapacity (suspected/actual/post-infectious);
- Taking care of the family members; or
- Voluntary social distancing.

In anticipation of the workforce shortages, the Department on Disability Services identified critical functions that can be performed via telecommuting using either personal or department-supplied equipment.

An assessment of telecommuting capabilities for Department on Disability Services is summarized in Table 12.

1. Essential Function	2. Amenable to Telecommuting Y/N	3. Number of Telecommuting Employees Needed	4. Equipment/Records/ Databases Necessary to Perform this Function via Telecommuting	5. Number of Employees Currently Equipped
Service Coordination	Y	All	Cell Phone / Laptop / Air card	All
Contracting and Procurement	Y	2	Cell Phone / Laptop / Air card	1
Quality Assurance	Y	22	Cell Phone / Laptop / Air card	4
Resource Management	Y	3	Cell Phone / Laptop / Air card	0
Human Resources	Y	3	Cell Phone / Laptop / Air card	0
Support Services	Y	2	Cell Phone / Laptop / Air card	0
Vocational Rehabilitation	Ν			
Intake	Ν			
IT	Y	8	Cell Phone / Laptop / Air card	6
Randolph Sheppard	Ν			
Waiver Unit	Y	3	Cell Phone / Laptop / Air card	3
Clients Benefits	Y	3	Cell Phone / Laptop / Air card	0

**Table 12: Department Essential Functions - Telecommuting** 

•

# EXTERNAL ORGANIZATIONS CONTINGENCY PLANNING

Employee absences during a pandemic will result from personal illness, illness of family members, school, daycare and public transportation closures, social distancing measures, etc. The pandemic is likely to affect multiple communities across the United States simultaneously. As a result, other departments, organizations, and businesses in the country are likely to experience high rates of employee absenteeism and may not be able to meet their business and leadership obligations.

Each department should evaluate each essential function it performs and determine what, if any, component of each essential function is dependent on EXTERNAL agencies, organizations, or businesses (internal department dependencies are identified in Table 2 Section 2.2.2). In the event that the main supplier, whom your essential function(s) depends on, ceases to operate or reduces their output capacity significantly, two potential alternate suppliers should be identified.

# Alternate Supplier

Information about primary and alternate suppliers is summarized in Table 13 below.

1. Essential Function Component Dependent on External Organizations	2. Main Supplier	3. Alternate Supplier 1	4. Alternate Supplier 2
TBD			

# **Table 13: Department Essential Functions – Reliance on External Organizations**

# **INFECTION CONTROL MEASURES**

Infection control measures are critical for the protection of employees. The primary strategies for preventing the spread of pandemic influenza are the same as those for seasonal influenza: (1) vaccination; (2) early detection and treatment; and (3) the use of infection control measures to prevent transmission. However, when a pandemic begins, a vaccine will not be available and the supply of antiviral drugs may be very limited. The ability to limit transmission and delay the spread of the pandemic in the workplace will, therefore, rely primarily on the appropriate and thorough application of infection control measures.

The Department on Disability Services will modify its operation procedures to increase the use of infection control measures to prevent transmission. Infection control measures that will most likely be utilized include: increased employee education and awareness and social distancing.

- 1. Increased employee education and awareness will include such practices as teaching proper cough etiquette and hand hygiene. Proper cough etiquette and hand hygiene techniques include:
  - Covering nose and mouth when coughing or sneezing.
  - Using facial tissues to contain respiratory secretions and dispose of them in a waste container.
  - Washing hands (with soap and water, an alcohol-based hand rub, or antiseptic hand wash) after having contact with respiratory secretions and contaminated objects/materials.
  - Placing portable hand-sanitizers at entry ways and other locations where equipment and items are touched by many people (e.g. copy machines).
- 2. Social distancing is the practice of increasing the physical distance between coworkers and between employees and clients. Within the workplace social distancing will be promoted to the extent feasible by:
  - Staggering shifts to reduce the amount of time employees share common spaces.
  - Rearranging schedules to provide consecutive days off for the incubation time interval of the disease.
  - Rearranging furniture to maintain spatial separation of at least 3 feet between employees.
  - Considering clientele distancing by developing creative avenues (including barriers as appropriate) to reduce contact with clients while continuing the provision of essential functions.

# **FUTURE PLANNING ENDEAVORS**

The procurement of PPE, flexibility in leave policy, and recovery issues are all critical components to continuity of operations planning. These issues should be addressed in future planning efforts at the City, Operational Area, State, and Federal levels and the Department will update this Section based on guidance from this future planning effort.

# SECTION 4 CONCEPT OF OPERATIONS

# **4.1ASSUMPTIONS**

The procedures in this Section were developed based on the following key assumptions:

- Emergencies or threatened emergencies can adversely impact the Department's ability to continue to support essential functions and to provide support to the City's operations and citizens;
- Emergencies and threatened emergencies differ in priority and impact;
- The vulnerability of the Department depends on the probability of an event occurring and the impact that event could have on operations and performance of essential functions;
- Outside assistance may be interrupted or unavailable during an emergency;
- City departments and offices must be prepared to operate without help for at least 72 hours;
- When the COOP is activated, the Department will implement a predetermined plan using trained and equipped personnel; and
- The Department will provide essential functions within 12 hours of the event and be able to continue these for 30 days or until termination of the event, whichever comes first.



Information below is included as an example. Each department must carefully review and customize this information to reflect internal SOPs, existing emergency response plans, and an overall internal culture and conventions of the Department.

# 4.2 PHASE I – ACTIVATION AND RELOCATION (0-12 HOURS FOLLOWING AN INCIDENT)

COOP activation for Department on Disability Services within the City of Washington, DC will commence at the direction of Judith Heumann, Director of the agency or designee. The following essential personnel will be contacted and the COOP plane shall be put into place.

<b>TITLE</b> Director Chief of Staff Human Capital Administration	<b>EMPLOYEE NAME</b> Nuss, Laura Bonsack, Deborah Gria Hernandez	REASON/FUNCTION Leadership Staff Issues Human Resources
Support Services Supervisor	Davidson, William	Facility, Risk Mgmt Coordination
Supervisory IT Specialist Deputy Director for DDA Operations Program Manager Quality Program Manager Supervisory Investigator Service Coordinator Program Manager Supervisory Service Coordinator Supervisory Service Coordinator	Bheem, Srinivas Anderson, Cathy Cathy Yademec Chase, Bryan Woodland, Winslow B Woodland, Winslow B Exton, Robin	IT troubleshooting and communications DDA Leadership & troubleshooting DDA Leadership & troubleshooting DDA Incident Mgmt DDA Incident Mgmt Service coord and consumer issues Service coord and consumer issues
Supervisory Community Health Nurse Supvry Health Insurance Analysis Supervisory Medicaid Waiver Specialist Deputy Director for RSA Supervisory Vocational Rehabilitation RSA Operations	Quarles-Owens, Shirley Brown, Shasta Smith, Cheryl Reese, Andrew Fadeyi, Ayo Vaughn-Roach, Sharon	Health and consumer issues Provider communications and issues Provider communications and issues RSA Leadership RSA/ VR Communications RSA Operations

Upon activation of the COOP, Department on Disability Services shall:

- 1. Utilize checklists in Annex B Implementation Checklists of this COOP Plan;
- 2. Notify COOP Contingency Staff and the rest of the Department's employees of COOP activation and provide them with basic instructions. Refer to Table 9 Section 2.8;
- 3. Notify the point of contact at the alternate facility/location of impending activation and actual relocation requirements. Refer to Tables 5 Section 2.4.2;
- 4. Arrange security at the alternate facility/location for vital records at the same level as the primary facility/location, to the extent possible;

5. Notify the appropriate internal and external organizations listed in Table 14 below of relocation status;

Complete Table 14 with internal and external contacts.

## Table 14: Internal and External Organizations Notification Contact Information

1. Organization Name	2. Contact Information
City Administrator	Allen Lew
Director of DGS	Brian Hanlon

- 6. Implement plans, procedures, and schedules to transfer essential functions, personnel, records, and equipment to alternate facilities/locations;
- 7. Provide guidance to Contingency staff and other departmental staff;
- 8. Assemble necessary documents and equipment required to continue performance of essential operations at alternate facilities/locations, including communications equipment, computer equipment, contact lists, vendor numbers, and contract numbers. Refer to Table 6 & Table 7 Sections 2.5 & 2.6;
- 9. Order equipment or supplies, if not already in place;
- 10. Transport vital records and files, supporting communications, IT framework and other necessary equipment to the alternate facilities/locations, if applicable; and
- 11. Arrange security for abandoned primary facility/location and non-moveable equipment and records, to the extent possible.

A list of 24-hour contact information for Key COOP staff will be maintained by each department. In addition, one Key COOP staff will maintain a list 24 hour contact information, including phone numbers and addresses, for all department staff to be used in the event of an emergency.



A list of 24-hour contact information for other departments, key City officials, customers, and suppliers will be maintained by each department.

This information should not be included in the COOP, but instead be maintained as a separate document (paper, electronic, CD, flash drive) that is easily accessible during an emergency.



# **GOVERNMENT OF THE DISTRICT OF COLUMBIA**

# DEPARTMENT ON DISABILITY SERVICES



# **COOP Division Plan Summaries**

#### **Office of the Director**

Once it has been determined that the COOP plan needs to be initiated the Director will meet immediately with the Deputy Director of DDA, Deputy Director of RSA, Agency Risk Officer, Supervisor of Information Technology, Human Capital Administrator to determine the extent of the need COOP Plan. Should the complete operation of the Department on Disability Services be impacted to the extent that several floors of the building are not usable, then the Director shall contact the City Administrator and the Director of Department of General Services to discuss options for available temporary or short term office space. This information will be relayed to the Supervisor of Support services and the Supervisor of Information Technology to inspect the facility and determine the agency needs to insure agency functions can be restored as quickly as possibly.

### Information Technology

The IT Department will determine the availability of phone, fax, computer, printer operation for full or partial staff being housed at a temporary location. The IT department will provides information as to how quick the MCIS and CHRIS systems can be operational and the availability of remote access to those systems. The IT department will distribute cell phone to essential staff when needed to the disruption to services at a minimum. The IT Supervisor will coordinate with OCTO to retrieve data from the OCTO bunker facility located at 3919 Benning Road NE, Washington, DC 20019 that serves as the storage facility for MCIS and Disability Determination Division daily back-up tapes. Maintenance and retention of client data in the CHRIS System is being accomplished 24/7 in real time by electronic vaulting provided by Iron Mountain. The client data is vaulted off site and out of the area.

### Support Services

The Support Services Division will coordinate with The Director of the Agency and the DGS representative to insure that minimum agency requirement can be met at a temporary location to include essential staff and equipment requirements. The Support Services Division will evaluate the physical records stored on the current site and determine if the records should be moved to the temporary location. The Support Services Division will continue to process records required for submission to courts as soon as the MCIS system is functional.

## Human Capital Administration

The Human Capital Administration insures that all personnel records are safe and maintained in a confidential manner. The Human Capital Administration will coordinate with IT to ensure that the Peoplesoft system can be operational as quickly as possible and coordinate with supervisors with respect to payroll issues. The Human Capital Administration will coordinate with the Director of the agency to insure that all action involving the relocation to a temporary location will not violate the collected bargaining agreement. The training department which is a part of this administration will find locations through out the city in which their training can be done.

#### Service Coordination

The Service Coordination Division currently uses cell phones and laptops to perform their duties. The agency will consider the available space at a temporary location when deciding how often staff will be required to meet with their immediate supervisors and if staff will be allowed to perform certain task from home.

#### **Contracting and Procurement**

The Chief Procurement Officer will coordinate with the Director of the agency and the Chief Financial Officer to determine what emergency funds are needed to get the agency functioning as quickly as possibly. The staff will need access to the agency network either at the temporary location or remotely by what ever means as established by the Supervisor of Information Technology to continue the process of needed contacts and client payments.

#### **Quality Assurance**

The Quality Assurance Divisions for both divisions DDA/RSA shall employ a field itinerary for staff with them reporting to immediate supervisors as determined by the Deputy Directors for those two divisions. Laptops and cell phones shall be utilized when available or on a shared basis. Incident investigation and client monitoring is a high priority.

#### **Clients Benefits**

Clients Benefits for both divisions DDA/RSA will require space at the temporary location to perform their task. Access to the agencies network is needed and if space is limited staff will be alternated as determined by the Director, the Deputy Director of DDA, the Deputy Director of RSA and the Human Capital Administrator.

#### **Client Intake Services**

Client Intake Services for both divisions DDA/RSA will require space at the temporary location or a location suitable for the individuals that we service which will be determined by the Director of the agency. Access to the agencies network is needed and if space is limited staff will be alternated as determined by the Director, the Deputy Director of DDA, the Deputy Director of RSA and the Human Capital Administrator.

#### Vocational Rehabilitation

The Vocational Rehabilitation Councilors have been in negotiation to provide services at various locations through out the city, which would continue if this COOP is implemented. There will be a need for councilors to meet with clients at the temporary location or a location suitable for the individuals that we service which will be determined by the Director of the agency. Access to the agencies network is needed and if space is limited staff will be alternated as determined by the Director, the Deputy Director of DDA, the Deputy Director of RSA and the Human Capital Administrator.

#### Randolph Sheppard Program

The Randolph Sheppard Program has off site storage facilities which maintain certain critical equipment such as cash registers, refrigerators, and freezers as well as other equipment relative to storage and the safety of food. The staff will need access to the agency network either at the temporary location or remotely by what ever means as established by the Supervisor of Information Technology to continue the process of monitoring and supporting the client that participate in the program.

#### **Operations Division**

The Operations Division will require space at the temporary location. The staff will need access to the agency network either at the temporary location or remotely by what ever means as established by the Supervisor of Information Technology to continue the process of the Medicaid Waiver Department and the Provider Resource Management.

### Administrative Staff

The administrative staff for the agency will require access to the agencies network and if space is limited staff will be alternated as determined by the Director, the Deputy Director of DDA, the Deputy Director of RSA and the Human Capital Administrator.

## **Office of the Attorney General**

The staff of the OAG will coordinate with the Attorney General of the District of Columbia with respect to office space if none is available in a temporary location. The staff will require access to DDS's network.

#### **Office of the Chief Financial Officer**

The staff of the OCFO will coordinate with the Chief Financial Officer of the District of Columbia with respect to office space if none is available in a temporary location. The staff will require access to DDS's network.

# 4.3 PHASE II – ALTERNATE FACILITY/LOCATION OPERATIONS (12 HOURS FOLLOWING AN INCIDENT THROUGH TERMINATION)

- 1. Provide further guidance to Contingency Staff and other departmental staff;
- 2. Identify replacements for missing personnel and request augmentation as necessary;
- 3. Begin full execution of essential functions at alternate facilities/locations;
- 4. Immediately notify Department General Services of the alternate facility/location activation, operational and communications status, and anticipated duration of relocation, if known;
- 5. Develop plans and schedules to phase down alternate facility/location operations and return essential functions, personnel, records, and equipment to the primary facility/location or to other temporary or permanent facilities/locations, when appropriate; and
- 6. Develop a staffing plan and determine responsibilities to implement reconstitution.

# 4.4 PHASE III – RECONSTITUTION (TERMINATION OF COOP OPERATIONS AND RETURN TO NORMAL OPERATIONS)

- 1. When notified that the threat or actual emergency no longer exists, inform all staff and provide instructions for resumption of normal operations;
- 2. Supervise an orderly return to the primary facility/location, or movement to other temporary or permanent facility/location, using a phased approach if conditions necessitate;
- 3. Inform the point of contact at the alternate facility/location and other points of contact that your staff and functions will be leaving the alternative facility/location, if applicable; and
- 4. Conduct an after action review of COOP operations and effectiveness of plans and procedures as soon as possible; identify areas for correction; develop an improvement plan (Refer to Annex E for After Action Report Template).

# ANNEX A: PLAN, ANALYSIS, AND REVIEW CHECKLISTS

Annex A forms are to be completed during the COOP completion process.

ID	<b>IDENTIFICATION AND PROTECTION OF VITAL RECORDS CHECKLIST</b>			
1.)	Have personnel been assigned responsibility for identifying and protecting vital records?	Yes	🗌 No	
2.)	Have vital records been evaluated on the basis of their necessity in carrying out emergency operations or in protecting the rights and interests of citizens and the government and not on their value as permanent records?	Yes	🗌 No	
3.)	Have measures been taken to ensure that emergency operating records vital to the continuity of essential functions during an emergency will be available at alternate facilities/locations in the event those facilities/locations are activated?	Yes	🗌 No	
4.)	Have measures been implemented to secure vital records and databases?	Yes	🗌 No	
5.)	Are vital records easily retrievable and maintained in proper condition?	Yes	🗌 No	
6.)	Is a current inventory of vital records easily accessible?	Yes	No No	
7.)	Have priorities and procedures been outlined for the recovery of vital records during an emergency?	Yes	🗌 No	
8.)	Have measures been identified to minimize damage to vital records during an emergency?	Yes	🗌 No	
9.)	Has a capability been provided to recover vital records that are damaged during an emergency?	Yes	🗌 No	

# SELECTING ALTERNATE FACILITIES/LOCATIONS CHECKLIST

Alt	ernate Facility/Location:			Additional Comments
1.)	Did you select a facility/location that does not share the same risk factors as your primary facility/location?	Yes	🗌 No	
2.)	Did you consider using existing infrastructures, telecommuting centers, virtual environments, or joint or shared space?	Yes	🗌 No	
3.)	Does the facility/location have the ability to be operational within 12 hours after activation?	Yes	🗌 No	
4.)	Can the facility/location support sustained operations for 30 days or longer?	Yes	🗌 No	
5.)	Do you have reliable logistical support, services and infrastructure system, including water, electric power, heating, and air conditioning, etc.?	Yes	🗌 No	
6.)	Do you have access to essential resources, such as food, water, fuel, and medical facilities?	Yes	🗌 No	
7.)	Have you identified backup power to the facility/location?	Yes	🗌 No	
8.)	Do you have access to office and housekeeping supplies?	Yes	🗌 No	
9.)	Have you thought about your transportation and parking requirements?	Yes	🗌 No	
10.)	Does the facility/location meet your equipment and furniture requirements?	Yes	🗌 No	
11.)	Do you have a requirement for secure storage containers?	Yes	🗌 No	
12.)	Do you need security personnel to provide perimeter access control and internal security functions?	Yes	🗌 No	
13.)	If you decide to co-locate with another agency did you establish a memorandum of agreement (MOA)/memorandum of understanding (MOU) with the owner?	Yes	🗌 No	
14.)	Do you have the authority to procure your own space?	Yes	🗌 No	
15.)	Will you require another agency to assist you in the selection and acquisition process?	Yes	🗌 No	

Continuity of Operations Plan Annex B – Implementation Checklists

# ANNEX B: IMPLEMENTATION CHECKLISTS

Annex B forms are to be completed upon COOP activation and implementation.

# **COOP IMPLEMENTATION CHECKLIST**

1.)	Has the executive decision been made to activate the Department Continuity of Operations Plan (COOP)?	Yes	🗌 No
2.)	Have you evaluated your operation and determined if you need to activate your alternate facility/location?	Yes	🗌 No
3.)	Have you evaluated your operation and determined if you need to request additional staff from another department?	Yes	🗌 No
4.)	Is the alternate facility/location prepared for your relocation, including security measures?	Yes	🗌 No
5.)	Have you notified:		
	Point of contact at the alternate facility/location?	Yes	🗌 No
	Contingency Staff and Department's employees?	Yes	🗌 No
	Other City departments as appropriate?	Yes	🗌 No
	Other external organizations, as appropriate?	Yes	🗌 No
	Public?	Yes	🗌 No
6.)	Have you deployed Contingency Staff to the alternate facility/location?	Yes	🗌 No
7.)	Have you transported the following to the alternate facility/location:		
	Vital records and files	Yes	🗌 No
	Supporting communications	Yes	🗌 No
	Information Technology hardware and software, as appropriate?	Yes	🗌 No
	Other necessary equipment?	Yes	🗌 No
8.)	Have you transferred the performance of essential functions or activities to the alternate facility/location?	Yes	🗌 No
9.)	Have you secured the primary facility/location, including any equipment or vital records left behind?	Yes	🗌 No

Annex B – Implementation Checklists

RECONSTITUTION CH	HECKLIST		
1.) Has the executive decis facility/location?	sion been made to return to the primary	Yes	🗌 No
facility/location, prepar	ocation, or other temporary or permanent red for your return, including security measures, heating, and air conditioning, etc.?	Yes	🗌 No
3.) Have you notified:			
Alternate Facility/L	Location Point of Contact?	Yes	🗌 No
Contingency Staff a	and other Departmental staff?	Yes	🗌 No
Other City departm	ents, as appropriate?	Yes	🗌 No
Other external orga	nizations, as appropriate?	Yes	🗌 No
Public?		Yes	🗌 No
4.) Have you provided inst	tructions for resumption of normal functions?	Yes	🗌 No
5.) Have you transported the	he following back to the primary facility/location		
Vital records and d	atabases	Yes	🗌 No
Supporting commu	nications	Yes	🗌 No
Information Techno	ology framework, as appropriate?	Yes	🗌 No
Other necessary equ	uipment?	Yes	🗌 No
6.) Have you transferred the back to the primary fac	ne performance of essential functions or activities ility/location?	Yes	🗌 No
•	Iternate facility/location or worked with the poin alternate facility/location?	t 🗌 Yes	🗌 No
the essential functions a	n after action review to assess the performance of at the alternate facility/location and prepared a correct any areas of concern?	Yes	🗌 No

# ANNEX C: ALTERNATE FACILITY/LOCATION TRANSPORTATION INFORMATION

# **ALTERNATE FACILITY/LOCATION #1**

**INSTRUTIONS:** Provide driving directions and a map to every alternate facility/location from the primary facility identified in Table 5: Alternate Facilities/Locations Section 2.4.2.

# ANNEX D: SUPPORTING DEPARTMENTAL DOCUMENTS (INCLUDING MOA/MOU)

Include any/all additional supporting departmental documents (i.e., SOP/SOGs) that are applicable to this COOP.

# MOU TEMPLATE<sup>1</sup>

# MEMORANDUM OF UNDERSTANDING BETWEEN DEPARTMENT ON DISABILITY SERVICES AND

#### I. INTRODUCTION

This Memorandum of Understanding ("MOU") is entered into between the District of Columbia DEPARTMENT ON DISABILITY SERVICES, ("DDS") and the \_\_\_\_\_\_, collectively referred to herein as the "Parties."

The Department on Disability Services has requested the services of the

#### II. PROGRAM GOALS AND OBJECTIVES

<sup>&</sup>lt;sup>1</sup> This MOU Template is for example purpose only. Consult your Legal and Contract Departments for further guidance.

#### III. SCOPE OF SERVICES

Pursuant to the applicable authorities and in the furtherance of the shared goals of the Parties to carry out the purposes of this MOU expeditiously and economically, the Parties do hereby agree:

A. RESPONSIBILITIES OF \_\_\_\_\_

### **B. RESPONSIBILITIES OF DDS UNDER THE MOU.**

#### IV. DURATION OF MOU

A. The period of this MOU shall be from\_\_\_\_\_, through \_\_\_\_\_\_, unless terminated in writing by the Parties prior to the expiration.

#### V. AUTHORITY FOR MOU

D.C. Official Code § 1-301.01

# VI. FUNDING PROVISIONS

## A. COST OF SERVICES

- 1. Total cost for services under this MOU shall not exceed \$\_\_\_\_\_\_for Fiscal Year (FY) 20\_\_. Funding for the services shall not exceed the actual cost of the services.
- 2. The estimated cost of this MOU is based on a total of \_\_\_\_\_\_as outlined in Attachment "A" during the term of this MOU.

# B. PAYMENT

1. Payment for goods and services shall be made via transfer by DDS to

2.	
	their costs; (2) Labor costs including hourly rates for all laborers and (3) reasonable overhead.
3.	Payment tofor the services to be performed/goods to be provided shall not exceed the amount of this MOU.
4.	DDS reserves the right to deny payment to
	for goods or
	services not provided pursuant to the terms of this MOU.
5.	DDS's Director andDirector or their
	designees shall resolve all adjustments and disputes arising from services
	performed under this MOU. In the event that the Parties are unable to resolve the
	issue, the matter shall be referred to the D.C. Office of Financial Operations and

Systems.

# VII. COMPLIANCE AND MONITORING

As this MOU is funded by District of Columbia funds,

\_\_\_\_\_\_will be subject to scheduled and unscheduled monitoring reviews by the District of Columbia to ensure compliance with all applicable requirements.

### VIII. RECORDS AND REPORTS

## IX. CONFIDENTIAL INFORMATION

Both Parties to this MOU will use, restrict, safeguard and dispose of all information related to services provided by this MOU, including any information developed through an investigation or prosecution of a case, in accordance with all relevant federal and local statutes, regulations, policies, and the relevant provisions of the Internal Revenue Code. Information received by either Party in the performance of responsibilities associated with the performance of this MOU shall remain the property of DDS.

## X. SPECIAL PROVISIONS FOR TERMINATION OF THE MOU

DDS or \_\_\_\_\_\_may terminate this MOU in whole or in part by giving thirty (30) calendar days advance written notice to the other Party on the following grounds:

- A. Lack of funding;
- B. Changes in applicable law;
- C. Changes in the structure or nature of the program;
- D. Elimination of the program or service;
- E. Failure of either Party to follow District laws, rules, or regulations; or
- F. Failure of either Party to follow the terms of this MOU.

# 2.10 XI. NOTICE

The following individuals are the contact points for each Party under this MOU:

# **XII. MODIFICATIONS**

The terms and conditions of this MOU may be modified only upon prior written agreement by the Parties.

## XIII. MISCELLANEOUS

The Parties shall comply with all applicable laws, rules and regulations whether now in force or hereafter enacted or promulgated.

# IN WITNESS WHEREOF, the Parties hereto have executed this MOU as follows:

Department on Disability Services

	Date:	
Laura Nuss		
Director		
	Date	
DDS Fiscal Officer		
Agency:		
	_	
	Date:	
Director		

Continuity of Operations Plan Annex E – After Action Report Template

**ANNEX E: AFFTER ACTION REPORTING** 

# **INTRODUCTION**

In order for a COOP plan to be effective, it is critical that the personnel, procedures, alternate facilities, and equipment be exercised and tested on a regular basis. In addition, many lessons can be learned following a real-life event where the COOP is activated. Yet no amount of exercising or real-life practice will be constructive unless each event is followed by an After Action Report (AAR). After Action Report is a structured evaluation designed to identify successes and shortfalls. Both exercises and real-life events can be evaluated using similar methods. This document uses exercises and real-life event interchangeably as far as evaluation methods and forms are concerned.

The participating local governments and jurisdictions should view the After Action Report not as a "report card" that grades weakness but rather as an opportunity to identify ways to build on strengths and improve COOP capacity. Because jurisdictions are testing new and emerging plans, skills, resources, and relationships, every exercise can be expected to result in multiple findings and recommendations for improvement.

# FUNCTION OF COOP AFTER ACTION REPORTS

The goal of a COOP After Action Report and exercise evaluation is to validate strengths and identify improvement opportunities for the participating jurisdiction(s). This is accomplished by observing the exercise and collecting supporting data, analyzing the data to compare performance against expected outcomes, and determining what changes need to be made to the procedures, COOP plan, staffing, equipment, and communications to ensure expected outcomes. The focus of the evaluation for discussion-based exercises (e.g., tabletop exercises) is on the COOP plan, procedures, and policies, whereas the focus for operations-based exercises (e.g., drills and full-scale exercises) is on assessing performance in activating and implementing COOP plan in response to a simulated major event.

An After Action Report serves the following important functions:

- Identification of problems/successes during COOP training, or emergency COOP plan activation and implementation.
- Analysis of the effectiveness of COOP plan components.
- Needed improvements in the COOP procedures or guidelines.
- Additional equipment and supplies required.
- Training and staffing deficiencies and need for continued exercising of the COOP plan.
- Describes and defines a plan of action for implementing improvements.

## **RESPONSIBILITY FOR AFTER ACTION REPORTS**

Following an exercise or a drill, individuals selected as observers prior to training, are responsible for completion of the After Action Report. In a real-life event, the head of the Department will be responsible for ensuring that an After Action Report was completed. Employees and customers should be invited to provide input. The report should be distributed on an as needed basis.

# AFTER ACTION REPORT OUTLINE

- 1. Executive Summary: The executive summary provides an overview of the exercise or actual event, major strengths demonstrated during the event and areas that require improvement.
- 2. Introduction and Background
- 3. Type/Location of Event / Drill / Exercise
- 4. Description of Event / Drill / Exercise
- 5. Chronological Summary of Event / Drill / Exercise
- 6. COOP Activation and Implementation Summary: Include information on what worked and what didn't, identify strengths to be maintained or built upon and potential areas for further improvement
- 7. Conclusions and Recommendations: As applicable, include a description of recommended event follow-up actions, assignments, associated costs or budget, timetable for completion or correction, and follow-up responsibilities
- 8. Training Needs

Below is the COOP Plan Exercise/Major Event After Action Report (AAR) Information Gathering Form. This form can be used to collect information for an After Action Report.

# **IMPLEMENTING CHANGE**

Recommendations for the future are the major reason for compiling an After Action Report. The goals of an exercise are not achieved until the recommendations that come out of the evaluation are implemented. The purpose of the evaluation is to improve the COOP and the local government's performance in carrying out that plan. This is most likely to occur if objectives relate clearly to COOP functions and the focus of the evaluation is on performance, not people.

Specifically, the change effort centers on these issues:

- Are the procedures sound?
- Are resources sufficient to support the procedures?
- Are personnel adequately trained to follow the procedures and use resources?
| COOP PLAN EXERCISE/MAJOR EVENT AFTER ACTION REPORT (AAR) INFORMATION<br>GATHERING FORM   |   |   |  |  |  |  |
|--|---|---|--|--|--|--|
|  |   |   |  |  |  |  |
| 4. TYPE OF EVENT<br>EXERCISE SeminarWorkshopTabletopGameDrillFunctionalFull-scale  | ACTUAL OCCURENCE  BRIEFLY DESCRIBE CIRCUMSTANCES BELOW:   | 5. DATES OF EVENT<br>(Month/Day/Year)         Begin:      //         End:      // |  |  |  |  |
| 6. HAZARD SCENARIO<br>Please enter only one (1) P for the Prima<br>Natural Hazards:  | ary hazard and one (1) or more S's for Secondary type(s) of h<br>Technological/Man-Made Hazards:  | azard(s)  |  |  |  |  |
| <ul> <li>Drought</li> <li>Flood</li> <li>Landslide</li> <li>Wild Fire</li> <li>Winter Storm</li> <li>Other (Describe)</li> </ul> | <ul> <li>Biological</li> <li>Chemical</li> <li>Civil Disorder</li> <li>Dam Failure</li> <li>Explosives</li> <li>Hazardous Materials</li> <li>Low Intensity Conflict</li> <li>Power Failure</li> <li>Radiological</li> <li>Structural Fires</li> <li>Terrorism</li> <li>Transportation Accidents Air/Rail/Hit</li> <li>Other (Describe)</li> </ul> | ghway/Water   |  |  |  |  |

7. INDICATE NUMBER OF PARTICIPANTS/AFFECTED INDIVIDUALS FROM YOUR JURISDICTION IN EACH DEPARTMENT: TOTAL #
Assessing Department
City Clerk Department
Emergency Management Department
Executive Department
Fire Department
HAZMAT
Human Resources Department
Police Department
Public Health Department
Public Works and Engineering Department
Purchasing Department
Utilities
Others (Describe)
PART II – GENERAL COMMENTS
WHAT WENT RIGHT? (Provide a general description of actions, procedures, and decisions that contributed positively to the

exercise/event.

WHAT AREAS NEED IMPROVE	e in a future exercis	e/event.				
PART III – COOP FUNCTIO	NS TESTED					
PART III – COOP FUNCTIO	NS TESTED		CORRECTIVE	E ACTION REQU	IREMENT(S)	
PART III – COOP FUNCTIO		(C			IREMENT(S)	d)
PART III – COOP FUNCTIO	RESULTS	(C				d)
PART III – COOP FUNCTIO COOP FUNCTIONS	RESULTS (Circle)	(C Planning				d) Facilities
	RESULTS (Circle) S-Satisfactory NI – Needs		heck to show th	at a corrective a	iction is require	
COOP FUNCTIONS	RESULTS (Circle) S-Satisfactory NI – Needs Improvement N/A – Not		heck to show th	at a corrective a	iction is require	
COOP FUNCTIONS	RESULTS (Circle) S-Satisfactory NI – Needs Improvement N/A – Not Applicable		heck to show th	at a corrective a	iction is require	
COOP FUNCTIONS	RESULTS (Circle) S-Satisfactory NI – Needs Improvement N/A – Not		heck to show th	at a corrective a	iction is require	
COOP FUNCTIONS	RESULTS (Circle) S-Satisfactory NI – Needs Improvement N/A – Not Applicable		heck to show th	at a corrective a	iction is require	

# Continuity of Operations Plan Annex E – After Action Report Template

RESULTS		ULTS	CORRECTIVE ACTION REQUIREMENT(S)				
	(Circle)		(Check to show that a corrective action is required)				
COOP FUNCTIONS	S-Satisfactory NI – Needs Improvement N/A – Not		Planning	Training	Personnel	Equipment	Facilities
		cable					
Employee Notification	S NI	N/A					
Public Notification	S NI	N/A					
[INSERT OTHER NOTIFICATION PROCEDURES HERE]	S NI	N/A					
2. ALTERNATE COOP SITE OPERAT	IONS						
Delegation of Authority	S NI	N/A					
Succession of Leadership	S NI	N/A					
Accessibility	S NI	N/A					
Physical Requirements (space, desks, chairs, lights, parking, etc.)	S NI	N/A					
Essential Equipment	S NI	N/A					
Essential Documents	S NI	N/A					
Interoperable Communications	S NI	N/A					
Interoperable Communications	S NI	N/A					
Staffing	S NI	N/A					
[INSERT OTHER ALTERNATE SITE OPERATIONS REQUIREMENTS HERE]	S NI	N/A					

#### PART III. CORRECTIVE ACTION PLAN (CAP):

<u>Recommendations & Comments</u>: Add additional pages as necessary. When commenting on areas of improvement, include the Block Number of the COOP Function you indicated needs improvement and the following codes for the corrective action checked: P = Planning; T = Training; PE = Personnel; E = Equipment; F = Facilities.

### Continuity of Operations Plan

## Annex E – After Action Report Template

<u>Timeline for Corrective Action</u>: Briefly describe the action(s) that will be taken to address the recommendations discussed above and the time frame for completing these corrective measures:

PREPARED BY: (Signature)	Title	Date

Continuity of Operations Plan Annex F – COOP Best Practices

**ANNEX F: COOP BEST PRACTICES** 

#### **COOP BEST PRACTICES**

This section provides suggested COOP best practices identified through the implementation of the County of San Diego departmental COOPs. These best practices are suggestions only and their utilization is not required for a functional COOP.

#### **Emergency Communications**

• Create an Emergency Phone List (phone tree) and keep it in Outlook as a Memo. This way it will always be available using Web Mail. Include external numbers for notification.

	×
Emergency Services	858-555-1234
Major	858-555-1235
Fire Chief	858-555-1236
Supervisors	858-555-1237
3/12/2007 3:55 PM	11

- Create a directory of **wireless**, **Internet**, **satellite upload/download** and **video teleconference** sites for the City.
- If possible, create standardized messages and deliver to the voicemail of all employees. Instruct employees to check voicemail daily.
- Create an emergency phone number with a voice mail greeting that can be changed. Use this number to update the staff during an emergency. Place this number on a business card and distribute to employees.

#### Vital Records

- Create a dossier of forms (hardcopy) and store at alternate locations. Include all essential documents/forms that would require immediate access following an emergency.
- Create a COOP folder on a shared drive and ensure all critical information and vital forms are stored within.

### <u>Other</u>

- Pre-position this COOP Plan and all supporting documents at the alternate facility and ask Department Contingency Staff to pre-position a CD or a flash drive containing an electronic version of this plan in their car/home.
- Create a quick reference card including How-To checklists. For example:
  - How to create a remote voice mail greeting;
  - How to set-up a Virtual Private Network (VPN); and
  - How to forward phones remotely.
- High limit City credit card holders should not keep the cards locked at the office. The Department's office may not be available during COOP activation.
- Create a financial account (job number) for emergency use. Track all mileage and rentals this is useful for FEMA reimbursement.

Continuity of Operations Plan Annex G – Definitions and Acronyms

# ANNEX G: DEFINITIONS AND ACRONYMS

#### Annex G – Definitions and Acronyms

After Action Report - a narrative report that presents issues found during an incident or exercise, along with recommendations on how those issues can be resolved.

Alternate Facility/Location – an alternate work site that provides the capability to perform minimum essential departmental functions until normal operations can be resumed.

Alternate Facility/Location Point(s) of Contact – the individual(s) responsible for the alternate facility/location during periods of normalcy and who, upon activation of the COOP, may be required to take action to ensure that the alternate facility/location is prepared for occupancy by the Key COOP staff.

**Continuity of Operations Plan (COOP)** – an internal effort within individual components of a government to ensure that the capability exists to continue essential component functions across a wide range of potential emergencies, including localized acts of nature, accidents, and technological or attack-related emergencies.

**COOP** Activation – the executive decision by the Director of Emergency Services (CAO, Director of OES, or their designee) to initiate the Continuity of Operations process.

**COOP Implementation** – the process and procedures conducted by the Department(s) to ensure the continuance of essential functions.

**Catastrophic Event** – an emergency event that renders a department's primary facility/location unusable for a sustained period of up to or exceeding 30 days.

**Contingency Staff** – the personnel of the Department designated to report to the alternate facility/location during COOP implementation to ensure that the Department is able to perform its essential functions.

**Critical Customers** – organizations or individuals for which the City or one of its departments performs mission-essential functions.

**Critical Essential Functions** – those essential functions that cannot be interrupted or can be only minimally interrupted following an incident.

**Critical Time** – the amount of time a particular function can be suspended before it adversely affects the Department's core mission.

**Delegated Authority** – an official mandate calling on the individual holding a specific position to assume responsibilities and authorities not normally associated with that position when specified conditions are met.

**Devolution** – the capability to transfer statutory authority and responsibility for essential functions from a department's primary operating staff and facilities to employees and facilities of other departments within the City or from another jurisdiction.

**Emergency** – a sudden, usually unexpected event that does or could do harm to people, resources, property, or the environment. Emergencies range from localized events that affect a single office in a building, to human, natural, or technological events that damage, or threaten to damage, local operations. An emergency can cause the temporary evacuation of personnel or the permanent displacement of personnel and equipment from the location to a new operating location environment.

**Essential Functions** – those functions, stated or implied, that City departments are required to perform by statute, executive order, or City policy and are necessary to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial/economic base in an emergency.

**Functional Exercise** – a fully simulated interactive exercise performed in real time that tests the capability of an organization to respond to a simulated event without actually moving people and equipment to an actual site.

**Interoperable Communications** – alternate communications that provide the capability to perform minimum departmental essential functions, in conjunction with other agencies, until normal operations can be resumed.

**Key COOP Staff** – staff of the Department necessary for the performance of the Department's essential functions.

**Long-term Essential Functions** –those essential functions that can be interrupted for the first 30 days following an incident, but must be resumed thereafter.

**Mitigation** – any sustained action taken to reduce or eliminate the Long-term risk to life and property from a hazard event.

**Memorandum of Understanding and Memorandum of Agreement (MOU/MOA) -** is a legal document describing a bilateral agreement between parties. It expresses a convergence of will between the parties, indicating an intended common line of action, rather than a legal commitment. It is a more formal alternative to a gentlemen's agreement, but generally lacks the binding power of a contract.

**Order of Succession** – the order in which and conditions under which the responsibilities and authorities of a public official are passed to another official when the original holder of the responsibilities and authorities is unable or unavailable to exercise them.

**Plan Maintenance** – steps taken to ensure the COOP is reviewed regularly and updated whenever major changes occur.

**Primary Facility/Location** – the site of normal, day-to-day operations; the location where the employee usually goes to work.

**Reconstitution** – the resumption of non-emergency operations at a primary facility/location following emergency operations at an alternate facility/location.

**Tabletop Exercise** - a round table, open forum type of discussion in which an emergency situation is presented to the participants. A series of questions is offered for consideration by the participants. Individual emergency response plans from communities and industrial operators are used in a discussion on how to best deal with the fictional emergency situation.

**Termination** – actions taken to end operations at an alternate facility/location and prepare for returning to non-emergency operations at a primary facility/location.

**Vital Records and Databases** – data information, in hard copy or electronic format, necessary to maintain the continuity of operations during an emergency, to recover full operations following an emergency, and to protect the legal rights and interests of citizens and the government.