
Continuity of Operations (COOP) Planning

An overview

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*Business Continuity Planning
Is Business Survival Planning*

COOP then and now

- Continuity Of Operations (COOP) planning initially was concerned only with protecting the computer infrastructure, basically what is known as “Disaster Recovery.”
- COOP evolved into an enterprise process to protect all assets through risk identification and risk avoidance and mitigation functions.
- COOP planning for all Federal agencies is under the direction of the Department of Homeland Security (DHS).
- Protecting and sustaining the computer infrastructure remains a major component of the COOP effort.

Federally mandated

- **COOP is a process mandated by**
 - **Presidential Decision Directives (PDDs)**
 - **Federal Preparedness Circulars (FPCs)**
 - **Executive Orders (EOs)**
 - **Codes of Federal Regulations (CFRs)**

PDDs and FPCs

- **PDDs**

- **PDD 62: Protection Against Unconventional Threats** (Classified)
- **PDD 63: Critical Infrastructure Protection (CIP)**
- **PDD 67: Enduring Constitutional Government and Continuity of Government Operations** (*superseded by NSPD 51*)

- **FPCs**

- **FPC 60: Continuity of the Executive Branch Continuity of the Federal Government at the Headquarters Kevel During National Security Emergencies**
- **FPC 65: Federal Executive Branch Continuity of Operations (COOP)**
- **FPC 67: Acquisition of Alternate Facilities for Continuity Of Operations (COOP)**

EOs, CFRs, other documents

- **EOs**
 - **EO 12148: Federal Emergency Management**
 - **EO 12472: Assignment of National Security and Emergency Preparedness Telecommunications Functions**
 - **EO 12656: Assignment of Emergency Preparedness Responsibilities**
- **CFRs**
 - **Title 36 CFR. Part 1236: Management of Vital Records**
 - **Title 41 CFR, Sec. 101.20.103-4: Occupant Emergency Program**
- **Other**
 - **National Security Act of 1947 as amended**
 - **National Security Presidential Directive (NSPD) 51**

DON Critical Infrastructure Protection (CIP)

- **DON CIP* is a comprehensive, Navy-wide initiative to:**
 - **Identify infrastructures, both cyber and physical**
 - **Assess their vulnerability to loss**
 - **Develop a coordinated physical and cyber indications and warning capability against terrorism, natural disaster, or error**
 - **Take necessary action to ensure achievement of objectives during critical infrastructure loss**

* See “Critical Infrastructure Protection for Naval Warfighters” (Cdr Lynne Gaudreau, USN, published Fall 2001 at http://www.chips.navy.mil/archives/01_fall/critical_infrastructure_protecti.htm)

FPC 65 COOP requirements (Slide 1 of 2)

- **FPC-65 describes planning considerations and requirements for COOP plans. FPC-65 requires that all Federal Executive Branch agencies must:**
 - **Be capable of implementing their COOP plans with, and without, warning.**
 - **Be operational not later than 12 hours after activation.**
 - **Be capable of maintaining sustained operations for up to 30 days.**
 - **Include regularly scheduled testing, training, and exercising of personnel, equipment, systems, processes, and procedures used to support the agency during a COOP event.**

FPC 65 COOP requirements (Slide 2 of 2)

- **FPC 65 also requires that agencies:**
 - **Provide for a regular risk analysis of current alternate operating facilities.**
 - **Locate alternate facilities in areas where the ability to initiate, maintain, and terminate COOP is optimal.**
 - **Take advantage of existing agency field infrastructures and give consideration to other options, such as telecommuting, work-at-home, and shared facilities.**
 - **Consider the distance of the alternate facility from the primary facility.**
 - **Include development, maintenance, and review of COOP capabilities using a Multi-Year Strategy and Program Management Plan (MYSPMP).**

Source: Emergency Management Institute Course IS-547 *Introduction to Continuity of Operations (COOP)*

COOP essential functions

- **Essential functions of enterprise COOP plans include:**
 - **Identify all functions**
 - **Prioritize essential functions**
 - **Establish staffing and resource requirements**
 - **Integrate supporting activities**
 - **Develop plans to perform additional functions as the situation permits**

Source: DHS COOP Plan Template Instructions

Determining essential functions

- **FPC 65 defines essential functions as those functions that enable an organization to:**
 - **Provide vital services**
 - **Exercise civil authority**
 - **Maintain the safety of the general public**
 - **Sustain the industrial or economic base during an emergency.**
- **When identifying essential functions, consider:**
 - **Functions that must be continued in all circumstances**
 - **Those functions that cannot suffer an interruption for more than 12 hours**
- **Agencies must be able to continue essential functions within 12 hours and be capable of sustaining essential functions for up to 30 days**

COOP contents/Activation & Relocation

- **Activation & Relocation**
 - **Decision process**
 - **Alert, Notification, & Implementation processes**
 - **Leadership**
 - **Succession**
 - **Delegation of Authority**
 - **Devolution**

Source: DHS COOP Plan Template Instructions

COOP contents/Alternate Facility Operations

- **Alternate Facility**
 - **Mission critical systems**
 - What are they
 - How are they made available at/from alternate site
 - **Vital files, records, and databases**
 - Emergency operations records
 - Legal and financial records
 - National security (see EO 12656)

Source: DHS COOP Plan Template Instructions

COOP contents/Return to Normal Operations

- **Return to normal operations**
 - **Project plan/time table**
 - **Determine: return to old facility vs. find new facility**
 - **Notification to personnel, vendors, etc.**
 - **After action documentation**
 - **What worked**
 - **What can be done better**

Source: [DHS COOP Plan Template Instructions](#)

COOP contents/Planning Responsibilities

- **Planning responsibilities**
 - Identify key staff positions
 - Define job functions according to COOP tasks (vs. “normal operations”)
 - Identify functional teams
 - Identify team primary and alternate members

Source: DHS COOP Plan Template Instructions

COOP contents/Logistics

- **Logistics**
 - **Alternate location**
 - **Space and equipment requirements and availability**
 - **Able to perform essential functions within established time frames (e.g. 12-72 hours) and for extended duration (e.g. 30-45 days)**
 - **Reliable logistics support, services, and infrastructure**
 - **Conducive to personnel health, safety, and emotional well-being**
 - **Interoperable communications**
 - **IT resources (hardware, software)**

Source: DHS COOP Plan Template Instructions

COOP contents/Communications

- **Interoperable communications**
 - **Meet organization's essential function requirements**
 - **Communicate with**
 - **Essential personnel**
 - **Other agencies, organizations, customers**
 - **Access to data and systems**
 - **Support COOP operational requirements**
 - **Interoperability with existing field infrastructure**

Source: DHS COOP Plan Template Instructions

COOP contents/Testing, Training, Exercises

- **Testing, Training, & Exercises (TT&E)**
 - Train individuals, teams
 - Test, exercise internal COOP plans, procedures
 - Test alert and notification procedures and processes
 - Present refresher orientation for COOP responders
 - Exercise plans with associated organizations, if appropriate

Source: DHS COOP Plan Template Instructions

COOP contents/Plan Maintenance

- **Plan Maintenance**
 - **Review schedule, unscheduled review “triggers”**
 - **Update**
 - **List of authorities and references**
 - **Operational checklists**
 - **Emergency calling directory**
 - **Key personnel roster & essential functions checklist**
 - **Emergency Response Team checklist**
 - **Alternate Site Acquisition checklist**
 - **Emergency Operating Records and IT checklist**
 - **Emergency Equipment checklist**
 - **Maps and evacuation routes**
 - **Definitions and acronyms**

Source: [DHS COOP Plan Template Instructions](#)

Protecting people

- **Ensuring the safety of all agency personnel is a critical element of COOP planning. However, COOP is not the same as an Occupant Emergency Plan (OEP)**
 - **OEPs are intended to ensure the safety of personnel in the event of an incident inside or immediately surrounding an agency's building. The OEP would be implemented:**
 - **In the event of a minor fire that required evacuating the building**
 - **If an emergency occurred outside the building that required sheltering in place**
 - **Depending on the emergency, the COOP plan may be implemented at the same time as the Occupant Emergency Plan**

Source: Emergency Management Institute Course IS-547 *Introduction to Continuity of Operations (COOP)*

IT specific concerns

- **Know customer requirements**
 - **Applications used**
 - **Criticality**
 - **Restoration priority**
 - **Infrastructure demands (capacity requirement)**
 - **Access to applications**
 - **Delivery of services to alternate site**
 - **Delivery of services to user virtual offices**
 - **Ability to access applications via secure portal**
 - **Smartcards, other devices**

Related information sources

- **FEMA**
 - **IS-547 Introduction to Continuity of Operations (COOP)**
<http://training.fema.gov/EMIWeb/IS/is547.asp>
- **GSA**
 - **Occupant Emergency Program (OEP) Guide**
 - **Occupant Emergency Plan Template**
 - **Evac Plan Sample 1**
 - **Occupant Emergency Plan (Abbreviated)/Telephone Bomb Threat Checklist**
 - **Emergency Call Numbers List (Key Persons)**
<http://www.wrc.noaa.gov/wrso/oep-coop.htm>
- **NIST**
 - **NIST 800-34: Contingency Planning Guide for IT Systems**