\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_District

**Continuity of Operations Plan**

Developed [Date]

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**THANK YOU**

Arizona would like to recognize the individuals who shared their valuable time and expertise in the development of this resource. We also thank those who provided counsel and insight during the development process.

This template was first developed in 2015 and published in 2016 with the help of staff from Arizona Department of Education, Arizona School Risk Retention Trust, Buckeye Elementary School District, Cave Creek Unified School District, Paradise Valley Unified School District, Scottsdale Unified School District. The template was originally adapted from the Texas School Safety Center School District Continuity of Operations Plan template.

This template was reviewed and updated in 2023 to align with the FEMA Continuity Guidance Circular from February 2018. The project planning team consisted of staff from Arizona Department of Education, Arizona School Risk Retention Trust, and Arizona Statewide Independent Living Council.

**INTRODUCTION**

The Arizona Department of Education’s Continuity of Operations Planning (COOP) template is provided to school districts and charter organizations in Arizona for the purpose of being used as a guide for the format and content of a standard COOP. This template provides guidance incorporating the traditional elements that may be considered for inclusion in the development of a school district or charter organization Continuity of Operations Plan. The 2023 COOP template adheres to the recommended format found in ADE’s Continuity of Operations COOP Functional Annex Guidelines, dated June 2023.

A Continuity of Operations Plan, or "COOP," is an effort within a school district or charter organization to ensure that essential functions continue to be performed during a wide range of disruptions to routine operations, including localized infrastructure outages and natural, technological, or human-caused disasters. The template may be used in its entirety or in part. This COOP planning template provides a basic outline for continuity of operations development.

A plan may incorporate all or some of the essential elements of a COOP when first developed. However, identifying and defining essential functions to include essential personnel to carry out those functions should be a priority during plan development. These essential functions can be outlined in ADE’s Essential Functions Tracker Excel sheet. District functions and services not deemed essential may be suspended to focus personnel and resources on essential functions during large scale or long-term disruptions.

In the current format, this template is public information. However, once completed and customized for use by your schools, you should consult your district’s legal counsel regarding the confidentiality and exemption of your district’s EOP from public release.

If electing to use this template, it is imperative that your COOP plan represents what your district/charter organization does to ensure the continuity of essential functions during disruptions to the traditional school calendar. Whole Community Engagement is a guiding principle in continuity planning. Involving all district departments, schools, and community partners (e.g., key vendors, families, students) in the planning process will strengthen the continuity plan. It is advantageous to organize a planning team for the development of your COOP to include, but not limited to, directors of essential departments in your organization and key school points of contact. It is also beneficial in considering Whole Community Engagement to involve persons with access and functional needs or other disabilities older adults, and those from diverse ethnic and racial backgrounds to the planning team. Of course, being successful in plan development requires the support of senior leadership in your district or charter organization.

**This introductory information should be deleted from your plan if your district/charter organization decides to use this template for the purpose of developing your COOP.**

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| RECORD OF CHANGES FOR COOP DOCUMENT | | | | |
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|  |  |  |  |  |
|  |  |  |  |  |
| **Change #** | **Date of Change** | **Change Entered By** | **Change Notes** | **Location/Section of Change** |
| Example | XX/XX/XXXX | John Doe | Updated Hazard Assessment | Section XX.X |
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# OVERVIEW

A Continuity of Operations Plan, or "COOP," is an effort within       School District to ensure that essential functions continue to be performed during a wide range of disruptions to routine operations, including localized infrastructure outages and natural, technological, or human-caused disasters. This COOP planning template provides a basic outline for continuity of operations program development. This template and documentation herein is reflective of and supports the district’s Emergency Operations Plan.

The Continuity of Operations Plan also includes continuity guidance for each district level department, district facility, and school. As a document developed in close collaboration with the district emergency operations plan, the COOP uses an “all-hazards” approach to program development and an integrated approach to continuity incident management.       School District is committed to maintaining and rapidly restoring essential services to students, faculty, and staff in the event of an emergency or disaster. In the event of facility damage or if essential functions are disrupted, it is imperative that functions and services be resumed as quickly as possible. Support for resuming essential functions and services includes consideration for staffing, educational programs, student support, alternate facilities, virtual/telework, records, equipment/supplies, and vendors/contracts.

# ASSESSMENTS AND ESSENTIAL FUNCTIONS

## Risk Assessment

      School District participated in a risk and hazard assessment during emergency and continuity of operations planning. The assessment involved a collaborative process, utilizing community partners. More information about the hazard assessment process is documented in the district’s Emergency Operations Plan (EOP).

## Business Impact Analysis

### A business impact analysis (BIA) evaluates the potential impacts of a business disruption to essential functions, processes, and systems. Essential functions are defined as functions that should be resumed within 30 days in order to mitigate impacts to the district/school. Deferrable functions can be postponed for up to 30 days with minimal impact to the organization. While all functions are important, each activity may not be an essential function that must be continued in a disruption. District functions and services not deemed essential may be suspended to focus personnel and resources on essential functions during large scale or long-term disruption incidents. Each essential function is prioritized by business impact score (BIS). The BIS is a numerical score used to prioritize essential functions. The higher the score the greater the perceived impact(s) to the district/school if the function is disrupted and the more quickly those impacts may accrue.

As part of their continuity planning,       School District conducted a BIA using the *ADE BIA Tool* (see Appendix B). The BIA tool uses four different recovery time objectives (RTOs) to categorize the timeframe in which an essential function’s outage becomes unacceptable to the district: 0-24 hours, 2-3 business days, 4-7 business days, and 8-30 days. In addition, the tool assesses the level of impact (i.e., no, low, medium, or high) across seven categories if the function was unable to be performed. District leadership and continuity personnel will use the BIA data (e.g., prioritized list of functions) during disruptions when evaluating essential functions and determining alternate operations strategies.

## Essential Functions

A business process analysis (BPA) identifies and documents the processes, personnel, systems, records, resources, external interdependencies to support the operation of essential functions.       School District has used the Essential Function Tracker Spreadsheet (EFTS) for this purpose. The EFTS documents the staff (including traveling and contracted staff), space, supplies, IT and communication systems, records, and internal and external interdependencies required to carry out each essential function. In addition, the spreadsheet documents whether any processes within a function can be carried out remotely or virtually. District leadership and continuity personnel will use the BPA (i.e., EFTS) to prioritize resources for essential functions during continuity operations. See the EFTS for a complete list of essential functions and resources needed to continue them (see Appendix C). (See Appendix B – The BIA Tool for a complete prioritized list of essential functions by business impact score.)

# STAFFING, ROLES, AND ASSIGNMENT OF RESPONSIBILITY

Key personnel who are relocated under this plan are collectively known as continuity personnel and may or may not also have a role on the district Incident Command System (ICS) team. The       School District ICS team is known as \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (*insert ICS team name, District Emergency Operations Team, or other title*). The District Emergency Operations Team and continuity personnel will establish an operational capability and perform essential functions within 12 hours from the time of the activation of the COOP, for up to a 30 day period or until normal operations can be resumed.

District Directors and School Administrators are responsible for department and school continuity programs including collaborating in the development of operating guidelines and job aids to support essential functions, staff contact lists, coordinating continuity operations when the COOP is activated, and completing training and testing as appropriate.

Immediately following an incident, the District’s ICS Team (*insert team name, District Emergency Operations Team, or other title*) will deploy and discuss response and recovery. Department and site specific plans are developed to facilitate the continuity and recovery process for the following District departments:[[1]](#footnote-2)

|  |  |  |
| --- | --- | --- |
| Administration/Superintendent’s Office | Assessments | Athletics |
| Communications/Public Relations | Community Education | Curriculum and Instruction |
| Facilities/Custodial | Financial/Business Services | Food Service/Child Nutrition |
| Grant Management | Homeless/Foster Care/Group Homes | Human Resources |
| Information Technology | Legal/Risk Management | School-Based Law Enforcement |
| School Nursing Services | Special Education | Student Services/Behavioral Health |
| Transportation | Warehouse |  |
| Elementary/Primary School Office | Middle School Office | High School Office |

### \*Make additions or deletions as needed with your planning team.

During an event requiring activation of the COOP, essential emergency employees and other special categories of employees will be activated by the Superintendent or designee to perform assigned response duties. One of these categories is continuity personnel, which can include Continuity Incident Command Team Members, workers responsible for essential function continuity operations, curriculum coordinators, and support staff.

Another category of staff that plays a key role in continuity of essential functions is traveling or contracted staff (e.g., psychologists, speech therapy, occupational therapy, physical therapy, staff that provide IEP services). Continuity personnel are identified and assigned from this category of staff to support relevant essential functions during a disruption.

In order to support continuity of operations, individuals assigned to support these operations must be knowledgeable about their roles and responsibilities and have the proper access, equipment, and skills. The EFTP identifies key continuity staffing needs (see Essential Functions section in this plan and Appendix B). Contact information for each staff member filling these roles is critical and should be kept updated under separate cover for privacy purposes.[[2]](#footnote-3)

The district continuity program, annexes, and procedures incorporate existing district/school-specific guidance and direction for human resource management. Human Resources is responsible for providing guidance on pay, leave/time off, work scheduling, benefits, telework, hiring and termination, authorities, and flexibilities. The Human Resources Director has the responsibility for district human resource related issues.

# EMERGENCY ORDERS OF SUCCESSION

One of the fundamental principles of continuity planning is to maintain leadership in the event of an emergency by establishing orders of succession in the event the district, department, or school leaders are not available during an emergency. Orders of Succession run from three to five deep utilizing position titles rather than individual names.

Identifying successors is critical in the event leadership is debilitated or incapable of performing their legally authorized duties, roles, and responsibilities. The following predetermined orders of succession is designed to allow for an orderly transition of leadership within the district. Successors to the Superintendent may require School Board approval. Consult with your attorney for further guidance.[[3]](#footnote-4)

**Table 1 – Superintendent Orders of Succession**

| **Superintendent Order of Successors** |
| --- |
| Superintendent |
|  |
|  |
|  |
|  |
|  |

**Table 2 – Director Orders of Succession**

| **Director Order of Successors** |
| --- |
| Director of |
|  |
|  |
|  |

Identify order of successors for all directors in your district.

# EMERGENCY DELEGATIONS OF AUTHORITY

Delegations of authority denote a pre-determined transfer of authorities that are assigned to specific positions, ideally before an emergency. A delegation of authority would be implemented if the person normally authorized is unavailable or unable to perform their regular responsibilities. These delegated authorities will lapse when normal channels have been reestablished. This provides successors with the legal or organizational authority to act on behalf of another person for a specific purpose.

The following list of authorities may apply as a framework when implementing a delegation of authority; however, may be superseded by board-designated positions who have the authority to perform any other act on behalf of the district except those acts that require authority specifically reserved for the School Board.

* Expenditure approval:
  + Spending approval as described above includes:
    - Consulting Agreements
    - Vendor Contracts
    - Leases
    - Capital Purchases
    - Other agreements with a financial agreement
  + Signature Authority (what types of spending requires signature)
* Release of financial information
* Hiring and firing staff
* Information technology – adding new users or adding new software
* Supervisory/management duties – assigning work, scheduling, leave authorization, etc.
* Closing and reopening schools
* Alert and notifications - who can notify which audiences
* Emergency authorization - activating emergency plans, evacuation, relocation, staff recall
* Release of public information

The following table summarizes the authorities and any exceptions for each key position in the succession tables. “Yes” refers to a position having all the authorities in that category. “No” refers to the position not having any authorities in that category. “E” stands for exceptions and refers to the position having authorities in that category, but with certain exceptions.

**Table 3 – Delegations of Authority Planning Table**

| **Authority** | **Expendi-ture Approval** | **Release of Financial Info.** | **Hiring & Firing** | **IT** | **Mgmt./ Super-visory Duties** | **Alert & Notifi-cations** | **Emer-gency Author-ization** | **Release of Public Info.** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Position** |
| Super-intendent |  |  |  |  |  |  |  |  |
| Director of |  |  |  |  |  |  |  |  |
| Director of |  |  |  |  |  |  |  |  |
| Director of |  |  |  |  |  |  |  |  |

# COMMUNICATIONS

The District recognizes communication as a critical component of successful management of an emergency and continuity of operations. The District has identified primary and alternate modes of communication in the district Multi-Hazard Emergency Operations Plan (EOP) and will use those capabilities in support of internal and external communication for continuity of operations. The district should consider identifying primary and redundant critical communications systems at the standard operating facility and any pre-identified alternate locations. All necessary and required district communications should be operational within 12 hours of activation of the continuity plan.

It is important that all staff stay informed and accounted for during a continuity event. The District has established procedures for contacting and accounting for employees, including their operating status, in the event of an emergency. District employees are expected to remain in contact with their direct supervisor during any facility closure or relocation situation, including virtual or telework.

The District will provide staff with guidance in order to continue essential functions during an emergency. The District may use any of the following methods to communicate with staff during a continuity event:

* Website or social media.
* Live employee briefings.
* Telephonic contact (voice, text).
* Local television, radio or print media.
* Other forms of communication as necessary.

It is the responsibility of district departments to maintain a list of external contacts that must be notified when the continuity plan is activated.

# CONCEPT OF OPERATIONS

The Concept of Operations section explains how the district will implement its continuity plan, and specifically, how it will address each continuity phase or element. The district’s continuity process should include the following **four phases: readiness and preparedness, activation, alternate operations, and reconstitution**.

* + - * 1. **Readiness and Preparedness Phase**

      School District will participate in readiness and preparedness activities to ensure personnel can continue essential district functions in a multi-hazard environment.       School District readiness activities are divided into two key areas:

* District readiness and preparedness
* School readiness and preparedness

1. District Readiness and Preparedness

The       School District Superintendent or designee is the lead entity for developing and maintaining overarching district disaster readiness and preparedness plans, training, and risk management including (but not limited to):

* Hazard Identification and Risk Assessment (HIRA)
* District Emergency Operations Plan (EOP), including hazard-specific and functional annexes
* District Continuity of Operations Plan (COOP), which may be an annex to the EOP
* Assisting district departments and schools to develop and maintain their site-specific emergency operations plans and procedures
* Coordinating COOP training for personnel

1. School Readiness and Preparedness

      School District personnel will prepare for a continuity event and plan in advance for what to do in an emergency. This may include (but is not limited to):

* Maintaining awareness of district EOP and COOP
* Participating in COOP training provided by the district
* Developing school continuity plans and procedures as required by the district
* Ensuring relevant school staff are trained on school continuity plans and procedures
  + - * 1. **Activation Phase**

To ensure the ability to respond to a disruption of operations with minimal disruption to essential functions,       School District will execute activation of the COOP, as described in the following sections. Activation of the COOP includes the following steps:

1. There is a threat of or actual incident that disrupts essential functions.

When there is a potential for or an actual event that disrupts essential functions, the School District/School will assess the impact or expected impact to essential functions.

1. COOP Annex activation when normal operations and necessary resources are impacted or expected to be impacted.

The       School District COOP will be activated by the Superintendent, or designee, based on ~~a~~ an emergency that impacts the district.

The activation of the COOP is a situation-driven process that allows flexible and scalable responses to all-hazard incidents that could disrupt operations with or without warning and during work or non-work hours. Activation of the COOP will not be required for all emergencies or disruptions.

The decision to activate the       School District’s COOP and related actions will be tailored for the situation and based on projected or actual impacts. There may or may not be advanced warning, depending on the disaster. To support the decision-making process regarding plan activation, key organization leadership and continuity personnel may use the guided questions below.

**Table 4 – Continuity Plan Activation**

| **Guided Questions for Continuity Plan Activation** | | |
| --- | --- | --- |
|  | **Business Hours** | **Non-Business Hours** |
| **Event with Warning** | * Is the hazard aimed at the facility or school area? * Is the hazard aimed at district/school employees or students? * Are employees or students unsafe remaining in the facility and/or school area? * How long is the facility or school expected to be impacted? | * Is the hazard aimed at the facility or school area? * Is the hazard aimed at district/school personnel? * Who should be notified of the hazard? * Is it safe for employees to come to work or students to come to school the next day? * How long is the facility or school expected to be impacted? |
| **Event without Warning** | * Is the facility/school affected? * Are employees and/or students affected? Have personnel and/or students safely evacuated or are they sheltering-in-place? * What are instructions from first responders? * How soon must the district be operational? | * Is the facility/school affected? * What are instructions from first responders? * How soon must the district be operational? |

As the decision authority, the       School District Superintendent (or their designee) will be kept informed of the situation and will evaluate all available information relating to:

* + Direction and guidance from local/state/federal emergency authorities.
  + Status of district and/or school sites.
  + The health and safety of employees, including continuity personnel.
  + The health and safety of students.
  + The ability to execute essential functions.
  + Changes in hazard advisories.
  + Intelligence reports.
  + The potential or actual effects on school power infrastructure, communications/information systems, office facilities, and other vital equipment.
  + The expected duration of the emergency situation.

1. Alert and Notification Procedures for Personnel

      School District maintains plans and procedures for communicating and coordinating activities with personnel before, during, and after a continuity event.

Before an event, personnel in       School District will monitor potential hazard information, including (but not limited to):

* Relevant social media and news outlets
* Weather reports
* Intelligence provided by local/state/federal public safety agencies
* District/School email notifications
* On-school emergency alarms and notification systems.

In the event normal operations are interrupted or an incident appears to be imminent or has already impacted the district/school,       School District will communicate the district’s and school’ operating status with all stakeholders (e.g., employees, key partners, students, families). per the provisions of the       School District Communications Plan.

Upon the decision to activate the COOP,       School District will notify all affected and interdependent school entities with information regarding continuity activation status, operational and communications status, and the anticipated duration of the incident or disruption.

1. Determine Continuity Strategies (i.e., Alternate Operations)

Once the COOP is activated and personnel are notified,       School District will evaluate the situation and determine the continuity strategy for continuing essential operational functions Continuity strategies or alternate operation may include the use of alternate locations, telework, devolution, or mutual aid agreements.       School District critical continuity personnel will develop the continuity strategy taking into consideration the Recovery Time Objectives (RTOs) of essential functions from the Essential Function Tracker Spreadsheet (“Restoration Needed Within”) and the Business Impact Score from the BIA Tool.

* + - * 1. **Alternate Operations Phase**

Upon activation of the COOP, all       School District departments will continue to operate at their standard operating facilities (if safely possible) until ordered to cease operations by the Superintendent’s Office through the heads of each department. At that time, affected departments’ essential functions will transfer to an alternate location, which may include virtual settings or telework.       School District should ensure that the COOP can be operational within 12 hours of plan activation.

During the continuity phases there are three strategies that may be used to continue operations of essential functions.       School District Incident Management Team and continuity personnel may implement one of these strategies or a hybrid strategy may be used, where more than one strategy is used to continue operations during an emergency. An example of a hybrid strategy would be having certain essential functions relocated to an alternate location, while other essential functions are assigned to a telework or virtual strategy. The following table lists the three strategies with key considerations of each.

**Table 5 – Continuity Strategies**

| **Alternate Locations** | **Telework/Virtual** | **Devolution** |
| --- | --- | --- |
| * Site(s) away from the primary site, where the district/school can resume essential functions * Should be in a safe location, not impacted by the emergency affecting the primary site(s) * Accessible to individuals with AFN or other disabilities * Consider availability of existing infrastructure and the operational needs of essential functions | * Effective for functions (or processes) identified in the BPA as able to be done via telework or virtually * Plan for access to necessary systems, equipment/supplies, and records necessary to continue essential function(s) * Consider during infectious disease outbreak, pandemic, or when the primary site is closed * Identify necessary accessible methods for Individuals with AFN or other disabilities | * Transfer of authority and responsibility for essential functions from primary site/staff to other site/staff or a partner organization not affected by the emergency * Plan for the transfer of command, control, and responsibility of essential functions * Consider during emergencies with a major impact on leadership personnel, facilities, systems, equipment/ supplies, and records * Consider devolving certain essential functions to alleviate workload and free personnel for other assignments * If deployment of continuity personnel is not feasible due to unavailability of personnel, consult with district attorney for guidance. |

      School District operates within a whole community preparedness approach and understands the external interdependencies required to continue essential functions. Therefore, the district considers the need for mutual aid agreements (MAAs) with community partners and key vendors in preparation for disruptions in operations. When applicable, the district considers resources and capabilities across partners and stakeholders and develops MAAs to facilitate access to resources during emergencies.

The following describes the four continuity of operations phases:

1. Accounting for Personnel

A critical requirement of each department head is to account for all personnel under their authority. Each district department will outline a process of personnel accountability in their department continuity procedures. This process may include using call-down telephone trees, email, or text verification. The accountability process should also include what to do about department personnel who are unaccounted for. During this process, available leadership should be identified. When key leadership is not available due to the circumstances of the emergency, their pre-identified successor should be contacted.

1. Implementing Continuity Strategies

Department critical continuity personnel will prepare for alternate operations. For the use of an alternate physical location, critical continuity personnel will:

* Ensure infrastructure systems, such as lighting, power, water, sanitation (bathrooms), and climate control (if applicable) are functional.
* Ensure communications and network connections are in place and functional.
* Verify all department critical personnel are on-duty, or enroute, and are aware of the move to the alternate location.
  + The current supervisor on site at the alternate location will be responsible for verifying department personnel accountability (critical and support personnel), and ensuring they are updated on current communications (department radio channels and phone numbers), and department leadership (i.e., who is in charge of the department operations at that time).
* Notify the Superintendent’s Office (through the department head) when said department has resumed essential functions at the alternate location.
  + If resumption of department essential functions will be delayed at the alternate location, notify the Superintendent’s Office immediately to give a status report and request additional resources as needed to restore department essential functionality.

To implement a virtual/telework strategy, department critical continuity personnel will:

* Ensure that IT systems, programs, applications, platforms, etc. are available and functional.
* Ensure communications and network connections are in place and functional.
* Ensure that virtual/telework procedures are developed and communicated to relevant stakeholders.
* Verify that critical personnel are on-duty, aware of the virtual/telework strategy, and have equipment and supplies needed.
* Notify the Superintendent’s Office (through the department head) when said department has resumed essential functions via virtual/telework.
  + If resumption of department essential functions will be delayed through virtual/telework, notify the Superintendent’s Office immediately to give a status report and request addition resources needed to restore department essential functions.

During continuity operations,       School District may need to acquire necessary personnel, equipment, and supplies that are not already in place for continuity operations on an emergency basis and/or to sustain operations for up to 30 days or until normal operations can be resumed. The Superintendent’s Office maintains the authority for emergency procurement.

1. Maintain Communications

      School District will maintain communication with both internal and external partners and stakeholders, including the media and the public. Communications will focus on operational updates related to implementation of continuity strategies and continuation of essential functions. The district/school will continue to provide guidance to employees throughout the continuity of operations phases.

1. Preparing for Reconstitution/Recovery

As soon as safely possible after a business disruption occurs,       School District critical continuity personnel should begin to prepare for reconstitution or recovery. The continuity phases are not mutually exclusive and planning for reconstitution will begin as soon as possible. The district will identify a reconstitution manager that will oversee and facilitate the district/school reconstitution or recovery process. During continuity operations, the reconstitution manager should determine the status of the department/facility(s), systems, equipment/supplies, and essential records affected by the incident as soon as practical (once all essential district functions have been restored).

* + - * 1. **Reconstitution Phase**

Within 48 business hours after receiving approval from the appropriate emergency services, and health and safety authorities that the incident has ended and is unlikely to immediately reoccur, reconstitution will begin.       School District will initiate a reconstitution plan, and begin to coordinate operations to salvage, restore, and recover the district’s primary operating functions (i.e., both essential and deferred functions) and standard operating facilities, systems, equipment/supplies, and essential records. The district/school will transition between alternate operations and reconstitution using a priority-based approach, ensuring that essential functions remain operational, to the greatest extent possible, during the transition.

The district reconstitution manager, who will be activated as soon as possible after the incident,will oversee and facilitate all phases of the district/school reconstitution process. Each district/school department will designate a reconstitution point-of-contact (POC) to work with the reconstitution managerand to coordinate and communicate developments regarding department reconstitution statuses.

Upon obtaining the status of the facility(s), the reconstitution managerwill determine how much time is needed to repair departments’ standard operating facility(s) and/or acquire a new facility(s). The reconstitution manager will also consider the time required to restore, repair, and/or procure systems, equipment/supplies, and essential records for the return to standard operations. The district reconstitution manager or designee has the responsibility of supervising the repair process and should notify the District Superintendent of the status of repairs, including estimates of when the repairs will be completed.

During reconstitution,       School District will communicate with and assess employees to determine availability to return to work following the emergency incident. The district/school will keep internal and external stakeholders informed of the reconstitution process and timeline and prepare employees, students, families, and partners for the return to standard operations.

These reconstitution plans are viable regardless of the level of disruption that originally prompted implementation of the COOP. Once the appropriate district authority has made this determination, one or a combination of the following options may be implemented, depending on the situation:

* + - * The affected department(s) continues to operate from its alternate location(s).
      * Reconstitute the affected department(s) standard operating location(s) and begin an orderly return to said location(s).
      * Begin to establish reconstituted department(s) in another facility or at another designated location.

1. Evaluate and Plan for Reconstitution - Planning Levels

Reconstitution planning levels have been created to focus and support the reconstitution planning process. A description of the levels is provided in the table below.

**Table 6 – Reconstitution Levels**

| **Reconstitution Level** | **Description** |
| --- | --- |
| **Level 1: Operational Planning** | **The primary operating facility, systems, or equipment/supplies have suffered no damage or have been minimally damaged.**  Planning for this level of disruption focuses on returning operations to the primary operating facilities, which includes restoring normal operations with personnel, systems, records, and equipment/supplies at the primary operating facility once the incident or disruption has ended. This level generally would last less than 30 days. |
| **Level 2: Short-Term Planning** | **The primary operating facility, systems, or equipment/supplies have been moderately damaged.**  Planning for this level of disruption focuses on moving operations to a temporary operating facility, which includes restoring normal operations with personnel, systems, records, and equipment/supplies at a temporary operating facility. This level generally would last from one-to-six months. |
| **Level 3: Long-Term Planning** | **The primary operating facility, systems, or equipment/supplies have been severely damaged or damaged beyond repair.**  Planning for this level of disruption focuses on moving operations to a new or temporary primary operating facility, which includes restoring normal operations with personnel, systems, records, and equipment/supplies at a new or rebuilt operating facility. This level generally will last six months or longer. |

1. Returning to Full (i.e., Standard) Operations

Before relocating back to the primary operating facility or another facility, the local or district law enforcement agency, environmental and safety, and facility services will conduct appropriate security, safety, and health assessments to determine building and/or workspace suitability. In addition, district IT will verify that all systems, communications, and other required capabilities are available and operational and that the affected district department(s) is fully capable of accomplishing its normal functions and operations at the new or restored standard operating facility.

Upon a decision by the Superintendent’s Office or designee that the standard operating facility can be reoccupied or that the department(s)/school will be re-established in a different facility:

* + - * The reconstitution coordinator and the head(s) of the affected department(s)/school will develop space allocation and facility requirements for their affected department(s).
      * The head(s) of the affected department(s)/school will notify their personnel that the emergency has passed, and will develop procedures, as necessary, for restructuring/reassigning their staff in support of the reconstitution process.

Upon verification that the required capabilities are available and operational and that the affected department(s)/school is fully capable of accomplishing all normal functions and operations at the new or restored facility, the head(s) of the affected department(s)/school will begin supervising a return of personnel, systems, equipment/supplies, and records to the department’s/school’s permanent operating facility.

Designated departments will develop processes for receiving and processing employee claims during the continuity event, including personnel claims (such as workers’ compensation, compensation for injuries, overtime pay, etc.).

      School District will conduct an After-Action Review (AAR) once back in standard operations. The Superintendent’s Office or designee is responsible for initiating and completing the AAR, and all affected departments/schools within       School District will have the opportunity to provide input to the report. The AAR will address the effectiveness of the response, including identifying strengths and areas for improvement. Following the AAR,       School District will develop an improvement plan as soon as possible after the reconstitution phase.

# BUDGETING AND ACQUISITION OF RESOURCES

The district should consider budgeting for resources and capabilities essential to continuity operations. As part of the budget process, the District may utilize a risk management methodology to identify, prioritize, and justify the allocation of budgetary resources. The district integrates the continuity budget with its long-term strategic plan and links the budget directly to objectives and metrics set forth in that plan.

For those contracts vital to the support of district/school essential functions, the district may want to ensure contractor statements of work (e.g., MAAs, memorandums of understandings) to include the provision to provide staffing, services, and resources during emergency conditions.

The district will keep thorough documentation of all expenses related to an emergency that causes a disruption to operations. The district must consider documentation of expenses that are in excess of standard operations. Specific documentation on forms provided by the State of Arizona and/or FEMA may be required to be eligible for reimbursement in a declared disaster.

# VITAL DATA, INFORMATION SYSTEMS, & ESSENTIAL RECORDS

Planning for resumption of vital information technology (IT) applications, data, hardware, communications (such as networking), and other IT infrastructure is an important part of the district’s comprehensive planning process. This component of the district’s plan is located in the District IT Disaster Recovery Plan and supporting documentation. The IT Disaster Recovery Plan, maintained under separate cover, include Recovery Time Objectives, Recovery Point Objectives, and Technical Recovery Guidance for each IT system that supports district essential functions. It is the responsibility of IT to support the operational needs of the district departments, schools, and essential functions. As such, the IT Disaster Recovery Plan and processes focus on supporting these needs rather than identifying limitations.

Essential records refer to information systems and applications, electronic and hard copy documents, references and records, including sensitive data, needed to support essential functions during a continuity incident. These records include emergency operations and continuity plans, personnel and payroll records, contracts, MAAs/MOUs or other vendor and partners agreements, orders of succession and delegations of authority, and information needed to protect the legal and financial rights of the district and its staff. The district should incorporate its essential records retention/management program into the overall continuity program, plans, and procedures. Each department is responsible for ensuring that essential records necessary to continue operations are maintained and accessible.

The back-up and off-site storage of vital data and essential records listed in the IT Disaster Recovery Plan and Records Management Retention Schedule are coordinated between the IT department and records management staff in conjunction with input by each district operation or support department. When needed, vital data and essential records can be retrieved from off-site storage for duplication and distribution.[[4]](#footnote-5) The District IT Disaster Recovery Plan and Record Management Retention Schedule can be found \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (include locations).

# TESTING, TRAINING, AND EXERCISING

The District follows FEMA suggestions for testing, training, and exercising (TT&E) to support the district’s and school’s preparedness and validate the continuity capabilities, policies, procedures, systems, and ability to perform essential functions during an emergency. The TT&E of continuity capabilities is critical to demonstrating, assessing, and improving the district’s and school’s ability to execute the continuity program, plans, and procedures.

* **Testing** demonstrates the correct operation of all equipment, procedures, processes, and systems that support the district’s/school’s continuity program. Testing ensures that preparedness resources are always ready.
* **Training** familiarizes continuity personnel with their roles and responsibilities in support of the performance of essential functions during a continuity event. Training also increases knowledge of continuity plans, policies, and procedures of all district and school staff.
* **Exercising** serves to test and assess continuity plans, validate procedures, and identify gaps for subsequent correction. Exercises provide a low-risk environment to test capabilities, create an environment of collaboration and learning, and may include both internal and external interdependencies.
* **Continuous Improvement Planning** documents strengths, areas for improvement, and corrective actions to strengthen the continuity program through process improvement activities. As part of TT&E, the district/school will incorporate evaluations, after action reports, and lessons learned into future iterations of continuity plans, policies, and procedures.

The District departments may perform testing, training, and exercise events on their essential functions. Suggested courses of actions for testing and evaluating are identified below.

**Table 7 – Testing, Training, and Exercise Considerations**

| **Continuity Testing, Training, & Exercise Considerations** |
| --- |
| Test and validate equipment to ensure internal and external interoperability and viability of communications systems. |
| Test alert, notification, and activation procedures for all continuity personnel. |
| Test primary and back-up infrastructure systems and services at continuity facilities. |
| Test capabilities to perform essential functions. |
| Test capabilities for recovering essential records, critical information systems, services, and data. |
| Test and exercise of required physical security capabilities at continuity facilities. |
| Test internal and external interdependencies with respect to performance of essential functions. |
| Train continuity personnel on roles and responsibilities. |
| Conduct continuity awareness briefings or orientation for the department. |
| Train district/school leadership on essential functions. |
| Train personnel on all reconstitution procedures. |
| Train traveling and contracted staff. |
| Allow opportunity for continuity personnel to demonstrate familiarity with continuity plans and procedures and demonstrate district/school capability to continue essential functions. |
| Conduct successor training for all department/school personnel who assume the authority and responsibility of the department/school leadership if that leadership is incapacitated or becomes otherwise unavailable during a continuity situation. |
| Train on the identification, protection, and availability of electronic and hard copy documents, references, records, information systems, and data management software and equipment needed to support essential functions during a continuity situation for all staff involved in the management of essential records. |
| Test capabilities for protecting classified and unclassified essential records and for providing access to them from the continuity facility or for telework/virtual relocation. |
| Train on delegation of authority for continuity, addressing how the department/school will identify and conduct its essential functions during a disaster or in the aftermath of a catastrophic emergency. |
| Conduct personnel briefings on continuity plans that involve using or relocating to continuity facilities, existing facilities, or telework/virtual offices. |
| Allow opportunity to demonstrate intra- and interagency continuity communications capability. |
| Allow opportunity to demonstrate back-up data and records required for supporting essential functions at continuity facilities or for telework/virtual offices are sufficient, complete, and current. |
| Allow opportunity for continuity personnel to demonstrate their familiarity with the reconstitution procedures to transition from a continuity environment to normal operations. |
| Allow opportunity for continuity personnel to demonstrate their familiarity with agency devolution procedures. |

TheDistrict formally documents all conducted continuity TT&E, including the event date, type, and participants. Continuity testing, training, exercise documentation, and debriefing documentation for the district is managed by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Further, the Districtconducts a comprehensive debriefing after each exercise, which allows participants to identify systemic weaknesses and gaps in plans and procedures and recommend revisions to the district/school continuity annex.

# PLAN MAINTENANCE

      School District engages in a periodic review and revision of the continuity of operations plan and related documents every two years. Scheduled updates include a review of the plan and updates to reflect district/school changes, procedural changes, new system capabilities, equipment upgrades, new hazards, and other relevant changes to the district’s operating environment.

In addition to the scheduled reviews and revisions, any major organizational changes, environmental changes, and changes in continuity of operations strategies or policies will trigger a plan review and update when they occur between regularly scheduled bi-annual plan updates.

# CONTINUITY PROGRAM

Continuity planning is an ongoing process. An effective and successful continuity program requires a continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during an incident response (see Figure 1).

**Figure 1 – Continuity Cycle**



      School District facilitates the continuity program by engaging in the following activities:

* **Planning** – Documenting procedures and strategies for resuming operations after a disruption.
* **Organizing and Equipping** - Identifying employees required for continuity of operations and documenting that employees have the training required to execute their functions during an emergency or disaster. Identifying, maintaining, and procuring supplies, equipment, and systems required to perform functions during a disruption.
* **Training** – Educating and re-educating all staff on continuity of operations and providing additional training for key continuity personnel.
* **Exercising** - Providing opportunity for staff to become familiar with continuity plans and procedures. This may be a simple drill (e.g., fire drill, communications drill), a tabletop exercise (i.e., a facilitated scenario-based discussion), or participation in more complex functional or full-scale exercises with community partners.
* **Evaluation and Improvement Planning –** Facilitating hot washes and after action reviews and developing after action reports to support continuous improvements in the continuity program.

A multi-year strategic plan is a brief document or table that helps the district organize, track, and improve the continuity program. The multi-year strategic plan includes short-term and long-term goals and objectives of the continuity program; regular reviews and revisions of the plan; planning, testing, training, and exercise milestones; resources requirements; and issues or potential obstacles that arise and strategies for addressing them.

# APPENDIX A: List of Plan Annexes

* Annex A: Multi-Year Strategic Plan

# APPENDIX B: Business Impact Analysis Tool

## A snapshot of the       District’s/school’s Business Impact Analysis (BIA) Tool is included here. The full, completed tool is kept at the following location:      .

# APPENDIX C: Essential Function Tracker Spreadsheet

## A snapshot of the       District’s/school’s Essential Function Tracker Spreadsheet (EFTS) is included here. The full, completed tool is kept at the following location:      .

# APPENDIX D: Glossary

|  |  |
| --- | --- |
| Term | Definition |
| Activation | Making a plan operative or active for a period of time around an incident. |
| All-Hazards | Encompasses all conditions, environmental or manmade, that have the potential to cause injury, illness, or death; damage to or loss or equipment, infrastructure services, or property; or alternatively causing functional degradation. |
| Appendix | A section of additional content at the end of a plan, which is attached to the plan. |
| Annex | Additional content related to the plan; however, it is kept separate from the plan as a stand-alone document. |
| Concept of Operations | Presents a clear picture of the sequence and scope of the planned emergency response, what should happen, when, and at whose direction. |
| Delegation of Authority | Grants authority to carry out specific functions, can be verbal or written. |
| Disability and Access and Function Needs | Persons who may have additional needs before, during and after an incident in functional areas, including but not limited to maintaining independence, communication, transportation, supervision, and medical care. Individuals in need of additional response assistance may include those who have disabilities; live in institutionalized settings; are seniors; are children; are from diverse cultures; have limited English proficiency or are non-English speaking; or are transportation disadvantaged. |
| Disaster | Defined by FEMA as an occurrence of a natural catastrophe, technological accident, or human-caused event that results in severe property damage, death, and/or multiple injuries. |
| Drill | A type of operations-based exercise that is a coordinated, supervised activity usually employed to test a single specific operation or function in a single organization. |
| Emergency | FEMA defines as an unexpected event which places life and/or property in danger and requires an immediate response. |
| Emergency Operations Center | The central location from which response and recovery activities are coordinated during a major emergency or disaster. |
| Essential Functions | Organizational business functions that are determined to be critical activities. |
| Essential Services | Organizational services or service lines that are determined to be critical activities. |
| Exercise or Exercising | Test and validate plans, policies, procedures, and capabilities. Identify resource requirements, capability gaps, strengths, areas for improvement, and potential best practices. |
| Full-Scale Exercise | A practice or test that is as close to a real event as possible. It is a lengthy exercise which takes place on location using, as much as possible, the equipment and personnel that would be called upon in a real event. |
| Functional Exercise | A fully simulated interactive exercise that tests the capability of an organization to respond to a simulated event. It is like a full-scale exercise but does not include equipment or deployment of actual field resources. |
| Hazard | Something that is potentially dangerous or harmful, often the root cause of an undesired outcome. |
| Hazard Vulnerability Analysis | Systematic approach to identifying hazards or risks that are most likely to have an impact on a healthcare facility and the surrounding community. |
| Incident | An occurrence, caused by either human action or natural phenomenon, that may cause harm and require action, which can include major disasters, emergencies, terrorist attacks, terrorist threats, wild and urban fires, floods, hazardous materials spills, nuclear accidents, aircraft accidents, earthquakes, hurricanes, tornadoes, tropical storms, war related disasters, public health and medical emergencies, cyber-attacks, cyber failure/accident, and other occurrences requiring an emergency response. |
| Incident Action Plan | Formally documents incident goals, operational period objectives, and the response strategy defined by incident command during response planning. |
| Incident Command System | A standardized approach to incident management that provides a common hierarchy within which responders from multiple agencies can be effective. |
| National Incident Management System | System that provides a consistent, nationwide approach for federal, state, tribal, territorial, and local governments; private sector; and non-governmental organizations to work effectively and efficiently together to prepare for, respond to, and recover from incidents, regardless of cause, size, or complexity. |
| Preparedness | A state of readiness to respond to a disaster, crisis, or any other type of emergency. |
| Preparedness Partner | A variety of response partners that may be coordinating or supporting an organization or community during an emergency or disaster incident. |
| Public Information | The processes and systems that enable effective communications with various targeted public audiences. |
| Redundant Systems | The ability to utilize backup systems for critical parts of the system that fail during an emergency or disaster. |
| Stakeholders | Person or group who has a share or an interest in incident resolution. |
| Tabletop (Exercise) | Discussion-based sessions in which key personnel assigned emergency management roles and responsibilities meet in an informal setting to discuss their roles during an emergency and their responses to a hypothetical, simulated emergency. |
| Telephone Tree | A prearranged, defined system of informing and activating a group of people by telephone. |
| Testing (Exercising) | A process designed to evaluate the effectiveness of emergency plans, policies, procedures, and capabilities. Includes drills and a variety of exercise types. |

# APPENDIX E: ACRONYM LIST

## AAR After Action Review

## ADE Arizona Department of Education

## AFN Access and Functional Needs

## BIA Business Impact Analysis

## BIS Business Impact Score

## BPA Business Process Analysis

## COOP Continuity of Operations Plan

## EFTS Essential Function Tracker Spreadsheet

## EOP Emergency Operations Plan

## FEMA Federal Emergency Management Agency

## HIRA Hazard Identification and Risk Assessment

## ICS Incident Command System

## IT Information Technology

## MAA Mutual Aid Agreement

## MOU Memorandum of Understanding

## POC Point of Contact

## RTO Recovery Time Objective

## TT&E Training, Testing, and Exercising

# APPENDIX F: References

* *Continuity Guidance Circular*. FEMA National Continuity Programsdated February 2018, FEMA.

1. Tailor the continuity and recovery group titles to those of your district. Use titles only – do not use the names of specific individuals. [↑](#footnote-ref-2)
2. Tailor this contact list to the stakeholders and suppliers specific to your district [↑](#footnote-ref-3)
3. Tailor this list by function to the departments and operations of your district. Use titles only – do not use the names of specific individuals. [↑](#footnote-ref-4)
4. Update guidance based upon district specific redundancies (off-site storage is considered the best practice). [↑](#footnote-ref-5)