_____District
Continuity of Operations Plan

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.

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This template is adapted from the Texas School Safety Center School District Continuity of Operations Plan template.

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 new 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. For the most part, the 2020 COOP template adheres to the recommended format found in ADE's Continuity of Operations COOP Functional Annex Guidelines, dated June 2016.

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 the 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 disruption incidents.

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. 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. 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.

RECORD OF CHANGES FOR COOP DOCUMENT

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
1.				
2.				
3.				
4.				
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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 campus. As a document developed in close collaboration with the district emergency operations plan, the COOP uses a "multi-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, records, equipment/supplies, and vendors/contracts.

CAMPUS & DEPARTMENT CONTINUITY PROGRAMS

Key personnel who are relocated under this plan are collectively known as the _____ (*insert District Emergency Operations Team or other title*). 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 Campus Administrators are responsible for Department and Campus Continuity Programs including collaborating in the development of operating guidelines and job aids to support essential functions, staff contact lists, coordinating continuity operations when activated, and completing training and testing as appropriate.

Immediately following an incident, the District's Incident Command Team 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]

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.

ESSENTIAL FUNCTIONS

A critical step in developing a COOP is identifying the district's essential functions, their associated key personnel, and supporting critical systems/processes that must be sustained.

While all functions are important, each activity may not be an essential function that must be continued in a disruption.

Steps in identifying essential functions are:[2]

1. Identify departmental and campus functions.
2. Determine essential functions - functions that have one or more of these attributes:

   o Has direct, immediate effect in preventing loss of life, personal injury, or loss of property.
   o Is essential for teaching and maintaining the educational environment.
   o Provides vital support to essential function(s) of another department.
   o Is required by law.
   o Must be continued under all circumstances.
   o Cannot suffer a significant interruption.

3. Prioritize these essential functions and list them in the ADE Essential Function Tracker spreadsheet.
4. Identify staff responsible for performing essential function by job title.
5. Identify the vital record and record location for each essential function.

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[1] Tailor the continuity and recovery group titles to those of your district. Use titles only – do not use the names of specific individuals.
[2] Sometimes tying functions to an organization's "Mission Statement" is helpful in identifying essential functions.

6. Determine the duration of time that a function or service can be interrupted before it must be restored to an acceptable level of operation.[3]

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.

IDENTIFICATION OF CONTINUITY PERSONNEL

During an event requiring activation of the COOP, 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.

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 Essential Functions chart also identifies key continuity staffing needs. Contact information for each staff member filling these roles is critical and should be kept updated under separate cover for privacy purposes.[4]

TRAINING AND EXERCISES

The District follows FEMA suggestions for training, and exercise to support the organization's preparedness and validate the continuity capabilities, program, and ability to perform essential functions during an emergency. The training and exercising of continuity capabilities is essential to demonstrating, assessing, and improving the district's ability to execute the continuity program, plans, and procedures.

- **Training** familiarizes continuity personnel with their roles and responsibilities in support of the performance of essential functions during a continuity event.

- **Exercises** serve to assess, validate, or identify for subsequent correction, all components of continuity plans, policies, procedures, systems, and facilities used in response to a continuity event. Periodic exercises also ensures that equipment and procedures are kept in a constant state of readiness.

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

Continuity 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 vital 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.

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[3] Tailor this list by function to the departments and operations of your district
[4] Tailor this list to the stakeholders and suppliers specific to your district

Continuity Training & Exercise Considerations
Train continuity personnel on roles and responsibilities.
Conduct continuity awareness briefings or orientation for the department.
Train district/campus leadership on essential functions.
Train personnel on all reconstitution/reopen procedures.
Allow opportunity for continuity personnel to demonstrate familiarity with continuity plans and procedures and demonstrate district/campus 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 ready 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 vital records.
Test capabilities for protecting classified and unclassified vital records and for providing access to them from the continuity facility.
Train on delegation of authority for continuity, addressing how the department/campus 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 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 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 activities.
Allow opportunity for continuity personnel to demonstrate their familiarity with agency delegation of authority procedures.

The District formally documents all conducted continuity training and exercises, including the event date, type, and participants. Continuity training, exercise documentation, and debriefing documentation for the district is managed by _____. Further, the District conducts a comprehensive debriefing after each exercise, which allows participants to identify systemic weaknesses in plans and procedures and recommend revisions to the district/campus continuity annex.

INITIALIZING CONTINUITY OF OPERATIONS PLANS

It is important that all staff, especially individuals not identified as continuity personnel, 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.

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.

HUMAN RESOURCE CONSIDERATIONS:

The district continuity program, annexes, and procedures incorporate existing district/campus-specific guidance and direction for human resource management, including 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.

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 element. The district's continuity implementation process should include the following **four phases: readiness and preparedness, activation, continuity operations, and reconstitution**.

A. 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
- Campus 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 and training including (but not limited to):

- Hazard Identification and Risk Assessment (HIRA)
- District Emergency Operations Plan (EOP)
- Assisting district departments and campuses to develop and maintain their site-specific emergency operations plans and procedures
- Coordinating emergency management training for personnel

2. Campus Readiness and Preparedness

School District personnel will prepare for a continuity event and plan in advance for what to do in an emergency.

B. Activation Phase

To ensure the ability to attain operational capability at alternate facilities and with minimal disruption to operations,   School District will execute activation plans as described in the following sections.

1. Decision Process

The   School District COOP will be activated by the Superintendent, or designee, based on a hazard or an emergency directed at the district.

The activation of the COOP is a situation-driven process that allows flexible and scalable responses to multi-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, since other actions may be more appropriate.

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

Guided Questions for Continuity Plan Activation		
	Business Hours	**Non-Business Hours**
Event with Warning	• Is the hazard aimed at the facility or campus area? • Is the hazard aimed at district/campus personnel? • Are employees unsafe remaining in the facility and/or campus area?	• Is the hazard aimed at the facility or campus area? • Is the hazard aimed at district/campus personnel? • Who should be notified of the hazard? • Is it safe for employees to come to work the next day?
Event without Warning	• Is the facility/campus affected? • Are personnel affected? Have personnel safely evacuated or are they sheltering-in-place? • What are instructions from first responders? • How soon must the district be operational?	• Is the facility/campus 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.
- Incident status of district and/or campus sites.
- The health and safety of personnel.

- The ability to execute essential functions.
- Changes in hazard advisories.
- Intelligence reports.
- The potential or actual effects on campus power infrastructure, communications/information systems, office facilities, and other vital equipment.
- The expected duration of the emergency situation.

2. Alert and Notification Procedures

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.
- On-campus emergency alarms and notification systems.

In the event normal operations are interrupted or an incident appears to be imminent, School District will communicate the campus' operating status with all stakeholders per the provisions of the School District Communications Plan.

Upon the decision to activate the COOP, School District will notify all affected and interdependent campus entities with information regarding continuity activation status, operational and communications status, and the anticipated duration of relocation(s).

3. Relocation Process

Once the COOP is activated and personnel are notified, School District will relocate critical personnel and essential operational functions to an alternate facility(s) if necessary. School District critical personnel will deploy/relocate to a pre-determined alternate facility(s) to perform the campus' essential functions and other continuity/reconstitution-related tasks.

C. Continuity Operations Phase

Upon activation of the COOP, all School District departments will continue to operate at their home 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, to include virtual settings. School District should ensure that the COOP can be operational within 12 hours of plan activation.

First arriving department critical personnel at the alternate location will prepare the site for essential function operations. Upon arrival at the alternate location, critical 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 en-route, 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), and ensuring they are updated on current communications (department radio channels and phone numbers), and department leadership (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.

A 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 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.

D. Reconstitution Operations 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 and department home facilities.

A district reconstitution coordinator will be designated for all phases of the district/campus reconstitution process, and each district/campus department will designate a reconstitution point-of-contact (POC) to work with the reconstitution coordinator and to coordinate and communicate developments regarding department reconstitution statuses.

During continuity operations, the reconstitution coordinator should determine the status of the department/facility(s) affected by the event as soon as practical (once all essential district functions have been restored). Upon obtaining the status of the facility(s), the reconstitution coordinator will determine how much time is needed to repair departments' home operating facility and/or acquire a new facility. Should   School District determine the need to repair the facility, the reconstitution coordinator 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.

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) home operating location(s) and begin an orderly return to said location(s).
- Begin to establish a reconstituted affected department(s) in another facility or at another designated location.

1. 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:

Reconstitution Level	Description
Level 1: Operational Planning	**The primary operating facility has suffered no damage or has 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, records, and equipment 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 has 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, records, and equipment at a temporary operating facility. This level generally would last from one-to-six months.
Level 3: Long-Term Planning	**The primary operating facility has 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, records, and equipment at a new or rebuilt operating facility. This level generally will last six months or longer.

2. Returning to Full 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 home operating facility.

Upon a decision by the Superintendent's Office or designee that the home operating facility of the affected department(s) can be reoccupied or that the department(s) will be re-established in a different facility:

- The reconstitution coordinator and the head(s) of the affected department(s) will develop space allocation and facility requirements for their affected department(s).
- The head(s) of the affected department(s) 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) is fully capable of accomplishing all normal functions and operations at the new or restored facility, the head(s) of the affected department(s) will begin supervising a return of personnel, equipment, and documents to the department'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 full operating functionality. The Superintendent's Office or designee is responsible for initiating and completing the AAR, and all affected departments within   School District will have the opportunity to provide input to the report. The AAR will address the effectiveness of the continuity plans and procedures, identify areas for improvement, and then develop a   School District Continuity of Operations Improvement Plan as soon as possible after the reconstitution.

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/campus essential functions, the District may want to ensure contractor statements of work include the provision to provide staffing, services and resources during emergency conditions.

The District will keep thorough documentation of all expenses. The District must consider documentation of expenses that are in excess of normal 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.

CONTINUITY COMMUNICATION & KEY EXTERNAL CONTACTS

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 or operations.

District departments are to maintain a list of external contacts that must be notified if continuity activation is declared.

COMMUNICATIONS

The District should consider having identified available and redundant critical communications systems that are located at the primary operating facility and continuity facility. Further, the District maintains fully capable continuity communications that support district/campus needs during all hazards.

All necessary and required district communications and IT capabilities should be operational within 12 hours of continuity activation.

EMERGENCY ORDER OF SUCCESSION

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

Continuity succession 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, and predefined, transition of leadership within the district. Successors to the Superintendent may require Governing Board approval. Consult with your attorney for further guidance.[5]

Superintendent Order of Successors
Superintendent

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[5] Tailor this list by function to the departments and operations of your district. Use titles only – do not use the names of specific individuals.

Director Order of Successors
Director of

Identify order of successors for all directors in your district.

VITAL DATA, INFORMATION SYSTEMS & ESSENTIAL RECORDS MANAGEMENT

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, campuses 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 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.[6] The District IT Disaster Recovery Plan and Record Management Retention Schedule can be found _____ (include locations).
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DELEGATION OF CONTROL AND DIRECTION

The District is prepared to transfer all its essential functions and responsibilities to personnel at a different location should emergency events render leadership or staff unavailable to support the execution of the district's essential functions. If deployment of continuity personnel is not feasible due to the unavailability of personnel, consult with your attorney for further guidance.

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[6] Update guidance based upon district specific redundancies (off-site storage is considered the best practice).

References

Continuity Guidance Circular 1 (CGC 1), *Continuity Plan Template and Instructions for Non-Federal Governments* dated September 2013, FEMA.