2023

CONTINUITY OF OPERATIONS PLANNING
COOP Functional Annex Guidelines

The Arizona Department of Education developed this guidance document in good faith as a preparedness tool for Arizona districts and schools. Guidance contained within this document utilizes state and federal planning resources; US Department of Education REMS COOP; Guide for Developing High-Quality Emergency Operations Plans for K-12 Schools; FEMA's Developing and Maintaining Emergency Operations Plans, Comprehensive Preparedness Guide (CPG101) 2018, and the Arizona Department of Emergency and Military Affairs COOP guidance. In the current format, this guidance is public information; however, districts and schools should be aware of the need to protect specific emergency planning information and should redact information as necessary for the safety of the district or school.

2nd EDITION   **UPDATED 10/31/2023**

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INTRODUCTION

Continuity of operations focuses on the ability of a district or school to quickly resume or continue essential functions during any type of emergency or disaster. The emphasis is on critical resources that support essential function operations. There are six critical resources that are considered while planning for continuity of operations:

- Staff
- Supplies/equipment
- Space (i.e., facilities)
- Systems
    - Information technology
    - Communications
- Essential records

A continuity of operations plan (COOP) is a functional annex to and supports a district's/school's emergency operations plan (EOP). It is developed to ensure that essential functions continue during an emergency and its immediate aftermath. Essential functions may include business services (e.g., payroll and purchasing), communications (e.g., internal and external), facilities maintenance, safety and security, and continuity of teaching and learning. Essential functions will be organized according to district/school functional areas, which will be discussed in further detail in this document.

The COOP planning team should consider the following when developing the goals, objectives, and continuity strategies in the annex:
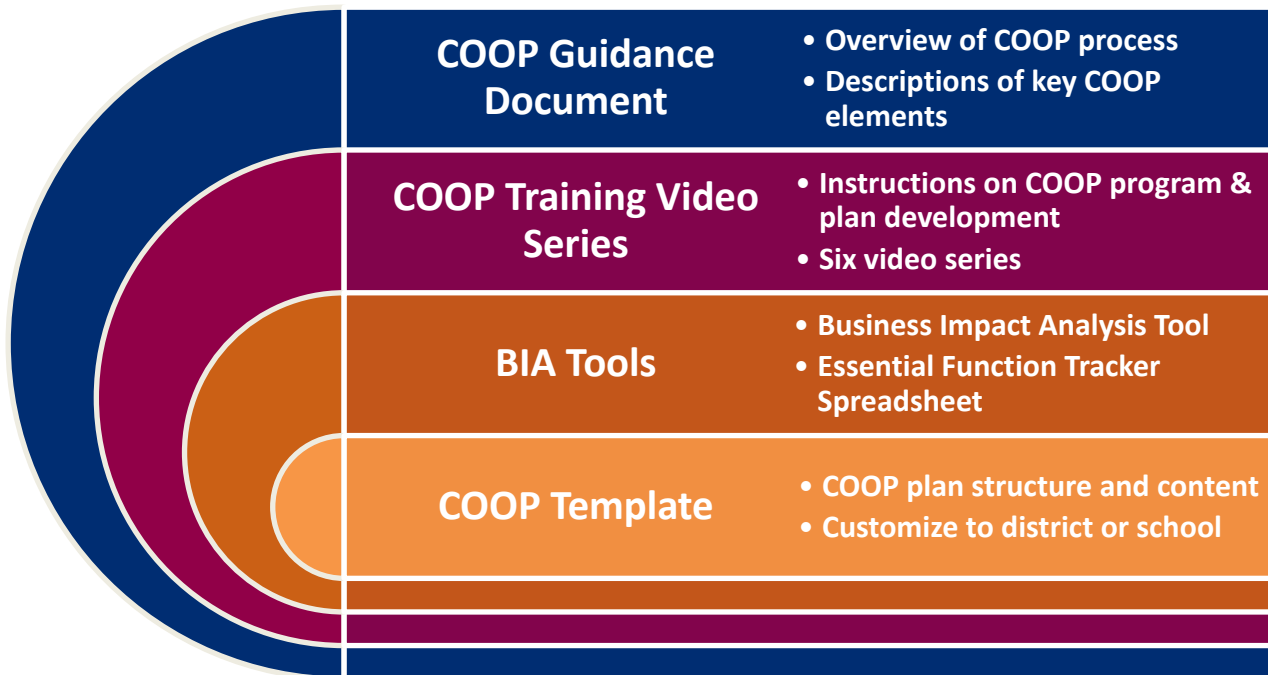
- How the COOP annex is designed, so that it can be activated at any time and sustained for up to 30 days
- How the COOP annex will set priorities for re-establishing essential functions, such as restoration of school operations, and maintaining the safety and well-being of students and the learning environment
- How the COOP annex will ensure students receive applicable related services in the event of a prolonged closure

Arizona Department of Education (ADE) provides four continuity planning resources to assist districts/schools with developing and maintaining a COOP Annex and a comprehensive continuity program. The four resources, listed below, should be used together and are also depicted in Figure 1.

1. This guidance document is one of those resources, which provides an overview of the continuity planning process and describes key elements of the COOP.
2. Secondly, ADE has developed a series of six brief training videos that guide planners through the details of starting a continuity program, identifying and prioritizing essential functions, identifying accompanying resources and interdependencies of essential functions, and integrating continuity planning and emergency operations planning.
3. The third resource available to districts/schools are two business impact analysis tools. These include the Business Impact Analysis (BIA) Tool specifically designed for Arizona districts/schools to prioritize essential functions and the Essential Function Tracker Spreadsheet (EFTS) specifically designed for Arizona districts and schools to identify and track critical business resources and interdependencies related to essential functions.
4. Lastly, ADE provides a COOP template that planners can customize to create a district/school COOP annex.

Figure 1 – ADE's COOP Resources

COOP Guidance Document	• **Overview of COOP process** • **Descriptions of key COOP elements**
COOP Training Video Series	• **Instructions on COOP program & plan development** • **Six video series**
BIA Tools	• **Business Impact Analysis Tool** • **Essential Function Tracker Spreadsheet**
COOP Template	• **COOP plan structure and content** • **Customize to district or school**

ADE's six continuity videos are described in Figure 2. The figure includes the title, contents, and length of each video. The videos are ordered to guide the continuity planning process and are best used in the order they are presented.

Figure 2 - ADE COOP Training Video Series

| Video 1	Video 2	Video 3	Video 4	Video 5	Video 6
Getting Started: Building a School or District COOP Program	Identify Essential Functions and Estimate Impacts	Prioritize Essential Functions Using a Business Impact Analysis Tool	Identify the Resources that Support Essential Functions	Identify the Internal and External Interdependencies that Support Essential Functions	Integrate Continuity Planning with Emergency Response Planning
Defining continuity of operations and essential functions .... Defining the project scope and objectives .... Establishing a project timeline .... Forming a planning team .... Obtaining leadership buy-in .... Holding a kick-off meeting	Defining essential functions .... Defining deferrable functions .... Identifying all school or district functions .... Estimating the impacts of disrupted functions .... Prioritizing functions	Defining a Business Impact Analysis Tool .... Familiarizing yourself with the tool .... Step-by-step instructions for using the Business Impact Analysis Tool .... Determining and sharing the business impact scores	Understanding the resources that supporting each essential function .... Reviewing the descriptions of staff, space, supplies, and systems .... Reviewing types of essential records .... Using the Essential Function Tracker Spreadsheet to document the resources and essential records that support essential functions	Defining interdependencies .... Reviewing the internal interdependencies that support essential functions .... Reviewing the external interdependencies that support essential functions .... Use the Essential Function Tracker Spreadsheet to document internal and external interdependencies	Difference between a COOP and EOP .... Diagrams that show how the COOP connects with the EOP .... The basic incident command structure and where COOP can fit into that structure .... The process of activating the COOP and how it may integrate with EOP activation
13:25 mins.	9:43 mins.	9:57 mins.	9:19 mins.	6:40 mins.	10:09 mins.

DEVELOPMENT AND DESIGN OF YOUR COOP ANNEX

In addition to the resources that ADE provides, they support the use of state and federal planning resources by districts and schools for continuity planning. The following documents can serve as additional planning resources, but sources are not limited to these:

- Federal Emergency Management Agency (FEMA), Comprehensive Preparedness Guide 101 (CPG 101), 2018 https://www.fema.gov/sites/default/files/2020-10/continuity-guidance-circular-2018.pdf
- US Department of Education, REMS COOP; Guide for Developing High Quality Emergency Operations Plans for K-12 Schools https://rems.ed.gov/GuideK12.aspx

ADE recommends following FEMA's CPG 101 six step planning process, as depicted in Figure 3. This planning process may be used to create new planning documents and annexes, as well as to revise and update existing plans.

Figure 3 – Six Step Planning Process
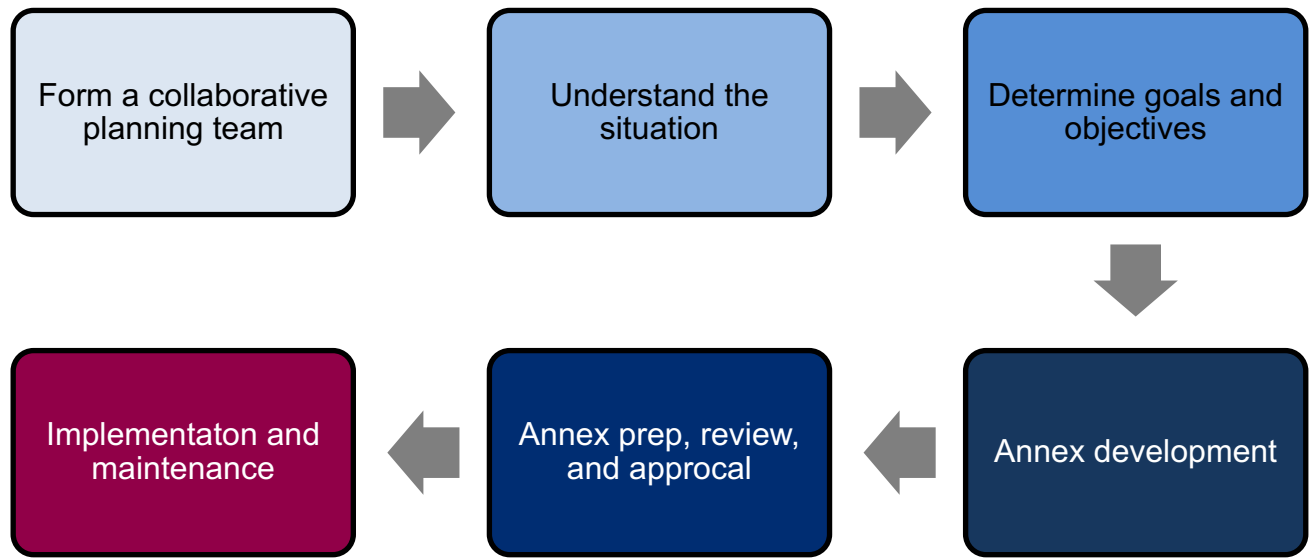
Another important principle from FEMA's CPG 101 is whole community engagement. Whole community engagement involves inviting and enabling the participation of a wide range of partners, stakeholders, and/or individuals into the planning process. Districts/schools should use whole community engagement as a guiding principle while developing the COOP annex, ensuring that students, families, teachers, staff, leaders, and those with access and functional needs and those from diverse ethnic backgrounds are able to participate in the process. Whole community engagement also refers to engaging a wide variety of external

partners, e.g., federal, state, tribal, local, government, non-government, and private organizations.

ANNEXES TO THE EMERGENCY OPERATIONS PLAN

The COOP Annex can be considered a functional annex to the district/school EOP. Functional annexes are individual documents or plans that can stand alone (i.e., separate from), but work in conjunction with the EOP. Functional annexes focus on specific actions, such as evacuation, lockdown, or communications. Hazard-specific annexes focus on the type of incident or emergency, for example, earthquake, flood, winter weather, or extreme heat. Annexes describe actions, roles, and responsibilities, and discuss how the district/school manages the function (i.e., activity) or responds to the hazard before, during, and after the emergency incident. Annexes may or may not be activated with the EOP, depending upon the incident and impact to the district/school.

The COOP functional annex is intended to:

- Set priorities and describe how a district or school will ensure that essential functions continue during an emergency and its aftermath
- Ensure students receive applicable related services (e.g., nutrition services) in the event of a prolonged closure (e.g., nutrition services)
- Guide the continuation and/or restoration of essential functions within 12 hours of activation
- Sustain essential functions for up to 30 days or until normal or standard operational status is achieved

When developing the COOP Annex consider the following steps or elements:

1. Identify essential functions
   a. Business impact analysis
   b. Business process analysis
2. Identify mitigation options (i.e., alternate operations)
   a. Telework/virtual work
   b. Alternate locations
   c. Devolution
3. Identify key elements (i.e., critical resources – staff, space, supplies, IT and communications systems, essential records)
   a. Human resources
   b. Orders of succession and delegations of authority
   c. Communications
   d. Critical systems
   e. Essential records

4. Plan and implement options and elements (i.e., continuity phases)
    a. Readiness and preparedness
    b. Activation
    c. Alternate operations
    d. Reconstitution
5. Develop testing, training, and exercising schedule or plan
6. Create a schedule for annex review and updates

FUNCTIONAL AREAS AND ESSENTIAL FUNCTIONS

Essential functions are those organizational functions that must continue under all circumstances, including when there is a school closure due to an emergency. Essential functions that are disrupted result in significant impacts to students, staff, confidence in the organization, financial, and legal areas. These include functions that keep the district/school operating, ensure response to emergencies, provide safety and security, and continue the learning environment. Functions are broad groups of work and typically there are a few to several functions within a department. Functions are large enough that they can be broken down into several smaller groups of work or processes.

Deferrable functions are those functions that could be delayed for up to 30 days during an emergency. They are still important to the district/school but can be de-prioritized to focus on those functions that are essential. Critical business assets (e.g., staff, space, supplies) from deferrable functions may be reassigned to support essential functions during an emergency. Examples of deferrable functions include sporting events, after school activities, and professional development.

Essential functions are truly those district/school functions and activities that must be continued under all circumstances. If some services or activities can cease during an emergency, they are likely deferrable function. Determining essential and deferrable functions ahead of an emergency reduces debate during an emergency event and focuses resources on what is most important.

Functional Areas

The use of functional areas can help guide the process of determining essential and deferrable functions. Consider all the larger groups of work or functions within each functional area of the district/school. ADE has determined functional areas for districts/schools to use. These areas may need to be adjusted to account for the specific of individual districts/schools.

- **Administration/Superintendents Office**
- **Assessments**
- **Athletics**
- **Communications-Public Relations**
- **Community Education**
- **Curriculum-Instruction**
- **Facilities-Custodial**
- **Financial-Business Services**
- **Food Services-Nutrition**
- **Grant Management**
- **Homeless-Foster-Group Homes**
- **Human Resources**
- **Information Technology**
- **Legal-Risk Management**
- **School-Based Law Enforcement**
- **School Nursing**
- **Special Education (SPED)**
- **Student Services-Behavioral Health**
- **Transportation**
- **Warehouse**
- **Elementary-Primary Office**
- **Middle School Office**
- **High School Office**

Identifying and Prioritizing Essential Functions

There are varying ways to identify and prioritize essential functions. A business impact analysis and business process analysis (BPA) are two methods of thoroughly evaluating an organization's essential functions and the resources and interdependencies required to keep functions operational. ADE has developed two tools to assist districts/schools with these tasks.

The BIA Tool evaluates the potential impacts of a business disruption to essential functions and quantifies the impact of a function's disruption to the district/school. The business impact score is the numerical score used to prioritize essential functions. The higher the score the greater the perceived impact(s) to the organization if the function is disrupted and the more quickly those impacts may accrue.

The EFTS is an Excel spreadsheet that provides a framework for determining and documenting the critical resources (i.e., staff, space, supplies, systems, etc.) needed to support essential functions. Internal and external interdependencies are also considered for each essential function. The spreadsheet is organized by functional area. Using the EFTS during the continuity planning process meets recommendations of not just identifying essential functions but conducting a BPA.

Individualized Education Plans and Other Special Needs

When considering essential functions, ensure planning for the provision and accommodation of students who have individualized education plans (IEPs). IEPs outline the individual educational accommodations needed by students and are legally binding. The COOP Annex must address IEPs of students with disabilities.

In addition to IEPs, the COOP Annex should consider how eligible students will receive continued medical and food service during prolonged school dismissals. And the needs of any students and staff with other access and functional needs or disabilities should be incorporated into continuity planning.

Please see "Guidance on Providing Services to Children with Disabilities during an H1N1 Outbreak" for more information on this topic.
http://www2.ed.gov/admins/lead/safety/emergencyplan/pandemic/index.html

Schools Supporting Emergency Management Functions

When considering district or school functions in an emergency, it is important to understand the functions of schools in supporting critical emergency management functions in the community. Schools are often called upon by local emergency management to perform functions outside of their normal operations, therefore these additional responsibilities should be considered when a school or district is creating a COOP Annex. Examples include the use of school sites as emergency shelters and school buses used for evacuation procedures.

ORDERS OF SUCCESSION

In the wake of an emergency impacting districts/schools, key staff may be injured, caring for loved ones, deceased, or otherwise unable to report to duty. As a result, it is necessary to have a procedure for filling these vacated positions (either temporarily or permanently). Determining orders of success prior to an emergency, allows for the orderly transition of authority. Best practices dictate that <u>at least</u> two individuals, identified by position/title, are identified to replace key positions. ADE recommends identifying 3-5 successors for key leadership positions. Below are considerations for the establishment and initiation of the orders of succession process.

- Positions may be prescribed by statute, order, or directive.
- There should be a succession procedure that specifies the circumstances and the method of notification.
- Successors serve until formally appointed by the appropriate authority, replaced, or relieved.

- Orders of succession are primarily for leadership positions and key management. ADE recommends orders of succession for superintendents and director level leadership.
- Individuals with unique skills and knowledge associated with essential functions should be considered.
- The first step in creating orders of succession is to create a list of alternates who would serve in an interim or acting capacity in the event the superintendent and directors are not available.
- The school board and district administration should approve the list of successors for leadership.

The ADE COOP Template provides tables to document orders of succession. Examples of orders of succession may look like these:

- District level: Superintendent, Assistant Superintendents of Finance and Instruction, and District Directors
- School level: Principal, Assistant Principal, Dean, and Head teacher

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

DELEGATIONS OF AUTHORITY

Districts may decide to grant authority to individuals who step into a role or title (i.e., successors) during an emergency. Delegations of authority provides successors with the organizational or legal authority to act in the position they are filling. They identify what can and cannot be done by an acting leader. It is important that delegations of authority have been reviewed by the district's legal team to identify possible restrictions, such as state law or district and/or local policies.

Empowerment of successors may include items such as:

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

- Release public information
- Alert and notifications

The making of critical decisions cannot be delayed as a result of confusion over authority and responsibility. Therefore, a definitive plan of delegation should be in place. The ADE COOP Template provides a table that may be used to document delegations of authority.

CONTINUITY OF COMMUNICATIONS

The delivery of clear, timely, accurate, and consistent messaging is critical for continuity of operations. Staff, students and families, and external partners and stakeholders must be informed on a regular basis throughout a disruption to standard operations. This requires establishing clear communication pathways and systems.

Communication systems refer to the equipment and platforms used to communicate (i.e., phones, email systems, radios, etc.). Districts/school should identify redundant (i.e., secondary and tertiary) ways to communicate when primary communications systems are disrupted. Consider developing a table that captures communication systems, audiences, and key system considerations during a COOP incident.

Communication pathways represent the flow of information internally to individuals across the district/school and externally to the district/school community, vendors, partners and stakeholders outside the district/school (i.e., who communicates with whom). Consider developing a communications pathways diagram to capture how communication would flow during a COOP incident. Remember, it is critical that students and families receive clear communication about continuity of instruction.

Considering the following when planning for continuity of communications:

- Redundant systems of internal and external communication
- Multiple methods for communicating with the whole school community
- An emergency notification system (ENS) - This may take multiple forms, such as an emergency communication short message service (SMS) application that pushes out emergency notifications or a telephone tree protocol with call-down rosters.
- County and state radio frequency satellite phones as alternative communication methods
- Procedures for testing communication systems on a regular basis
- Communications with the local emergency operations center, first responders, or even the state authority in the event cellular towers and phone landlines are affected
- Systems that are impacted by power loss

CONCEPT OF OPERATIONS

Concept of operations describes how the district/school will implement and manage the continuity strategies and procedures for each continuity phase or element. It is recommended that districts/schools should develop procedures within each of these phases. Figure 4 helps to describe the continuity phases and the recommended actions within each phase.

1. Readiness and Preparedness Phase

   This phase encompasses all district and school preparedness planning and training that occurs prior to an emergency that disrupts operations. Risk management activities occur in this phase, including district and school hazards assessments and identifying mitigation strategies. This phase involves developing emergency operations and relevant hazard-specific and functional annexes, including continuity of operations plans and procedures. Training district and school staff in continuity of operations is an important component of readiness. During this phase, planners should consider methods for sharing the COOP Annex with district and school officials, the School Board, and other relevant internal and external stakeholders.

2. Activation Phase

   This phase outlines the procedure for activating the COOP Annex. This should include who has the authority to activate the plan and under what circumstances or thresholds must be met for activation. The activation phase includes initial response actions, such as alert and notifications to personnel and evaluation operational impacts for the purpose of developing continuity strategies.

3. Alternate Operations Phase

   In this phase districts/schools implement continuity strategies to keep essential functions operational. Procedures to be included in this section of the COOP include accounting for personnel, implementing the continuity strategies, and preparing for reconstitution of (i.e., return to) normal operations or standard operating procedures. It is important during this phase, and all phases, to maintain communications, with both internal and external audiences.

4. Reconstitution Phase

   Alternate operations transitions to normal or standard operations during restoration. This includes the return of staff and students to permanent facilities. IT systems, communications systems, supplies, and records are restored to pre-disruption levels.
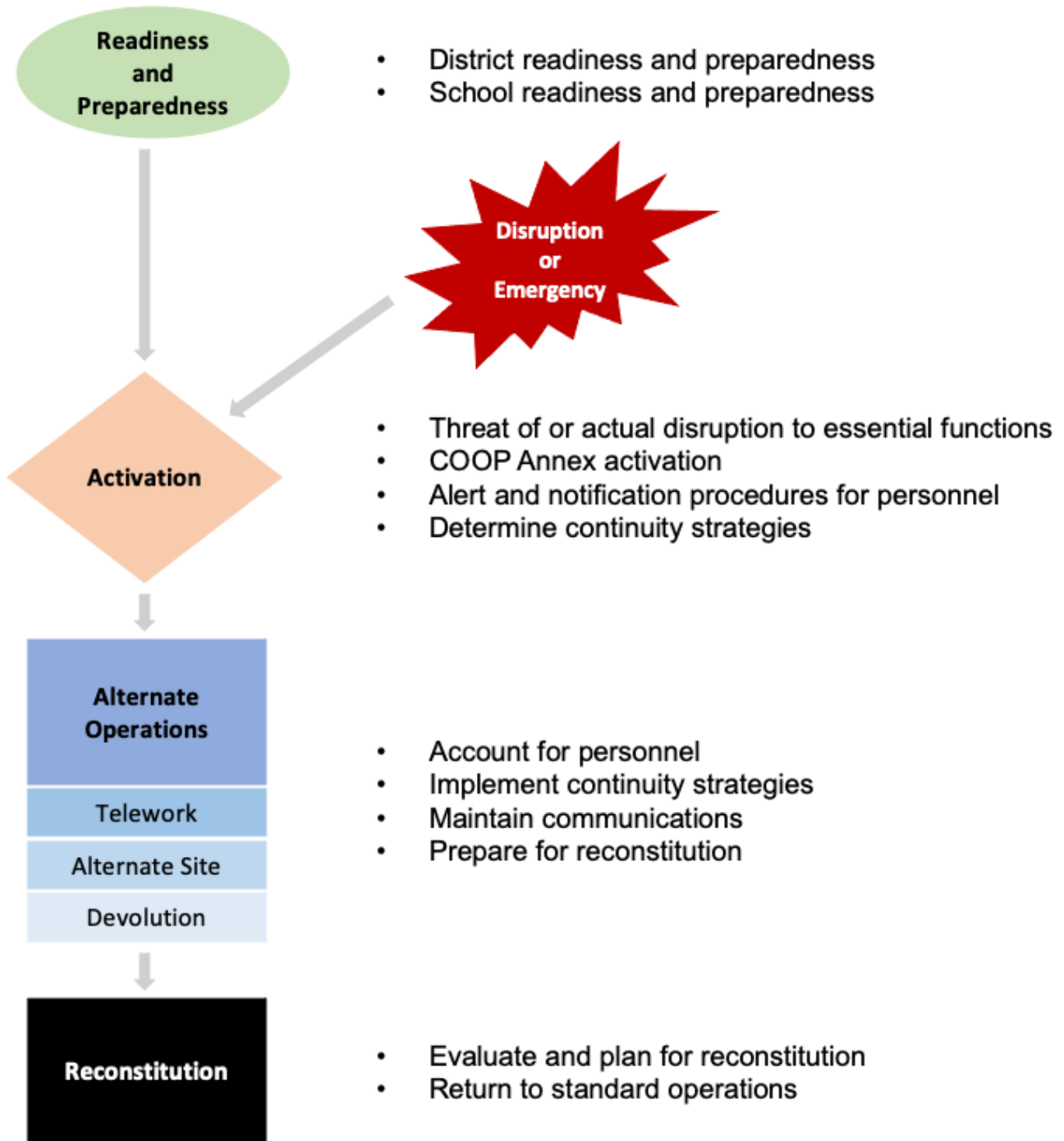
Any deferred functions are reinstated. Reconstitution activities may include verifying restoration of facilities, equipment/supplies, systems, and records; establishing district staff and/or the school community at the permanent facility; and communicating the return to normal operations. Districts should appoint a Reconstitution Manager to begin this work as soon as feasible after a disruption. It is recommended that schools designate a reconstitution point-of-contact to coordinate with the Reconstitution Manager.

When planning for reconstitution, consider the minimum requirements needed to return to normal operations and restore the learning environment, including:

- Number of staff and students
- Number of safe and healthy facilities
- Business and financial systems operating
- Other resources needed to return to normalcy

When reconstitution has been established and the district/school is operating normally, an after action review should be conducted to evaluate the district's/school's response to the continuity disruption. Strengths and areas for improvement determined during the after action review should be used to revise and improve plans and procedures for future continuity of operations incidents.

Figure 4 – Continuity Phases

Readiness and Preparedness
- District readiness and preparedness
- School readiness and preparedness

Disruption or Emergency

Activation
- Threat of or actual disruption to essential functions
- COOP Annex activation
- Alert and notification procedures for personnel
- Determine continuity strategies

Alternate Operations
Telework
Alternate Site
Devolution
- Account for personnel
- Implement continuity strategies
- Maintain communications
- Prepare for reconstitution

Reconstitution
- Evaluate and plan for reconstitution
- Return to standard operations

ALTERNATE OPERATIONS STRATEGIES

When planning alternate operations consider the following three strategies:

- Telework or virtual work, including virtual or distance learning
- Alternate site(s)
- Devolution

During a disruption, more than one strategy may be useful. A hybrid strategy may be used when certain essential functions can be accomplished virtually, while others may require an alternate site. It is important to ensure operations can continue for 30 days or until normal operations resumes and to provide for reliable logistical support, services, and infrastructure systems. Establishing any necessary MOUs, MOAs, MAAs, or other collaborative agreements that may be needed during any alternate operations strategy should also be accomplished during development of the COOP Annex.

Telework/Virtual

Telework or virtual work occurs from home using remote access provided by IT. Districts/schools should develop procedures for the implementation of telework or virtual work to continue essential functions, including determining which essential functions can be done virtually. (Note: The EFTS includes space to document telework ability for each essential function.) Consider the equipment and supplies staff will need to carry out their work virtually, and for distance learning (i.e., virtual learning) the equipment and supplies students will need for continuity of education.

In a situation that requires extended virtual work or distance learning due to facility or utility disruptions, districts/schools should consider how long a virtual strategy is viable for continuity of operations before an alternate site strategy is implemented. In some situations, such as a pandemic, an alternate site may not be a safe or viable alternative.

Alternate Site

An alternate site strategy involves continuing essential functions at an alternate facility when the permanent facility has been damaged or is unable to be safely used. Districts/schools should develop procedures for the use of an alternate site to continue essential functions, including planning for the resources needed to support essential functions at the temporary location. When planning for an alternate site consider the following:

- Feasibility of relocating within the district
- Mobile offices/classrooms
- Capacity/occupancy requirements

- Utility requirements
- Location/access for staff and students (e.g., access via public transportation)
- Critical resources needed on site (i.e., supplies/equipment, systems, essential records) and transport of resources to the alternate facility
- Rotations or shifts for staff and/or students when space is limited
- Prioritize space for:
  o Teams or staff that work on essential functions.
  o Work processes that operate best when teams/staff can collaborate in person.
  o Students with the greatest need for in-person learning.

Devolution

Devolution is the transfer of responsibility and authority of essential functions to another facility or to a partner organization if the impact to district/school leadership, staff, and facilities is catastrophic. In extreme circumstances, when an emergency or disaster has rendered leadership, staff, or facilities incapable of response or use, leadership responsibility and essential functions would devolve to a predetermined facility or organization for an extended period.

Devolution planning involves:

1. Procedures for the transfer of statutory authority and responsibility for essential functions.
2. Identifying who will order the devolution and under what conditions.
3. Identifying triggers for activation.
4. Identifying minimum staffing and leadership needs for essential functions and determining the "tipping point" for performance of essential functions (i.e., the number of staff necessary for any alternate operations).
5. Determining the resources required to assist should devolution occur.

Questions to help identify activation triggers for devolution:

- How many bus drivers and vehicles needed to provide transportation services for all students.

- At what point does the district/school "fail to operate?"

- How many IT personnel are needed to run network operations before the district/school "fails to operate"?

- How many teachers are required to provide instruction at a school?

ESSENTIAL RECORDS AND TECHNOLOGY

The identification, protection, and availability of essential records during a disruption is critical to continue essential functions. FEMA defines essential records as information systems and applications, electronic and hardcopy documents, references, and records needed to support essential functions during a continuity incident. When considering the availability of essential records, information systems and applications should also be evaluated as many records are kept in electronic format.

Continuity planning includes identifying, protecting, and accessing essential records. Redundant data management is critical; planners should work with district/school IT leadership when developing the COOP Annex to ensure redundancy (i.e., backup) of essential systems and records. During the BPA, the EFTS guides planners to document the essential systems and records that are needs to continue essential functions. Essential records may be organized into two categories:

1. Emergency operations records includes emergency operations and continuity plans and procedures, emergency contact information for leadership and management, level of education for management staff, contact information for operational, safety and security, risk management personnel, and general employees.
2. Legal and financial records can include business and procurement information, payroll records, student data, and any records related to the protection of the rights of the individuals who are served by the district/school (e.g., IEPs).

Emergency operations records may include:
- Leadership, management, and staff contact information
- Staff emergency contact information
- Parent and student contact information
- Student emergency contact information
- Emergency plans directives
- Functional and hazard specific annexes
- Orders of succession
- Delegations of authority
- References for those who perform essential functions

Legal and financial records may include:
- Personnel records
- Social security records
- Payroll records
- Retirement records
- Insurance records
- Contract records
- Student education records
- Financial and business records

Considerations for Accessing Essential Records

Districts and schools should take preventive measures to protect key documents and/or copies that are readily accessible by leadership and available in alternate locations ensure alternative versions are available during and after an emergency, such as:

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

HUMAN RESOURCE MANAGEMENT

Continuity planning requires the designation of personnel that are needed to perform essential functions during an emergency or disaster. Districts/schools should designate such staff as essential continuity personnel and plan for at least two back-ups for these roles. Planners should work with district/school human resources during the development of the COOP Annex to align policies and procedures related to essential continuity personnel.

Consider the following when planning for essential continuity personnel:

- Human resource expectations during a disruption to operations (e.g., pay, time off, support services, employee assistance program).
- Clear expectations on roles and responsibilities during a disruption.
- Ensure applicable collective bargaining obligations are satisfied.
- Ensure key continuity personnel have advanced training regarding their assigned essential functions.

- Maintain a roster of continuity personnel and back-ups contact information.
- The needs of continuity personnel with access and functional needs and other disabilities (e.g., accessible communications, accessible facilities/alternate sites, reasonable accommodations or modifications).

All Staff

In addition to continuity personnel, continuity planning should consider all district/school staff, including traveling and contracted staff. All staff should be aware of the expectations before, during, and after a disruption to operations, as well as the resources available to them, including support services and/or the employee assistance program. Planners should work with district/school human resources to ensure policies and procedures for staff align with union contracts. During disruptions to operations staff may be reassigned and consideration should be made to know the abilities and special skills of district/school staff. Any reassignment of staff should be reviewed with human resources to ensure allowable reassignments according to human resource policies and union contracts.

TESTING, TRAINING, AND EXERCISING THE PLAN

Testing

Testing refers to the period testing of equipment, procedures, and systems that support continuity of operations. This helps to keep resources that support essential functions in working order and ensure readiness to respond. The COOP Annex should plan for testing.

Training

The training of employees is critical to implementing the COOP Annex. Untrained employees may not be able to continue or reinstate their functions during a business disruption. Employees must have knowledge of the COOP Annex and other emergency/crisis plans. Participation in ongoing training activities is critical for leadership, continuity personnel, and others involved in responding to continuity of operations disruptions. All staff should also participate in basic continuity training activities

District/school leaders and planners should plan for the delivery of training for continuity staff and all employees on a regular basis according to district recommendations. Training plans should take into consideration new employees, existing employees, and reassignment of employees. A training plan or schedule should be incorporated into the COOP Annex.

Exercising

Along with training, exercising provides an opportunity for leadership, continuity personnel, and employees to become familiar with continuity plans and procedures. Exercises may take

the form of 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. Districts/school should hold or participate in exercises on a regular basis according to district recommendations. Include the schedule of exercising in the COOP Annex.

Considerations for Testing, Training, and Exercising

To Validate COOP and Ensure Essential Functions are Supported, check for the following:

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

UPDATING AND REVIEWING PLANS AND PROGRAMS

Districts/schools should establish a regular cycle of COOP Annex reviews and revisions. In addition, consider updating the COOP Annex after exercises and real-world events, which trigger after action reviews. After action reviews produce strengths and areas for improvements, which can be used to validate and update continuity plans and procedures. Other situations that may trigger a review and revision are changes in leadership, organizational re-structuring, and changes in systems.

ADE has developed the *Arizona District and School Emergency Preparedness and Response Competencies* which include a competency on continuity planning. The continuity planning competency provides a framework for districts/school to evaluate and assess continuity planning efforts. Planners should consider the use of this framework when reviewing and updating the COOP Annex.

Multi-year strategic planning is a way for districts/schools to document short- and long-term planning goals. Issues, concerns, potential obstacles, and strategies for addressing these can be documented in a multi-year strategic plan (MYSP). Planning, testing, training, and exercising activities and resource requirements to support the continuity program may also be included in the MYSP.

NATIONAL PREPAREDNESS INFORMATION

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

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

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

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

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