

# Continuity of Operations

Clean Air Agencies help protect the public from breathing harmful air during emergencies, but some clean air agencies have themselves also been directly impacted by disasters like earthquakes, floods, fires, epidemics, and cyberattacks. What would you do if the building your agency works in suddenly burned down? What plan would you follow if an epidemic meant some key people from your team were all unable to come to the office? How would you accomplish your essential business functions if your server room flooded? These kinds of situations call for a COOP Plan.

## What is a COOP plan?

State and local air pollution agencies that want to be well prepared to continue providing essential services during a time of emergency should consider developing a Continuity of Operations Plan (often called a "COOP" plan). These plans help agencies deal with events that limit the number of staff, access to facilities, and/or damaged infrastructure, by streamlining the decision-making about how to accomplish essential functions, continue providing services, and work with backup equipment or facilities.

## What is it for?

A traditional COOP plan establishes effective processes and procedures to quickly deploy pre-designated personnel, equipment, vital functions and supporting hardware and software to an alternative site to sustain organizational operations for a set period of time. It identifies the essential functions of an organization and articulates ways – who and how - to keep these functions going during an emergency. It also covers how to re-establish normal operations after the emergency has ended.

## Two kinds of COOP plan

Different clean air agencies will have different needs. Small agencies that serve a single county may have fewer resources to plan with and for. They may be better served by a simpler plan like that used by Knox County, Tennessee. At four pages long, this straightforward but effective plan identifies the core functions of the agency, and then creates a backup plan and identifies the person responsible. Knox County's plan articulates four scenarios ranging from loss of facility access to a pandemic. For each scenario, it describes services that could be suspended, and which would be critical to continue. It articulates the responsible personnel and essential equipment, and what their backups would be. It also articulates a primary plan for how the agency would manage each scenario. For larger emergencies that exceed the limits of this plan, Knox County can draw on resources at the county level, or even integrate into state or federal COOP plans.

Large agencies serving whole states may require a more detailed and sophisticated plan, integrated with the emergency response and incident command structures of other entities. An example of an excellent and sophisticated plan that requires more resources to develop but that applies more detail to preparedness is the plan used by the Oklahoma Department of Environmental Quality (DEQ). It includes details on the core authorities and responsibilities of the agency, the essential functions of the organization, its essential records, and how they will be managed in an emergency. It identifies "continuity personnel", "continuity facilities", orders of succession, delegations of authority, and other human resources issues. It provides a plan for activating and implementing a plan, for devolution of control and direction during emergencies, and for reconstituting afterwards. It articulates a program for testing, training, and implementing exercises, a budget, and a multi-year strategy for managing the program. Which level of detail is right for your agency? It should suit the size and scope of the agency's needs.

## How to develop a COOP plan

Constructing any COOP plan always starts with putting together a planning team responsible for its development. This team should have top-level leadership buy-in – it’s the essential first step for a successful plan. As with any successful endeavor, the planning team should first identify what they are trying to achieve: the objectives and scope for the plan (say, “enabling continuity of functions that affect our regulatory responsibilities during emergencies lasting longer than 8 hours”). Here’s a bare-bones outline describing the steps the team can take to build a plan. The team can begin writing the plan by identifying & prioritizing the essential agency’s functions, and the people who do them. The team should identify alternate sites, personnel, delegated authorities, and business practices in case the primaries are unavailable and a communication plan. Because communications are so critical to our agencies’ work, the team may want to identify communications methods during emergencies. Critical records, resources and & data should be listed, in addition to critical facilities, people, and equipment – and how those will be protected, backed up, kept offsite, or reconstituted. Once backups and alternatives have been described, the plan should detail when and how the COOP should be activated, how people will be notified, procedures for operations using backup facilities, equipment, and/or people, and procedures for returning to normal. Finally, the plan should include the steps that will be undertaken to update it regularly and a schedule for practicing it. Communicating with the public and our sources that are regulated for air quality are also a critical element for the interim period and the steps for coming back to full service.

### In the near term: a checklist

Although a complete COOP plan is ideal, agencies are looking at telework and other social distancing strategies to rapidly deal with the COVID-19 pandemic. You can start with these key questions if your agency needs to take action more quickly than it takes to develop a COOP plan.

- Are there any key business functions that currently can only be performed in the office? Is any essential work material saved on a non-centralized server (i.e., can you only access it while in the office)?
- How do your employees work remotely – can they access all of the needed programs and processes needed to perform their job? Do they have log-in information? Have key personnel tested their remote access capability? Can key personnel forward incoming calls to an alternate phone number? Can key personnel access their voicemail to respond to calls off site?
- How will you handle ongoing communications to your employees? Do you have a group set up within the above capability to communicate with your teams? Do you have everyone’s cell phone number? Do you need to distribute a contact list for everyone in your department to complete?
- Have you reviewed your organization’s leave and pay policies? Do they take things such as work from home, sick leave, pay continuation, emergency leave, etc. into proper consideration? Have you identified the back-up employees or processes needed?
- How will you monitor the wellness of your employees? Daily check-ins? How are you monitoring and communicating with those unable to work? Do you have the resources (benefits, medical, etc.) needed to be able to assist the employees unable to perform key business functions?
- How are your key stakeholders, regulated entities, and communities impacted? What is your communication strategy to regulated entities, stakeholders, media, vendors, etc. if you are unable to provide expected services? Do you know how to reach/have a directory of your key contacts and partners? Do you have a way to communicate with them?

Links and resources:

[Federal Emergency Management Agency \(FEMA\) Resources on COOP Planning](#)

[Knox County’s COOP Plan](#)

[Oklahoma DEQ’s COOP Plan](#)

[NACAA’s COVID-19 Resources Page](#)