

Federal Emergency Management Agency
Directives Management System



FEMA

FEDERAL PREPAREDNESS CIRCULAR

Date	Office
FPC 65	Office of National Security Coordination

TO: HEADS OF FEDERAL DEPARTMENTS AND AGENCIES

SUBJECT: FEDERAL EXECUTIVE BRANCH CONTINUITY OF OPERATIONS (COOP)

1. **PURPOSE:** This Federal Preparedness Circular (FPC) provides guidance to Federal Executive Branch departments and agencies for use in developing contingency plans and programs for continuity of operations (COOP). COOP planning facilitates the performance of department/agency essential functions during any emergency or situation that may disrupt normal operations.
2. **APPLICABILITY AND SCOPE:** The provisions of this FPC are applicable to all Federal Executive Branch departments, agencies, and independent organizations, hereinafter referred to as "agencies." The COOP elements outlined herein are for use at all levels of Federal Executive Branch organizations, regardless of location.
3. **SUPERSESSON:** The provisions of this FPC supersede:
 - a. Federal Preparedness Circular 65, Federal Executive Branch Continuity of Operations, dated July 26, 1999.
 - b. Federal Preparedness Circular 66, Test, Training and Exercise Program for Continuity of Operations, dated April 30, 2001.
 - c. Federal Preparedness Circular 67, Acquisition of Alternate Facilities For Continuity of Operations, dated April 30, 2001.
4. **AUTHORITIES:**
 - a. The National Security Act of 1947, dated July 26, 1947, as amended.
 - b. The Homeland Security Act of 2002 (Public Law 107-296), dated November 25, 2002.
 - c. Executive Order 12148, Federal Emergency Management, dated July 20, 1979, as amended.
 - d. Executive Order 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions, dated April 3, 1984.
 - e. Executive Order 12656, Assignment of Emergency Preparedness Responsibilities dated November 18, 1988, as amended.

- f. Executive Order 13286, Establishing Office of Homeland Security, dated February 28, 2003.
- g. Presidential Decision Directive 67, Enduring Constitutional Government and Continuity of Government Operations, dated October 21, 1998.

5. REFERENCES:

- a. 41 Code of Federal Regulations 101.20.103-4, Occupant Emergency Program, revised as of July 1, 2000
- b. 36 Code of Federal Regulations, Part 1236, Management of Vital Records, revised as of July 1, 2000.
- c. Presidential Decision Directive 62, Protection Against Unconventional Threats to the Homeland and Americans Overseas, dated May 22, 1998.
- d. Homeland Security Presidential Directive 3, Homeland Security Advisory System, dated March 11, 2002.
- e. Homeland Security Presidential Directive 5, Management of Domestic Incidents, dated February 28, 2003.
- f. Homeland Security Presidential Directive 7, Critical Infrastructure Identification, Prioritization, and Protection, dated December 17, 2003.
- g. Homeland Security Presidential Directive 8, National Preparedness, dated December 17, 2003.
- h. Federal Preparedness Circular 60, Continuity of the Executive Branch of the Federal Government at the Headquarters Level During National Security Emergencies, dated November 20, 1990.

6. POLICY: It is the policy of the United States to have in place a comprehensive and effective program to ensure continuity of essential Federal functions under all circumstances. To support this policy the Federal Executive Branch has implemented the Continuity of Operations (COOP) Program. COOP is defined as the activities of individual departments and agencies and their sub-components to ensure that their essential functions are performed. This includes plans and procedures that delineate essential functions; specify succession to office and the emergency delegation of authority; provide for the safekeeping of vital records and databases; identify alternate operating facilities; provide for interoperable communications; and validate the capability through tests, training, and exercises. All Federal agencies, regardless of location, shall have in place a viable COOP capability to ensure continued performance of essential functions from alternate operating sites during any emergency or situation that may disrupt normal operations.

7. BACKGROUND: COOP planning is simply a “good business practice”—part of the fundamental mission of agencies as responsible and reliable public institutions. Today’s changing threat environment and the potential for no-notice emergencies, including localized acts of nature, accidents, technological emergencies, and military or terrorist attack-related incidents, have increased the need for COOP capabilities and plans that enable agencies to continue their essential functions across a broad spectrum of emergencies. This, coupled with the potential for terrorist use of weapons of mass destruction, has emphasized the importance of COOP programs that ensure continuity of essential government functions across the Federal Executive Branch.

To provide oversight and coordination of this effort, Presidential Decision Directive (PDD) 67 established the Federal Emergency Management Agency (FEMA) as the lead agency for Federal Executive Branch COOP. This authority was transferred to the Department of Homeland Security on March 1, 2003, and then delegated to the Emergency Preparedness and Response Directorate (FEMA). FEMA's Office of National Security Coordination has been designated as DHS's lead agent for the Federal Executive Branch COOP program. Included in this responsibility is the requirement to formulate guidance and establish common standards for agencies to use in developing viable, executable COOP plans; facilitate interagency coordination as appropriate; and oversee and assess the status of COOP capabilities of Federal Executive Branch agencies. Additionally, each Federal Executive Branch agency is responsible for appointing a senior Federal government executive as an emergency coordinator to serve as program manager and agency point of contact for coordinating agency COOP activities, to include planning, programming, and budgeting for a viable and executable COOP program that conforms to this FPC.

8. **OBJECTIVES:** COOP planning is an effort to ensure that the capability exists to continue essential agency functions across a wide range of all hazard emergencies. The objectives of a viable COOP plan include:
- a. Ensuring the performance of an agency's essential functions/operations during a COOP event;
 - b. Reducing loss of life, minimizing damage and losses;
 - c. Executing as required, successful succession to office with accompanying authorities in the event a disruption renders agency leadership unable, unavailable, or incapable of assuming and performing their authorities and responsibilities of office;
 - d. Reducing or mitigating disruptions to operations;
 - e. Ensuring that agencies have alternate facilities from which to continue to perform their essential functions during a COOP event;
 - f. Protecting essential facilities, equipment, vital records, and other assets;
 - g. Achieving a timely and orderly recovery from an emergency and reconstitution of normal operations that allows resumption of essential functions for both internal and external clients; and
 - h. Ensuring and validating COOP readiness through a dynamic, integrated test, training, and exercise program to support the implementation of COOP plans.
9. **PLANNING REQUIREMENTS FOR VIABLE COOP CAPABILITY:** Viable department and agency COOP capability consists, at a minimum, of the following elements:
- a. Must be capable of implementation both with and without warning;
 - b. Must be operational within a minimal acceptable period of disruption for essential functions, but in all cases within 12 hours of COOP activation;
 - c. Must be capable of maintaining sustained operations until normal business activities can be reconstituted, which may be up to 30 days;
 - d. Must include regularly scheduled testing, training, and exercising of agency personnel, equipment, systems, processes, and procedures used to support the agency during a COOP event;

- e. Must provide for a regular risk analysis of current alternate operating facility(ies);
- f. Must locate alternate operating facilities in areas where the ability to initiate, maintain, and terminate continuity operations is maximized;
- g. Should consider locating alternate operating facilities in areas where power, telecommunications, and internet grids would be distinct from those of the primary;
- h. Should take maximum advantage of existing agency field infrastructures and give consideration to other options, such as telecommuting locations, work-at-home, virtual offices, and joint or shared facilities;
- i. Must consider the distance of alternate operating facilities from the primary facility and from the threat of any other facilities/locations (e.g., nuclear power plants or areas subject to frequent natural disasters); and
- j. Must include the development, maintenance, and annual review of agency COOP capabilities using a multi-year strategy and program management plan. The multi-year strategy and program management plan will outline the process the agency will follow to:
 - (1) Designate and review essential functions and resources,
 - (2) Define short and long-term COOP goals and objectives,
 - (3) Forecast COOP budgetary requirements,
 - (4) Identify COOP program issues, concerns, potential obstacles, and the strategy for addressing these, as appropriate.
 - (5) Establish COOP planning, training, and exercise activities and milestones for these activities.

10. ELEMENTS OF A VIABLE COOP CAPABILITY: At a minimum, all agency COOP plans and programs shall include the following elements:

- a. **PLANS AND PROCEDURES.** A COOP plan shall be developed and documented that, when implemented, will provide for continued performance of an organization's essential functions under all circumstances. At a minimum, the plan must:
 - (1) Delineate essential functions and activities, agency interdependencies, and the resources needed to perform them;
 - (2) Establish orders of succession to key agency positions and establish and maintain current roster(s) of fully equipped and trained COOP personnel with the authority to perform essential functions, to include a devolution of control plan;
 - (3) Provide for the identification and preparation of alternate operating facilities for continuity operations;
 - (4) Outline a decision process for determining appropriate actions in implementing COOP plans and procedures;
 - (5) Provide procedures for the notification and relocation of COOP personnel to one or more alternate operating facilities;

- (6) Provide procedures for the orientation of COOP personnel and for conducting operations and administration at alternate operating facilities;
- (7) Provide for operational capability at the COOP site as soon as possible with minimal disruption to operations, but in all cases within 12 hours of activation;
- (8) Establish reliable processes and procedures to acquire resources necessary to continue essential functions and sustain operations until normal business activities can be reconstituted, which could be up to 30 days;
- (9) Provide for the ability to coordinate activities with non-COOP personnel; and
- (10) Provide for reconstitution of agency capabilities, and transition from continuity operations to normal operations

See Annex A- Plans and Procedures.

- b. **ESSENTIAL FUNCTIONS.** The identification and prioritization of essential functions is a prerequisite for COOP because it establishes the planning parameters that drive the agency's efforts in all other planning and preparedness areas. Essential functions are those functions that enable agencies to provide vital services, exercise civil authority, maintain the safety and well being of the general populace, and sustain the industrial/economic base in an emergency.

Agencies should carefully review all of their organization's missions and functions before determining those that are essential. Improper identification of essential functions can have a negative impact on the entire COOP plan, because other aspects of the COOP plan are designed around supporting these functions. If an agency fails to identify a function as essential, it will not make the necessary arrangements to perform that function. If it identifies too many functions as essential, it risks being unable to adequately address all of them. In either case, the agency increases the risk that it will not be able to perform its essential functions in a COOP situation.

Planning related to essential functions must also include identification of partners integral to program delivery, testing data exchanges between partners, developing complementary COOP plans, sharing key information on readiness with other partners and the public, and taking steps to ensure that the agency's essential functions will continue in a COOP situation. Careful consideration must be given to department and agency interdependencies to ensure the continued delivery and performance of essential functions across the full spectrum of threats and "All Hazards" emergencies.

See Annex B – Essential Functions.

- c. **DELEGATIONS OF AUTHORITY.** To ensure rapid response to any emergency situation requiring COOP plan implementation, agencies should pre-delegate authorities for making policy determinations and other decisions at headquarters, field levels, and other organizational locations, as appropriate. Clearly established delegations of authority are vital to ensuring all agency personnel know who has authority to make key decisions in a COOP situation. Generally, pre-determined

delegations of authority will take effect when normal channels of direction and control are disrupted and will terminate when these channels are restored.

See Annex C – Delegations of Authority

- d. **ORDERS OF SUCCESSION.** Agencies are responsible for establishing, promulgating, and maintaining orders of succession to key positions. Such orders of succession are an essential part of an agency's COOP plan to ensure agency personnel know who has authority and responsibility if agency leadership is incapacitated or unavailable in a COOP situation. Orders should be of sufficient depth to ensure the agency's ability to manage and direct its essential functions and operations while remaining a viable part of the Federal government throughout any emergency.

See Annex D – Orders of Succession

- e. **ALTERNATE OPERATING FACILITY(IES).** All agencies must identify and prepare alternate operating facilities as part of their COOP plans, and prepare their personnel for the possibility of unannounced relocation of essential functions and/or COOP personnel to these facilities. As a minimum, alternate operating facilities must provide:

- (1) Sufficient space and equipment to sustain the relocating agency;
- (2) Capability to perform essential functions as soon as possible with minimal disruption of operations, but in all cases within 12 hours of activation and until normal business activities can be reconstituted, which could be up to 30 days under various threat conditions, including threats involving weapons of mass destruction;
- (3) Reliable logistical support, services, and infrastructure systems;
- (4) Consideration for the health, safety, security, and emotional well being of relocated employees;
- (5) Interoperable communications, including means for secure communications, with all identified essential internal and external organizations, customers, and the public; and
- (6) Computer equipment, software, and other automated data processing equipment necessary to carry out essential functions.

See Annex E – Alternate Operating Facilities.

- f. **INTEROPERABLE COMMUNICATIONS.** The ability of an agency to execute its essential functions at its alternate operating facilities is dependent upon the identification, availability, and redundancy of critical communications and information technology (IT) systems to support connectivity between key government leadership, internal elements, other agencies, critical customers, and the public (e.g. secure and non-secure phone, video conferencing, fax, and messaging capabilities,

etc.) during crisis, disasters, or wartime conditions. All necessary and required communications and IT capabilities must be operational as soon as possible following COOP activation, but in all cases within twelve hours of notification. Departments and agencies listed in the COOP Communications Plan (CCP) must test the communications capabilities at their alternate operating facilities quarterly. All other organizations should also validate their internal and external communications capabilities at their alternate operating facilities quarterly.

See Annex F – Interoperable Communications.

- g. **VITAL RECORDS AND DATABASES.** The identification, protection, and ready availability of electronic and hardcopy documents, references, records, and information systems needed to support essential functions during a COOP situation is another critical element of a viable COOP plan. Agency personnel must have access to and be able to use these records and systems in conducting their essential functions. They must also have procedures for protecting and updating them. As a minimum, categories of these types of records are:

- (1) Emergency Operating Records. These include records and databases essential to the continued functioning or reconstitution of an agency during and after a COOP event. Examples are emergency plans and directives, orders of succession, delegations of authority, staffing assignments, and related records of a policy or procedural nature that provide agency COOP personnel with the guidance and information resources necessary for conducting operations during a COOP situation, and for resuming normal operations at its conclusion.
- (2) Legal and Financial Records. These include vital records critical to carrying out an agency's essential legal and financial functions and protecting the legal and financial rights of individuals directly affected by its activities. Included are records having such value that their loss would significantly impair the execution of essential agency functions, to the detriment of the legal or financial rights and/or entitlements of the agency or of the affected individual(s). Examples of this category of vital records are accounts receivable; contracting and acquisition files; official personnel records; Social Security, payroll, retirement, and insurance records; and property management and inventory records.

The COOP Plan must account for the identification and protection of the vital records, systems, and data management software and equipment, to include classified or other sensitive data, as applicable, necessary to perform essential functions, and to reconstitute normal agency operations after the emergency. To the extent possible, agencies should pre-position and update on a regular basis duplicate records or back-up electronic files.

See Annex G – Vital Records and Databases.

- h. HUMAN CAPITAL. COOP human capital planning and preparedness encompasses the following areas:
- (1) Agency planning and readiness;
 - (2) Designation of emergency employees and other special categories of employees;
 - (3) Dismissal or closure procedures;
 - (4) OPM and media announcements on government operating status;
 - (5) Status of non-emergency employees and non-special categories of employees;
 - (6) Sample agency guidelines for communicating to employees;
 - (7) Methods of employee communications,
 - (8) Employee awareness of changes in building operations,
 - (9) Pay flexibilities,
 - (10) Staffing flexibilities,
 - (11) Benefit issues,
 - (12) Employee roles and responsibilities.

See Annex H – Human Capital.

- i. TEST, TRAINING AND EXERCISES. Testing, training, and exercising of COOP capabilities are essential to assessing, demonstrating and improving the ability of agencies to execute their COOP plans and programs. Tests and exercises serve to assess, validate, or identify for a subsequent corrective action program, specific aspects of COOP plans, policies, procedures, systems, and facilities used in response to an emergency situation. Training familiarizes COOP personnel with the procedures and tasks they must perform in executing COOP plans. All agencies must plan, conduct, and document periodic tests, training, and exercises to demonstrate the plan's viability and identify deficiencies. Deficiencies and actions taken to correct them must be documented.

Specific objectives of a COOP TT&E program are to:

- (1) Assess and validate COOP plans, policies, and procedures;
- (2) Ensure that agency personnel are familiar with alert, notification, and deployment procedures;

- (3) Test alert, notification and deployment procedures and systems at least annually;
- (4) Ensure COOP personnel are sufficiently trained to carry out agency essential functions in a COOP situation;
- (5) Conduct individual and team training of agency COOP personnel to ensure currency of knowledge and integration of skills necessary to implement COOP plans and carry out essential functions;
- (6) Exercise procedures by deploying designated personnel and equipment to the alternate operating facilities to ensure an agency's ability to perform essential functions and operations during a COOP situation;
- (7) Ensure that backup data and records required to support essential functions at the alternate operating facilities are sufficient, complete, and current;
- (8) Test and validate equipment to ensure both internal and external interoperability;
- (9) Ensure agency personnel understand the procedures to phase out COOP operations and transition to normal activities (reconstitution) when appropriate;
- (10) Conduct refresher orientation for COOP personnel;
- (11) Document completed COOP training and identify training requirements; and
- (12) Develop a Multi-Year Test, Training, and Exercise (TT&E) Plan that addresses COOP TT&E requirements, resources to support these activities, and a TT&E planning calendar.

See Annex I – Test, Training, and Exercises.

- j. **DEVOLUTION OF CONTROL AND DIRECTION.** Devolution planning supports overall COOP planning and addresses the full spectrum of threats and all-hazards emergencies that may render an agency's leadership and staff unavailable to or incapable of supporting the execution of its essential functions from either its primary or alternate location(s). The devolution option of COOP shall be developed to address how an agency will identify and conduct its essential functions during increased threat situations or in the aftermath of a catastrophic emergency.

See Annex J – Devolution of Control and Direction.

- k. **RECONSTITUTION.** Extensive coordination is necessary to procure a new operating site once an agency suffers a facility loss or in the event that collateral damage from a disaster renders the structure unsafe for reoccupation. Reconstitution embodies the ability of an agency to recover from a catastrophic event and consolidate the necessary resources that allow it to return to a fully functional entity of the Federal Government.

See Annex K – Reconstitution.

11. COOP IMPLEMENTATION: A COOP plan involves the deliberate and pre-planned movement of selected key principals and supporting staff to an alternate operating facility. Relocation may be required to accommodate a variety of emergency scenarios. Examples include scenarios in which:

- a. An agency headquarters is unavailable and operations can shift to a regional or field location;
- b. A single agency facility is temporarily unavailable and the agency can share one of its own facilities or that of another agency; or
- c. Many, if not all, agencies must evacuate the immediate area.

While these scenarios involve the unavailability of a facility, the distinction must be made between a situation requiring evacuation only and one dictating the need to implement COOP plans. As an example, a sudden emergency, such as a fire or hazardous materials incident, may require the evacuation of an agency building with little or no advance notice, but for only a short duration. Alternatively, an emergency so severe that an agency facility is rendered unusable and likely will be for a period long enough to significantly impact normal operations, may require COOP plan implementation.

Agencies should develop an executive decision process that allows for a review of the emergency and determination of the best course of action for response and recovery. This will preclude premature or inappropriate activation of an agency COOP plan. The phasing for COOP activation and relocation, alternate operating facility operations, and reconstitution are as follows:

a. ACTIVATION AND RELOCATION (0-12 HOURS)

Activate plans, procedures, and schedules to transfer essential functions, personnel, records, and equipment to alternate operating facilities. Agency Headquarters POCs must notify the FEMA Operations Center (FOC), (540) 665-6100/1-800-634-7084, and other appropriate agencies of any COOP activation regardless of agency location and the time of execution or activation of call-down procedures. The FOC will relay notification information to the Homeland Security Operations Center (HSOC) and the Office of National Security Coordination (ONSC).

b. ALTERNATE OPERATING FACILITY OPERATIONS

Provide additional guidance to COOP personnel and all other employees. Notify the FOC and all other appropriate agencies immediately of the agency's alternate location, operational and communications status, and the anticipated duration of relocation, if known. Commence full execution of essential functions at the alternate operating facility(ies). The FOC will relay this information to the HSOC and the ONSC.

c. **RECONSTITUTION (TERMINATION AND RETURN TO NORMAL OPERATIONS)**

Inform all organizational personnel that the necessity to COOP no longer exists and provide instructions for resumption of normal operations. Supervise an orderly return to the normal operating facility, or movement to other temporary or permanent facility(ies). Report the status of relocation to the FOC and other agency points-of-contact, as applicable. The FOC will relay this information to the HSOC and the ONSC.

12. **RESPONSIBILITIES:** The following responsibilities must be clearly outlined in agency COOP plans and internal documents:

a. Each agency head is responsible for:

- (1) Establishing an agency COOP program;
- (2) Appointing a senior executive as the agency COOP program point-of-contact;
- (3) Developing a COOP Multi-Year Strategy and Program Management Plan that includes a program budget to support a viable COOP capability;
- (4) Developing, approving, and maintaining agency COOP plans and procedures for headquarters and all subordinate elements;
- (5) Conducting tests, training, and exercises of agency COOP plans at least annually, to include COOP personnel, and essential systems and equipment, to ensure timely and reliable implementation of COOP plans and procedures;
- (6) Participating in interagency COOP exercises to ensure effective interagency coordination and mutual support;
- (7) Notifying the FOC and other appropriate agencies upon any implementation of COOP plans;
- (8) Providing updates on COOP status to the FOC as designated or if the agency's COOP status changes; and
- (9) Coordinating intra-agency COOP efforts and initiatives with policies, plans, and activities in accordance with directives related to terrorism, Critical Infrastructure Protection, and all-hazards preparedness. Contingency planning efforts such as Disaster Recovery Plans, Information Assurance, National Response Plan, Business Continuity Plans etc., should be integrated into the agency's COOP plan.

b. FEMA is responsible for:

- (1) Serving as the Department of Homeland Security's designated Lead Agent for Federal Executive Branch COOP;

- (2) Coordinating and monitoring COOP activities of Federal Executive Branch agencies;
- (3) Issuing COOP guidance, in cooperation with the General Services Administration and the Office of Personnel Management, to promote understanding of, and compliance with, the requirements and objectives of governing directives;
- (4) Chairing the COOP Working Group (CWG), which serves as the principal interagency forum for discussion of COOP matters such as policy guidance, plans, and procedures, and for dissemination of information to agencies for developing and improving their individual COOP plans;
- (5) Conducting periodic assessments of Executive Branch COOP capabilities and reporting the results to the National Security Council and the Homeland Security Council.
- (6) Conducting a government-wide COOP exercise every other year as an assessment and validation tool of Federal COOP readiness;
- (7) Assisting as required, the Federal legislative and judicial branches with COOP planning and implementation; and
- (8) Providing oversight for the development of COOP training courses that are available to all agencies.

c. General Services Administration (GSA) is responsible for:

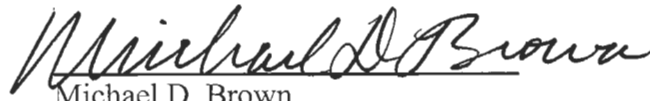
- (1) Developing and conducting a COOP training program available to all agencies; and
- (2) Maintaining a database of all alternate operating facilities.

d. Office of Personnel Management (OPM) is responsible for:

- (1) Maintaining and revising Human Capital management guidance for emergency situations.
- (2) Assisting the heads of other departments and agencies with personnel management and staffing during national security emergencies.

13. **POINT OF CONTACT:** Should you have any questions or need additional assistance with the information contained in this FPC, please contact the Director, Office of National Security Coordination, at 202.646.4145.

14. DISTRIBUTION: This FPC is distributed to the heads of Federal departments and agencies, senior policy officials, emergency planners, and other interested parties.



Michael D. Brown
Under Secretary
Emergency Preparedness and Response

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