Directives and Standards

Subject: Continuity of Operations

Purpose: To ensure the uninterrupted continuation of Reclamation Mission

Essential Functions (MEFs) during disruptions to normal operations. This Directive and Standard (D&S) establishes the framework, requirements, and processes to support the successful development and management of

Reclamation continuity programs.

Authority: National Security Act of 1947, as amended (50 U.S.C. § 3042); Executive

Order 13618, Assignment of National Security and Emergency Preparedness Communications Functions, July 6, 2012; Telework Enhancement Act of 2010 (5 U.S.C. § 6501-6506); Presidential Policy Directive 40, National Continuity Policy (PPD-40); Federal Mission Resilience Strategy, 2020. Federal Continuity Directive 1 (FCD-1); Federal Continuity Directive 2 (FCD-2); Departmental Manual (DM) Part 900 Chapter 4; Reclamation Manual (RM) Delegations of Authority; RM

Policy, Emergency Management (EMG P01)

Approving Official: Director, Mission Assurance and Protection Organization

Contact: Emergency Management and Readiness Office (EMRO) (84-52200)

1. Introduction.

- A. The safety, reliability, and continuity of Reclamation's MEFs are fundamental to Reclamation's mission and its ability to deliver services to the American public. Reclamation is also a partner in the nationwide framework to support the Department of the Interior's Primary Mission Essential Functions and the National Essential Functions. This D&S establishes the requirements, roles, and responsibilities for Reclamation continuity programs by specifying and defining the required elements of a continuity plan to ensure the seamless and immediate continuation of MEFs. The 11 continuity capability elements are established in FCD-1 and are fundamental to a successful continuity program.
- B. There are four phases of continuity operations outlined in FCD-1, Section VII Continuity Capability Elements: Readiness and Preparedness, Plan Activation, Continuity Operations, and Reconstitution. Reclamation uses these four phases to build continuity processes and procedures, establish goals and objectives, and support the performance of organizational essential functions during a continuity plan activation. Implementing the 11 continuity capability elements and the associated requirements outlined in this D&S supports all four phases.

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2. Applicability.

- A. This D&S applies to the facilities where Reclamation MEFs are performed and to the employees responsible for the performance of these MEFs, their supervisors, and those designated as continuity coordinators or continuity team members.
- B. This D&S does not apply to lapses in appropriations (i.e., government shutdown). However, personnel can test or evaluate components of continuity plans during these situations (e.g., communications and accountability).
- 3. **Continuity Capability Elements.** The continuity capability elements listed below provide the overarching requirements for Reclamation continuity programs and plans to ensure compliance with PPD-40, FCD-1, and this D&S. This compliance includes the implementation of a continuity plan to support the continuance or rapid resumption of MEFs following a change to normal operating conditions which is critical to Reclamation's resilience during a disruption or emergency. All Reclamation continuity programs and plans will incorporate the following elements per FCD-1:
 - A. **Program Management, Plans, and Procedures.** All Reclamation continuity programs, including facilities and personnel responsible for the performance of MEFs as well as those who provide oversight and supervision for them, will meet the following program management, plans, and procedures minimum requirements:
 - (1) The Reclamation Continuity Program Manager will provide oversight and direction for Reclamation's overall continuity program, including ensuring compliance with Reclamation and federal directives, coordinating with Reclamation leadership and continuity coordinators, leading the Reclamation Continuity Working Group, and liaising with Department counterparts on continuity policy, training, and exercises.
 - (2) Regional Directors will:
 - (a) Ensure any facilities within their respective regions responsible for performing MEFs establish continuity programs and plans following this D&S and relevant higher authorities and that said plans are ready for execution when needed. Regional Directors and their designated personnel will consider operational complexity and the ability to effectively activate multiple continuity plans concurrently when determining whether to consolidate multiple facilities under a single plan.
 - (b) Ensure Reclamation facilities responsible for the performance of MEFs within their respective regions have appointed primary and alternate continuity coordinators to manage their programs and plans. Continuity coordinators may be assigned at the most appropriate level for facilities responsible for the conduct of MEFs.

- (c) Plan for and support funding, staffing, and executing program activities (e.g., program/plan development, oversight, testing, training, exercising, and promoting a prepared and resilient organization).
- (3) Continuity coordinators are responsible for the day-to-day oversight and management of their respective continuity programs and for developing and maintaining their continuity plans. Coordinators will provide subject matter expertise and guidance to their leadership and continuity team and coordinate with the Reclamation Continuity Program Manager. Training requirements for continuity coordinators are listed in EMG 01-01, *Emergency Management*, Appendix A.
- (4) Facilities required to have a continuity program and plan will:
 - (a) Implement a multi-year strategy plan for developing, maintaining, and annually reviewing continuity capabilities.
 - (b) Outline procedures for emergency procurement of equipment, services, and personnel to support the continued performance of MEFs.
 - (c) Ensure continuity plans establish operational capabilities at alternate locations as soon as possible, but no later than 12 hours after continuity plan activation, to ensure uninterrupted performance of MEFs.
 - (d) Ensure operational capability for at least 30 days following plan activation or until normal operations resume. This includes planning for challenges posed by incidents extending past 30 days.
 - (e) Review their continuity program and plan annually. Updates to continuity programs and plans from the annual review will be incorporated no later than 120 days after the review and will be annotated in the continuity plan.
 - (f) Ensure and document plan approval by the program and plan's approval authority (i.e., the senior leader at the facility where MEFs are performed). Activation of a continuity plan is at the discretion of that authority or its successor. Approval and subsequent revisions will be annotated in the continuity plan.
 - (g) Establish and maintain appropriate procedures and instructions for Emergency Relocation Group (ERG) members and Devolution Emergency Response Group (DERG) members to support continuity and devolution at alternate locations.
 - (h) Outline processes and procedures to protect personnel, alternate locations, equipment, records, and other assets critical to MEF performance.

- (i) Include a decision matrix or process for plan activation. The process will outline activation methods for with or without warning situations and during duty or non-duty hours.
- B. **Essential Functions.** To support the continued performance of Reclamation MEFs, Reclamation facilities required to have a continuity program and plan will conduct a biennial review of their MEFs to include MEF validation, a Business Process Analysis (BPA), and a Business Impact Analysis (BIA) per FCD-2. Biennial reviews will be validated by the facility's approval authority, documented with their essential records, and made available, upon request, to the Reclamation Continuity Program Manager or the Department.
- C. **Orders of Succession.** Continuity programs will ensure that their plans include written orders of succession to ensure an orderly, predefined leadership transition during vacancies or changes in normal operations where the position holder cannot perform their duties. Orders of succession will be included in that facility's essential records packet (see paragraph 3.F.(2)(g)). Personnel positions identified in the orders of succession will participate in continuity testing, training, and exercising.
- D. **Delegations of Authority.** Reclamation delegations of authority from the Commissioner are designated in RM Delegations of Authority. Further re-delegations of authority will follow paragraph 3.E. of RM Delegations of Authority and be included in the facility's essential records packet.
- E. **Communications and Information Systems.** The access and availability of Reclamation communication and information systems are critical to the continued performance of MEFs. At a minimum, Reclamation continuity programs will:
 - (1) Maintain and test all primary and alternate communications and information systems used to perform MEFs. Maintenance and testing of these systems will not be limited to traditional office sites and include those systems at any locations required to perform those functions, as well as associated supply chains and data processing centers.
 - (2) Plan accordingly for MEFs that require uninterrupted communications and information technology (IT) support, including ensuring risk assessments are conducted as part of biennial BPA and BIA reviews and issuing Government Emergency Telecommunications Service cards and Wireless Priority Service to relevant continuity personnel.
 - (3) Establish signed agreements with alternate location system owners, where applicable, to ensure the presence and adequacy of communications capabilities necessary to perform MEFs.

- F. **Essential Records Management.** The following are the essential records management minimum requirements:
 - (1) Reclamation continuity programs will ensure they have appointed an essential records manager at the appropriate levels.
 - (2) Essential records managers, in coordination with their continuity coordinators, will:
 - (a) Identify and protect essential records that specify how Reclamation will operate during a continuity plan activation, including performing MEFs, reconstitution, devolution, and all appropriate policies, authorities, and procedures.
 - (b) Identify and protect all essential records to protect the legal and financial rights of the government and those affected by Reclamation activities per FCD-1, Annex F Essential Records Management.
 - (c) Ensure continuity personnel and devolution personnel can access required media, equipment, and instructions for retrieval of essential records at all locations performing MEFs.
 - (d) Conduct an essential records risk assessment annually to identify risks associated with retaining essential records in current locations, determine the difficulty of reconstituting the records if destroyed, and identify off-site storage locations and requirements.
 - (e) Determine requirements to provide alternate storage locations for duplicate records to guarantee the availability of essential records under all conditions.
 - (f) Implement needed protections for essential records based on risk assessment results, including dispersing those records to other locations or storing those records off-site or electronically in an automated system.
 - (g) Develop and maintain an essential records packet and ensure continuity team members can access it from locations performing MEFs. An essential records packet is an electronic or hardcopy compilation of key information, instructions, and supporting documentation needed to access essential records in an emergency. Essential records packets will follow requirements outlined in FCD-1, Annex F.
 - (h) Remove essential records from inventory and storage locations when superseded or no longer applicable according to the Department's records schedule.

- G. **Alternate Locations.** Alternate locations refer to sites where MEFs can be continued or resumed when the primary location becomes unusable or uninhabitable during a catastrophic emergency. In addition to identifying alternate locations, Reclamation continuity programs and plans may leverage telework and remote work to support the performance of MEFs when feasible. To meet alternate locations minimum requirements, continuity programs will:
 - (1) Establish and maintain alternate operating locations for ERG relocation during a continuity plan activation. Individual programs may choose to utilize a combination of alternate locations and remote and telework capabilities, depending upon the nature and performance of their MEFs.
 - (2) Conduct an annual review of alternate locations for suitability and functionality to ensure they meet the requirements and criteria in FCD-1, Annex G, and can support the continued performance of their MEFs.
- H. **Human Resources.** In this continuity capability element, "human resources" refers to humans as a resource in the performance of MEFs rather than any office of human capital or human resources. See Appendix A for a definition of continuity personnel and devolution personnel. A facility's senior leaders are responsible for identifying and designating those personnel. To meet the minimum continuity human resources requirements, continuity programs will:
 - (1) Prepare all employees to conduct or support continuity operations by:
 - (a) Defining continuity personnel expectations, roles, and responsibilities.

 Continuity team members will acknowledge those expectations in writing.
 - (b) Maintaining a roster of trained personnel capable of performing and supporting MEFs. Rosters will include primary and sufficient alternate personnel.
 - (2) Provide guidance to continuity personnel on individual preparedness measures to ensure their response to a continuity activation.
 - (3) Establish and implement procedures to communicate and coordinate activities with all personnel, continuity facilities, and entities Reclamation interacts with (e.g., other organizations, customers, stakeholders) before, during, and after a disruption to normal operations, including alerts and notifications. Minimum communication requirements for continuity plan activations include:
 - (a) Communicating and coordinating activities with non-continuity personnel during continuity plan activations.
 - (b) Communicating operating status to all staff and stakeholders.

- (c) Communicating guidance on pay, leave, staffing, and other human resources flexibilities to all staff.
- (d) Providing information or reference provisions and procedures to assist disaster survivors regarding employee assistance programs and needs.
- (4) Establish and implement accountability procedures for continuity and noncontinuity personnel in the affected area during continuity plan activations. Personnel accountability actions will be conducted per Department and Reclamation policy and will include:
 - (a) An account of all continuity personnel and, if applicable, devolution personnel within 12 hours of a continuity plan activation.
 - (b) An account of all staff in the affected area within 72 hours of a continuity plan activation.
- I. **Devolution.** Devolution is the capability to transfer statutory authority and responsibility for performing MEFs from an organization's primary operating staff and facilities to other designated staff and alternate locations. A continuity plan's devolution option addresses how that facility will notify and transfer command and control and responsibility for performing MEFs to geographically dispersed locations unaffected by the disruption. To meet federal devolution requirements, continuity programs will:
 - (1) Determine the viability of devolution personnel and locations performing that facility's MEFs. Then, identify those personnel and facilities in the continuity plan, including primary and alternate DERG members.
 - (2) Identify both active and passive triggers that result in the activation and implementation of the devolution option.
 - (3) Outline procedures for the transition of direction and control of operations to and from devolution personnel and locations.
 - (4) List the necessary resources, such as equipment and materials, to facilitate the performance of MEFs by devolution personnel and at devolution locations.
- J. **Reconstitution.** Reconstitution provides a process by which surviving or replacement personnel resume normal operations at the original or replacement operating facility. As an element of continuity, reconstitution simultaneously sustains MEFs while coordinating the resumption of normal operations. Reconstitution planning begins at the start of a continuity plan activation. The following are the reconstitution minimum requirements:

- (1) Facilities where MEFs are performed will appoint a reconstitution manager to oversee all phases of the reconstitution process during a continuity plan activation. The reconstitution manager and team members will be designated by position (not by name) in the continuity plan and will be separate personnel from the ERG, where feasible.
- (2) Reconstitution managers and continuity coordinators will work together to:
 - (a) Identify resources dedicated to reconstitution, separately from existing continuity support, in the reconstitution section of the continuity plan.
 - (b) Fill out and save the GSA Standard Form 2050 (SF-2050), Reconstitution Questionnaire, as an essential record to document the required space, equipment, and resources to reconstitute appropriately. The form will be reviewed annually.
 - (c) Develop a reconstitution plan following FCD-1 to recover from the effects of a disruption in operating conditions and to transition back to normal operations once a threat or disruption has passed.
 - (d) Outline the necessary procedures for conducting a smooth transition from the continuity facility to the existing primary operating facility, another temporary facility, or a new permanent primary operating facility.
 - (e) Verify operational capability and availability of systems, communications, essential records, infrastructure, and other required resources to accomplish all MEFs at the new or restored primary operating facility.
 - (f) Detail processes and procedures to determine if any records were affected by the incident to ensure an effective transition or recovery of essential records.
 - (g) Include redeployment plans for phasing down alternate location operations and supervising the return of operations, personnel, records, and equipment to the primary or other operating facility in a priority-based approach.
 - (h) Detail processes to instruct all personnel on how to resume normal operations.
- K. **Testing, Training, and Exercising (TT&E).** Continuity coordinators will ensure the TT&E requirements listed below are met and documented, including relevant dates, personnel involved, and outcomes. Documentation will be made available to the Reclamation Continuity Program Manager or the Department upon request.
 - (1) **Testing.** Continuity programs will include and document the completion of the following minimum testing requirements:

- (a) Quarterly testing of the internal and external primary and contingency communications and IT systems required for the performance of MEFs.
- (b) Annual alert and notification procedures testing, including emergency notification system testing for continuity and devolution personnel.
- (c) Annual testing of primary and backup infrastructure systems and services, such as power, water, and fuel, at alternate locations.
- (d) Annual remote and telework capabilities testing, including IT infrastructure required to support those options during a continuity activation.
- (e) Annual testing for information systems and essential records, including, at a minimum:
 - (i) Test recovery strategies for essential records, critical information systems, services, and data (classified and unclassified).
 - (ii) Test protection capabilities for classified and unclassified essential records and IT systems and for providing alternate location access.
- (2) **Training.** To meet minimum training requirements, continuity programs will conduct and document annual training on roles and responsibilities for all continuity and devolution personnel, including host or contractor personnel, who are assigned to support and sustain the performance of MEFs. Training will include:
 - (a) Education on the continuity plan, including using or relocating to alternate locations or other work arrangements, such as telework and remote work.
 - (b) Familiarization with the reconstitution and devolution plans and procedures.
 - (c) Communications and IT system planning necessary to support or sustain the performance of MEFs.
 - (d) Instruction to identify, protect, and make available electronic and hardcopy essential records, documents, references, records, information systems, and data management software and equipment (including classified or sensitive data) needed to support or sustain the performance of MEFs.
- (3) **Exercising.** Continuity coordinators will refer to the Homeland Security Exercise and Evaluation Program for guiding principles on exercise programs, including exercise program management, design, development, conduct, evaluation, and improvement planning. Exercise credit can be given for real-world activations of a continuity plan that involves the participation of the relevant continuity or

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devolution team members. Following EMG 03-01, Critical Information Requirements and Duty Officer Program, all real-world Reclamation continuity plan activations will be reported. To meet the minimum exercise requirements, continuity coordinators will:

- (a) Develop and implement an approved exercise plan that includes a cycle of events to incorporate evaluations, after-action reports, and lessons learned into the improvement plan.
- (b) Conduct and document an annual exercise to test continuity plans, processes, procedures, and demonstrate continuity personnel's familiarity with continuity plans, processes, and procedures, and validate the capability to continue or quickly resume MEFs. Exercises will:
 - (i) Include the deliberate and pre-planned movement of ERG members to an alternate location.
 - (ii) Test and validate internal and external communication capabilities.
 - (iii) Verify that data and records required to support MEFs at alternate locations are sufficient, complete, current, and accessible to continuity team members.
 - (iv) Demonstrate the capability to continue MEFs from telework and remote work locations, including accessing and using records, communications, and systems, if telework or remote work are used as continuity strategies.
- (c) Conduct and document a biennial exercise for devolution team members to demonstrate their familiarity with devolution plan processes and procedures. Exercises will:
 - (i) Familiarize devolution team members with devolution plan processes and procedures.
 - (ii) Familiarize devolution team members with reconstitution plans and procedures for the original or replacement primary operating facility.
 - (iii) Test and confirm internal and external communications capabilities.
 - (iv) Verify that data and records required to support MEFs at alternate locations are sufficient, complete, current, and accessible to devolution team members.

- (v) Maintain situational awareness and outreach with internal and external organizations concerning the performance of Reclamation MEFs.
- (vi) Demonstrate the capability to continue MEFs from telework and remote work locations, including accessing and using records, communications, and systems, if telework or remote work are used as continuity strategies.
- 4. **Definitions.** See Appendix A.
- 5. **Review Period.** The originating office will review this release at least once every four years.