Subject: Continuity of Operations (COOP)

Purpose: To ensure the uninterrupted continuation of Reclamation essential functions during emergencies or threats. This Directive and Standard (D&S) establishes the framework, requirements, and processes to support the development and management of Reclamation COOP programs. The primary benefit of this D&S is to ensure uninterrupted continuation of Reclamation essential functions during emergencies or threats to personnel or facilities.


Approving Official: Director, Policy and Programs Directorate

Contact: Emergency Management and Aviation Office (EMAO)

1. Introduction. This D&S establishes requirements and responsibilities for Reclamation COOP programs and plans by specifying and defining required elements of a continuity plan. The safety, reliability, and continuity of Reclamation’s essential functions (as defined in Appendix A), and the well-being of Reclamation’s staff, are fundamental to Reclamation’s mission and delivery of services to the American public. Reclamation is also a partner in the nationwide framework to support the Department’s Primary Mission Essential Functions (PMEFs) and the National Essential Functions.

A. This D&S establishes the minimum continuity standards for Reclamation to incorporate into its daily operations to ensure the seamless and immediate continuation of essential functions. It also establishes the framework, requirements, and processes to support the development of Reclamation’s continuity programs by specifying and defining the 11 elements of a continuity plan which are required to successfully support the four phases of continuity.
B. There are four phases of continuity: (1) Readiness and Preparedness Phase, (2) Activation Phase, (3) Continuity Operations Phase, and (4) Reconstitution Phase. 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 COOP activation. Refer to FCD-1, Annex L – *Continuity Operational Phases and Implementation*, and Appendix A of this D&S for further explanation of the four phases of continuity. The execution of the 11 elements of continuity outlined in FCD-1, Section VII – *Continuity Capability Elements* and by the associated requirements as outlined in this D&S support all four phases.

2. **Applicability.**

   A. This D&S applies to all Reclamation employees.

   B. This D&S applies to Reclamation’s facilities where Reclamation employees conduct Mission Essential Functions (MEFs).

   C. This D&S does not apply to lapse in appropriations (i.e., government shutdown), however, staff can test or evaluate components of continuity during these situations (e.g., communications, accountability).

3. **Implementation.** This D&S defines annual requirements as those scheduled to occur during the Federal fiscal year, October 1 through September 30. Every Reclamation office/facility performing essential functions must have a COOP program and a plan managed and maintained by a COOP coordinator. The Reclamation COOP Program Manager will review all Reclamation COOP programs and plans using an internal control program developed, maintained, and executed by EMAO to ensure compliance with PPD-40, FCD-1, FCD-2, and this D&S.

4. **COOP Programs, Plans, and Procedures.** PPD-40, FCD-1, FCD-2, and this D&S outline the overarching requirements for continuity programs and plans. Implementation of a continuity plan is intended to continue or rapidly resume essential functions following a change to normal operating conditions. The sustainment of essential functions is critical to Reclamation’s resilience during a continuity activation and is ensured via the preparation and execution of the continuity elements listed in this section. All Reclamation continuity programs and plans must incorporate the following elements:

   A. **Essential Functions.** To support the PMEFs and the MEFs established by the Department and Reclamation, COOP coordinators will lead a Business Process Analysis as explained in FCD-2, Annex C – *Business Process Analysis*, to identify and document processes necessary to perform essential functions.
B. **Program Management, Plans, and Procedures.** The following are the program management, plans, and procedures minimum requirements:

1. Reclamation Leadership Team (RLT) members must:
   
   a. at a minimum, ensure offices or facilities have appointed primary and alternate COOP coordinators to manage COOP programs at the Washington, Denver, regional, and area offices. COOP coordinators may be assigned at the level deemed most appropriate for other offices or facilities responsible for the conduct of MEFs.
   
   b. ensure the Washington, Denver, regional, area offices, and any other offices or facilities responsible for the conduct of MEFs, establish COOP programs and plans. Some COOP programs and plans may fall under the appropriate regional or area office COOP program and plan or may act as a standalone program and plan for a specific office or facility.
   
   c. ensure COOP programs, plans, and requirements are in place, compliant with this D&S, and are ready for execution.
   
   d. ensure that functional representatives participate as Continuity Development Team (CDT) members as requested by COOP coordinators.
   
   e. plan for and support funding, staffing, and executing supporting activities (e.g., developing plans; training, exercising, establishing, and maintaining supporting infrastructure and processes; promoting a prepared and resilient organization).

2. In addition to other RLT responsibilities, the Director, Policy and Programs, will provide Reclamation-wide oversight and executive-level coordination of COOP functions, as well as lead the development, coordination, and execution of the Denver Office COOP Plan.

3. The approval authority who signs the COOP plan will provide oversight of COOP processes and procedures to ensure MEFs are capable of continuing or rapidly resuming during a COOP activation.

4. The Chief, Emergency Management and Aviation Office, will provide operational and tactical-level planning, coordination, support, and information sharing related to the Reclamation COOP Program.
The Reclamation COOP Program Manager will manage the Reclamation COOP Program, provide oversight and direction to Reclamation COOP coordinators, and lead and manage the Reclamation Continuity Working Group.

COOP coordinators must:

- Form and chair a CDT for coordination with functional representatives in their organization to enhance COOP program planning and implementation.
- Plan, develop, and maintain assigned COOP programs and plans and provide oversight to ensure proper execution of all requirements of this D&S.
- Implement a multi-year strategy plan that provides for the development, maintenance, and annual review of continuity capabilities.
- Outline procedures for emergency procurement of equipment, services, and personnel to support continuity operations.
- Ensure COOP coordinators/managers establish operational capabilities at alternate locations as soon as possible, but no later than 12 hours after COOP plan activation.
- Ensure operational capability for a minimum of 30 days following COOP activation or until normal operations resume. This includes planning for challenges posed by continuity events extending past 30 days.
- Conduct an annual review of the COOP plan (the plan must include a review of all alternate locations for suitability and functionality). The COOP coordinator and at least two other continuity personnel members will conduct the annual review. COOP coordinators must complete all updates as soon as possible, not to exceed 90 days after review. COOP coordinators must also record the date of the review, names of personnel conducting the review, and any noted corrections.
- Obtain approval for a COOP plan whenever completing or revising a new plan. The COOP coordinator must record the approval authority’s name, signature, and the date of signature on the plan itself (e.g., the regional director signs and dates the regional office COOP plan, the area manager signs and dates the area office COOP plan). The COOP coordinator must also conduct revision approvals following normal Reclamation distribution and approval processes.
(i) establish and maintain appropriate procedures and instructions for Emergency Relocation Group (ERG) members and Devolution Emergency Relocation Group (DERG) members to support continuity and devolution at alternate locations.

(j) develop and maintain processes and procedures to protect personnel, alternate locations, equipment, records, and other assets critical to MEF performance.

(k) develop and utilize a decision matrix or process for COOP activation. The COOP coordinator must include activation methods for with or without warning situations, and for during duty or non-duty hours.

(7) The approval authority who signed the COOP plan (or successor in their absence) determines when/if to activate a COOP plan.

C. **Orders of Succession.** COOP coordinators must ensure the following orders of succession minimum requirements are met:

(1) COOP plans must:

   (a) include written orders of succession in advance of a continuity event to ensure an orderly, predefined leadership transition during changes in normal operations.

   (b) utilize a formal and sequential listing of positions, rather than listing specific names of individuals.

(2) Personnel positions identified in the orders of succession must participate in COOP testing, training, and exercising as identified in paragraph 6.K. of this D&S.

**Delegations of Authority.** RLT members must establish delegations of authority in advance to ensure the orderly transition of responsibilities during a continuity activation. All Reclamation delegations of authority from the Commissioner are designated in RM [Delegations of Authority](#). Further re-delegations of authority must follow Paragraph 3.E. of RM [Delegations of Authority](#).

D. **Communications and Information Systems.** COOP coordinators must ensure the following communications and information systems minimum requirements are met.

(1) COOP coordinators must:
(a) establish signed agreements with alternate location system owners to ensure the presence and adequacy of communications capabilities.

(b) maintain and test all primary and alternate communications and information systems used in the performance of MEFs, including associated supply chains and facilities such as data processing centers, in accordance with Department and Reclamation requirements.

(c) enroll primary and alternate operating locations involved in the performance of MEFs in the Federal Communications Commission’s Telecommunications Service Priority Program.

(d) provide dedicated access to communications capabilities for facilities and personnel at designated alternate locations, and:

   (i) ensure communications capabilities are adequately maintained and that continuity personnel are properly trained in their use.

   (ii) plan accordingly for MEFs that require uninterrupted communications and information technology (IT) support.

   (iii) issue, and ensure appropriate continuity personnel and/or continuity facilities have activated, Government Emergency Telecommunications Service (GETS) cards and Wireless Priority Service (WPS) on cellular telephones.

(e) properly protect all sensitive information including all communications, verbal and written, and must comply with information security requirements per D&S SLE 02-01, Identifying and Safeguarding Controlled Unclassified Information (CUI).

E. Essential Records Management. The following are the essential records management minimum requirements:

(1) RLT members must ensure offices have appointed an essential records manager at the appropriate levels. As a minimum, the Washington Denver, regional, and area offices will have an essential records manager appointed to manage records essential to continuity operations.

(2) To meet the following essential records management minimum requirements, COOP coordinators and essential records managers must:
(a) identify and protect essential records that specify how Reclamation will operate during a COOP activation, including performance of 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 (refer to FCD-1, Annex F – Essential Records Management for more information).

(c) ensure continuity personnel have the capability to access required media, equipment, and instructions for retrieval of essential records at all locations performing continuity operations procedures.

(d) conduct an essential records risk assessment at least annually to:

(iv) identify risks associated with retaining essential records in current locations and determine the difficulty of reconstituting the records if destroyed, and

(v) identify off-site storage locations and requirements.

(e) use of appropriate storage methods and formats.

(f) determine requirements to provide alternate storage locations for duplicate records to guarantee the availability of essential records under all conditions.

(g) implement needed protections for essential records based on risk assessment results to include dispersing those records to other locations or storing those records off-site or electronically in an automated system.

(h) develop and maintain an essential records packet and ensure COOP team members have the capability to access it from locations performing continuity operations procedures. 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. COOP team members must update or cycle packets on the same schedule as all other essential information to remain current. At a minimum, an essential records packet must:

(i) include an electronic and/or hard copy list of continuity personnel with up-to-date telephone numbers,
(ii) include an inventory of essential records listing the records’ precise locations,

(iii) include all necessary access mechanisms (e.g., keys, access readers),

(iv) include alternate location information (e.g., address),

(v) include access requirements and lists of equipment necessary to access the records,

(vi) include lists of records recovery experts and vendors if required (e.g., names, phone number, addresses), and

(vii) include a copy of the organization’s continuity plan.

(i) Remove essential records from inventory and storage locations when superseded or no longer applicable according to the Department’s records schedule, Volume II, Chapter 2 - Subject Index Chapter 6 – Schedules.

F. Alternate Locations. COOP coordinators may leverage telework and remote work to support continuity operations, when feasible. To meet the following alternate locations minimum requirements, COOP coordinators must:

(1) establish and maintain at least two alternate operating locations for ERG relocation during a COOP activation (one near site close enough to not affect work commute and one far site outside of the local area).

(2) Conduct an annual review of alternate locations for suitability and functionality, validate continuity requirements, and document the date and names of personnel conducting the review/validation.

(3) establish and implement procedures for the reception and orientation of continuity personnel.

(4) coordinate with site facility managers to ensure availability of space and services.

(5) establish and review annually alternate location Memorandum of Agreements (MOAs) or Memorandum of Understandings (MOUs) for sites that are neither Reclamation-owned or leased. MOAs or MOUs must be current, signed by the owner/occupant of the facility, and the COOP coordinator and the owner/occupant of the facility must review the MOAs/MOUs annually, or following changes to people in positions who approve the MOA/MOU. The COOP coordinator must also document the review date and names of personnel conducting the review. MOAs/MOUs must:
(a) specify the time required to notify the owner/occupant of a COOP plan activation requiring use of the owner/occupant’s facility.

(b) list facility space and service details.

(c) detail access control procedures during occupancy.

(6) ensure alternate locations must have the following capabilities:

(a) The ability to support the performance of MEFs with minimal disruption of operations, for a minimum of 30 days or until normal operations resume, including:

(i) the ability to replicate capabilities needed to perform MEFs by providing systems and configurations used in normal daily operations.

(ii) the capability to access and use essential records necessary to conduct continuity operations.

(iii) sufficient communications capabilities needed to conduct continuity operations, including secure communications as appropriate.

(iv) functional IT system capabilities necessary to conduct continuity operations.

(v) emergency backup power capability for primary power source disruptions, if feasible.

(b) If lodging is required to reduce fatigue or to overcome unreasonable travel distances between home and alternate locations, COOP coordinators will ensure lodging is available to support deployed continuity personnel at or near alternate locations.

(7) assess each activity, task, or responsibility associated with continuity operations to determine if it is capable of being performed via telework or whether it must be performed, in part or in whole, at an alternate location.

G. **Human Resources (this refers to the management of human capital, but not functions conducted exclusively by individual human resources offices).** Human resources processes include establishing procedures for sustaining administrative services, personnel accountability, and support services for all employees affected during a COOP activation. To meet the following human resources minimum requirements, COOP coordinators must:
(1) prepare all employees to conduct or support continuity operations, including:

   (a) defining continuity personnel expectations, roles, and responsibilities. COOP coordinators must detail expectations, roles, and responsibilities in writing and obtain signed acceptance.

   (b) maintaining a roster of trained personnel capable of performing continuity operations. Rosters will include primary and sufficient alternate personnel. The COOP coordinator must update rosters when personnel changes occur and must include names, the personnel’s office, and government-issued cellular telephone numbers.

(2) provide guidance to continuity personnel on individual preparedness measures taken to ensure their response to a continuity activation. Guidance must include:

   (a) recommended content and maintenance of drive-away kits for deploying continuity personnel, and

   (b) stipulations on how to prepare and plan for a continuity activation, including procuring an emergency supply kit, making a family emergency plan, and being informed about the different types of catastrophic emergencies that could occur and the appropriate responses.

   (c) non-continuity personnel’s roles and responsibilities during COOP activations and specifically how they will be utilized and supported.

(3) establish and implement procedures to communicate and coordinate activities with all personnel, continuity facilities, and entities the affected organization interacts with (e.g., other organizations, customers, stakeholders) before, during, and after a continuity event, including alerts and notifications. Minimum communication requirements for COOP activations include:

   (a) communicating and coordinating activities with non-continuity personnel during COOP activations.

   (b) communicating the organization’s 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 non-continuity personnel in the affected area during COOP activations. Minimum accountability requirements during COOP scenarios include:

(a) mandatory compliance and response to all directions during COOP activations to ensure accountability and safety.

(b) communication on how non-continuity personnel are expected to remain in contact with their organization and/or supervisor.

(c) an account of all continuity personnel within 12 hours of a COOP activation.

(d) an account of all staff in the affected area within 72 hours of a COOP activation.

H. **Devolution.** A devolution location must be a facility significantly outside the geographic region of the primary operating facility used to conduct continuity operations. The COOP coordinator must develop a devolution plan for continuity to address conducting MEFs when the primary operating facility, and/or ERG members are not available. To meet the following devolution minimum requirements, COOP coordinators must:

(1) establish a devolution location(s).

(2) identify both active and passive triggers that result in the activation and implementation of the devolution plan.

(3) outline procedures for the transition of direction and control of operations to and from the devolution location.

(4) list the necessary resources, such as equipment and materials, to facilitate the performance of MEFs at the devolution location.

(5) identify and document primary and alternate DERG members and maintain a DERG roster of trained personnel capable of performing devolution operations. DERG rosters must:

(a) be updated when changes of DERG personnel occur.

(b) at a minimum, include names, offices, and government-issued cellular telephone numbers.

I. **Reconstitution.** Reconstitution provides a process by which surviving and/or replacement personnel resume normal operations at the original primary operating
facility or a replacement primary 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 activation. The following are the reconstitution minimum requirements:

(1) RLT members must ensure offices have appointed a reconstitution manager at the appropriate levels. At a minimum, the Washington, Denver, regional, and area offices will have a reconstitution manager to oversee all phases of the reconstitution process during a COOP activation.

(2) To meet the following reconstitution minimum requirements, COOP coordinators must:

(a) designate a reconstitution manager and team members by position (not by name) in the reconstitution section of the COOP plan.

(b) identify resources dedicated to reconstitution, separately from existing continuity support, in the reconstitution section of the COOP plan.

(c) fill out and save GSA Standard Form 2050 (SF-2050), Reconstitution Questionnaire, as an essential record to document required space, equipment, and resources to properly reconstitute.

(d) develop a reconstitution plan 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. This plan must include the following:

(i) a status assessment of the impacted facilities, personnel, and assets,

(ii) evaluation of the assessment results, and

(iii) implementation of reconstitution operations based on needs determined by assessment results.

(e) outline the necessary procedures for conducting a smooth transition from the continuity facility to either the existing primary operating facility, another temporary facility, or a new permanent primary operating facility.

(f) 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.

(g) detail processes and procedures to determine if any records were affected by the incident to ensure an effective transition or recovery of essential records.
(h) 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.

(i) detail processes to instruct all personnel on how to resume normal operations.

J. Testing, Training, and Exercising (TT&E), Documenting, and Reporting. COOP coordinators must ensure the following TT&E documenting and reporting minimum requirements are met:

(1) Testing. COOP coordinators must include and document the following minimum testing requirements:

(a) quarterly testing of the internal and external primary and contingency communications and IT systems,

(b) annual testing of alert and notification procedures for continuity personnel,

(c) annual testing of primary and backup infrastructure systems and services, such as power, water, and fuel, at alternate locations,

(d) annual testing of telework capabilities, to include IT infrastructure required to support telework options during a continuity activation, and

(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 (both classified and unclassified), and

   (ii) test protection capabilities for classified and unclassified essential records and IT systems and for providing alternate location access.

(2) Training. In order to meet the following minimum training requirements, COOP coordinators must:

(a) conduct annual continuity awareness briefings for all staff to include new personnel as they onboard.

(b) conduct annual training on roles and responsibilities for all continuity personnel, including host or contractor personnel, who are assigned to activate, support, and sustain continuity operations. Training must include:
(i) education on the continuity plan involving using or relocating to alternate locations or other work arrangements, such as telework,

(ii) familiarization with the reconstitution and devolution plans and procedures,

(iii) communications and IT system planning necessary to support or sustain continuity operations, and

(iv) how 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 continuity operations.

(c) provide annual training on roles and responsibilities for personnel, including host or contractor personnel, who are assigned to activate, support, and sustain devolution operations. As a minimum, annual training must:

(i) familiarize personnel with the devolution plan processes and procedures,

(ii) educate personnel on the use of communications and IT systems used during devolution operations,

(iii) explain how to access, identify, and protect electronic and hardcopy documents, references, records, information systems, and data management software and equipment (including classified and other sensitive data) needed to support essential functions during devolution operations, and

(iv) explain how to identify and conduct MEFs during an increased threat situation or in the aftermath of a catastrophic emergency or unplanned incident that activates the devolution plan.

(3) **Exercising.** COOP coordinators may refer to the Homeland Security Exercise and Evaluation Program (HSEEP) for guiding principles on exercise programs, as well as a common approach to exercise program management, design, development, conduct, evaluation, and improvement planning. In order to meet the following minimum exercising requirements COOP coordinators must:

(a) develop and implement an exercise plan that includes a cycle of events to incorporate evaluations, after action reports, and lessons learned into the development and implementation of an improvement plan. The approval
authority who signed the COOP plan will support and promote the implementation of after-action reports and improvement plans.

(b) conduct an annual exercise to test COOP plans, processes, procedures, and demonstrate continuity personnel’s familiarity with continuity plans, processes, and procedures and must validate the capability to continue or quickly resume MEFs. The exercise must:

(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 ERG members, and

(iv) if telework is used as a continuity strategy, demonstrate the capability to continue MEFs from telework sites to include accessing and using records, communications, and systems.

(c) conduct a biennial exercise for DERG members to demonstrate their familiarity with devolution plan processes and procedures. This exercise must:

(i) familiarize DERG members with devolution plan processes and procedures,

(ii) familiarize DERG members with reconstitution plans and procedures for the original primary operating facility or a replacement primary operating facility,

(iii) test and validate 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 DERG members,

(v) maintain situational awareness and outreach with internal and external organizations with respect to performance of Reclamation MEFs, and

(vi) if telework is used as a continuity strategy, demonstrate the capability to continue MEFs from telework sites, to include accessing and using records, communications, and systems.
(d) provide exercise credit for actual incidents. After the occurrence of an incident, the exercise schedule (for required annual ERG and/or biennial DERG COOP exercises) for the affected facility may be reset (in the fiscal year of the incident) if the following criteria are satisfied:

(i) a real-world incident caused the office/facility’s COOP plan activation authority to activate the office/facility’s COOP plan,

(ii) the office/facility’s COOP plan activation was reported in appropriately (see section (4)(b) of this D&S), and

(iii) the office/facility’s ERG relocated to an alternate site due to the office/facility’s COOP plan activation.

(4) **Documenting and Reporting.** COOP coordinators must document all conducted TT&E events utilized to train and prepare continuity personnel, including the date of the event, those personnel participating in the event, and the event outcome.

(a) To provide visibility on Reclamation continuity efforts, regional COOP coordinators must update the Reclamation COOP tracking document on the EMAO SharePoint site COOP page as changes occur. This document will be reviewed annual at the Reclamation Continuity Working Group Workshop.

(b) All Reclamation COOP plan activations must be reported in accordance with SLE 08-03, *Serious Incident Reporting and Duty Officer Program.*

5. **Definitions.** See Appendix A

6. **Review Period.** This originating office will review this release at least once every 4 years.