

**CONTINUITY OF GOVERNMENT (COG) and  
CONTINUITY OF OPERATIONS (COOP)  
Emergency Planning Guidance  
*for a Consolidated Approach***

*Introduction*

The changing threat environment has shifted our awareness to the need for Continuity of Government (COG) and Continuity of Operations (COOP) capabilities that enable state and local governments to continue their essential functions across a broad spectrum of emergencies.

To address that need, in part, *FEMA 02 Supplemental Appropriations for the First Responder Initiative* funds were provided to state and local governments for the purpose of updating their emergency operations plans to address all hazards. Specifically, funds could be used to develop or update state and local continuity of government and continuity of operations plans, which play a critical role in effectively preparing the State for any emergency or disaster.

The overall purpose of both Continuity of Operations and Continuity of Government is to ensure the continuity of essential functions under all circumstances that may disrupt normal operations. As a baseline of preparedness for the full range of potential emergencies, all governments/agencies should have in place viable Continuity of Government and Continuity of Operations capabilities.

This guidance document describes the concept of Continuity of Government, explains the federal concept of Continuity of Operations, and introduces the concept of a consolidated COG/COOP capability, referred to as “continuity of government operations” for the purposes of this document. The goal is to develop a plan that clearly addresses elements of both COG and COOP, or to provide for the identification or addition of these elements into existing plans.

The principles and practices of COG are imbedded into existing California law and emergency plans. Existing plans that address COG may lack the new emphasis contained in COOP on ensuring operational capability of essential functions through tests, training, exercises, and interoperable communications. Incorporating both COG and COOP elements into plans and procedures can result in more integrated, comprehensive, and workable emergency plans.

## Continuity of Government (COG)

### *Background*

In anticipation of major catastrophic disasters, governmental units must be prepared to maintain operations throughout all types of destructive events including enemy attack by any method. Continuity of Government has been defined as the preservation, maintenance, or reconstitution of the civil government's ability to carry out its constitutional responsibilities.

It is essential to maintain the fabric of our constitutional form of government and to ensure that Californians have faith in their governments' capability to provide for their health, safety and welfare and to contribute to the common defense of the United States. Continuity of Government is concerned with the full range of governmental services including the three branches of government (judicial, legislative, and executive) and all levels of government (federal, state, and local).

### *Established in CA Laws and Plans*

Continuity of Government is addressed by a variety of State laws, plans, and in emergency and administrative procedures.

The Emergency Services Act, Section 8650, states: "Emergency plans means those official and approved documents, which describe the principles and methods to be applied in carrying out emergency operations or rendering mutual aid during emergencies. These plans include such elements as continuity of government, the emergency services of governmental agencies, mobilization of resources, mutual aid, and public information."

In Executive Order W-9-91, numbers 4 and 5 respectively state: "The head of each department, bureau, board, commission and independent institution of state government, hereinafter referred to as an agency, is responsible for the emergency planning, preparedness, and training of his or her agency;" and "Each agency shall establish a line of succession which includes at least three persons for each position that is assigned essential emergency functions, for both headquarters and major field division, as defined by agency director. The agency plan shall define the conditions to be met to shift responsibility to the next successor; ... ."

COG is critical to providing rapid and effective response to a truly catastrophic disaster and is identified as an element of the *California Emergency Plan* by the Emergency Services Act. (Gov. Code § 8560)

The *California Emergency Plan* contains a brief description of the seven elements of COG that must be considered by all branches of government in California through development of appropriate emergency plans and related procedures.

## **Continuity of Operations (COOP)**

### *Background*

Continuity of Operations, similar to Continuity of Government, is a federal planning concept that focuses on government's ability to continue essential functions. In order to ensure continuity of essential federal functions under all circumstances, all Federal agencies are directed to develop a Continuity of Operations capability.

COOP planning guidelines are provided in a number of Federal Preparedness Circulars (referenced at the end of this document). The Circulars list and describe the critical elements that must be addressed by each department.

COOP planning is simply a "good business practice"—part of the fundamental mission of agencies as responsible and reliable public institutions. For years, COOP planning activities have been an individual agency responsibility conducted primarily in response to the threat of emergencies within the confines of the organization.

The elements of a viable COOP capability are almost identical to the components of COG. COOP encompasses and enhances COG elements to establish a baseline of preparedness for the full range of potential emergencies.

## **Consolidation of COG and COOP**

### *Comprehensive Integrated Approach*

The state has relied on a variety of documents, such as business continuity or business resumption plans, to accomplish many of the same planning objectives as those of COG and COOP. To maintain consistency among federal, state, and local plans, this document proposes that all levels of California government develop an integrated "continuity of government operations" capability, which is a consolidation of all the planning elements included in COG and COOP (see table below for list of elements). This involves ensuring that all the elements of continuity of government operations have been addressed and/or are incorporated in agency emergency plans and procedures. This effort would support coordinated planning at all governmental levels, thereby providing for a more effective emergency response.

Development of a continuity of government operations capability can be useful in updating emergency plans and procedures. The COG/COOP concepts that have been summarized below are consistent with the federal guidance for all levels of government in updating their plans

### **Combined COG/COOP Elements**

1.	Emergency concepts, actions and procedures provided in emergency plans and emergency action plans.
2.	Identification and prioritization of essential functions.
3.	Line of succession to essential positions required in an emergency.
4.	Delegation of authority and pre-delegation of emergency authorities to key officials.
5.	Emergency operations centers, alternate (work-site) facilities and alternate emergency operations centers.
6.	Interoperable communications.
7.	Protection of government resources, facilities and personnel.
8.	Safeguarding of vital records and databases.
9.	Tests, training and exercises.

## Preparing Plans to Address COG and COOP

### *Objectives*

COG/COOP planning is an effort to assure that the capability exists to continue essential agency functions throughout any potential emergency. The objectives of continuity of government operations activity include:

- Ensuring the continuous performance of an agency or department's essential functions/operations during an emergency;
- Protecting essential facilities, equipment, records, and other assets;
- Reducing or mitigating disruptions to operations;
- Reducing loss of life, minimizing damage and losses; and,
- Achieving a timely and orderly recovery from an emergency and resumption of full service to customers.

### *Planning Considerations*

In accordance with federal guidance, COG/COOP:

- Must be maintained at a high level of readiness;
- Must be capable of implementation, both with and without warning;
- Must be operational no later than 12 hours after activation;
- Must maintain sustained operations for up to 30 days; and,
- Should take maximum advantage of existing agency field infrastructures.

### *Recommended Approach*

There are several possible approaches to addressing both COG and COOP. They include:

- 1) Updating existing business continuity plans and business resumption plans to address COG/COOP elements and incorporate those documents by reference into the emergency operations plan (EOP).
- 2) Developing a separate plan to address COG/COOP and incorporating it into the EOP as an annex or by reference.
- 3) Consolidating documents containing required elements by reference in emergency operations plans.

## Checklist

The following is a checklist of recommended items to be included by element:

### **1. Emergency concepts, actions and procedures provided in emergency plans and emergency action plans.**

- Identify the emergency functions and activities.
- Outline a decision process of determining appropriate actions in implementing COG/COOP plans and procedures.
- Include procedures for employee advisories, alerts and COG/COOP plan activation, with instructions for relocation to pre-designated facilities, with and without warning, during duty and non-duty (if activated for emergency response) hours.
- Provide for attaining operational capability within 12 hours.
- Establish reliable processes and procedures to acquire resources necessary to continue essential functions and sustain operations for up to 30 days.

### **2. Identification and prioritization of essential functions.**

- Identify all functions performed by the agency, then determine and prioritize which must be continued under all circumstances.
- Establish staffing and resources requirements needed to perform essential functions.
- Identify mission critical data and systems necessary to conduct essential functions.
- Defer functions not deemed essential to immediate agency needs until additional personnel and resources become available.
- Integrate supporting activities to ensure that essential functions can be performed as efficiently as possible during emergency relocation.

### **3. Line of succession to essential positions required in an emergency.**

- Identify lines of succession to essential positions required to maintain essential operations.
- Describe line of succession by positions or titles, rather than names of individuals.
- Ensure that the line of succession is formally promulgated and included in action plans for emergency reference.

### **4. Delegations of authority and pre-delegation of emergency authorities to key officials.**

- Identify the programs and administrative authorities needed for effective operations at all organizational levels having emergency responsibilities.
- Identify the circumstances under which the authorities would be exercised.
- Document the necessary authorities at all points where emergency actions may be required, delineating the limits of authority and accountability.
- State explicitly the authorities of designated successors to exercise agency direction, including any exceptions, and the successor's authority to re-delegate functions and activities as appropriate.

- Indicate the circumstances under which delegated authorities would become effective and when they would terminate. Pre-determined delegations of authority would take effect when normal channels of direction are disrupted for a specified period of time and would terminate when these channels have been reestablished.
- Ensure that officials who may be expected to assume authorities in an emergency are trained to carry out their emergency duties.
- Specify responsibilities and authorities of individual agency representatives designated to participate as members of interagency emergency response teams.

**5. Emergency operations centers (EOC), alternate (work site) facilities, and alternate emergency operations centers.**

- Ensure immediate capability to perform essential functions under various threat conditions, including threats involving weapons of mass destruction.
- Designate a specific facility and location for the department's Emergency Operations Center (DOC).
- Identify an alternate emergency operations center to be used in the event the facility is unavailable or staff is unable to respond to the facility.
- Ensure that the alternate location (for work site or EOC) has sufficient space and equipment to sustain the relocating organization. Agencies and departments are encouraged to pre-position and maintain minimum essential equipment for continued operations at the alternate operating facilities where possible.
- Identify reliable logistical support, services, and infrastructure systems, including water, electrical power, heating and air conditioning, etc.
- Plan for the ability to sustain operations for a period of up to 30 days.

**6. Interoperable communications.**

- Ensure the continuation of interoperable communications with all identified essential internal and external organizations, critical customers, and the public (document in emergency plans and procedures).
- Provide for a communication capability commensurate with an agency's essential functions and activities.
- Ensure the ability to communicate with contingency staff, management, and other organizational components.
- Ensure the ability to communicate with other agencies and emergency personnel.
- Provide for access to other data and systems necessary to conduct essential activities and functions.
- Test alert and notification procedures and systems for any type of emergency at least quarterly.

**7. Protection of government resources, facilities and personnel.**

- Consider and provide for the health, safety, and emotional well being of relocated employees.
- Provide appropriate physical security and access controls for resources and facilities.

**8. Safeguarding of vital records and databases.**

- Ensure the collection and retention of emergency operating records for future use.
- Provide for the identification and protection of essential legal and financial records.

**9. Tests, training and exercises.**

- Provide for individual and team training of agency contingency staff and emergency personnel to ensure currency of knowledge and integration of skills necessary to implement COG/COOP plans and carry out essential functions.
- Ensure internal agency testing and exercising of COG/COOP plans and procedures to ensure the ability to perform essential functions and operate from designated alternate facility (ies).
- Joint agency exercising of COG/COOP plans, where applicable and feasible.



## References, Resources and Websites

Source of Information	Topic	Website Address
FEMA Planning Guides	Introduction to State and Local EOP Planning Guidance	<a href="http://www.fema.gov/onp/introstate.htm">http://www.fema.gov/onp/introstate.htm</a>
Federal Preparedness Circulars		<a href="http://www.app1.fema.gov/library/libfpc_a.htm">http://www.app1.fema.gov/library/libfpc_a.htm</a>
Federal Preparedness Circular 65	Federal Executive Branch Continuity of Operations	<a href="http://www.fas.org/irp/offdocs/pdd/fpc-65.htm">www.fas.org/irp/offdocs/pdd/fpc-65.htm</a>
Federal Preparedness Circular 66	Test, Training and Exercise Program for Continuity of Operations (COOP)	<a href="http://www.fema.org/pdf/library/fpc66.pdf">www.fema.org/pdf/library/fpc66.pdf</a>
Federal Preparedness Circular 67	Acquisition of Alternate Facilities for Continuity of Government Operations (COOP)	<a href="http://www.fema.org/pdf/library/fpc67.pdf">www.fema.org/pdf/library/fpc67.pdf</a>
Federal Continuity of Government Commission		<a href="http://www.continuityofgovernment.org/home.html">http://www.continuityofgovernment.org/home.html</a>
California Office of Emergency Services		<a href="http://www.oes.ca.gov">www.oes.ca.gov</a>
National Emergency Management Association	Information on resource typing	<a href="http://www.nemaweb.org/index.cfm">www.nemaweb.org/index.cfm</a>
Florida Emergency Management COG Plan	Continuity of Government	<a href="http://www.dca.state.fl.us/bpr/Projects/CEMP%20Online/Continuity%20of%20Government.htm">http://www.dca.state.fl.us/bpr/Projects/CEMP%20Online/Continuity%20of%20Government.htm</a>
FEMA Guidance	CPG 1-10	<a href="http://www.survivalring.org/nbcprep/cpg1-10.pdf">http://www.survivalring.org/nbcprep/cpg1-10.pdf</a>