

Reclamation Manual

Directives and Standards

Subject: Continuity of Operations (COO)

Purpose: Ensures that essential Reclamation operations and activities are continued in the event of an emergency or threat of an emergency at any Reclamation office/facility. This requires identification of functions that would have to be performed during and after such an emergency, development of plans for performing these functions, and development of the capability to execute those plans.

Authority: Presidential Decision Directive (PDD) 67, *Enduring Constitutional Government and Continuity of Government Operations*, October 1998; 41 CFR 101-20 *Management of Buildings and Grounds*; 29 CFR 1910.38, *Employee Emergency Plans and Fire Prevention Plans*; 36 CFR 1236, *Vital Records During an Emergency*; Federal Preparedness Circular 60, *Continuity of the Executive Branch of the Federal Government at the Headquarters Level During National Security Emergencies*, November 20, 1990; Federal Preparedness Circular 64, *Continuity of the Executive Branch of the Federal Government at the Regional Level During National Security Emergencies*, November 20, 1990; Federal Preparedness Circular 65, *Federal Executive Branch Continuity of Operations*, July 26, 1999; Special Publication 800-12, *An Introduction to Computer Security: The NIST Handbook*, National Institute of Standards and Technology (NIST); and Departmental Manual (DM) Part 380, Chapter 6, *Vital Records Program*.

Contact: Director of Operations, W-6000
Dam Safety Office, D-6600

1. Responsibilities.

- A. **Commissioner/Director of Operations.** The Commissioner or Director of Operations, depending upon each individual incident, will serve as a member of the Departmental Executive Policy Team during COO incidents or emergencies. The Director of Operations will provide the COO Program Manager with an annual report on the COO activities of the Washington Office. The Director of Operations will assign a COO Coordinator to write, exercise, and maintain the Washington Office COO plan.
- B. **Director.** Each Regional Director will provide a brief annual report on COO activities within their region at the annual Dam Safety Assessment Meeting [Reclamation Manual (RM) FAC 01-06]. The Director of the Management Services Office will provide a brief consolidated report for all offices represented in Denver annually to the COO Program Manager on COO activities. Each Director will assign a COO Coordinator to write, exercise, and maintain their office COO plan.
- C. **Area Manager.** Each Area Manager will provide a brief annual report on COO activities for their area office and any field offices under their direction at the annual

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Dam Safety Assessment Meeting. Each Area Manager will assign a COO Coordinator to write, exercise, and maintain their office COO plan.

- D. **COO Program Manager.** The COO Program Manager position will be located in the Dam Safety Office (D-6600). This position will provide centralized expertise, guidance, and support for the COO program. The COO Program Manager will ensure that COO plans throughout Reclamation are consistent with Department of the Interior policy and guidance. The COO Program Manager will verify that COO plans are exercised, revised, and updated periodically in accordance with appropriate guidance. The COO Program Manager will prepare a consolidated COO report to be included in the Annual Dam Safety Report to the Commissioner.
 - E. **Regional Office COO Coordinator.** In addition to responsibilities as COO Coordinator, the Regional Office COO Coordinator will also have responsibilities to assist the COO Program Manager with COO oversight and evaluations of offices/facilities within their region. This regional contact will be the COO Program Manager's primary contact on COO issues with each region.
 - F. **COO Coordinator.** Each office/facility's COO Coordinator will incorporate essential functions for their office/facility that have been identified by the local management team and write, exercise, and maintain an office/facility COO plan that ensures the continued activities of their office/facility. The COO Coordinator will ensure their office/facility plan meets the requirements identified in this Directive and Standard.
2. **COO Plans.** Area, regional, Denver, and Washington Offices will:
- A. **Program Requirement.** Ensure that COO plans are developed and implemented at all offices/facilities. Each plan will include a signed certification statement by either the Area Manager, Regional/Office Director, or senior manager as appropriate.
 - B. **Minimum COO Plan Requirements.** Ensure that COO plans include the following minimum components. Plans may vary in the manner in which these components are addressed.
 - (1) **Essential Activities and Functions.** Essential activities and functions that must be performed during an emergency situation must be identified. Offices/facilities must maintain capability to perform the following minimum essential functions within 12 hours.
 - (a) Minimum essential functions are:
 - (i) provide for the safety and well being of employees, visitors, and the public;

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- (ii) maintain essential communications; and
 - (iii) retain the capability to direct emergency responses.
- (b) Additional examples of essential functions will also include management activities such as procedures for procurement, financial and property management, recording time and attendance, and similar activities.
- (c) The COO Coordinators must work closely with the Information Technology (IT) groups to identify the IT functions and activities required for the organization to perform its minimum essential functions.
- (2) **Vital Records, Systems, and Equipment.** Offices/facilities are responsible for the identification and protection of vital records, systems, and equipment, including the ability to access and use such records, systems, and equipment to perform essential activities and functions. Care should be taken to provide protection of duplicates and backups of both paper and computer records by storage in such a location that an incident will not affect both the original and the duplicate records. Vital records and systems include the COO plan and those documents and systems necessary to implement the COO plan (such as names and phone numbers of key individuals). See DM Part 380, Chapter 6, *Vital Records Program*. Vital records are divided into two categories:
- (a) Emergency operating records are vital records essential to the continued functioning or reconstitution of an organization during and after an emergency. Included are emergency plans and documents (e.g., security plans, hazardous material plans, standing operating procedures/emergency action plans, COO plans, and “as-built” drawings), orders of succession, delegations of authority, staffing assignments, selected program records needed to continue critical agency operations, as well as related policy and directives or guidelines that assist agency staff in conducting operations under emergency conditions and for resuming normal operations after an emergency.
 - (b) Legal and financial rights records are vital records essential to protect the legal and financial rights of the Federal Government and of the individuals directly affected by its activities. Examples of these records are records containing proof of ownership, financial interest (e.g., social security, payroll, retirement, insurance, accounts receivable), legal proceeding decisions, contractual obligations, and similar records. These records were formerly known as "rights-and-interests" records.

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- (c) Vital records and systems include any IT applications or systems, including special systems, such as Supervisory Control and Data Acquisition Systems (SCADA), Geographic Information Systems (GIS), etc., that are required for the organization to perform its minimum essential functions. The COO Coordinator must ensure that personnel developing the COO plan work closely with the IT group to identify and develop plans for those resources.
- (3) **Succession and Delegations of Authority.** This includes the current order of automatic succession for key management positions responsible for decision making or directional functions of the organization covered by the plan. This order of succession should include at least one successor from outside the local geographic area, any predetermined limited delegations of authority in the event of an interruption of normal operations, and sufficient information for contacting automatic successors and those with limited delegations of authority during duty and non-duty hours.
- (4) **Relocation/Alternate Work Sites.** Work sites must be identified and appropriate preparation of one or more alternate locations from which the office/facility can conduct its essential activities or functions; the number and complexity of such sites should be commensurate with the nature of potential threats and likely consequences. At least one site should be sufficiently physically and geographically separate from the primary location to ensure that essential activities and functions can be conducted regardless of the nature of the disruption. Alternate work sites must be capable of supporting staff and systems necessary to conduct essential activities or functions. Such capabilities should include, but are not limited to, communications, security, transportation, local area network (LAN)/wide area network (WAN) capability if required, and space for the emergency organization. Support staff personal needs must be accounted for also. This may include provision for shift rotation, bedding, sanitation supplies, food, personal hygiene kits, and the well-being of employees' families.
- (5) **Emergency Organization.** An emergency management team must be identified which is capable of performing essential activities and functions during an emergency. This includes the means for activating and deploying that team.
- (6) **Occupant Emergency Plan.** All COO plans must contain occupant emergency plans compliant with existing General Services Administration (GSA) regulation to safely evacuate employees in an emergency (41 CFR 101-20 and 29 CFR Part 1910.38). This would include offices that are Reclamation owned, not limited to GSA-owned buildings. Plans should include a system or means of notification of employees and the public concerning potential threats and actions that should be taken. Bilingual emergency signs and notices may be necessary based upon office/facility location and public use.

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- (7) **Identification/Accountability of Employees.** Each COO plan should contain a system or means for identifying the location and status of employees in the aftermath of an incident or event interrupting operations. Such a system or means should be sufficiently flexible to address a variety of situations and conditions.
- (8) **Communications Plan.** A system or means, with redundancy, for communicating with employees, visitors, and the public subsequent to an emergency must be developed. This would include specific duties expected of public affairs officers. Contact lists of management and essential staff must be identified and maintained.
- (9) **Information Technology Plan.** Each COO plan should identify systems and procedures for recovering vital IT applications and systems including special purpose systems, such as SCADA, GIS, etc., as soon as possible after an emergency. The systems and procedures should address the following items:
 - (a) Identification of IT applications and systems required to support minimum essential functions of the organization. Each application and system must be identified by either name or type. For example, word processing, spreadsheets, and e-mail are examples of application types; Reclamation Enterprise Maintenance Management System (REMMS) and Time and Attendance System (TAAS) are examples of application names; and Control LAN/WAN, Administrative LAN/WAN, and SCADA systems are examples of system types.
 - (b) Identification of the most likely contingencies that will adversely effect the availability of the applications or systems identified in paragraph (a), including an evaluation of the potential impact to the IT applications and systems identified in paragraph (a).
 - (c) Development of plans for recovering from a contingency including initial response, application and system restoration, and resumption of normal IT application and system operations. The plans should include specific steps required for each phase of recovery from a contingency, locations of backup media, and the person or position responsible for performing the required steps. The IT plan can refer to additional documentation, such as IT backup and restore procedures, to provide the procedures and steps required for recovery from a contingency provided the locations of such documentation are listed in the plan.
 - (d) Development of plans for moving IT applications or systems off site, including the identification of LAN/WAN requirements, uninterruptible

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power requirements, and any other requirements specific to IT applications and systems.

- (e) Development of any requirements for training IT personnel to implement the IT plan in the event of a contingency.

(10) **Restoration.** A plan or means for restoring normal functions as soon as is practicable and prudent must be included in the COO plan. This should include predetermining and assigning responsibilities to a restoration team and identifying restoration and cleaning contractors. If an office/facility has any special needs such as computer facilities, specialized contractors and equipment sources should be predetermined.

(11) **Training and Exercises.** A program for training and exercises for all managers and employees potentially affected by disruptions to operations and for all staff with specific responsibilities during an interruption of normal activities must be included in the COO plan. See paragraph 3 for details.

C. **Annual Review and Revision.** Ensure that COO plans are reviewed at least annually or more frequently when there are significant changes. Plans are revised or updated following these reviews and each exercise, drill, or actual event when the COO plan is implemented. Reviews will include the specific identified essential functions and procedures as well as the names, communication information, and emergency organization. See the Checklist (available from the COO Program Manager, D-6600) for required items.

D. **Prevention and Mitigation.** Each office/facility preparing a COO plan will take appropriate and prudent measures (including consideration of cost-effectiveness) to reduce risks or threats, to minimize the consequences of interruption of normal activities, and to improve the capability of the organization to perform essential activities and functions. Examples of such measures include installation of security systems, off-site storage of vital records, off-site storage of computer backups, installation of fire protection systems, or permanent relocation of offices away from vulnerable areas.

3. **Exercises.** All Reclamation area, regional, Denver, and Washington offices will conduct exercises and testing of their COO plan based on site-specific conditions.

A. **Orientation Exercise (Seminar).** As a minimum, each office/facility is required to perform one communications drill and orientation exercise annually. The orientation exercise may be performed in conjunction with an occupant emergency plan exercise. Orientation exercises and drills should be conducted in preparation for a tabletop exercise. These drills and exercises will be performed to familiarize management and

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key staff with the COO plan and their personal responsibilities and to ensure contact information is current. Relocation sites should be checked and Memoranda of Understanding confirmed.

- B. **Tabletop Exercise.** As a minimum, each office/facility is required to perform one tabletop exercise every 3 years. These exercises will be performed to evaluate the COO plan's effectiveness. This would include:
- (1) management and key staff knowledge of their personal responsibilities;
 - (2) relocation site operational capability;
 - (3) order of succession for principal and key officials noted;
 - (4) warning, notification, and activation procedures tested; and
 - (5) essential functions identified, tested, and staffed.
- C. **Functional Exercise.** As a minimum, each Mission Essential Facility is required to conduct a functional exercise every 6 years. All Non-Mission Essential Facilities are encouraged to follow the same schedule. An actual emergency event may satisfy this exercise requirement with submission of an "After-Action" report to the COO Program Manager.
- D. **Combination Dam/Office Exercises.** At offices that operate and maintain dams and/or associated facilities, it is suggested to conduct these COO exercises in coordination with dam exercises, hazardous waste drills, or other types of emergency drills when possible or feasible.
- E. **Reports.** Actual incidents and emergencies may provide opportunities for an office/facility to receive credit for exercising a COO plan if appropriate actions have been taken. After an exercise or actual incident, a report will be written documenting the exercise or incident showing why and how the COO plan was activated or exercised. The report should include incident description, actions taken, identified strengths and deficiencies, and recommended corrective actions including a planned course of action to implement and track the recommended actions. The level of detail and information provided in this report should be sufficient to provide information to those reviewing and conducting similar exercises in the future.
- (1) **Situation Reports.** Actual incident situation reports must be submitted to appropriate management with a copy to the COO Program Manager in draft form within 24 hours of the incident. These reports may continue as a situation develops if the incident is ongoing.

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- (2) **After-Action Reports.** Final after-action reports should be submitted to appropriate management with a copy to the COO Program Manager within 2 weeks of an incident conclusion. Safety Accident and/or Incident Evaluation Reports may be used as supplemental information for this reporting requirement. Final after-action reports must be approved by the COO Program Manager to receive credit for the annual tabletop or possibly functional exercise requirement.
- (3) **Exercise Reports.** Exercise documentation reports should be submitted to appropriate management with a copy to the COO Program Manager within 2 weeks of an exercise's conclusion. During orientation exercises, drills, and tabletop exercises, COO Coordinators from other Reclamation offices/facilities may be used as observers to provide independent comments and evaluations on the exercise. This will assist other offices/facilities as well as provide corporate knowledge for possible backup operations.

4. Oversight and Evaluation.

- A. **Frequency.** Reclamation's offices/facilities will receive an onsite evaluation and verification/inspection as needed on a periodic basis based on requirements determined by the Department of the Interior. The COO Program Manager and Regional COO Coordinators will perform needed evaluations.
- B. **Certification Requirements.** See the Checklist (available from the COO Program Manager, D-6600) for required items that will be verified for each evaluation. This checklist should be presented at the annual meetings as part of each office/region's annual report. See the Director's responsibilities in paragraph 1B.

5. Classification of Offices/Facilities Within Reclamation.

A. Mission Essential Facilities.

- (1) These have been defined as headquarter offices; regional offices; offices/facilities that require 24-hour, 7-day coverage; and power facilities that have a generation capacity greater than 300 megawatt. These Reclamation offices/facilities are: Washington Headquarters, Denver Office, Great Plains Regional Office, Wyoming Area Office, Eastern Colorado Area Office, Lower Colorado Regional Office, Lower Colorado Dams Office (Hoover Dam), Mid-Pacific Regional Office, Central Valley Operations Office, Northern California Area Office (Shasta Dam), Pacific Northwest Regional Office, Grand Coulee Power Office (Grand Coulee Dam), Snake River Area Office (Black Canyon Dam), Hungry Horse Dam, Upper Colorado Regional Office, Glen Canyon Dam, and Colorado River Storage Project Control Centers.

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(2) Offices with associated dams are identified for several reasons. First, the office is at times co-located in the dam. Second, the office supplies staff and management expertise in support of the dam. Third, if any major incident were to occur at the dam, it is expected that the normal operations of the associated office would be interrupted due to the response at the dam.

B. **Non-Mission Essential Facilities.** These have been defined as all remaining area offices/facilities that are not classified as a "Mission Essential Facility." Area office COO plans should incorporate essential functions performed at field offices or dams for which they are responsible. Area offices may determine that these smaller offices require or do not require a separate COO plan.

6. Definitions.

A. **Continuity of Operations Plan.** The documented process for continuation/recovery of essential business and operation functions in the event of an unexpected disruption of service. The plan describes the preplanned sequence of events that allows for the continuation/recovery of essential business functions, operations, computer resources, networks, and facilities.

B. **After-Action Report.** A report that documents an exercise or incident showing why and how the COO plan was activated or exercised. The report should include incident description, actions taken, identified strengths, deficiencies, and recommended corrective actions, including a planned course of action to implement and track the recommended actions.

C. **Drill.** An activity designed to evaluate a single emergency response function. This involves an actual field response such as making contacts to check the information included in the communication directory. A drill's effectiveness lies in the focus on a single or relatively limited portion of the overall response system in order to evaluate and improve that function.

D. **Essential Function.** Those functions considered essential to the ongoing operation of the office/facility unit. That is, those functions, activities, and computer resources which loss, interruption, or misuse thereof would have a significant adverse impact upon the services or operations provided. Offices/facilities must maintain capability to have, at a minimum, the three essential functions [as defined in paragraph 2B(1)(a)] operational within 12 hours.

E. **Facility.** A Reclamation dam for which an emergency action plan has been developed and which Reclamation has an ongoing operation and maintenance responsibility. A facility may also be a dam, power plant, and/or office combined.

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- F. **Functional Exercise.** An activity in which participants respond in a coordinated manner to a timed and simulated incident that parallels a real operational event as close as possible. This exercise is generally conducted in an emergency operations center or incident command post, and messages are passed to the participants in written form, by telephone, radio, fax, computer, or other method of communication. The functional exercise uses information such as emergency plans, maps, charts, and other information available in a real event and creates stress by increasing the frequency of messages, intensity of activity, and complexity of decisions and/or requirements for coordination. It does not involve actual mobilization of emergency response forces in the field. Participants should include management, key agency staff, and personnel from outside organizations as appropriate.
- G. **Incident, Interruption, Emergency.** A condition or action that develops suddenly which presents a threat to a local office, facility, or community. This would include a condition that will cause an office/facility to stop or severely impair the continuity of identified essential functions.
- H. **Office.** Buildings or complexes that contain employees performing tasks in support of Reclamation's responsibilities. Examples are Washington, Denver, regional, area, and field offices.
- I. **Orientation Exercise (Seminar).** An activity designed to introduce, discuss, and update emergency planning documents, organization structure, or emergency warning system to familiarize key personnel with the emergency procedures and their responsibilities. This may be through a lecture, panel discussion, or general discussion and can include visual presentations. This should involve all personnel with a role in the plan, problem, or procedure. It should also include a review of past cases, if any, for lessons learned.
- J. **Tabletop Exercise.** An informal activity involving discussions of actions to be taken on described emergency situations. A tabletop exercise is done without time constraints which allows the participants to practice emergency situation problem solving, evaluate plans and procedures, and to resolve questions of coordination and assignment of responsibilities. A series of messages is issued to participants in the exercise, and they respond verbally to the simulated incident in a nonstressful atmosphere. This exercise should involve management, key agency staff, and personnel from outside organizations as appropriate.