
Continuity Of Operations Plan

DIVISION OF SENIOR AND ADULT SERVICES (DSAS)

Rev: December 2015

DSAS

Approval

This plan was developed in accordance with guidance in the *National Continuity Policy Implementation Plan*, dated August 2007; Continuity Guidance Circular 1 (CGC 1) , *Continuity Guidance for Non-Federal Entities (States, Territories, Tribal, and Local Government Jurisdictions and Private Sector Organizations)*, dated January 21, 2009; Continuity Guidance Circular 2 (CGC 2), *Continuity Guidance for Non-Federal Entities*, dated July 22, 2010.

The signatures below attest approval of the plan and agreement to execute the responsibilities described therein.

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1.0 INTRODUCTION

The Division of Senior and Adult Services, henceforth referred to as DSAS, is susceptible to a range hazards that could impair its ability to sustain critical services. Whether resultant from a deliberate action or a naturally occurring incident, events such as the 2003 Blackout and the tragedy of 9/11 have underscored the value in developing Continuity of Operations Plans (COOP). Recognizing the unpredictable nature of emergencies and the threat they pose to operations, DSAS developed a COOP to ensure the continuance of mission essential functions across the spectrum of potential hazards.

1.1 Purpose

The DSAS's mission is to empower seniors and adults with disabilities to age successfully by providing resources and support that preserve their independence.

To accomplish this, DSAS must ensure the continuation, or rapid resumption, of its operations during emergencies. This document outlines the strategy and resources to maintain critical services during threats or conditions that may disrupt normal operations. The overarching goal of the DSAS COOP is to restore mission essential functions within 12 hours of plan activation and ensure the capability to sustain the functions for up to 30 days.

This document is intended to be used as a supplement plan to the DSAS Contingency Plan and other emergency planning documents, including Standard Operating Procedures (SOP) and Standard Operating Guidelines (SOG).

1.2 Applicability and Scope

This COOP applies to the functions, operations, and resources of the DSAS. All DSAS personnel must maintain an awareness of the continuity policies, procedures, and responsibilities delineated within the COOP.

The DSAS COOP:

- Ensures the performance of mission essential functions and operations during natural, technological or adversarial types of emergencies and disasters.

- Addresses the four phases of continuity planning: Readiness and Preparedness, Activation and Relocation, Continuity Operations, and Reconstitution.
- Establishes guidelines to execute succession of command with accompanying authorities in the event an emergency renders DSAS leadership unable, unavailable, or incapable of performing authorities and responsibilities.
- Ensures that DSAS has alternate facilities from which to continue to perform mission essential functions during an emergency.
- Describes guidelines that allow for a timely and orderly recovery from an emergency and reconstitution of normal operations.
- Outlines plan maintenance procedures to be followed to ensure COOP effectiveness.

1.3 Situation and Hazard Vulnerability

Situated in Cuyahoga County, Ohio DSAS is vulnerable to numerous hazards, many of which could result in a disruption of all, or some, of its operations. These hazards include, but are not limited to, severe thunderstorms, floods, fires, tornadoes, HAZMAT incidents, earthquakes, severe winter weather, and public health emergencies. Based upon the results of a Hazard and Vulnerability Assessment conducted by Cuyahoga County, the County is at particular risk of severe thunderstorms, utilities disruption, flooding, HAZMAT incidents, and IT disruptions.

As emergencies typically occur without warning, continually assessing the DSAS's risk to hazards is critical. Doing so enables DSAS to apply a comprehensive, risk-based approach to continuity planning.

1.4 Planning Assumptions

This COOP is based on the following assumptions:

- The COOP may be implemented with or without warning.
- An emergency may require the relocation of organization personnel to the alternate facility.
- The COOP will be operational no later than 12 hours following activation.

- DSAS will be capable of sustaining mission essential functions for 30 days following the event.
- Some employees with assigned roles and responsibilities in the COOP may be personally impacted by the emergency and unable to work.
- All attempts will be made to provide services to clients with minimal interruptions.
- Specific DSAS procedures are delineated in the DSAS Contingency Plan

1.5 Objectives

Referencing the continuity planning objectives identified in Continuity Guidance Circular 1 (CGC 1), *Continuity Guidance for Non-Federal Entities*, DSAS continuity objectives are as follows:

- Ensure the continuous performance of mission essential functions/operations during emergencies.
- Reduce or mitigate disruptions to operations.
- Reduce the loss of life and minimize property damage and loss.
- Execute a successful order of succession with accompanying authorities in the event a disruption renders DSAS leadership unable, unavailable, or incapable of performing authorities and responsibilities.
- Ensure DSAS has a pre-identified facility where mission essential functions can be sustained.
- Protect essential facilities, equipment, records, and other assets in the event of a disruption.
- Achieve the organization's timely and orderly recovery and reconstitution from an emergency.
- Ensure and validate continuity readiness through a Continuity Test, Training, and Exercise (TT&E) program and operational capability.
- Continue to provide services to clients with minimal interruptions.

2.0 MISSION ESSENTIAL FUNCTIONS

Mission Essential Functions are defined as those functions, stated or implied, that organizations are required to perform by statute, executive order, or an organization's policy. Mission essential functions are necessary to provide vital services, exercise civil authority, and/or maintain the safety and well-being of the general populace during and following emergencies.

As part of the planning process, DSAS referenced Continuity Guidance Circular 2 (CGC 2) to identify and prioritize mission essential functions.

Prioritized Mission Essential Functions
1.) Centralized Intake Phone Line
2.) Adult Protective Services
3.) Home Health Aide Services for critical care clients
4.) Home-Delivered Meals
5.) Homemaking Services
6.) Services provided through local Senior Centers

3.0 CONCEPT OF OPERATIONS

There are a number of situations that could lead to activation of the DSAS COOP. Any event that compromises the continuation of mission essential functions or inhibits an organization's ability to operate out of their primary facility should be considered possible triggers for COOP activation. Listed below are several scenarios that could cause DSAS to transition from normal operations to COOP activation:

- DSAS's primary facility has been rendered inaccessible or inoperable by an emergency.
- The threat of an event (natural or adversarial) has prevented access to the primary facility.
- A utility failure prevents normal operations from being conducted within the primary facility.
- Services provided to seniors at community locations are compromised due to an emergency.

When confronted with a COOP activating scenario, organization leadership must determine the best course of action based on the emergency, as well as the organization's readiness posture. The implementation of the DSAS COOP consists of four phases: (I) readiness and preparedness, (II) activation and

relocation, (III) continuity operations, and (IV) reconstitution. The following sections provide detail on the processes and procedures that occur within each phase of the COOP.

3.1 Phase I: Readiness and Preparedness (Ongoing)

To ensure COOP capabilities, the DSAS actively participates in organization-level and staff-level preparedness activities.

Organization-level training activities are conducted through collaborative events, such as exercises and tests of warning/notification systems. This level of preparedness is important to routinely practice as it enhances the internal COOP capabilities of the organization as well as its ability to coordinate COOP operations with external partners.

Staff-level preparedness within the organization is achieved by preparing personnel for what to expect and what will be expected of them during COOP activation. This includes encouraging personnel to enhance their personal preparedness through the development of family emergency plans and by preparing “drive-away” kits. [Attachment A](#) may be referenced for information regarding the recommended contents of “drive-away” kits.

Staff-level preparedness is also fostered by clearly defining roles and responsibilities among staff members identified as **Continuity Personnel**. This is accomplished by supplying the applicable training and resources necessary for staff to accomplish their predefined roles and responsibilities during COOP activation.

3.1.1 Continuity Personnel

DSAS has identified the staff members in the following table as Continuity Personnel. These individuals have been assigned specific roles and duties to perform during COOP activation.

Name/Position	Responsibilities
DSAS Administrator	• Activates COOP
DSAS Business Service Manager, Executive Officer, and Deputy Administrators	• Activates COOP in absence of DSAS Administrator • Coordinate Home-Delivered meals, homemaking services and adult protective services/Centralized Intake
Procurement and Contracting Manager	• Coordinates services with contracted Senior Centers and other non-contracted community partners
Office on Aging Manager	• Develop communication plan
QA Manager	• Provide data on overall impact of emergency
Administrative Officer	• Coordinate office space availability at other Health and Human Service Agencies for DSAS staff; Coordinate transfer of Centralized Intake Line to DCFS with County DOIT
All DSAS Staff	• Register with County Ready Notify system

In order for the DSAS COOP to be a viable plan, continuity policies and procedures must be integrated into normal operations and routinely practiced. Additional information on the DSAS strategy to ensure COOP readiness is located in [Section 6.0 Training and Exercises](#).

3.2 Phase II: Activation and Relocation (0-12 hours)

Operational capability at the alternate facility should occur within 12 hours of COOP activation. This process involves transferring mission essential functions, personnel, records, and equipment to the alternate facility

Phase II prescribes the process and various methods of COOP activation. Depending on the type and severity of the emergency situation, COOP activation may be initiated in the following ways:

- The DSAS Administrator may initiate continuity activation
- The DSAS Deputy Administrator's may activate the COOP in the absence of the Administrator

3.2.1 Decision Making Process

As a scenario-driven process, COOP activation and relocation is scalable to the full spectrum of hazards and threats that could impact DSAS. Although incidents capable of disrupting operations can occur with or without warning and during or outside normal work hours; not all emergencies warrant COOP activation and relocation.

A Decision Matrix has been included below to aid in the decision-making process for COOP activation. The Decision Matrix takes into consideration the factors that influence the necessity for COOP activation, such as: projected or actual impact of incident, warning, and time of occurrence.

Decision Matrix for COOP Implementation		
	Work Hours	Non-Work Hours
Event With Warning	• Is the threat aimed at the facility or surrounding area? • Is the threat aimed at organization personnel? • Are employees unsafe remaining in the facility and/or area?	• Is the threat aimed at the facility or surrounding area? • Is the threat aimed at organization personnel? • Who should be notified of the threat? • Is it safe for employees to return to work the next day?
Event Without Warning	• Is the facility affected? • Are personnel affected? Have personnel safely evacuated or are they sheltering-in-place? • What are instructions from first responders? • How soon must the organization be operational?	• Is the facility affected? • What are the instructions from first responders? • How soon must the organization be operational?

3.2.2 Alternate Facility

Should an emergency warrant a COOP activation and relocation from the primary facility, DSAS has identified the location below as the alternate facility.

Existing/Primary Facility	Alternate Facility Address	Alternate Facility Contact	MOU/MOA in Place
13815 Kinsman Road, Cleveland, OH 44120	Any Health and Human Service location. Primary locations will be Jane Edna Hunter Building, 3955 Euclid Avenue; and Virgil E. Brown Building, 1641 Payne Ave.	DCFS and JFS Administrative Operations Managers	Yes, on file.

3.2.3 Alert and Notification Process

Plans and procedures are maintained for communicating and coordinating activities with personnel before, during, and after a COOP event.

Before an event, advisory information will be monitored by all means available. Should normal operations be interrupted by an emergency, organizational leadership will notify personnel and interdependent entities via email and phone and provide information regarding: continuity activation and relocation status, operational and communications status, and the anticipated duration of relocation.

Notifications include:

- Alternate facilities Point-Of-Contact
- Organization headquarters, if a subordinate organization
- Subordinate organizations, if an organization headquarters
- County Ready Notify System
- Phone calls to subordinates from supervisors

3.2.4 Leadership

Orders of Succession

Immediately following a COOP activating event, organization leadership may be unavailable or incapacitated. Implementation of orders of succession may be necessary as a result various circumstances including, but not limited to; the

death or illness of an incumbent, absence due to work or vacation, or inability to report to work as a result of inaccessible roadways.

Pre-identifying orders of succession is critical to ensuring continuous leadership during an emergency. In the event an incumbent is incapable of fulfilling his or her duties, DSAS has identified successors for key leadership positions in the following table.

Orders of Succession	Responsibilities	Limitations
1.DSAS Administrator	Oversee all operations of DSAS	Absence or inability to report for duty
2. DSAS Business Service Manager,	Continue day to day operations	Absence of Administrator
3, DSAS Executive Officer	Continue day to day operations	Absence of Business Services Manager
4, DSAS Deputy Administrators	Continue day to day operations	Absence of Executive Officer
5, DSAS Administrative Officer	Continue day to day operations	Absence of Deputy Administrators

Delegations of Authority

Generally, DSAS's pre-determined delegations of authority will take effect when normal channels of direction are disrupted and terminate when these channels have resumed.

The positions listed below, are delegated authority to exercise the powers and perform the duties of the DSAS Administrator in case of absence, inability to perform, or vacancy of the office.

Type of Authority	Position Title Holding Authority	Triggering Conditions
1. DSAS Business Service Manager Executive Officer and Deputy Administrators	Continue day to day operations	Absence of Administrator
2. DSAS Administrative Officer	Continue day to day operations	Absence of Administrator and Deputy Administrators

3.3 Phase III: Continuity Operations (12 hours – Termination of Emergency)

Upon activation of the COOP, continuity personnel will be dispatched to the alternate facility to ready the site for operation. This preparation includes establishing connectivity for **mission critical systems** and **interoperable communications**, and ensuring the transfer/ availability of **essential files, records, and databases**.

The DSAS Administrator or designee, will order the cessation of operations within the primary facility upon the successful transfer of mission essential functions to the alternate facility.

Staff arriving at the alternate facility will follow any established check-in procedures. Once personnel have been checked-in, they will conduct initial activities including:

- Receiving all applicable instructions regarding COOP duties and the use of systems and equipment
- Monitoring and assessing the situation that prompted the COOP activation and relocation
- Establishing and maintaining necessary channels of communication
- Ensuring the performance of mission essential functions
- Planning and preparing for reconstitution

3.3.1 Mission Critical Systems

It is imperative that all systems critical to the DSAS mission essential functions be available during a COOP activation. Information regarding DSAS's critical systems is listed below.

System Name	Current Location	Other Locations	Person(s) responsible for system sustainment
Centralized Intake Phone Line	DSAS Administrative Offices	Jane Edna Hunter Building, 3955 Euclid Avenue	DSAS Administrative Officer
Home Health Aide Management System (HHAMS)	DSAS Administrative Offices	JFS Buildings with an available server	DSAS Administrative Officer

3.3.2 Interoperable Communications*

Various means of interoperable communications must be available at both the primary and alternate facilities. Information regarding the communications systems necessary for the performance of DSAS's mission essential functions is documented below.

Communication Equipment	Provider	# Available at Alternate Facility	Communication Needs at Alternate Facility
Landline Phones	N/A	Yes	Yes
Faxes	N/A	Yes	Yes
Network Connectivity	N/A	Yes	Yes
Data Lines/Jacks	N/A	Yes	Yes
Computers (laptops, PCs, etc.)	N/A	Yes	Yes
Printers	N/A	Yes	
E-mail	N/A	Yes (pending server move)	
Internet/Wireless/ Broadband	N/A	Yes	
Radio (i.e. 800MHz)	N/A		

* Services indicated are at alternate JFS sites

3.3.3 Essential Files, Records, and Databases

The files, records, and databases listed below have been determined essential in the performance of DSAS's mission essential functions.

Essential File	Method of Record	Current Location	Back-up/Redundancy	Person(s) responsible for retrieval
All DSAS program databases on DSAS Server	Electronic	DSAS Administrative Offices	Will occur if outages are expected to last more than 4 hours	DOIT

3.4 Phase IV: Reconstitution

Within 24 hours of relocation to the alternate facility, operations will be initiated to assess the restoration and recovery of the primary facility. This process will only occur after the appropriate authorization is received declaring that the emergency is over. Once the emergency situation has ended the organizational leadership will determine the status of the primary facility. Determining the extent of damages and time needed for repairs will enable informed decision making early in the reconstitution phase.

During the reconstitution phase, one or a combination of the following options may be implemented depending on the circumstances following the emergency situation:

- Continue the performance of mission essential functions from the alternate facility for up to 30 days
- Initiate transition back to primary facility (Preferred Option)
- Begin establishing reconstitution of normal operations from a different facility

Prior to the decision to return to the primary facility or relocate to another location; security, safety, and health assessments will be performed to establish facility suitability. Additionally, mission critical systems and equipment at the new facility, or restored primary facility, will also be assessed. Once the determination is made regarding whether to return to the primary facility or relocate to a different facility, the following actions will occur:

- Notify personnel that the emergency or threat has subsided
- Issue notifications to appropriate offices and organizations regarding status
- Develop a time-phased plan to prioritize functions and projects for resuming normal operations.
- Transition of all mission essential functions, personnel, equipment , and records to the new or restored primary facility

Once the necessary personnel, systems, and records are in place at the new or restored primary facility, all mission essential functions will be transferred from the alternate facility and normal operations will be resumed.

4.0 BUDGETING AND ACQUISITION OF RESOURCES

DSAS budgets for and acquires resources and capabilities necessary for continuity operations based on the current Cuyahoga County procurement policies and other applicable directives.

5.0 PLAN DEVELOPMENT AND MAINTENANCE

The DSAS COOP will be reviewed and updated annually. The DSAS Administrative Officer will oversee the maintenance of the COOP and document all revisions in the Record of Changes table on page iii. Situations that prompt updates to the COOP include:

- The release of new COOP guidance
- Conditions within the existing Plan have changed
- Revisions/updates are identified in the after-action report following an exercise or actual event
- Organization risk conditions have changed

6.0 TRAINING AND EXERCISES

Testing, training, and exercising helps to identify improvements to DSAS's COOP policies, procedures, systems, and facilities. Periodic testing and exercising also ensures that equipment and procedures are maintained in a constant state of readiness.

After exercising the COOP, an After Action Report (AAR) will be completed to review the effectiveness of the Plan and identify areas for improvement.

Attachment B contains the DSAS's COOP Program Testing, Training, and Exercises Multi-Year Strategy.

ATTACHMENT A: Drive-Away Kits

A Drive-Away Kit should include copies of all relevant emergency planning documents for DSAS. If possible, it is advisable to maintain a laptop computers loaded with the documents.

If available, hard copies of forms and documents needed to continue mission essential functions should be included in the kits in the event of a power outage.

Continuity personnel should also maintain a personal Drive-Away Kit that includes personal care items, such as;

- A change of clothing
- Personal hygiene items (soap, shampoo, etc.)
- Drinking water
- Non-perishable food/snacks
- Eating utensils
- Flashlight
- Batteries
- Portable radio
- Blanket
- First aid kit/first aid items
- Prescription medicines
- Contact lenses and solution

Additional information on Drive-Away Kits can be found by visiting www.ready.gov.

ATTACHMENT B: COOP Testing, Training, and Exercises Multi-Year Strategy

Activity	Tasks	Frequency
Plan update and certification	- Review entire plan for accuracy - Incorporate lessons learned and changes in policy and philosophy - Manage distribution of plan updates	Annually
Maintain and update Orders of Succession	- Obtain names of current incumbents and designated successors - Update Delegation of authorities	Annually
Maintain alternate facility readiness	- Check all systems - Verify access codes and systems - Cycle supplies and equipment as needed	Quarterly
Review and update supporting Memoranda of Understanding/Agreements	- Review for currency and new needs - Incorporate changes, if required - Obtain signature renewing agreement or confirming validity	Annually
Train new staff member designated as "continuity personnel"	- Provide an orientation and training class - Schedule participation in all training and exercise events	Within 30 days of appointment
Orient new policy officials and senior management	- Brief officials on COOP - Brief each official on his/her responsibilities under the COOP	Within 30 days of appointment
Plan and conduct exercises	- Conduct internal exercises - Support and participate in interagency exercises	Annually or as needed

ATTACHMENT C: Authorities and References

Authorities

N/A

References

- Directive 51/Homeland Security Presidential Directive 20, *National Continuity Policy*, dated May 9, 2007.
- Continuity Guidance Circular 1, *Continuity Guidance for Non-Federal Entities (States, Territories, Tribal, and Local Government Jurisdictions and Private Sector Organizations)*, dated January 21, 2009.
- Continuity Guidance Circular 2, *Continuity Guidance for Non-Federal Entities: Mission Essential Functions Identification Process (States, Territories, Tribes, and Local Government Jurisdictions)*, dated July 22, 2010.
- FEMA Continuity of Operations Plan Template.
- FEMA Comprehensive Preparedness Guide 101, *Developing and Maintaining State, Territorial, Tribal, and Local Government Emergency Plans*, dated March 2009.
- The Cuyahoga County Emergency Operations Plan, dated May 2012
- The Cuyahoga County Continuity of Operations Plan, dated 2010
- The Countywide All Natural Hazards Mitigation Plan for Cuyahoga County, dated 2012

ATTACHMENT D: Definitions and Acronyms

After Action Report (AAR) – a narrative report that presents issues found during an incident or exercise, along with recommendations on how those issues can be resolved.

Alternate Facility/Location – an alternate work site that provides the capability to perform mission essential functions until normal operations can be resumed.

Alternate Facility/Location Point(s) of Contact – the individual(s) responsible for the alternate facility/location during periods of normalcy and who, upon activation of the COOP, may be required to take action to ensure that the alternate facility/location is prepared for occupancy by the Key COOP staff.

Catastrophic Event – an emergency event that renders an organization's primary facility/location unusable for a sustained period of up to or exceeding 30 days.

Contingency Staff – the personnel of the organization designated to report to the alternate facility/location during COOP implementation to ensure that the Department is able to perform its mission essential functions.

Delegated Authority – an official mandate calling on the individual holding a specific position to assume responsibilities and authorities not normally associated with that position when specified conditions are met.

Devolution – the capability to transfer statutory authority and responsibility for essential functions from a department's primary operating staff and facilities to employees and facilities of other departments within the City or from another jurisdiction.

Functional Exercise – a fully simulated interactive exercise performed in real time that tests the capability of an organization to respond to a simulated event without actually moving people and equipment to an actual site.

Interoperable Communications – alternate communications that provide the capability to perform minimum departmental essential functions, in conjunction with other agencies, until normal operations can be resumed.

Key COOP Staff – staff of the Department necessary for the performance of the Department's essential functions.

Memorandum of Understanding and Memorandum of Agreement (MOU/MOA) - is a legal document describing a bilateral agreement between parties. It expresses a convergence of will between the parties, indicating an intended common line of action, rather than a legal commitment. It is a more formal alternative to a gentlemen's agreement, but generally lacks the binding power of a contract.

Mission Essential Functions – those functions, stated or implied, that organizations are required to perform by statute, executive order, or policy and are necessary to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial/economic base in an emergency.

Order of Succession – the order in which and conditions under which the responsibilities and authorities of a public official are passed to another official when the original holder of the responsibilities and authorities is unable or unavailable to exercise them.

Plan Maintenance – steps taken to ensure the COOP is reviewed regularly and updated whenever major changes occur.

Primary Facility/Location – the site of normal, day-to-day operations; the location where the employee usually goes to work.

Reconstitution – the resumption of non-emergency operations at a primary facility/location following emergency operations at an alternate facility/location.

Vital Records and Databases – data information, in hard copy or electronic format, necessary to maintain the continuity of operations during an emergency, to recover full operations following an emergency, and to protect the legal rights and interests of citizens and the government.