Continuity of Operations Plan

RECORD OF CHANGES

Change #	Date of Change	Change Entered By	Change Notes	Location/Section of Change
1.	May 5, 2023	Christopher Willis	Initial Draft	All Sections
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OVERVIEW

A Continuity of Operations Plan, or "COOP," is an effort within the Orting School District to ensure that essential functions continue to be performed during a wide range of disruptions to routine operations, including localized infrastructure outages and natural, technological, or human-caused disasters. This COOP provides a basic outline for continuity of operations program development. This is reflective of and supports the district's Emergency Operations Plan.

The Continuity of Operations Plan also includes continuity guidance for each district level department, district facility and campus. The Orting School District is committed to maintaining and rapidly restoring essential services to students, faculty, and staff in the event of an emergency or disaster. In the event of facility damage or if essential functions are disrupted, it is imperative that functions and services be resumed as quickly as possible. Support for resuming essential functions and services includes consideration for staffing, educational programs, student support, alternate facilities, records, equipment/supplies, and vendors/contracts.

CAMPUS & DEPARTMENT CONTINUITY PROGRAMS

Key personnel who are relocated under this plan are collectively known as the Emergency Operation Team. Upon activation, these team members will deploy to two possible facilities at **Washington Soldiers Home** or administrative facilities at the **Orting Quarry** if the primary facility is compromised. Upon arrival, continuity personnel will establish an operational capability and perform essential functions within 12 hours from the time of the activation of the COOP, for up to a 30-day period or until normal operations can be resumed.

Cabinet members, school principals, and department manager is responsible for School or Department Continuity Programs including development of operating guidelines and job aids to support essential functions, staff contact lists, coordinating continuity operations when activated, and completing training and testing as appropriate.

Department specific plans are developed to facilitate the continuity and recovery process for the following District departments:

- Technology
- Business Services
- Administration/Superintendent's Office

- Athletics
- Facilities/Custodial
- Food Services

- Curriculum and Instruction
- School Offices
- Human Resources

- Health Services
- Communications
- Transportation

ESSENTIAL FUNCTIONS

A critical step in developing a COOP is identifying the district's essential functions, their associated key personnel, and supporting critical systems/processes that must be sustained.

While all functions are important, each activity may not be an essential function that must be continued in a disruption.

Steps in identifying essential functions are:

1. Identify departmental and campus functions.
2. Determine essential functions - functions that have one or more of these attributes:

   - Has direct, immediate effect in preventing loss of life, personal injury, or loss of property.
   - Is essential for teaching and maintaining the educational environment.
   - Provides vital support to essential function(s) of another department.
   - Is required by law.
   - Must be continued under all circumstances.
   - Cannot suffer a significant interruption.

3. Prioritize these essential functions and list below.
4. Identify staff responsible for performing essential function by job title.
5. Identify the vital record and record location for each essential function.
6. Determine the duration of time that a function or service can be interrupted before it must be restored to an acceptable level of operation.

Essential Function	Person(s) Responsible (by Position Title)	Essential Records or IT Systems Needed	Location of Record (Network, Cabinet)	Function Restoration Needed Within….			
				0-24 Hrs.	2-3 Days	1 Week	Beyond
Emergency and Continuity Incident Management Coordination	Superintendent	District COOP and EOP, Continuity Staff Contact Information	Electronic Database and Hard Copies in Office/ EOC	☒	☐	☐	
Re-establish curriculum delivery for affected campus(s) at alternate location(s) or via home delivery using distance-learning resources	Curriculum and Instruction personnel; Education Support personnel	Education delivery technology; alternate classroom space or virtual curriculum delivery system	Shared Electronic Database	☐	☒	☐	
				☐	☐	☐	
				☐	☐	☐	
				☐	☐	☐	

District functions and services not deemed essential may be suspended to focus personnel and resources on essential functions during large scale or long-term disruption incidents.

IDENTIFICATION OF CONTINUITY PERSONNEL

During an event requiring activation of the COOP, emergency employees and other special categories of employees will be activated by the Superintendent or designee to perform assigned response duties. One of these categories is continuity personnel, which can include Incident Command Team Members, workers responsible for facilities and technology, Cabinet Members and Support Staff.

Essential Function	Minimum Staffing Requirements	Continuity Strategy/Shifts	Support Staff Requirements Number/Type	Total Staff
District Continuity Incident Management	Superintendent, PIO, Cabinet members, technology director, Facilities Director, Director of Business Services, Transportation Coordinator	Full day shift	Custodians, Technology Team, Administrative Assistants, School Resource Officer	20+

Identifying alternate district operations facilities.	Superintendent and Safety Director	Regular School Day	Available facilities and technology Staff	10+

In order to support continuity of operations, individuals assigned to support these operations must be knowledgeable about their roles and responsibilities and have the proper access, equipment, and skills. The chart below identifies key continuity staffing needs. Contact information for each staff member filling these roles is critical and should be kept updated under separate cover for privacy purposes.

The District also maintains a list of individuals who are trained and certified to support educational activities if assigned teachers and/or administrators are unavailable to support their routine or educational continuity activities.

TRAINING, TESTING, AND EXERCISES

The District must establish agreements with Pierce County Emergency Management, City of Orting conduct drills, and develop auxiliary plans to support the organization's preparedness and validate the continuity capabilities, program, and ability to perform essential functions during an emergency. The testing, training, and exercising of continuity capabilities is essential to demonstrating, assessing, and improving the district's ability to execute the continuity program, plans, and procedures.

- **Training** familiarizes continuity personnel with their roles and responsibilities in support of the performance of essential functions during a continuity event.

- **Drills** serve to assess, validate, or identify for subsequent correction, all components of continuity plans, policies, procedures, systems, and facilities used in response to a continuity event. Periodic testing also ensures that equipment and procedures are kept in a constant state of readiness.

The District performs drills events at regular intervals, as shown in the table below.

Continuity Training & Exercise Requirements	Monthly	Quarterly	Annually	As Required
Test and validate equipment to ensure internal and external interoperability and viability of communications systems.			✓	
Test alert, notification, and activation procedures for all continuity personnel.			✓	
Test primary and back-up infrastructure systems and services at continuity facilities.			✓	
Test Annexes for recovering vital records, critical information systems, services, and data.			✓	
Test and exercise of required physical security .capabilities at continuity facilities.			✓	
Meet with City of Orting, Emergency Management, Soldiers Home, and Orting Quarry Staff with respect to performance of essential functions.			✓	
Train continuity personnel on roles and responsibilities.			✓	
Conduct continuity awareness briefings or orientation for all staff			✓	
Train district/campus leadership on essential functions.			✓	
Conduct an exercise that incorporates the movement of continuity personnel to continuity facilities.			✓	
Conduct assessment of continuity plans and programs.			✓	
Report findings of all annual assessments to the Superintendent.			✓	
Conduct successor training for all district/campus personnel who assume the authority and responsibility of the district/campus leadership if that leadership is incapacitated or becomes otherwise unavailable during a continuity situation.			✓	
Train on the identification, protection, and ready availability of electronic and hard copy documents, references, records, information systems, and data management software and equipment needed to support essential functions during a continuity situation for all staff involved in the vital records program.			✓	
Test capabilities for protecting financial, sand for providing access to them from the continuity facility.			✓	

Continuity Training & Exercise Requirements	Monthly	Quarterly	Annually	As Required
Conduct personnel briefings on continuity plans that involve using or relocating to continuity facilities, existing facilities, or virtual offices.				✓
Allow opportunity to demonstrate intra- and interagency continuity communications capability.				✓
Allow opportunity to demonstrate back-up data and records required for supporting essential functions at continuity facilities are sufficient, complete, and current.				✓

The District formally documents all conducted continuity drills, including the event date, type, and participants. Documentation should include test results, feedback forms, participant questionnaires, and other documents resulting from the event. Further, the District conducts a comprehensive debriefing after each exercise, which allows participants to identify systemic weaknesses in plans and procedures and recommend revisions to the district/campus continuity operations.

HUMAN RESOURCES

It is important that all staff, especially individuals not identified as continuity personnel, stay informed and accounted for during a continuity event. The District has established procedures for contacting and accounting for employees, including their operating status, in the event of an emergency.

District employees are expected to remain in contact with their direct supervisor during any facility closure or relocation situation.

The District will provide staff with guidance in order to continue essential functions during an emergency. The District may use any of the following methods to communicate with staff during a continuity event:

- Website or social media.
- Live employee briefings.
- Voice or Text.
- Local television, radio or print media.
- Other forms of communication as necessary.

Accounting for all personnel during a continuity event is of utmost importance. To account for all staff, the District will access the checklist of all continuity personnel in the Go Kit and attempt to contact personnel that are unaccounted for. Accountability information is reported to the Superintendent. The Superintendent's Office has the responsibility of attempting contact with those individuals who are unaccounted for.

An event that requires the activation of the COOP may personally affect district staff. Therefore, the Business Office has the responsibility to create provisions and procedures to assist all staff, especially those who are disaster victims, with special human resource concerns following a catastrophic disaster.

HUMAN RESOURCE CONSIDERATIONS

The district continuity program and procedures incorporate existing district/campus- specific guidance and direction for human resource management, including guidance on pay, leave/time off, work scheduling, benefits, telework, hiring and termination, authorities, and flexibilities. The Human Resources Director has the responsibility for district human resource related issues.

The Superintendent or designee work closely with the Human Resources Office to resolve human resource issues related to continuity activities. The Human Resources Director serves as the district liaison to work with the Continuity Coordinator or Continuity Manager when developing or updating the district's Emergency Operations Plan.

CONCEPT OF OPERATIONS

The Concept of Operations section explains how the district will implement its continuity plan, and specifically, how it will address each continuity element. The district's continuity implementation process should include the following four phases: readiness and preparedness, activation, continuity operations, and reconstitution**.**

A. Readiness and Preparedness Phase

The Orting School District will participate in the full spectrum of readiness and preparedness activities to ensure personnel can continue essential district functions in a multi- hazard environment. Orting School District readiness activities are divided into two key areas:

- District readiness and preparedness
- School readiness and preparedness

1. District Readiness and Preparedness

The Safety Director takes the lead for developing and maintaining overarching district disaster readiness and preparedness plans and training including (but not limited to):

- District Emergency Operations Plan (EOP)
- Assisting district departments and campuses to develop and maintain their site-specific emergency operations plans and procedures
- Coordinating emergency management training for personnel

2. Campus Readiness and Preparedness

School District Staff will prepare for a continuity event and plan in advance for what to do in an emergency.

Activation Phase

To ensure the ability to attain operational capability at alternate facilities and with minimal disruption to operations, the district will execute activation plans as described in the following sections.

1. Decision Process Matrix

The District COOP will be activated by the Superintendent, or designee, based on a hazard or an emergency directed at the district.

If an incident only affects a single district campus, the principal in collaboration with the superintendent and Safety Director has the authority to activate their school continuity procedures.

The activation of the COOP is a situation-driven process that allows flexible and scalable responses to multi-hazard incidents that could disrupt operations with or without warning and during work or non-work hours. Activation of the COOP will not be required for all emergencies or disruptions, since other actions may be more appropriate.

The decision to activate the School District's COOP and related actions will be tailored for the situation and based on projected or actual impact. There may or may not be advanced warning, depending on the disaster. To support the decision-making process regarding plan activation, key organization personnel will use the decision matrix below.

Business Hours	Non-Business Hours
- Is the hazard aimed at the facility or campus area? - Is the hazard aimed at school personnel? - Are employees unsafe remaining in the facility and/or school area?	- Is the hazard aimed at the facility or campus area? - Is the hazard aimed at campus personnel? - Who should be notified of the hazard? - Is it safe for employees to come to work the next day?
- Is the facility/campus affected? - Are personnel affected? Have personnel safely evacuated or are they sheltering-in-place? - What are instructions from first responders? - How soon must the district be operational?	- Is the facility/campus affected? - What are instructions from first responders? - How soon must the district be operational?

As the decision authority, the District Superintendent will be kept informed of the situation and will evaluate all available information relating to:

- Direction and guidance from local/state/federal emergency authorities.
- Incident status of on-campus institutions.
- The health and safety of personnel
- The ability to execute essential functions.
- Changes in hazard advisories.
- Intelligence reports.
- The potential or actual effects on campus power infrastructure, communications/information systems, office facilities, and other vital equipment.
- The expected duration of the emergency situation.

2. Alert and Notification Procedures

The Orting School District maintains plans and procedures for communicating and coordinating activities with personnel before, during, and after a continuity event.

Before an event, the superintendent and COOP personnel will monitor potential hazard information, including (but not limited to):

- Relevant social media and news outlets.
- NOAA/NWS.
- Intelligence provided by local/state/federal public safety agencies.
- On-campus emergency alarms and notification systems.
- Pierce County Emergency Operations

In the event normal operations are interrupted or an incident appears to be imminent, Orting School District will communicate the campus' operating status with all stakeholders per the provisions of the District Communications Plan.

Upon the decision to activate the COOP, the district will notify all affected and interdependent campus entities with information regarding continuity activation status, operational and communications status, and the anticipated duration of relocation(s).

3. Relocation Process

Once the COOP is activated and personnel are notified, the district will relocate critical personnel and essential operational functions to an alternate facility(s) if necessary. Continuity Operations Phase

Upon activation of the COOP, all District departments will continue to operate at their home operating facilities (if safely possible) until ordered to cease operations by the Superintendent's Office. At that time, affected departments' essential functions will transfer to their alternate facility or remotely from individual homes. School District should ensure that the COOP can be operational within 12 hours of plan activation.

First arriving department critical personnel at the alternate facility will prepare the site for essential function operations. Upon arrival at the alternate facility, critical personnel will:

- Ensure infrastructure systems, such as lighting, power, water, sanitation (bathrooms), and climate control (if applicable) are functional.
- Ensure communications and network connections are in place and functional.
- Verify all department critical personnel are on-duty, or en-route, and are aware of the move to the alternate facility.
    - o The current supervisor on site at the alternate facility will be responsible for verifying department personnel accountability (critical and support), and ensuring they are updated on current communications (department radio channels and phone numbers), and department leadership (who is in charge of the department operations at that time).
- Notify the Superintendent's Office (through the department head) when said department has resumed essential functions at the alternate facility.
    - o If resumption of department essential functions will be delayed at the alternate facility, notify the Superintendent's Office immediately to give a status report and request additional resources as needed to restore department essential functionality.

A requirement of each department head is to account for all personnel under their authority. Each district department will outline a process of personnel accountability in their department continuity procedures. This process may include using call-down telephone trees, email, or text verification. The accountability process should also include what to do about department personnel who are unaccounted for.

During continuity operations, Orting School District may need to acquire necessary personnel, equipment, and supplies that are not already in place for continuity operations on an emergency basis and/or to sustain operations for up to 30 days or until normal operations can be resumed. The Superintendent's Office maintains the authority for emergency procurement.

B. Reconstitution Operations Phase

Within 48 business hours after receiving approval from the appropriate emergency services, and health and safety authorities that the incident has ended and is unlikely to immediately reoccur, reconstitution will begin. The School District will initiate a reconstitution plan, and begin to coordinate operations to salvage, restore, and recover the district's primary operating functions and department home facilities.

The superintendent or designee will be designated for all phases of the district/campus reconstitution process, and each district/campus department will designate a reconstitution point-of-contact (POC) to work with the superintendent or designee and to coordinate and communicate developments regarding department reconstitution statuses.

During continuity operations, the superintendent or designee should determine the status of the department/facility(s) affected by the event as soon as practical (once all essential district functions have been restored). Upon obtaining the status of the facility(s), the superintendent or designee will determine how much time is needed to repair departments' home operating facility and/or acquire a new facility.

These reconstitution plans are viable regardless of the level of disruption that originally prompted implementation of the COOP. Once the appropriate district authority has made this determination, one or a combination of the following options may be implemented, depending on the situation:

- The affected department(s) continues to operate from its alternate facility(s).
- Reconstitute the affected department(s) home operating facility(s) and begin an orderly return to said facility(s).
- Begin to establish a reconstituted affected department(s) in another facility or at another designated location.

1. Reconstitution Planning Levels

Reconstitution planning levels have been created to focus and support the reconstitution planning process. A description of the levels is provided in the table below:

Reconstitution Level	Description
Level 1: Operational Planning	**The primary operating facility has suffered no damage or has been minimally damaged.** Planning for this level of disruption focuses on returning operations to the primary operating facilities, which includes restoring normal operations with personnel, records, and equipment at the primary operating facility once the incident or disruption has ended. This level generally would last less than 30 days.
Level 2: Short-Term Planning	**The primary operating facility has been moderately damaged.** Planning for this level of disruption focuses on moving operations to a temporary operating facility, which includes restoring normal operations with personnel, records, and equipment at a temporary operating facility. This level generally would last from one-to-six months.
Level 3: Long-Term Planning	**The primary operating facility has been severely damaged or damaged beyond repair.** Planning for this level of disruption focuses on moving operations to a new or temporary primary operating facility, which includes restoring normal operations with personnel, records, and equipment at a new or rebuilt operating facility. This level generally will last six months or longer.

2. Returning to Full Operations

Before relocating back to the primary operating facility or another facility, the local law enforcement agency, environmental and safety, and facility services will conduct appropriate security, safety, and health assessments to determine building and/or workspace suitability. In addition, the district will verify that all systems, communications, and other required capabilities are available and operational and that the affected district department(s) is fully capable of accomplishing its normal functions and operations at the new or restored home operating facility.

Upon a decision by the Superintendent's Office or designee that the home operating facility of the affected department(s) can be reoccupied or that the department(s) will be re-established in a different facility:

- The Superintendent or designee and the head(s) of the affected department(s) will develop space allocation and facility requirements for their affected department(s).
- The head(s) of the affected department(s) will notify their personnel that the emergency has passed, and will develop procedures, as necessary, for restructuring/reassigning their staff in support of the reconstitution process.

Upon verification that the required capabilities are available and operational and that the affected department(s) is fully capable of accomplishing all normal functions and operations at the new or restored facility, the head(s) of the affected department(s) will begin supervising a return of personnel, equipment, and documents to the department's permanent operating facility.

District Human Resources will develop processes for receiving and processing employee claims during the continuity event, including personnel claims (such as workers' compensation, compensation for injuries, overtime pay, etc.) and replacing lost or broken equipment.

The district will conduct an After-Action Review (AAR) once back in full operating functionality. The Superintendent's Office is responsible for initiating and completing the AAR, and all affected departments and schools will have the opportunity to provide input to the report. The AAR will address the effectiveness of the continuity plans and procedures, identify areas for improvement.

BUDGETING AND ACQUISITION OF RESOURCES

As part of the budget process, the District utilizes a risk management methodology to identify, prioritize, and justify the allocation of budgetary resources.

CONTINUITY COMMUNICATION & KEY EXTERNAL CONTACTS

The District recognizes communication as a critical component of successful management of an emergency and continuity of operations. The District has identified primary and alternate modes of communication in the district's Emergency Operations Plan (EOP) and will use those capabilities in support of internal and external communication for continuity of operations.

EMERGENCY ORDER OF SUCCESSION

One of the fundamental principles of continuity planning is to maintain leadership in the event of

an emergency by establishing an order of succession in the event the district, department or campus leaders are not available during an emergency. Orders of Succession run from three to five deep utilizing position titles rather than individual names.

Continuity succession is critical in the event leadership is debilitated or incapable of performing their legally authorized duties, roles and responsibilities. The following predetermined Orders of Succession is designed to allow for an orderly, and predefined, transition of leadership within the district. Successors to the Superintendent, will serve only until the Board of Directors designates a replacement.

GO-KITS

Each department and campus is responsible for having available items such as checklists, contact lists, files important to department or campus continued operation, and any other specialized items essential to coordinate an effective response during an emergency and provide for the rapid resumption of essential functions.

Example for a Department or Campus Go-Kit

Department/School Go-Kit	
- District identification badge - Communication equipment - Organization cell phone - Personal cell phone - Hard copies of student records - Reunification material - COOP - Directions to continuity facility - Master contact lists	- District and emergency contact numbers - Nurses medical kit - Chargers/extra batteries for phones, GPS, and laptop - AED, first aid kit - Maps of surrounding area - Flashlight - Emergency Operations Plan - Educational materials/ supplies - Pens, pencils and paper
•	•
•	•
•	•

Individual office staff members and teachers should build similar go-kits to include essential work or teaching materials.

VITAL DATA, INFORMATION SYSTEMS & ESSENTIAL RECORDS MANAGEMENT

Planning for resumption of vital information technology (IT) applications, data, hardware, communications (such as networking) and other IT infrastructure is an important part of the district's comprehensive planning process. As such, IT Disaster Recovery Guidelines and processes focus on supporting these needs rather than identifying limitations.

Essential records refer to information systems and applications, electronic and hard copy documents, references and records, including sensitive data, needed to support essential

functions during a continuity incident. These records include information needed to protect the legal and financial rights of the District and its staff. The District has incorporated its essential records program into the overall continuity program, plans and procedures. The District Records Management Program is responsible for coordinating support of records management into the COOP.

The back-up and off-site storage of vital data and essential records listed in the IT Disaster Recovery Plan and Records Management Retention Schedule are coordinated between the IT department and records management staff in conjunction with input by each district operation or support department.

CONTINUITY FACILITIES

When a district facility is lost due to an incident, continuity facilities will be needed to support district essential functions. Potential continuity facility locations should be pre-identified to include: Use of noneducational sites; consolidating within other district educational facilities or via agreement with external partners such as local community centers or other partner school districts, and/or facilities owned or operated by private or nongovernmental sectors.

Continuity operations could include alternate uses of existing facilities or virtual options for the relocation of campus-level educational activities or key district leaders and support staff.

The District has assessed the organization's essential functions to identify which functions the district must conduct onsite and which functions, if any, district staff can conduct via telework, including evaluating the use of telework for supporting extended continuity operations.

The District must identify locations that may serve as continuity facilities. Locations should be evaluated where the potential disruption of the organization's ability to initiate and sustain operations is minimized. This section should identify alternate facilities, and the infrastructure or resources needed to conduct essential functions at these facilities.

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