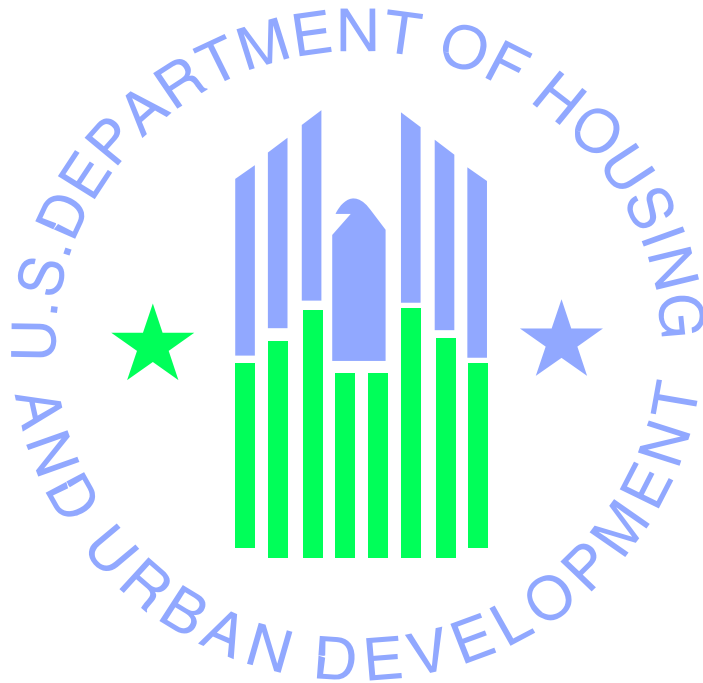


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U.S. Department of Housing
And Urban Development
451 7th Street SW
Washington DC 20410

***DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT***



CONTINUITY OF OPERATIONS (COOP)

HANDBOOK 3205.1

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U.S. Department of Housing and Urban Development

Special Attention of:Principal Organization Heads and
Regional Directors**Transmittal** for Handbook No.: **3205.1****Issued: April 20, 2005**

1. This Transmits:
The handbook 3205.1, HUD Continuity of Operations (COOP).

2. Summary:

The HUD Continuity of Operations (COOP) Handbook provides policy and guidance to managers, supervisors, and staff on the development and updating of COOP Plans that are required of each Federal department and agency. It implements the provisions of Presidential Decision Directive 67 (Enduring Constitutional Government and Continuity of Government Operations), and the new Federal Preparedness Circulars (FPC) 65 (Federal Executive Branch Continuity of Operations), which incorporated FPC 66 (Test, Training, and Exercise), and FPC 67 (Acquisition of Alternate Facilities for COOP). The Handbook provides detailed guidance on the HUD Continuity of Operations program that will enable the Department to continue to perform its essential functions under all circumstances.

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HANDBOOK**HUD CONTINUITY OF OPERATIONS (COOP)**

CHAPTER 1. HUD CONTINUITY OF OPERATIONS (COOP)

- 1-1 Purpose.** This Handbook implements the Federal Preparedness Circular (FPC) 65, Federal Executive Branch Continuity of Operations (COOP), dated June 15, 2004. Federal Preparedness Circular 65 provides guidance to Federal Executive Branch departments and agencies for use in developing contingency plans and programs for COOP. COOP planning facilitates the performance of HUD's essential functions during any emergency or situation that may disrupt normal operations. With the information contained in this handbook, HUD organizations have guidance for COOP for use in developing and updating COOP plans. FPC 65 provides the following policy and guidance:
- a. To have in place a comprehensive and effective program to ensure the continuity of essential Federal functions under all circumstances.
 - b. For the acquisition of alternate facilities to support COOP.
 - c. To ensure the execution of essential functions in the event that emergency relocation of any department or agency organizational element is required.
 - d. For the development of a viable and executable TT&E program to support the implementation and validation of COOP plans.
 - e. For a comprehensive plan to account for and respond to the threats faced by HUD employees during a COOP event.
 - f. To familiarize HUD managers with the many human capital resources and flexibilities that exists to assist them during an emergency.
 - g. To identify essential functions and determine necessary resources to facilitate there immediate transfer to a devolution site.
 - h. To provide for a plan to transition from COOP status to normal operations once a threat or disruption has passed.
- 1-2 Policy.** Presidential Decision Directive (PDD) 67 established the requirement that all Federal Executive Branch departments and agencies have in place a comprehensive and effective program to ensure the continuity of essential Federal functions under any circumstances. To support this policy the Federal Executive Branch has implemented the COOP Program. COOP is defined as the activities of individual departments and agencies and their sub-components to ensure that their essential functions are performed. This includes plans and procedures that delineate essential functions; specify succession to office and the emergency delegation of authority; provide for the safekeeping of vital records and databases; identify alternate operating facilities; provide for interoperable communications; and validate the capability through tests, training, and exercises. All

Federal agencies, regardless of location, shall have in place a viable COOP capability from alternate operating sites during any emergency or situation that may disrupt normal operations. Additionally, each Federal Executive Branch agency is responsible for appointing a senior executive as a coordinating agent for COOP activities, to include planning, programming, and budgeting for a viable and executable COOP program that conforms to this FPC.

1-3 Background. Today's changing threat environment and the potential for no-notice emergencies, including localized acts of nature, accidents, technological emergencies, and military or terrorist attack-related incidents, have increased the need for COOP capabilities and plans that enable agencies to continue their essential functions across a broad spectrum of emergencies. As a baseline of preparedness for the full range of potential emergencies, all HUD organizations must have in place viable COOP plans and procedures that ensure the continuity of performance of essential functions during any emergency or situation that may disrupt normal operations.

1-4 Objectives. COOP planning is an effort to ensure that the capability exists to continue essential HUD functions across a wide range of all hazard emergencies. The objectives of a viable COOP plan include:

- a. Ensuring the performance of a HUD's essential functions/operations during a COOP event;
- b. Reducing loss of life, minimizing damage and losses;
- c. Executing, as required, orders of succession to office with accompanying authorities
- d. Reducing or mitigating disruptions to operations;
- e. Ensuring that HUD has alternate facilities from which to continue to perform
- f. its essential functions during a COOP event;
- g. Protecting essential facilities, equipment, vital records, and other assets;
- h. Achieving a timely and orderly recovery from an emergency and reconstitution of normal operations; and
- i. Ensuring and validating COOP readiness through a dynamic, integrated test, training, and exercise program to support the implementation of COOP plans.

1-5 Applicability and Scope. The provisions of this Handbook are applicable to all principal organizations in HUD Headquarters, as well as Regional and Field Offices.

1-6 Supersession. The provisions of this FPC supersede:

- a. Federal Preparedness Circular 65, Federal Executive Branch Continuity of Operations, dated July 26, 1999.
- b. Federal Preparedness Circular 66, Test, Training and Exercise Program for Continuity of Operations, dated April 30, 2001.
- c. Federal Preparedness Circular 67, Acquisition of Alternate Facilities For Continuity of Operations, dated April 30, 2001.

1.7 Authorities.

- a. The National Security Act of 1947 dated July 26, 1947, as amended.
- b. Executive Order (EO) 13243, Providing an Order of Succession Within the Department of Housing and Urban Development, dated December 18, 2001, as amended.
- c. EO 12656, Assignment of Emergency Preparedness Responsibilities, dated November 18, 1988, as amended.
- d. EO 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions, dated April 3, 1984.
- e. The Homeland Security Act of 2002 (Public Law 107-296) dated November 25, 2002.
- f. EO 12148, Federal Emergency Management, dated July 20, 1979, as amended.
- g. EO 13286, Establishing Office of Homeland Security, dated February 28, 2003.
- h. PDD 67, Enduring Constitutional Government and Continuity of Government Operations, dated October 21, 1998.

1-8 References.

- a. PDD 62, Protection Against Unconventional Threats to the Homeland and Americans Overseas, dated May 22, 1998.
- b. Presidential Memorandum dated March 19, 2002, Continuation of Order of Succession dated December 18, 2002.
- c. Title 41 Code of Federal Regulations (CFR), Section 101.20.003, Definitions, and Section 101.20.103-4, Occupant Emergency Program, revised as of July 1, 2000.
- d. Title 36 CFR, Part 1236, Management of Vital Records, revised as of July 1, 2000.
- e. FPC 65, Federal Executive Branch Continuity of Operations (COOP), dated June 15, 2004.
- f. Homeland Security Presidential Directive 3, Homeland Security Advisory System, dated March 11, 2002.
- g. Homeland Security Presidential Directive 5, Management of Domestic Incidents, dated February 28, 2003.
- h. Homeland Security Presidential Directive 7, Critical Infrastructure Identification, Prioritization, and Protection, dated December 17, 2003.
- i. Homeland Security Presidential Directive 8, National Preparedness, dated December 17, 2003.
- j. Continuity of Operations Plan for HUD Headquarters dated June 2004.
- k. Continuity of Operations Plans (COOP) for the HUD Regional Offices and Field Offices dated July 2004.

1-9 Definition of Terms.

Continuity of Government (COG). A coordinated effort within each branch of the Federal Government to ensure the capability to fulfill minimum essential responsibilities in a catastrophic emergency and to ensure the capacity to maintain an enduring constitutional government.

Continuity of Operations (COOP). An organization's internal efforts to ensure that a viable capability exists to continue essential functions across a wide range of potential emergencies. COOP plans and procedures delineate essential functions, specify succession to office and the emergency delegation of authority, provide for the safekeeping of vital records and databases, identify alternate operating facilities, provide for interoperable communications, and validate the capability through tests, training, and exercises.

COOP Coordinator. The individual in a Headquarters organization, Regional Office or Field Office designated to coordinate all COOP plan development, test, training, and exercise (TT&E), and plan implementation activities.

Continuity of Operations (COOP) Plan. A plan that provides for the continuity of essential functions of an organization in the event an emergency prevents occupancy of its primary building or other occupied space.

COOP Emergency Relocation Group (CERG). Pre-designated Headquarters (HQ), Regional, and Field Office management officials and staff, who will move to an Emergency Relocation Site (ERS) to continue HUD essential functions in the event a HUD building and/or other occupied space is threatened or incapacitated. The CERG is comprised of Initial Relocation Staff (IRS), which includes the Advanced Group and Leadership Group, plus Full Relocation Staff (FRS).

COOP Event. Emergencies, or potential emergencies, that may affect a department's or agency's ability to carry out its essential functions.

Coordinator, Emergency Relocation Site (CERS). The individual at a HUD emergency relocation site (ERS) responsible for the coordination and support of the CERG deployment at an ERS.

Critical Infrastructure Protection (CIP). Risk management actions intended to prevent a threat from attempting to, or succeeding at, destroying or incapacitating critical infrastructures. Critical infrastructures are those systems and assets so vital to the nation that their incapacity or destruction would have a debilitating impact on national security, national economic security, and/or national public health or safety.

Delegation of Authority. Specifies who is authorized to act on behalf of the D/A head and other key officials for specific purposes.

Devolution. The transfer of essential functions, as the result of a COOP event, to another organizational entity (i.e. person, office, or organization, etc.) geographically located outside the threatened or incapacitated area.

Drive-Away Kit. An easily transported set of materials, technology, and vital records that will be required to establish and maintain minimum essential operations.

Emergency Relocation Site (ERS). An existing HUD facility or external sources to house the CERG and enable the continuation of HUD essential functions in the event a HUD building and/or other occupied space is threatened or incapacitated.

Enduring Constitutional Government (ECG). A cooperative effort among the Executive, Legislative, and Judicial branches of government, coordinated by the President, to preserve the capability to execute constitutional responsibilities in a catastrophic emergency.

Essential Functions. Those functions that enable Federal Executive Branch departments and agencies to provide vital services, exercise civil authority, maintain the safety and well being of the general populace, and sustain the industrial/economic base during an emergency.

Full Relocation Staff (FRS). The management officials and staff members of the COOP CERG responsible for the execution of essential functions. Initial Relocation Staff (IRS) plus FRS constitute a complete CERG.

HUD Emergency Operations Center (HEOC). The entity responsible for receiving and communicating HUD guidance and direction during the activation and relocation phases of a COOP emergency.

Initial Relocation Staff (IRS). CERG personnel who immediately deploy to an Emergency Relocation Site (ERS) upon receiving a COOP warning or activation. These individuals initiate actions at the ERS within 12 hours in preparation for the arrival of the FRS. The full FRS plus the IRS constitute the complete CERG.

Interoperability: 1. The ability of systems, personnel, or agencies to provide services to and accept services from other systems, personnel, or agencies and to use the services so exchanged to enable them to operate effectively together. 2. The condition achieved among communications-electronic systems or items of communications-electronics equipment when information or services can be exchanged directly and satisfactorily between them and/or their users.

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

Multi-year Strategy and Program Management Plan. A process that ensures the maintenance and continued viability of COOP plans through budgetary funding.

Orders of Succession. Provisions for the assumption of senior agency offices during an emergency in the event that any of those officials are unavailable to execute their legal duties.

Primary Organization Head (POH). The senior representative of a principal HUD organizational element (i.e. Assistant Secretary, Director, Chief, etc.).

Reconstitution. The process by which surviving and or replacement agency personnel resume normal agency operations from the original or replacement primary operating facility.

Risk Analysis. The identification and assessment of hazards.

Telecommuting Locations. Those locations set up with computers and telephones that enable employees to work at a location closer to their home than their official duty station.

Test, Training, and Exercise (TT&E).

- **Test:** A demonstration of the correct operation of equipment, procedures, processes, and systems that support the COOP organization either in Headquarters or the field.
- **Training:** Instruction in individual or agency functions, procedures and responsibilities that enable staff to effectively carry out COOP responsibilities.
- **Exercise:** An evaluation of individual or organizational performance against a set of standards or objectives related to the Headquarters COOP plan, a Regional Office or a Field Office COOP plan.

Vital Databases. Information systems needed to support essential functions during a COOP situation.

Vital Records. Electronic and hardcopy documents, references, and records needed to support essential functions during a COOP situation. The two basic categories of vital records are emergency operating records and legal and financial records.

Work-at-home. When an employee carries out their work duties at their residence rather than their official duty station.

- 1-10 Point of Contact:** Should you have any questions or need additional assistance with the information contained in this Handbook, please contact the Director of the Emergency Planning and Management Division, the Office of Security and Emergency Planning, HUD Office of Administration, at (202) 708-5555

CHAPTER 2. RESPONSIBILITIES

2-1 General. The following responsibilities guide development of HUD COOP plans:

- a. The Secretary has overall responsibility for the development of viable and executable contingency plans for COOP.
- b. The Assistant Secretary for Administration has the lead in COOP development and planning for the Department.
- c. Each Headquarters Program Office COOP Coordinator is responsible for development and maintenance of a current COOP Implementation Plan for his/her office that identifies its essential functions and the individuals needed to support them, consistent with the guidance provided by this handbook and FPC 65.
- d. Regional Directors are responsible for development of a Regional Office COOP plan and oversight of the development of all Field Office COOP plans within their jurisdiction.
- e. Field Office Directors are responsible for development of Field Office COOP plans.
- f. Regional and Field Office Program Directors are responsible for providing all required information and support to their Regional Directors and Field Office Directors in all phases of COOP plan development, test, training, and exercise, and plan implementation. They must ensure appropriate coordination with the COOP Coordinators in their respective Headquarters program office.
- g. The Secretary, Regional Directors, and Field Office Directors are responsible for executing their respective COOP plans.
- h. The Directors, Administrative Service Centers (ASC) and Directors, Administrative Resource Divisions (ARD), are responsible for providing direct support to the Regional and Field Office COOP Coordinators in developing those portions of the COOP plans falling within Administration's area of responsibility. These include: space, furniture, office supplies and equipment, building security, telecommunications, data systems, information technology and connectivity, procurement, transportation, lodging, and general administrative support.
- i. All Regional Directors will develop a COOP Multi-Year Strategy and Program Management Plan for their Region and Field Offices that includes a program budget to support a viable COOP capability for their region. This plan should be coordinated with the Director of their respective Administrative Service Center and the Assistant Deputy Secretary for Field Policy Management, Headquarters HUD.
- j. All HUD organizations, both in the Headquarters and the field, will participate in interagency COOP exercises to ensure effective interagency coordination and mutual support.
- k. Administration and Information Technology (IT) staffs assigned to Field Offices are responsible for assisting Field Office Directors and Regional Office COOP Coordinators in identifying and addressing all Administration and IT resources required for developing a viable Field Office COOP plan.

2-2 Responsibilities.**a. The Assistant Secretary for Administration will:**

1. Serve as the lead in planning the HUD COOP program.
2. Develop and maintain the HUD Headquarters COOP Plan.
3. Maintain copies of Headquarters program office COOP Implementation Plans.
4. Coordinate the annual review/update of COOP plans.
5. Coordinate the development of COOP plans and procedures that will enable designated Regional Offices to temporarily assume HUD HQ duties.
6. Provide technical assistance, as necessary, to the ASCs, local Administration staff, and Regional and Field Office COOP Coordinators in developing their COOP plans.
7. Maintain copies of Regional Office and Field Office COOP plans.
8. Develop a HUD COOP Test, Training and Exercise (TT&E) program.
9. Develop COOP notification procedures for disseminating instructions regarding COOP.
10. Schedule and conduct periodic training and exercises related to the execution of HUD COOP plans.
11. Conduct periodic assessments of HUD COOP capabilities to include exercises, emergency notifications, and evaluations.
12. Coordinate HUD COOP security, safety, and health requirements.
13. Provide guidance on the management of vital HUD records.
14. Coordinate the development of plans and schedules for the orderly transition of all HUD essential functions, personnel, equipment, and vital records from an emergency Relocation Site (ERS) to a new or restored HUD HQ facility.
15. Develop a COOP Multi-Year Strategy and Program Management Plan that includes a program budget to support a viable COOP capability.
16. Participate in interagency COOP exercises to ensure effective interagency coordination and mutual support.
17. Develop and maintain a HUD Remedial Action Program (ERAP).
18. Coordinate intra-agency COOP efforts and initiatives in accordance with directives.
19. Establish and Maintain a HUD Emergency Operations Center (HEOC) that will:
 - Notify the FEMA Operations Center (FOC) and other appropriate agencies upon any implementation of COOP plans.
 - Provide updates on COOP status to the FOC as required or if the HUD's COOP status changes.

- b. **Assistant Secretaries, Regional Directors, and Field Office Directors will, as applicable:**
1. Appoint a COOP Coordinator for coordinating development and implementation of COOP plans and keeping the Office of Security and Emergency Planning or the Regional Director, as appropriate, informed of any changes in the designation of the COOP Coordinator;
 2. Identify essential functions and revalidate as necessary;
 3. Implement a Family Assistance Plan to provide CERG members advice on what to do if the COOP Plan is implemented and the CERG is deployed to an alternate location;
 4. Consider the professional qualifications and personal situations in selecting CERG members and other employees necessary for a COOP activation. Identified employees should be physically and emotionally capable of working in a high stress environment with austere support facilities;
 5. Coordinate the development of COOP plans and procedures that will enable designated Regional Offices to temporarily assume Headquarters duties and responsibilities;
 6. Pre-delegate authorities for making operational decisions, policy, and other determinations;
 7. Maintain a current roster of CERG members, designating both Initial Relocation Staff (IRS) and Full Relocation Staff (FRS);
 8. Maintain current personnel COOP notification rosters;
 9. Ensure that all CERG members understand HUD COOP plan procedures, and staff not identified as CERG members understand their responsibilities. The official status of non-CERG staff will be determined by the circumstances requiring HUD COOP plan implementation;
 10. Prepare backup copies and/or updates of vital records;
 11. Designate alternate facilities as part of their COOP plan;
 12. Designate personnel responsible for compiling and maintaining a drive-away kit, if necessary;
 13. To the extent possible, pre-position drive-away kits and other essential equipment, supplies, and materials at an ERS;
 14. Develop, initiate, and conduct a Test, Training & Exercise (TT&E) program that initiates the COOP notification plan quarterly, with and without warning, and during duty and non-duty hours;
 15. Train all CERG members and ensure their knowledge and skills are current;
 16. Identify and incorporate applicable HUDS ERAP items into annual revisions of the COOP plan;
 17. Conduct periodic coordination visits to the ERS;

18. Ensure provisions for the completion of time and attendance functions by one or more CERG members;
19. Plan, as a result of a COOP event, the devolution of essential Headquarters, Regional Office or Field Office functions to another HUD organizational entity (organization, or office) geographically located outside of the threatened or incapacitated area;
20. Regional Directors may assign responsibility to their Deputy Regional Director and/or Regional Office COOP Coordinator a broad range of COOP planning and implementation activities. However, the decision to implement the Regional Office COOP plan must be retained by the Regional Director, unless he/she is unavailable or unable to exercise this authority; and,
21. **As the Chief Technology Officer:**
 - A. Coordinate the development of COOP IT plans that detail the transition of critical HUD COOP computers, information and data systems requirements from a HUD organizational element to an ERS and from an ERS to a reconstituted facility.
 - B. Provide guidance on access to essential HUD COOP data systems at an ERS.
 - C. Develop and maintain disaster recovery plans for HUD information systems.

CHAPTER 3. PLANNING PRINCIPLES

3-1 Planning Guidance. The implementation of the COOP plan involves the deliberate and pre-planned movement of selected key principals and supporting staff to an alternate operating facility. Relocation may be required to accommodate a variety of emergency scenarios. Examples include scenarios in which:

- a. HUD Headquarters is unavailable and operations can shift to a regional or field location.
- b. A single HUD facility is temporarily unavailable and the HUD program offices can share one of HUD's facilities or that of another agency; or
- c. Many, if not all, HUD offices must evacuate the immediate area.

While these scenarios involve the unavailability of a facility, the distinction must be made between a situation requiring evacuation only and one dictating the need to implement COOP plans. HUD Headquarters should develop an **executive decision process** that allows for a review of the emergency and determination of the best course of action for response and recovery. This will preclude premature or inappropriate activation of an agency COOP plan. COOP planning will vary, depending upon the size and responsibilities of the office, and the opportunity for devolving essential functions to other organizations and locations. There are three phases for the execution of COOP: activation and relocation, alternate operating facility operations, and reconstitution. The three phases of HUD's COOP plans will include the critical components described in this chapter.

3-2 Objectives: COOP planning is an effort to ensure that the capability exists to continue HUD's essential functions across a wide range of all hazard emergencies. The objectives of a viable COOP plan include:

- a. Ensuring the performance of HUD's essential functions/operations during a COOP event;
- b. Reducing loss of life, minimizing damage and losses;
- c. Executing, as required, successful succession to an office with accompanying authorities;
- d. Reducing or mitigating disruptions to operations;
- e. Ensuring that HUD offices have alternate facilities from which to continue to perform their essential functions;
- f. Protecting essential facilities, equipment, vital records, and other assets;
- g. Achieving a timely and orderly recovery from an emergency and reconstitution to normal operations; and
- h. Ensuring and validating COOP readiness through a dynamic, integrated test, training, and exercise program.

- 3-3 Planning Requirements:** A viable COOP capability consists, at a minimum, of the following elements:
- a. Must be capable of implementation both with and without warning;
 - b. Must be operational within a minimal acceptable period of disruption for essential functions, but in all cases **within** 12 hours of COOP activation;
 - c. Must be capable of maintaining sustained operations until normal business activities can be reconstituted, which may be up to 30 days;
 - d. Must include regularly scheduled testing, training, and exercising of HUD's personnel, equipment, systems, processes, and procedures used to support HUD's essential functions during a COOP event;
 - e. Must provide for a regular risk analysis of current alternate operating facility(ies);
 - f. Must locate alternate operating facilities in areas where the ability to initiate, maintain, and terminate continuity operations is maximized;
 - g. Should consider locating alternate operating facilities in areas where power, telecommunications, and Internet grids would be distinct from those of the primary facilities;
 - h. Should take maximum advantage of existing HUD Regional and Field Office infrastructures and give consideration to other options, such as telecommuting locations, work-at-home, virtual offices, and joint or shared facilities;
 - i. Must consider the distance of alternate operating facilities from the primary facility and from the threat of any other facilities/locations (e.g., nuclear power plants or areas subject to frequent natural disasters); and
 - j. Must include the development, maintenance, and annual review of HUD's COOP capabilities using a multi-year strategy and program management plan. The multi-year strategy and program management plan will outline the process HUD offices will follow to:
 - (1) Designate and review essential functions and resources,
 - (2) Define short and long-term COOP goals and objectives,
 - (3) Forecast COOP budgetary requirements,
 - (4) Identify COOP program issues, concerns, potential obstacles, and the strategy for addressing these, as appropriate.
 - (5) Establish a schedule and milestones for COOP planning, training, and exercise.
- 3-4 Elements Of A Viable COOP Capability:** At a minimum, all HUD COOP plans and programs shall include the following elements:
- a. **Plans and Procedures.** COOP Plans shall be developed and documented by Headquarters, and each Regional Office and Field Office. Each Headquarters primary organization shall develop its own COOP Implementation Plan. When implemented, these plans will provide for the continued performance of HUD essential functions. At a minimum, COOP plans should:

1. Delineate HUD organizational essential functions and activities;
 2. Establish orders of succession to key HUD positions and establish and maintain current roster(s) of fully equipped and trained COOP personnel with the authority to perform essential functions, to include a devolution of essential functions;
 3. Provide for the identification and preparation of alternate operating facilities for continuity operations;
 4. Outline a decision-making process for determining appropriate actions in implementing HUD COOP plans and procedures;
 5. Establish a roster of fully equipped and trained HUD CERG members, designated as IRS (Advanced Group/Leadership Group) or FRS, with the authority to perform essential functions and activities;
 6. Include procedures for HUD employee advisories, alerts, and COOP plan activation, with and without warning, with instructions for relocation to pre-designated facilities during both duty and non-duty hours;
 7. Provide for personnel accountability throughout the duration of the emergency and devise a plan for the productive use of non-COOP personnel;
 8. Provide for the ability to coordinate activities with non-COOP personnel;
 9. Provide for attaining operational capability **within 12 hours** of COOP plan activation;
 10. Establish reliable processes and procedures to acquire resources necessary to continue essential functions and sustain operations for up to 30 days of COOP plan implementation;
 11. Provide for reconstitution of HUD capabilities, and transition from continuity operations to normal operations;
 12. Identify vital records, databases and systems and where/how they are stored; and
 13. Delineate the responsibilities of the individuals who have COOP roles (leadership, planners, COOP personnel).
- b. **Essential Functions.** All HUD organizational elements should identify their essential functions as the basis for COOP planning and include them in their COOP plans. Essential functions are those functions that enable HUD organizational elements 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. In identifying essential functions, HUD organizational elements should:
1. Identify all functions performed by HUD organizational elements, then determine which are deemed essential and must be continued under any circumstances;
 2. Prioritize, to the extent possible, these essential functions based on the criticality and time sensitivity of the function to the extent possible, and also prioritize them against likely COOP triggers and scenarios;
 3. Establish CERG staffing and resource requirements needed to perform essential functions;

4. Identify mission critical data and systems necessary for a CERG to conduct essential functions;
 5. Defer functions not deemed essential to immediate agency needs until additional personnel and resources become available;
 6. Integrate supporting activities at the ERS to ensure that essential functions can be performed as efficiently as possible for the duration of the emergency; and
 7. Include a statement that indicates all functions deemed not essential will be deferred.
- c. **Delegations of Authority.** To ensure rapid response to any emergency situation requiring a HUD COOP plan implementation, HUD organizational elements should pre-delegate authorities for making policy determinations and operational decisions. These delegations of authority should:
1. Identify the programs and administrative authorities needed for effective operations at all organizational levels having emergency responsibilities;
 2. Identify the circumstances under which the authorities would be exercised;
 3. Document the necessary authorities at all points where emergency actions may be required, delineating the limits of authority and accountability;
 4. State explicitly the authority of designated successors to exercise organizational direction, including any exceptions, and the successor's authority to re-delegate functions and activities, as appropriate;
 5. Indicate the circumstances under which delegated authorities would become effective and when they would terminate. These pre-determined delegations of authority generally take effect when normal channels of direction are disrupted and would terminate when these channels have been restored;
 6. Ensure that officials who are expected to assume authorities in an emergency are trained to carry out their emergency duties. Training should be conducted annually; and
 7. Specify responsibilities and authorities of individual organizational representatives designated to participate as members of interagency emergency response teams.
- d. **Orders of Succession.** All HUD organizational elements are responsible for establishing, promulgating, and maintaining orders of succession to key positions. Such orders of succession are an essential part of a COOP plan. Lines of succession should be maintained by all HUD organizational elements reporting to the Secretary to ensure the continuity of essential functions. Succession should be provided to a minimum depth of three at any point where policy and operational functions are carried out. All HUD organizational elements should:
1. Establish an order of succession to the position of organizational element head;
 2. Establish orders of succession to other key organizational element leadership positions;

3. Identify any limitation of authority based on delegations of authority to others;
 4. Describe orders of succession by positions or titles, rather than names of individuals;
 5. Include the orders of succession in the organizational element's vital records;
 6. Revise orders of succession as necessary, and distribute revised versions promptly as changes occur. Designate responsibility for updating;
 7. Establish the rules and procedures designated officials are to follow when addressing the issues of succession to office in emergency situations;
 8. Include in succession procedures the conditions under which succession will take place, method of notification, and any temporal, geographical, or organizational limitations of authorities;
 9. Assign successors, to the extent possible, among the emergency teams established to perform essential functions, to ensure that each team has an equitable share of duly constituted leadership; and
 10. Provide briefings to designated successors on their responsibilities as successors and on any provisions for their relocation. Designated successors must be provided annual refresher briefings.
- e. **Alternate Facilities.** All HUD organizational elements will designate an emergency relocation site (ERS) as part of their COOP plans, and prepare their personnel for the possibility of an unannounced relocation of a CERG. An ERS may be identified from existing HUD facilities or external sources. As a minimum, an ERS should provide:
1. Immediate capability to perform essential functions under various threat conditions, including threats involving weapons of mass destruction;
 2. Sufficient space and equipment to sustain the relocating CERG. Since the need to relocate may occur without warning, or access to normal operating facilities may be denied, HUD organizational elements are encouraged to pre-position and maintain minimum essential equipment for continued operations at an ERS;
 3. Interoperable communications, including means for secure communications, with all identified essential internal and external organizations, critical customers, and the public;
 4. Reliable logistical support, services, systems, and infrastructure to including water, electrical power, heating, ventilation, air conditioning (HVAC), and etc;
 5. Capability to perform essential functions as soon as possible with minimal disruption of operations, but in all cases within 12 hours of activation, and until normal business activities can be reconstituted, which could be up to 30 days;
 6. Consideration for the health, safety, and emotional well being of relocated CERG members;
 7. Appropriate physical security and access controls; and
 8. Access to HUD critical systems.

- f. **Interoperable Communications.** The success of HUD organizational elements operations at an Emergency Relocation Site (ERS) is absolutely dependent upon the availability and redundancy of critical communications systems to support connectivity to internal HUD organizations, other agencies, critical customers, and the public. When identifying communications requirements, HUD organizational elements should take maximum advantage of the entire spectrum of communications media likely to be available in any emergency situation. These services may include, but are not limited to secure and/or non-secure voice, fax, and data connectivity, Internet access, and e-mail. Interoperable communications should provide:
1. Capability commensurate with the organizational element's essential functions and activities;
 2. Ability to communicate between the HEOC and the CERG staff, management, and other organizational components;
 3. Ability to communicate with the FEMA Operations Center and the Homeland Security Operations Center, other Federal agencies and their COOP sites, and critical customers;
 4. Access to data and systems necessary to conduct essential activities and functions;
 5. Redundant communications systems for use in COOP implementation; and
 6. Interoperability with existing field infrastructures.
- g. **Vital Records and Databases.** The identification, protection and ready availability of electronic and hardcopy documents, references, records, and information systems needed to support HUD essential functions under the full spectrum of emergencies is a critical element of a successful COOP plan. HUD personnel must have access to and be able to use these records and systems in conducting their essential functions. Categories of these types of records are:
1. Emergency Operating Records. Vital records, regardless of media, essential to the continued functioning or reconstitution of an organization during and after an emergency. Included are emergency plans and directives, orders of succession, delegations of authority, staffing assignments, and related records of a policy or procedural nature that provide agency staff with guidance and information resources necessary for conducting operations during an emergency, and for resuming normal operations at its conclusion.
 2. Legal and Financial Records. Vital records, regardless of media, critical to carrying out an organization's essential legal and financial functions and activities, and protecting the legal and financial rights of individuals directly affected by its activities. Included are records having such value that their loss would significantly impair the conduct of essential agency functions to the detriment of the legal or financial rights or entitlements of the organization or of the affected individuals. Examples of this category of vital records are accounts receivable, contracting and acquisition files, official personnel files, Social Security, payroll, retirement and insurance records, and property management and inventory records.

3. Essential Function Records. HUD organizational element COOP plans should account for identification and protection of vital records, systems, and data management software and equipment, to include classified or sensitive data as applicable, necessary to perform essential functions and activities, and to reconstitute normal agency operations after the emergency. To the extent possible, HUD organizational elements should pre-position and update on a regular basis duplicate records and/or back-up electronic files at an ERS.

An effective vital records program must account for:

- a. Establishment of a vital records program;
 - b. Appropriate medium for accessing vital records;
 - c. Maintenance of inventory of records;
 - d. Performance of a risk assessment;
 - e. Appropriate protection method;
 - f. Procedures for updating vital records;
 - g. Identification of a records recovery expert;
 - h. Development/maintenance of vital records plan packet;
 - i. Development of a training program;
 - j. Periodic review of program to address security issues, problem areas, updates, and additional vital records; and
 - k. Capability for protecting classified and unclassified vital records and databases.
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- h. **Human Capital**. The Headquarters Office of Human Resources is responsible for the design, update, and carrying out of a comprehensive plan to take into account and respond to the threats that HUD employees are most likely to face in a COOP event. These plans interact with and impact on human capital management. HUD managers should be familiar with the many human capital resources and flexibilities that exist to assist managers and employees in an emergency. The HUD Capital Management Plan should be consistent with the family of HUD Headquarters Emergency Response Plans, such as the OEP, and therefore should be coordinated with the offices responsible for those plans. COOP human capital planning and preparedness encompasses the following areas:
 - a. Agency planning and readiness;
 - b. Designation of emergency employees and other special categories of employees;
 - c. Dismissal or closure procedures;
 - d. OPM and media announcements on government operating status;
 - e. Status of non-emergency employees and non-COOP employees;
 - f. Sample agency guidelines for communicating to employees;
 - g. Methods of employee communications;

- h. Employee awareness of changes in building operations;
 - i. Pay flexibilities;
 - j. Staffing flexibilities;
 - k. Benefit issues; and,
 - l. Employee roles and responsibilities.
- i. **Test, Training, and Exercise (TT&E).** TT&E of COOP capabilities are essential to demonstrating and improving the ability of HUD organizational elements to execute their COOP plans. Tests and exercises serve to assess, validate, or identify for a subsequent corrective action program, specific aspects of COOP plans, policies, procedures, systems, and facilities used in response to an emergency situation. Training familiarizes COOP personnel with the procedures and tasks they must perform in executing COOP plans. The HUD COOP TT&E Program develops, implements, and institutionalizes a comprehensive, all-hazards program to improve the ability of HUD to effectively manage and execute its COOP plans. In addition, the HUD program incorporates the three functional areas of testing systems and equipment, training personnel, and exercising plans and procedures.
- 1. Objectives of the HUD COOP TT&E Program are to:
 - a) Assess and validate COOP plans, policies, and procedures;
 - b) Ensure that all HUD personnel are familiar with COOP notification and deployment procedures;
 - c) Ensure that the appropriate HUD personnel are sufficiently trained to carry out HUD essential functions when deployed at an ERS or working in a COOP environment;
 - d) Exercise procedures by deploying CERG personnel and equipment to an ERS to ensure the ability to perform HUD's essential functions at the alternate facility are sufficient, complete, and current;
 - e) Ensure that backup data and records required to support essential functions at the ERS are sufficient, complete, and current;
 - f) Test and validate equipment to ensure both internal and external interoperability;
 - g) Ensure that the appropriate HUD personnel understand the procedures to phase down COOP operations and transition to normal activities when appropriate;
 - h) Develop a Multi-Year Test, TT&E Plan that addresses COOP TT&E requirements, resources to support these activities, and a TT&E planning calendar;
 - i) Conduct refresher orientation for COOP personnel; and,
 - j) Develop and maintain a HUD Exercise Remedial Action Program (ERAP).
 - 2. Training will familiarize CERG members with the essential functions they may

have to perform in an emergency. Tests and exercises will validate or identify for subsequent correction specific aspects of HUD COOP plans, policies, procedures, systems, and facilities used in response to an emergency situation. Periodic testing will ensure that equipment and procedures are maintained in a constant state of readiness. All HUD organizational elements shall plan and conduct tests and training to demonstrate viability and interoperability of their COOP plans. Deficiencies and actions taken to correct them must be documented. COOP TT&E plans should provide for:

- a) Individual and team training of HUD CERG members to ensure they have current knowledge and integration of skills necessary to implement COOP plans and carry out essential functions. Team training should be conducted at least annually for CERG members on their respective COOP responsibilities.
 - b) Annual COOP awareness briefing (or other means of orientation) for the entire workforce;
 - c) Internal testing and exercising of COOP plans and procedures to ensure the ability to perform essential functions and operate from an ERS. This testing and exercising should occur at least annually. Annual exercise that incorporates the deliberate and pre-planned movement of the COOP personnel to an alternate operating facility;
 - d) Quarterly testing of HUD organizational element emergency notification procedures and systems for any type of emergency.
 - e) Semi-annual testing of plans for the recovery of vital classified and unclassified records, critical information systems, services, and data;
 - f) Quarterly testing of COOP communications capabilities; and,
 - g) Orientation for HUD CERG members arriving at an ERS. The orientation should cover the support and services available at the facility, including communications and information systems for exchanging information if the normal operating facility is still functioning; and administrative matters, including supervision, security, and personnel policies.
- j. **Devolution of Control and Direction.** Devolution planning supports overall COOP planning and addresses the full spectrum of threats and all-hazards emergencies that may render an agency's leadership and staff unavailable or incapable of supporting the execution of its essential functions from either its primary or alternate location(s). The devolution option of COOP shall be developed to address how HUD will identify and conduct its essential functions during increased threat situations or in the aftermath of a catastrophic emergency. The devolution site and personnel must be capable of supporting all the COOP essential functions and activities of the devolving organization, as well as the inherent essential functions of the host HUD organization. At a minimum the plan should:
1. Identify prioritized essential functions and determine necessary resources to facilitate their immediate and seamless transfer to a devolution site;

2. Include a roster identifying fully equipped and trained personnel at the designated devolution site with the authority to perform essential functions and activities when the devolution option of COOP is activated;
 3. Identify the likely triggers that would initiate or activate the devolution option;
 4. Specify how and when direction and control of program office operations will be transferred to the devolution site;
 5. List necessary resources (people, equipment, and materials) to facilitate the ability to perform essential functions at the devolution site.
 6. Establish reliable processes and procedures to acquire resources necessary to continue essential functions and sustain operations for extended periods.
 7. Establish capabilities to restore or reconstitute HUD authorities to their pre-event status upon termination of devolution.
- k. **Reconstitution.** Extensive coordination is necessary to procure a new operating site once an agency suffers a facility loss, or in the event that collateral damage from a disaster renders the structure unsafe for reoccupation. Reconstitution embodies the ability of HUD Headquarters to recover from a catastrophic event and consolidate the necessary resources that would allow it to return to a fully functional entity of the Federal Government.

HUD must have a plan to return to normal operations once the Secretary or a successor determines reconstitution can begin to resume normal business operations. This plan must:

1. Provide an executable plan to transition from COOP status to an efficient normal operational status once a threat or disruption has passed;
2. Provide coordinated and pre-planned options for reconstitution of HUD Headquarters regardless of the level of disruption that caused implementation of its COOP plan. These options must include movement from the COOP or devolution location to the originating operating facility or a new operating site if necessary; and,
3. Outline procedures necessary to affect a smooth transition from a relocation site, whether standard COOP or devolution scenario, to a new or restored Headquarters facility.

3-5 High Impact Programs. The following prepared by the Office of Management and Budget (OMB), includes programs that may assist in determining what is essential to HUD's overall mission and responsibilities. This listing is not all-inclusive. Headquarters program offices must review all of their functions to determine those that are truly essential.

HUD's High Impact Programs

Community Development Block Grants

Housing Loans

Mortgage Insurance

Section 8 Rental Assistance

Public Housing

3-5-1 HUD Program Offices with High Impact Programs. The following, prepared by OMB, provides examples that can further assist HUD Headquarters in identifying COOP essential functions. This listing is not all-inclusive. Program Offices and others must further review their missions and responsibilities to develop a broader listing of essential functions.

<u>Component</u>	<u>High Impact Program</u>
Government National Mortgage Association	Housing Loans
Office of Community Planning and Development	Community Development Block Grants
Office of Housing	Section 8 Rental Assistance and Mortgage Insurance
Office of Public and Indian Housing	Public Housing