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**The following pages concerning business continuity planning (COOP)
were found in the original document on pages 39 through 51.**

To see the entire document, visit:

<http://www.hud.gov/utilities/intercept.cfm?/offices/fheo/library/FHEO-DisasterToolkit.pdf>

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Carole Coles Henry, M.S.W.

Director City of Phoenix Equal Opportunity Department
251 West Washington Street, 7th Floor Phoenix, AZ 85003-2295
Phone: (602)262-6258
Fax: (602)534-1124
[Email: carole.coles.henry@phoenix.gov](mailto:carole.coles.henry@phoenix.gov)

Vickie V. Covington, SPHR

Special Projects and Investigation Manager Texas Workforce Commission Civil Rights Division
101 East 15 Street; Room 144-T Austin, TX 78778
Phone: (512)463-4615
Fax: (512)463-2643
[Email: vickie.covington@twc.state.tx.us](mailto:vickie.covington@twc.state.tx.us)

Elizabeth Davis

Director
EAD & Associates, LLC
Emergency Management & Special Needs Consultants
44 Court Street - Suite 908
Brooklyn, NY 11201
Phone: (718) 330-0034
Fax: (718) 330-0039
[Email: edavis@eadassociates.com](mailto:edavis@eadassociates.com)

Adriana Escander Program Manager Alianza for Fair Housing
Community Legal Services of Mid-Florida, Inc. 122 E. Colonial Drive; Suite 200
Orlando, FL 32801 Phone: (407)841-7777 Fax: (407)246-1661
[Email: Adrianae@clsmf.org](mailto:Adrianae@clsmf.org)

Lynn Grosso
Director of Enforcement
Office of Fair Housing and Equal Opportunity U.S. Department of Housing and Urban Development
451 Seventh Street, SW, Room 5222 Washington, DC 20410
Phone: (202)402-2904
Fax: (202)708-4445

Annie Grunewald
Senior Project Manager EAD & Associates, LLC
Emergency Management & Special Needs Consultants
44 Court Street - Suite 908 Brooklyn, NY 11201 Phone: (718) 330-0034 Fax: (718)
330-0039
[Email: gruneann@aim.com](mailto:gruneann@aim.com)

Judith A. Harris
Division Manager
Fair Housing Division
Georgia Commission of Equal Opportunity
2 Martin Luther King, Jr. Drive, S.E.
Suite 1002; West Tower Atlanta, GA 30334 Phone: (404)656-5483 Fax: (404)656-
4399
[Email: jharris@gceo.state.ga.us](mailto:jharris@gceo.state.ga.us)

Kim Kendrick
Assistant Secretary for the Office of Fair Housing and Equal Opportunity
U.S. Department of Housing and Urban Development
451 7th Street, SW,
Washington, DC 20410 Phone: (202) 708-0614
[Email: Kim_Kendrick@hud.gov](mailto:Kim_Kendrick@hud.gov)

Continuity of Operations Plan (COOP)

INTRODUCTION

A continuity of operations (COOP) plan has always been part of the mission of the federal government to ensure that the Department's essential operations are available to the public. The Department of Housing and Urban Development (HUD), Office of Fair Housing and Equal Opportunity (FHEO) has in place a viable COOP Plan. The development of a COOP Plan is significant and an essential part of disaster preparedness. The COOP Plan is a step-by-step plan to ensure the stability of critical functions during a wide range of potential emergencies and events. Whatever one chooses to call it – disaster planning, emergency preparedness, or business continuity (and experts note that there are differences) – the goals are ultimately the same: to get an organization back up and running in the event of an interruption. The problem causing the interruption could be one computer crashing or an entire network crashing. Or it could be an electrical outage or the result of a terrorist activity. The goal is to have some contingency plans in the event of a problem. A disaster recovery plan exists to preserve the organization so that it can continue to offer its services.

As we learned after Hurricanes Katrina and Rita, fair housing agencies and advocates need to be prepared to assist those who find themselves without housing after natural disasters of all types. We have also learned from the events of September 11, 2001, and other disasters that it is difficult to provide the needed services to others when an agency's own staff is attempting to recover from a disaster. A disaster recovery plan is a users' guide—the documentation—for how to preserve an organization. In order for a plan to be useful, it must be created before an interruption occurs. Business continuity is disaster recovery. Lost revenue is a driving force in business continuity. The reason to do a recovery plan is essentially to keep the funding coming in and the services going, and the clients being served.

In the absence of a COOP Plan, an agency cannot fulfill its mission should a crisis of any size disrupt normal business operations. Therefore, COOP planning is good business practice, and implementing a few actions can make a substantial difference in recovering from a disaster to ensure that essential services are provided to an agency's client base. In order to write your plan, you have to do some planning. This planning is the process that will get you to the step where you then commit your plan to paper—you can't write a plan until you do the preparation. The most difficult thing is getting started; the second most difficult task is keeping the plan current.

Unfortunately, there are no cookie-cutter templates, and one size doesn't fit all. There are some common elements among plans, but every plan will be different because every organization's structure and circumstances are unique. This sample provides some elements of a comprehensive COOP Plan that can be used to assist agencies in conceptualizing and developing a strategy for the continuity of operations in the event of any disaster.

SAMPLE PURPOSE AND OPERATIONAL CONCEPT

The objective of this plan is to ensure the execution of an agency's essential functions during any crisis and to provide for the safety and well-being of employees during any emergency in which your agency's building or other occupied space is threatened or not accessible. Specific objectives include:

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

The purpose of a COOP Plan is to provide direction and to ensure that an agency is able to continue to provide services for those times when there is a disruption of regular service capabilities. For the most part, COOPs are designed to enable agencies and advocates to continue to operate after natural disasters, minor events, and emergency shutdowns that affect thousands of businesses and organizations. These types of events include (this list is not exhaustive):

- 2004 hurricane season (five major storms)
- 2005 hurricane season (six major storms, including Katrina and Rita)
- Bridge closures and bridge collapses
- Tornadoes, wildfires, and earthquakes
- Broken water mains and floods
- Chemical spills
- Terrorist or man-made disaster
- Power outages
- Computer System Shut-down

Although the effects of an emergency cannot be predicted, planning for operations under such conditions can mitigate the effects of the emergency on the agency's mission, employees, facilities, and general public.

This COOP Plan describes how [insert name of agency] will sustain its capability to perform critical functions during and after a disruption in internal operations, whether caused by severe weather, natural or man-made disasters, or terrorists attack. This COOP Plan ensures that an agency or organization:

- Has the capability to implement the COOP Plan both with and without warning
- Is able to perform essential functions immediately after activation of the COOP Plan (the time period of activation should be determined by the agency)
- Is able to maintain critical functions for 15–30 days or as long as necessary

- Includes regularly scheduled testing, training, and exercising of agency personnel and other stakeholders
- Includes regularly scheduled testing of equipment, systems, processes, and procedures used to support the agency during an event requiring the activation of the COOP Plan.

ESSENTIAL FUNCTIONS

The “Essential Functions” section should include a list of the agency’s essential functions and activities that must be continued under any and all circumstances. Agencies should identify essential programs and any new programs or expansion programs. The agency’s program office should conduct a critical analysis of individual processes and responsibilities that must be in place to allow that program or function to exist.

Sample of Essential Functions

Essential Function	Unit Assignment	Priority Ranking*	Staff Assigned	Backup Staff Assigned
Ensuring that staff are paid in the event of a	Accounting Division	H	Joe Smith	Janie Harris
Ensuring that the clients are able to report incidents of	Intake Division	M	Melody Blanche	Nichelle Millings
Ensuring that education and outreach efforts are in place to inform the public of their rights during a disaster	Education and Outreach Staff	H	Terri Tolbert	Janet Wanzer
Ensuring that enforcement efforts can be executed during	Legal Staff	H	David Mitchell	Kennedy Taylor

* H = high; M = medium; L = low.

Typically, once the COOP Plan is activated, the agency suspends all other nonessential activities. This will allow the agency to focus on the essential functions to eventually restore operations.

Analyze and Know Your Organization

Determine Your Critical Services and Functions: Answer the following questions to help craft your recovery plan.

1. What are your organization's functions and services? (What you do—in detail)
2. What staff is responsible for what functions?
3. Which functions and services are critical, and which are less so?
4. Do a client impact analysis: in the event of an interruption, what would be the impact on your services to your clients? For example, if your organization delivers meals to clients at home, how would you get those meals to them should your facilities be inaccessible?
5. Whom do you serve? (Who are your clients, what are their ages, etc?)
6. Where do you serve them? (on-site, at their home, at another organization's facilities, etc.)
7. How do you serve them? (What do you provide to your clients: information, food, medical care, transportation, etc? How are these services provided: via phone, fax, or internet, in person, etc.)
8. What are your personnel requirements? (Are services provided by staff, volunteers, etc?)
9. What are your equipment requirements? (cars, computers, etc.)
10. How do your services impact the organization's functioning? (For example, if fee-for-service is crucial to your operations, what will happen if you cannot perform those services?)
11. In order to make contingency plans, differentiate your organization's services. If, for example, a phone system is needed to provide services to your clients, this may be the area that you should invest in by having phone service with multiple providers. If it's your computer system or your website, this may be where you want to focus your resources.
12. How quickly does each of your services have to get back up and running? In other words, what is the acceptable level of downtime? (This is also addressed in more detail in the Recovery Time Objective section.)
13. Alternative Work Sites: Do you have a place for your staff to go should your offices become unusable?
14. Make arrangements with another organization to set up an office, kitchen, classrooms or whatever is needed in order to provide your services.
15. Or alternatively, can you make arrangements for another organization to take over your services?
16. For organizations with multiple sites, make a plan, so that should something should happen, you can move programs or offices from site A to site B.

Planning and Policy Sample Statement

This COOP Plan establishes policy and provides guidance to ensure the execution of the essential functions for the [insert name of agency] in the event that an emergency at the agency or its service area threatens or incapacitates operations or requires the relocation of selected personnel and functions.

Planning Objectives

A COOP Plan is a contingency plan that allows an agency to continue essential functions and services when normal operations are disabled due to disaster or events that take the agency offline.

The COOP Plan is the agency's blueprint for internal operations in the event of a disaster. The objectives of a viable COOP Plan include the following:

- To ensure the performance of an agency's essential functions during an emergency and to enable the expansion of services that may be in greater demand after a disaster
- To ensure the safety of employees
- To protect essential equipment, records, and other assets
- To reduce disruptions to operations
- To minimize damage and loss
- To promote an orderly recovery from emergency operations
- To identify relocation (alternate) sites

Policy

The [insert name of agency] [executive director and administrator] approved and issued the Continuity of Operations Mission Statement on [insert month, day, and year], establishing the agency's objectives in developing and implementing a comprehensive continuity of operations capability for all facets of the agency's operation.

Sample Employee Contacts Form

In times of crisis, it is important that the agency is able to locate personnel assigned to fair housing functions. This form should be completed by each employee to enable the agency to locate the employees in times of crisis. This information should be stored on a portable disc or drive by the designated emergency point of contact.

Once all of the employee contact forms are completed, the forms can be used to create a telephone call tree that will assist in passing essential information to your employees during a crisis.

Name: _____

Position: _____

Supervisor name and phone: _____

Key responsibilities: _____

Home address: _____

City, state, ZIP: _____

Home phone: _____ Cell phone: _____

Work phone: _____ Fax: _____

Work e-mail: _____ Home e-mail: _____

Emergency contact name: _____

Emergency contact address: _____

Emergency contact city, state, ZIP: _____

Emergency contact phone: _____

Sample Employee Go-Kits

All employees should keep on hand a Go-Kit in the event of an emergency. The Go-Kit should be stored in a place that can be easily accessed during a disaster or emergency situation, for example in an office desk drawer or closet, in the trunk of a car, and/or in a brief case. The Go-Kit should contain essential items that will assist in sustaining ones everyday life functions and facilitate communications efforts with other employees and essential staff. Items that should be included in the Go-Kits are at least one working flashlight, batteries, radio, charged cell phone, 3 day supply of water and food, cash, employee emergency contact information (cell and home numbers), and agency financial information or account numbers.

Essential employees should also prepare a Go-Kit that includes information to sustain the agency. This should include but is not limited to: computer disks that store financial information; insurance policies; emergency contact lists; maps; call rosters; identification; payroll information; agency checks; MOU's; petty cash and other items essential to sustaining the agency and or business.

Go-Kit Check List

Go-Kit Essential Items	
Call Roster	
COOP Plan	
Financial Information	
Insurance Policy	
Payroll Information	
Back-up Computer Files	
Flash light/Batteries	
Water Supply/Food	
Cell Phone	

Sample Vendor Essentials Form

In the event that you have to relocate your business operations to a different location, who are the essential vendors you will need to be able to reach? Use this form to provide that information so that you can reach these vendors in times of crisis. Examples of these vendors include the property manager of your agency facilities, payroll services, banking information, the utility companies who provide services at your normal business location, print and photos shop suppliers, paper, computer, and printer suppliers, and others whose goods and services are essential to your daily operations.

Company name: _____

Account number: _____

Goods/services provided: _____

Vendor street address: _____

Vendor phone: _____ Vendor fax: _____

Sales rep: _____

E-mail or Web site address: _____

Sample Alternate Site Locations

In advance of the agency disaster, the agency should have a list of facilities outside of the primary place of business that may be available for temporary relocation of your services. Response teams who have known about available temporary sites for relocation have been able to restore their essential services more quickly than those who begin to look for an alternate site after the disaster hits. Use this form to consider where you will locate your services in advance of needing a new place to locate. It may also be beneficial for your agency to establish partnerships with a local real estate firm that will assist the agency in locating space or developing memoranda of understanding with state or local governmental agencies and private institutions.

This list may include county extension offices, mobile facilities such as trailers or tents, community centers not already designated as shelters in community disaster plans, etc.

In the event that the present facility is unable to be used, the agency planned relocation sites include the following:

Within five miles of present site: _____

10 miles from present site: _____

50 miles from present site: _____

100 miles from present site: _____

Tents: _____ Trailers: _____

Vans: _____

Operations to be performed at this site: _____

Employees to be located at this site: _____

*Note: A policy should be implemented that will encourage employees to work offsite. This will require your agency to develop remote access to the agency's systems.

Sample Essential Partners Forms

The fair housing essential partners in the event of an emergency will usually be onsite. However, a list of cell phone and land-line contacts, especially those outside the affected disaster zone, can be very valuable in the event of a disaster. This form can be used to gather those essential partner details, and then a telephone list can be assembled from this data.

Name of agency, entity, or person: _____

Is this partner ____ local ____ county ____ state ____ national

Land-line phone: _____ Cell phone: _____

E-mail: _____ Web site: _____

County, state, or national contact when local contact is unable to operate:

Agency purpose: _____

Sample Computer Resources Checklist

Know where the agency's servers are located. The agency should have a separate disaster recovery plan for the computer resources to address what happens if water, wind, or fire destroys the data contained in the agency computer systems.

Do you have a computer disaster recovery plan? YES NO (If no, the agency's next task is to assign someone to develop a separate plan for computer recovery)

My primary server(s) is/are located at:

Online Tape drive (how often) _____ Central server Other

My backup server(s) is/are located at:

DATA RETRIEVAL SYSTEM:

FAIL-SAFE SYSTEM FOR INFORMATION

RETRIEVAL: Hard copies are filed:

Backup electronic copies are located:

Duplicate CD or disk backup copies are maintained separately from my primary computer resources at:

COOP RESOURCES

The following list and links provides additional information and resources to assist an agency with developing continuity of operations plans.

1. Presidential Decision Directive 67.

<http://hudatwork.hud.gov/po/a/osep/epmd/coophb3205-1.pdf>

2. Federal Preparedness Circular 65.

www.hud@work.hud.gov/po/a/osep/coop/natsig.pdf

3. Presidential Decision Directive 63

[hud@work.hud.gov/po/i/it/security/nistsp800-26.pdf - 2005-05-06](http://hud@work.hud.gov/po/i/it/security/nistsp800-26.pdf-2005-05-06)

4. Office of Management and Budget Circular No. A-130

[hudatwork.hud.gov/po/reac/products/DCG/security_pdf/mass/mass system inventory.pdf - 2004-10-28](http://hudatwork.hud.gov/po/reac/products/DCG/security_pdf/mass/mass_system_inventory.pdf-2004-10-28)

5. The Federal Emergency Management Agency, Continuity of Operations Federal Preparedness Circular 65

[hudatwork.hud.gov/po/a/osep/epmd/coophb3205-1.pdf - 2005-10-26](http://hudatwork.hud.gov/po/a/osep/epmd/coophb3205-1.pdf-2005-10-26)

