

Developing a Continuity of Operations (COOP) Annex for K-12 Schools and School Districts

Background

A key objective of schools in the U.S. is to provide effective educational programming in a safe and secure learning environment. Supporting activities needed to achieve this include program administration, communication with stakeholders, transportation of students, and provision of food programs and medical services. If an emergency occurs, schools and districts must have processes and systems in place to ensure continuity of education, learning, and these supporting activities, even if this means they must occur at a different school or location or with alternate staff and teacher support.

In order to continue providing educational programming during or after a large emergency event, which may require school dismissal or closure, schools and districts should identify essential functions of the school that must continue under any and all circumstances. These essential functions will likely involve teaching and learning, the physical aspects of buildings and the campus, business functions, and emotional and psychological recovery.

As part of a planning process described in detail below, a Continuity of Operations (COOP) Annex to the school's emergency operations plan (EOP) that describes how a school or district will ensure the continuation of essential functions during an emergency and its aftermath can be created. The goal of activating a COOP Annex is to restore essential functions within 12 hours of activation and to sustain restored essential functions for up to 30 days or until full operational status is achieved. In addition, the activation of a COOP Annex serves to help protect essential buildings and facilities, equipment, records, students, teachers, staff, and assets; reduce or mitigate disruptions; and minimize damage to life and property. Continuity of operations, including the creation of a COOP Annex, should be coordinated with local community partners, such as emergency management representatives and first responders, to maximize the use of existing infrastructure, facilities, and other resources.

A Look at the Topic Today

Every day, more than 55 million elementary and secondary school students attend our nation's public and nonpublic schools. Families and communities expect that schools will keep their children safe from human-caused threats, such as violence and crime, and hazards, such as infectious disease outbreaks, that impact the school and surrounding community.

In 2015, property damage totals from natural hazards exceeded \$4,000,000,000, with the majority of that cost resulting from flooding (National Weather Service, 2015). Hurricane Sandy, which devastated

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many coastal towns in the northeastern United States in the fall of 2012, led to multiple school closures and extended absences. Schools may also be impacted by other hazards, such as contaminated food outbreaks, of which there were 11 nationwide in schools during 2013 resulting in 362 illnesses. Finally, schools can be impacted by biological hazards. The 2009 H1N1 outbreak led to school dismissals that impacted approximately 824,966 students and 53,217 teachers, resulting in a total of at least 3,170,061 student-days of school lost (U.S. Centers for Disease Control and Prevention, 2013). The global Ebola outbreak, which began in the spring of 2014 and continues today, has also prompted schools to consider planning for extended absences.

The table below describes a range of emergency events that could impact a school or district that may require the activation of a COOP Annex.

Natural Hazards	Technological Hazards	Biological Hazards	Adversarial, Incidental, & Human-caused Threats
<ul style="list-style-type: none"> • Earthquakes • Tornadoes • Hurricanes • Floods • Wildfires • Extreme temperatures • Landslides or mudslides • Tsunamis • Volcanic eruptions • Winter precipitation 	<ul style="list-style-type: none"> • Explosions or accidental release of toxins • Hazardous material releases from major highways or railroads • Radiological releases from nuclear power stations • Dam failure • Power failure • Water failure 	<ul style="list-style-type: none"> • Infectious diseases • Contaminated food outbreaks • Toxic materials present in school laboratories 	<ul style="list-style-type: none"> • Fire • Active shooter • Cyber attacks

Relation to EOP Development and Emergency Management Planning

The [Guide for Developing High Quality School Emergency Operations Plans \(School Guide\)](#) was developed in partnership with six Federal agencies including the U.S. Department of Education (ED), with roles and responsibilities in school safety, security, emergency management, and preparedness. The *School Guide* provides several key principles for school emergency management planning and a recommended six-step planning process to help schools develop a high-quality EOP that is flexible, adaptable, and customizable to the building level.

As the six-step planning process applies to the creation of a COOP Annex, in *Step 1: Form a Collaborative Planning Team*, it is important that members of the team include—or get input from— individuals who represent school activities and functions. These representatives will need to determine, for example, some of the essential functions or activities provided by the district or school. Because districts and schools will likely need to work closely with community partners, such as emergency management, to

plan for continuity of operations, representatives from these groups should also be on the planning team.

In *Step 2: Understand the Situation*, the planning team identifies threats and hazards that are likely to affect the school and community. Although the threats and hazards identified in this step by each school will be different, it is likely that one or more of these emergency events could cause a cessation in essential functions at the school (see examples in the chart above).

The work performed in Step 2 by the planning team will likely reveal the need for a COOP Annex. If so, in *Step 3: Determine Goals and Objectives* and *Step 4: Plan Development (Identifying Courses of Action)*, the team develops goals, objectives, and courses of action for before, during, and after continuity of operations is needed. In these steps, the planning team should consider how to create the COOP Annex so it may be activated at any time, how to set priorities for re-establishing essential functions, and how to ensure students receive applicable related services such as continuity of teaching and learning, food programs, and medical services in the event of a prolonged closure.

In *Step 5: Plan Preparation, Review, and Approval* the plan is written and approved. The *School Guide* explains that one way to format the EOP is through the creation of the Basic Plan, Functional Annexes, including the COOP Annex, and Threat- and Hazard-Specific Annexes. Finally, in *Step 6: Plan Implementation and Maintenance*, schools and districts implement the activities described in the EOP, including conducting exercises.

The Nine Elements of a Continuity of Operations (COOP) Annex

A COOP Annex can address the following nine elements to help ensure that after a large emergency that significantly impacts the school occurs, teaching and learning continues; physical aspects of the school and campus are addressed, such as identification of an alternate site and provision of classroom equipment, books, and material; business functions continue to operate; and appropriate emotional and psychological support is provided to students, teachers, and staff.

- 1. Define Essential Functions.** The planning team should identify all of the functions performed by the district or school and determine which are critical, and need to continue during and after an emergency. One essential function the team will likely readily identify is continuity of education, which includes teaching and learning, special education and related services, and school-based medical services and food programs. Other essential functions may include communications (internal and external), computer and systems support, facility use/maintenance, business services (e.g., payroll), and the provision of safety, security, mental

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SCHOOL COOP FACT SHEET

and behavioral health services. Examples of non-essential functions may include after-school activities, professional development/educator training, sporting events, and field trips.

- 2. Create Orders of Succession.** Orders of succession define who will play an active leadership role when regular leadership is unavailable. For example, the district may want to determine with the school who will serve as Interim Principal in the absence of the regular Principal. The first step in creating orders of succession is to create a list of alternates who would serve in an interim or acting capacity in the event that an administrator or manager is not available. This list should be approved by the school board and district administration.
- 3. Create Delegations of Authority.** Delegations of authority identify what can and cannot be done by an acting leader based on his or her role or title. Again, using the Interim Principal as an example, the person should know which decisions she/he is allowed to make in the absence of the Principal. Any document that lays out delegations of authority should be reviewed by the district or school's general counsel to ensure it meets state law and district and/or local policies (for example, in the event of a pandemic, school closure requirements vary and in some states it is the local health department who has authority while in others the district superintendent has authority to decide whether or not schools stay open or closed and whether or not students are dismissed).
- 4. Identify Alternate Facilities and Locations.** Depending on what are considered essential functions of the school or district, alternate locations should be identified that can be used if the primary school or its buildings can't be used. Alternate locations may include schools, administrative buildings, and other facilities. Essential functions or activities that need to be performed at an alternate location should also be identified, such as the provision of lunches through the National School Lunch Program (NSLP) or dispensing of medications.
- 5. Establish Plans for Communications Continuity.** Communicating with stakeholders, such as students, parents/guardians, staff, teachers, the media, and community partners is important in any emergency and can be critical to ensuring continuity of operations. Effective and regular communication allows for all relevant persons to be kept up-to-date on actions the district and school is taking and what is required of them, if anything. To ensure that the district and school will be able to communicate in an emergency, when some lines of communication may not be working, back-up and redundant systems should be identified. For example, if electrical power to the region is lost during an emergency, parents and guardians could be told ahead of time that information will be provided on a notice board in front of the school.
- 6. Create a Plan for Accessing Vital Records.** Vital records can be organized into two categories: 1) Emergency operations records, which include information such as staff contact information, orders of succession, and delegations of authority; and 2) Legal and financial records, which can include information such as personnel records, payroll records, contracts, and student data information such as emergency contact cards, medical records, and education records.
- 7. Establish a Plan for Human Capital Management.** Teachers and staff should be clear about what they are expected to do in an emergency and students and families should know how

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

SCHOOL COOP FACT SHEET

education would continue during and after a large emergency. Provisions and accommodations should also be provided for students who have an Individualized Education Program (IEP) and eligible students should still be provided medical and food services during prolonged school dismissals. Staff and teachers should have advanced training regarding their assigned essential functions.

- 8. Establish Plans for Devolution.** Devolution occurs when essential functions are handed over to alternate staff and teachers at another location. Although a rare occurrence, schools and districts need to prepare for a situation where a school needs to close and its administrators, teachers and staff are no longer able or available to provide support in their day-to-day roles. Procedures, guidance, and organizational structure need to be developed so that the transfer of roles and responsibilities to other administrators, staff and teachers at another school or location can go smoothly.
- 9. Establish a Plan for Reconstitution.** Reconstitution occurs when educational programming is restored and teachers and staff are able to continue teaching and providing other support. The process of reconstitution can be rather complex, so districts and schools need to consider how this will be achieved quickly and efficiently.

Key Resources

Several REMS TA Center and Federal Emergency Management Agency (FEMA) resources are available to support planning for continuity of operations. These include:

- Continuity of Operations Planning (COOP) Specialized Training Package, REMS TA Center.** This training package features self-paced training materials to support high-quality emergency management planning across a range of topics. The COOP package includes a presentation on developing a COOP Annex, a tabletop exercise, and a resource sheet.
<http://remstacenter.org/TrainingPackage.aspx>
- Continuity of Operations Web Page, FEMA.** This Web page houses information on FEMA continuity of operations resources, including an upcoming events section housing information on FEMA's Continuity Webinar Series, other news and resources, such as new online courses, and brief sections on defining COOP and describing the goal of continuity.
<https://www.fema.gov/continuity-operations>
- Independent Study Continuity of Operations Courses Web Page, FEMA.** This Web page displays all independent study (IS) courses offered by FEMA's Emergency Management Institute (EMI) that focus on continuity of operations, such as IS-547: Introduction to Continuity of Operations and IS-156: Building Design for Homeland Security for Continuity of Operations.
<https://training.fema.gov/is/searchis.aspx?search=continuity%20of%20operations>

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

SCHOOL COOP FACT SHEET

- **Preparing for Infectious Disease: Department of Education Recommendations to Ensure the Continuity of Teaching and Learning for Schools (K-12), ED.** This document provides recommendations to help schools maintain the continuity of teaching and learning for individuals or small groups of students who are out of school for extended hours, and large groups of students and staff disrupted by school dismissals or large numbers of faculty absences. While the focus of the resource is on preparing for infectious diseases, the suggestions within are applicable to any incident requiring continuity of teaching and learning. http://rems.ed.gov/Docs/DoE_Recommendations_to_Ensure_Continuity_Teaching_and_Learning.pdf
- **Department of Education Questions and Answers on Providing Services to Children with Disabilities during Extended Student Absence or School Dismissal, ED.** This Q & A document addresses the provision of special education and related services and early intervention under Parts B and C of the Individuals with Disabilities Education Act (IDEA), related to the extended absence of a child or a school dismissal. http://rems.ed.gov/Docs/DoE_Questions_and_Answers_on_Providing_Services_to_Children.pdf
- **School EOPs In-Depth: Developing a COOP Annex, REMS TA Center.** This 20-35 minute online course helps participants learn about the purpose and goals of a COOP Annex, identify the types of situations that may activate the COOP Annex, develop a COOP Annex in alignment with the six-step planning process described in the *School Guide*, and revise and implement an annex. <http://rems.ed.gov/trainings/EOPsDevelCOOPAnnex.aspx>

References

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[disease-outbreaks-annual-report-2013-508c.pdf](http://www.cdc.gov/foodsafety/pdfs/foodborne-disease-outbreaks-annual-report-2013-508c.pdf)