CONTINUITY OF OPERATION PLAN (COOP)

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Section 1: Plan Assumptions

Plans to continue operations will need to be flexible to address any given situation that triggers the Continuity of Operations Plan (COOP). The following assumptions outline the potential impact on OPTIONS' capacity to continue operations:

- Staff levels may be significantly reduced due to: illness; attending to family concerns during an emergency, such as children remaining at home; need to relocate, road closures, etc.
- Staff may be lost due to significant mortality associated with disease or due to natural or manmade disasters.
- Remaining staff employees may be psychologically affected by the emergency.
- Human resource reduction may be temporary or may be long-term depending on the severity or type of emergency.
- Communication may be compromised.

Section 2: General

2-1 Purpose

The COOP establishes policy and guidance to ensure the continuation of services provided by OPTIONS in the event of an emergency. Such an emergency may threaten or incapacitate services or require relocation of some services. Specifically, this COOP is designed to:

- Ensure that OPTIONS is prepared to respond to emergencies, recover from them and mitigate against their impacts.
- Ensure that OPTIONS is prepared to provide critical services in an environment that is threatened, diminished or incapacitated.
- Provide timely direction, control and coordination of the OPTIONS' leadership before, during and after an event.
- Establish and enact time-phased implementation procedures to activate various components of this plan.
- Facilitate the return to normal operating conditions as soon as practical, based upon circumstances and the threat level.
- Ensure that the COOP is viable, operational and compliant with all requirements.
- Ensure that the COOP is fully capable of addressing all types of emergencies with minimal or no disruption of services.

2-2 Applicability and Scope

- The provisions within this plan apply to all service areas operated by OPTIONS.
- Support from other organizations mentioned in this plan will be coordinated by the leadership of OPTIONS.
- This plan applies to situations that require relocation or emergency actions as determined by the leadership of OPTIONS. It does not apply to temporary

disruptions of services during short-term building evacuations or other situations where services are anticipated to be restored within a short period of time (a matter of hours).

2-3 Responsibility for Plan Development and Implementation

 OPTIONS leadership will be responsible for the development and implementation of the COOP. The leadership will be comprised of the Steering committee members (CEO, CFO, HR Director, Program Director(s))

2-4 Definitions

<u>Continuity of Operations</u>: Internal organizational efforts to ensure that a viable capability exists to continue essential functions through plans and procedures that delineate essential functions: specific succession of leadership and emergency delegation of authority; provide for the safekeeping of vital records and databases; identify alternative operating sites; provide for communication; develop alternative scheduling to offset staff losses; provide staff support during emergencies; and validate the capability through tests, training and exercises.

<u>Continuity of Operations Plan (COOP)</u>: Plan that provides for the continuity of essential functions of an organization in the event an emergency prevents occupancy of its primary headquarters building, living sites of persons served, or an event that limits operations through extensive staff losses or other resource limitation.

<u>COOP Emergency Staffing Plan</u>: Plan to address severe losses in staffing due to disease, natural disaster or other emergencies that threaten operations through harm to human resources.

<u>Crisis Response Team</u>: Core group of the leadership personnel that are responsible for assisting programs and services in maintaining essential functions. The CRT will be comprised of the Steering committee members (CEO, CFO, HR Director, Program Director(s))

<u>Staffing Response Team</u>: Pre-designated principles and staff who deploy immediately upon threat of an actual emergency event when human resources must be diverted, rescheduled or supported to facilitate continuing operations. This team will address human resource issues and arrange for employee support. The SRT shall be comprised of the Program Managers and Supervisors.

<u>COOP Event</u>: Emergencies or potential emergencies that may affect a department or site's ability to carry out its essential functions, such as, but not limited to: epidemics or pandemics, disease, natural disaster such as floods, earthquakes, etc.; terror attacks or related emergency events.

<u>Delegation</u>: The transfer of essential functions, as the result of a COOP event, to another organizational element (i.e. person, office or organization) geographically located outside the threatened area.

<u>Emergency Relocation Site</u>: Facility to which the programs or services and persons served can relocate to and continue essential functions in the event that a facility is threatened or incapacitated.

<u>Essential Functions</u>: Essential functions are those functions that enable services and programs to provide vital care, maintain safe and quality operations, maintain the safety of employees and sustain a viable business base during an emergency.

<u>Principal Organizational Head</u>: The operational head of OPTIONS during a COOP event.

<u>Command Center</u>: Central location to funnel all information and from which to direct COOP. Critical to the location of the command center is the effectiveness in facilitating communication.

Section 3: Operational Concept

3-1 Objective: Staff Resources During an Emergency

The objective of this plan for human resources is to ensure the execution of the services' essential functions during any crisis which would trigger the COOP. Also, to provide for the safety and well being of the employees during an emergency when a sudden or ongoing and severe reduction in staff/human resources exists that threatens safe and effective operations. Specific objectives of this plan include:

- Ensuring the continuous performance of essential functions during an emergency
- Protecting the safety and productivity of working staff members
- Reduction of mitigating disruptions to operations
- Addressing health issues that may affect the organization
- Pre-planning for the potentially critical loss of staff members through scheduling, identification of alternative resources and temporary business reductions
- Reducing loss of life and minimizing damage and losses
- Achieving a timely and orderly recovery from an emergency and resumption of full services

3-2 Types of Potential Emergencies or Disasters that May Compromise Continuity of Operations:

Each potential emergency or disaster will have a prescribed plan attached to the COOP:

- Fire
- Earthquake
- Bomb Threat
- Violence in the Workplace
- Flooding or Severe Weather
- Nuclear Accident
- Medical Emergency
- Pandemic

3-3 Warning Conditions

Warning conditions that may activate the COOP include the following:

- Notification by one of the California Departments that a threatening condition may exist
- Declaration of a State of Emergency by either the President of the United States or Governor of California
- Any other warning sign or eminent condition that may lead the CRT to believe that an emergency was currently or about to take place.

3-4 Essential Functions of Operations

The following are the essential functions of operations for all services provided by OPTIONS:

- Medical conditions that require treatment
- Medication
- Food and shelter (for persons receiving residential care and supported living only)
- Behavioral intervention (for persons so identified in their ISP. Such individuals may be prone to behavioral outbursts during an emergency or under times of stress)

3-5 Delegation of Essential Functions

The authority of the Principal Organizational Head (POH) will act in succession as follows:

- CEO
- Program Director(s)
- Human Resource Director
- CFO
- Program Manager/QIDP(s)
- General Manager

The authority of OPTIONS leadership at sites will act in conjunction with the above leadership as follows:

- Program Manager/QIDP(s)
- Program Supervisor(s)

3-6 Direction and Control

The Crisis Response Team will provide direction and control in line of succession. An attachment to this plan will include all emergency contact information.

3-7 Communication

When the COOP is activated, the Crisis Response Team will establish a command post. When possible, that will be at the Central Office in San Luis Obispo. Depending on the circumstances, it may be established at a remote location. The following forms of communication will be utilized listed in succession:

- Telephone land line
- Cell phone
- E-mail
- Internet
- HAM radio operators

3-8 Operating Hours

During COOP Contingencies, the POH will determine the hours of work for personnel. All efforts will be made to ensure that working hours of most staff members will be similar to normal non-emergency periods. However, there may be times that staff members may be required to work beyond normal hours.

Section 4: COOP Activation/Termination

4-1 Phase I: Activation

 All personnel will be notified that an emergency is taking place. This will start with an alert by the Crisis Response Team members. Emergency communication will

be identified with the location where the emergency is taking place.

- The Crisis Response Team will establish a command center. If possible, it will be a the Central Office in San Luis Obispo @ 1201 Palm Street.
- The initial actions of the Crisis Response Team will be to assess the magnitude of the emergency. Key considerations include:

The potential duration of the emergency
Identifying which vital services may be disrupted
Determining if relocation is necessary
Assessing staffing levels
Determining if the necessary resources are available for the duration

- The Crisis Response Team will set up an emergency staffing schedule of both the Crisis Response Team itself, as well as the location of the emergency. If an emergency is taking place at multiple sites, this process will be delegated within the Crisis Response Team with a particular member of the Crisis Response Team being assigned a particular site. Communication will be coordinated for all Crisis Response Team members during non-duty time and for personnel at the location of the emergency.
- Crisis Response Team will assess the need for staffing support necessary at the site of the emergency.

4-2 Phase II: Alternative Operations

- The Crisis Response Team will determine the responsibility of each team members throughout the emergency.
- A relocation team will be created within the Crisis Response Team to determine alternative locations should evacuation become necessary.
- Plans for augmentation of staff members will be activated as necessary.
- Vital services will be re-established at alternative sites. The goal will be to stabilize services as soon as possible.
- Transition of responsibilities according to job functions analysis may occur
 throughout the course of an emergency. Re-deployment of personnel will be
 evaluated on a regular basis to ensure continuity of critical operations.
 Administrative staff members may be required to work direct care shifts during an
 emergency.

4-3 Phase III: Reconstitution and Termination

- The Crisis Response Team will assess when services can be re-established.
 Criteria will be established to determine the extinction of the emergency. A plan will be developed to sustain services if the emergency is prolonged. In particular, this plan will cover: on-going need for staffing, vital resources, re-location site, and return procedures.
- After the emergency, a debriefing will take place to determine service and COOP performance and to identify areas to improve.

Section 5: COOP Responsibilities

5-1 Responsibility of Senior Management

Many or all members of the senior management will be part of the Crisis Response Team whose responsibilities include the implementation of the COOP. During an emergency, all senior management staff members will be required to check-in to determine the Principle Organizational Head and where the command center is located.

5-2 Responsibilities of Professional Personnel

Contract personnel will be considered non-available or non-essential during an emergency.

5-3 Responsibilities of Middle Management Personnel

These persons will be dispatched to the field to aid on-site direct care staff members. Other middle management personnel will be assigned to sites unaffected by the emergency to ensure and guard against disruption of services. A critical responsibility of the middle management will be to establish reliable communication with the command center.

5-4 Responsibilities of Direct Support Staff Personnel

Direct support personnel will be responsible for providing services across departments as necessary. They may be re-deployed to other services and programs requiring additional assistance. Direct support personnel will be responsible for essential functions such as medical/health care and behavioral supports. It is assumed that normal staffing ratios may not be maintained during an emergency. Priority will be given to sites that are experiencing an emergency.

5-5 Office Support Functions

Administrative personnel will be responsible for providing support across OPTIONS for such key functions as payroll, vital records maintenance, access to funds, facilities management, vehicle management and similar functions. Support personnel may be re-

deployed to non-emergency sites to free up direct support staff to go where deemed necessary by the Crisis Response Team.

5-6 Emergency Staffing Plan

It is assumed that should the Emergency Staffing Plan need to be enacted that a serious event has taken place such as a pandemic or major catastrophe. It is assumed that normal staffing ratios will be compromised. A list of persons and their location will be generated. Due to the fact that some persons served live in their own homes or apartments, efforts will be made to locate and inform them of the emergency staffing plan. As soon as possible, an emergency schedule will be generated to ensure that staff members are relieved at regular intervals. In order of priority, the following persons will be utilized:

- Staff members currently working
- Use of other available staff members who are properly trained
- Use of administrative staff members to be assigned based upon their geographical location
- Use of staff members who have not completed their training
- Use of non-OPTIONS staff members, who are properly trained (such as persons who work for a different organization)
- Use of non-staff persons who are not trained. In this event, such persons should have some experience working with disabled persons. All such persons would work only with a properly trained staff member.

Section 6: Coordination Instructions

6-1 Vital Records and Data Bases

- 1. OPTIONS has off-sight back-up of vital information. The purpose is to have backup of data as well as two weeks of data in case data becomes corrupted. Online backups are incremental backups. Data is backed up daily but only the data that has changed.
- 2. OPTIONS will have a continual mirror back up of data drives to a back up drive. This is a constant local back up of the two data drives on the server. If either data drive fails for any reason, this drive can be used to replace it immediately.
- 3. Data is virus protected through Sophos end point protection. Back up data is protected off site by Keep it Safe.
- 4. OPTIONS will continue to do a Monday through Friday incremental back-up to an offsite (internet) back up server with Keep it Safe.

- 5. All precautionary measures will allow OPTIONS to recover lost data from a disaster. Data recovery can start within 24 hours.
- 6. Systems tests are conducted by OPTIONS contracted IT support team, Get Wired, every six months to assess the hardware condition which includes power supplies and hard drives.

6-2 Security/Confidentiality

Normal efforts to preserve confidentiality of persons served will be maintained whenever possible. However, given the circumstances of a particular emergency or disaster, it may become necessary to let others know that persons served have special needs. Any such disclosure will be prudent and conveyed with great discretion on a need-to-know basis. Furthermore, the identity of the person will be guarded to the greatest possible extent.

Security of records, data and other articles, such as prescription medication will be preserved at all times. If relocated, a safe and preferably locked space will be secured as soon as possible. If such a site is not available, such items will be secured in a locked vehicle.

6-3 Identification of Alternative Sites in Event of Evacuation

In order of availability, the following alterative sites will be utilized in the event of an evacuation:

- 1. If it becomes necessary to evacuate from a particular site, a sign should be posted to the door of the primary site indicating the site where persons have evacuated to. The sign can either be attached to the door by tape or a tack, or it can be a piece of paper placed in the door jam and then shutting the door on the paper so that it will remain intact.
- 2. Alternative sites owned and/or operated by OPTIONS will be utilized. Proper authorities or governing agencies will be immediately notified. If a capacity flex is required, a flex request will be made as soon as possible.
- 3. The nearest sites which have the same license as those vacated from and who are willing to accept persons served from OPTIONS. Staff members from OPTIONS will transport, support and help persons served at the alternative site. If an OPTIONS vehicle is not readily available, staff may utilize their personal vehicle in an emergency situation and will be reimbursed for mileage.

4. Should evacuation become necessary, OPTIONS has made arrangements to share homes operated by the following providers:

<u>North</u>: DuMolin Community Living (Main Office: 1455 N. Dutton Ave. Suite B; Santa Rosa, CA 95401. Denise Keeley, Owner; 707-566-2200; denise@dumolinhomes.com.)

South: Epiphany Homes (Main Office: 1331 Doris Ave., Oxnard, CA 93035. Mathew Steinorth, CEO; 805-485-8111; matthew@epicare.org)

Both of these organizations have numerous sites that are licensed similar to services operated by OPTIONS.

6-4 Test/Review of Plan

To ensure that all staff and persons served are prepared for the variety of emergencies and disasters that may occur during any scheduled shift, the following procedures will be upheld:

- OPTIONS' Safety Committee will annually create a guideline for the year specifying the disaster drills to be practiced on a monthly basis at all OPTIONS' programs. Every month, designated staff for each site will execute, practice, and complete at least two disaster drills with the persons served. These drills will be documented by staff using a "Disaster Drill Checklist." The categories of these disaster drills include: Fire, Bomb Threat, Earthquake, Nuclear, Violence in the Workplace, Flood, Severe Weather, and Seizure/Medical. Procedures on how to address these disasters are outlined and posted at each site. These methodologies will be used by staff while conducting the disaster drills and documented on the "Disaster Drill Checklist." Additionally, the "Disaster Drill Checklist" form indicates: the date, time, shift (am or pm), site, location of the drill, type of drill, if an evacuation occurred, persons served present, others present, a written report by staff about the correct course of action, and evaluation of the drill (receptivity of the drill from persons served, the fluidity of the evacuation, etc.), problems that arose during the drill, action plan, and persons served that require further assistance or equipment. These Disaster Drill Checklists will be reviewed by OPTIONS' Chief Operating Officer by the end of each month. Monthly, at the safety committee meeting, OPTIONS' Program Director or designee will provide OPTIONS' Administration with a list that specifies which sites have completed their scheduled disasters.
- The effectiveness of these procedures will be evaluated and reviewed at least twice a year at the Safety Committee Meeting and/or at the Human Rights Committee meeting.

Section 7: Appendix

- A. Phone Tree
- B. List of Locations operated by OPTIONS
- C. Specific Emergency Plans
- D. Evacuation Checklist
- E. Emergency Planning Zones
- F. Outside Agencies Contact Information

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