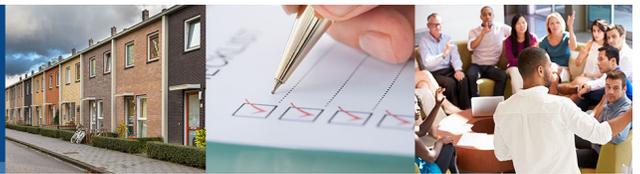




HOUSING COUNSELING DISASTER RECOVERY TOOLKIT



Continuity of Operations Plan

Housing Counseling Agencies (HCAs) can use these instructions and template to develop a Continuity of Operations Plan (COOP) that meets the specific needs of their agency and local conditions. Agencies may want to label their COOPs as “business sensitive” if they need to protect specific information contained within their plan.

HUD-approved intermediaries, State Housing Finance Agencies, and multi-state organizations may provide this template to their sub-grantees and affiliates, or to their onsite offices.

INSTRUCTIONS

What is a Continuity of Operations Plan?

A COOP is a plan for recovering and continuing operations in response to emergencies, such as weather events, power outages, terrorism attacks, or other significant disruptions to agency operations. The COOP helps ensure that all personnel, facilities, and information are protected so that necessary functions and normal operations can resume rapidly following the emergency. The COOP should address the following:

- Critical functions that an agency must perform, regardless of the emergency
- Personnel and resources needed to perform these functions
- What to do if an agency is unable to perform regular housing counseling services
- How to get up and running again after the emergency

What is the role of a Housing Counseling Agency after a disaster?

HCAs are uniquely positioned to help their communities recover after a disaster. They can provide case management, connect housing counseling clients to disaster recovery services, help clients navigate the complexities of insurance and disaster recovery resources, provide guidance on home repair financing and oversight, help clients make difficult decisions about their recovery options, and refer clients to supportive services to help them cope with stress and trauma. However, HCAs can only play this critical role if they are able to stay open post-disaster and keep operations running. A COOP that is tailored to the specific circumstances of each organization – risks, location, staff, services, and facilities – can help the agency stay operational during the disruptions created by a disaster.



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How do you develop a COOP?

The development of a COOP requires a thorough analysis of your operations, the identification of hazards in your area, the risks associated with different types of emergencies, and the relationships and assets you have to draw on to keep your services running. When developing a COOP, you should consider the following tasks:

- **Create your agency's COOP along with an emergency response plan, which contains the following elements that will inform your agency's COOP:**
 - A risk assessment of the types of hazards (natural and human-caused) likely in your community and the likely impacts on your operations
 - Coordination and communication with public emergency services (i.e., local emergency management agency, and fire, police, and emergency medical services)
 - Protective actions for life safety (e.g., evacuation, shelter, shelter-in-place, lockdown)
 - Hazard- and threat-specific emergency procedures
 - Agency staff emergency roles and responsibilities
 - Procedures for determining whether your agency can continue operations
 - Procedures for notifying HUD's Office of Housing Counseling of "inactive status" if your agency is unable to perform business
 - Procedures for COOP activation
- **Include staff in your COOP preparation.** Your staff will be affected by disasters, and their ability to work during the recovery may vary, depending on where they live and their personal situations. For example, staff who care for relatives, or who live far from your agency's office, may have more difficulty getting to work after a disaster. Involving your staff in planning helps them be prepared and you to be aware of likely staff challenges. Include key personnel in ongoing discussions about the COOP and replace COOP team members as staff turns over.
- **Identify alternate facilities.** Think about what you will do if your site is badly damaged or becomes inaccessible. Plan for contingencies, because a disaster that damages your agency may also damage other facilities. Ask whether it is possible to move certain core functions to another facility, and allow some operations to be continued with staff working remotely from home. What capabilities do you need in an alternate facility or for remote work? Does your agency have the capability to run a virtual office, using telephone or video conferencing services? Think about safety, work environment, computers, document storage, confidential space to meet with clients, and other key aspects of your operations.
- **Make plans to secure documents and personal information.** As an HCA, you have confidential information on your clients' financial and other personal identifying information. Client files must remain confidential and secure. Create an electronic backup, or duplicate hard copies of client files that can be



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stored offsite in a location that is less exposed to the hazards in your area. Identify ways to access systems and documents and communicate information in the event of a disaster, and regularly test them to ensure that they are functional.

- **Prioritize operations and services.** Determine your essential and nonessential operational functions. If you have to close for a few days or can only move certain operations to an alternate facility, which parts of your operations must continue?
- **Develop procedures.** Think through the three key phases of COOP implementation: preparation, activation, and resumption of operations. Specifically, these phases include the following:
 - *Preparation:* What actions must your staff take to prepare for continuity of operations? You need to identify specific actions, assign staff roles, develop procedures, and put in place systems that support implementation of the COOP.
 - *Activation:* Be clear about the circumstances under which a COOP is activated, who activates it, and how.
 - *Resumption of operations:* Think about responsibilities around repairing damage, filing for insurance, helping employees who may have suffered damage themselves to get back on their feet, and other challenges that may be present post-disaster.



HOUSING COUNSELING AGENCY COOP TEMPLATE

I. Introduction

[Agency Name] developed this Continuity of Operations Plan to ensure that necessary services can continue in the aftermath of an emergency in a safe and effective manner. This plan was originally developed on **[insert date]** and is updated **[quarterly/bi-annually/annually]**. This plan was last updated on **[insert date]**.

Objectives

The **[Agency Name]**'s continuity objectives are to:

- Ensure that necessary functions can be performed after a disaster event.
- Avoid the loss of life and minimize property damage and loss.
- Protect personnel, facilities, equipment, and other assets critical to **[Agency Name]**'s operations.
- Protect the records, documentation, and personal information of housing counseling clients.
- Execute a successful order of succession in the event the emergency makes it impossible for assigned personnel to perform their responsibilities as outlined in this COOP.
- Minimize disruptions to operations.
- Ensure that there are facilities where the necessary functions can be performed.
- Achieve a timely and orderly recovery following the emergency.



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Scope of the Plan

[Agency Name] identified the following key functions that must resume immediately after an emergency. These functions may be required during the response and/or recovery stages, and each require personnel, resources, and preparation. How and when each of these functions are fulfilled is outlined in the Implementation section of the plan.

Function	Responsible Personnel	Resources	Preparation
Maintain internal communications.	<ul style="list-style-type: none"> All personnel 	<ul style="list-style-type: none"> List of personnel and their contact information 	<ul style="list-style-type: none"> Establish a communication tree, including social media. Develop procedures for notifying staff when it is safe to return to work.
Maintain external communications.	<ul style="list-style-type: none"> Executive Director 	<ul style="list-style-type: none"> Public emergency services* HUD Office of Housing Counseling (OHC) Media 	<ul style="list-style-type: none"> Establish a communication tree, including social media. Develop procedures for contacting public emergency services, HUD OHC, and the media.
Counsel existing clients.	<ul style="list-style-type: none"> Manager # of housing counselors # of administrative staff 	<ul style="list-style-type: none"> Space to meet with housing counseling clients Client files Access to Agency's electronic systems Portable electronic devices for key personnel Software for video conferencing 	<ul style="list-style-type: none"> Identify a backup location and enter into an agreement to trigger use in the event of a disaster. Establish options for working from home. Develop a system to ensure that client lists are current. Provide training on accessing systems remotely.
Provide disaster-related services: <ul style="list-style-type: none"> Referrals for dealing with loss from an emotional perspective Guidance for submitting insurance claims to deal with personal property loss Education and review of construction contracts for repairs to homes Facilitating mortgage loss mitigation applications Assistance with avoiding eviction 	<ul style="list-style-type: none"> Manager # of housing counselors # of administrative staff 	<ul style="list-style-type: none"> All of the resources listed under "Counsel existing clients" Knowledge of locations and programs offered by other agencies and nonprofits, and through the Federal Emergency Management Agency (FEMA) and Small Business Administration (SBA) 	<ul style="list-style-type: none"> Ensure that several staff members know the programs offered by FEMA, SBA, and other providers. Work with the local jurisdiction to gain information on local or regional disaster planning.



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Function	Responsible Personnel	Resources	Preparation
Maintain access to housing counseling client files and financial information.	<ul style="list-style-type: none"> Grant manager Accountant Bookkeeper 	<ul style="list-style-type: none"> Access to client financial records Access to Agency's bank accounts, financial information, and HUD grant information Knowledge of grants available to the Agency in the event of a disaster A backup of all files and, as needed, vital documents in hard copy. 	<ul style="list-style-type: none"> Maintain written procedures for accessing records and accounts.

* These activities also are a part of the emergency response plan.

II. COOP Preparation

Staff Responsibilities: To prepare for any emergency event, **[Agency Name]** has assigned the following responsibilities to staff members:

Staff Member Name and Title/Role	Responsibilities
[Name] , Executive Director	<ul style="list-style-type: none"> Provide strategic leadership and policy direction for development and implementation of the COOP. Determine who is responsible for implementing each aspect of the COOP. Ensure that adequate funding is available for emergency operations. Develop an Emergency Staffing Plan (see Appendix 1) in partnership with the HR manager. Update the COOP annually. Activate and implement the COOP when necessary. Establish communications with public emergency services for a facility safety and usability assessment.* Review facility condition report after a disaster event. Determine whether operations may continue at the facility after a disaster event. Create a procedure for submitting an "inactive status" request to the OHC if the agency is unable to perform business.* Notify HUD of status following a disaster event.



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Staff Member Name and Title/Role	Responsibilities
[Name] , Human Resources (HR) manager or assigned staff	<ul style="list-style-type: none"> Maintain a list of key contacts and their emergency contact information, and update it every three months. Establish a communication tree in the event that email communication is not working. Conduct alert and employee notification tests. Maintain and update annually the list of community partners (including email and phone numbers) that can provide assistance in the event of an emergency. Understand the individual roles and responsibilities in the event of COOP activation. Provide protocols to staff for teleworking arrangements in the event of an emergency. Develop an Emergency Staffing Plan (see Appendix 1) in partnership with the Executive Director. Activate assigned staff to carry out responsibilities outlined in the COOP when an emergency occurs.
[Name] , Facility manager or assigned staff	<ul style="list-style-type: none"> Communicate with the Executive Director before visiting the facility for a safety and usability assessment.* Assess the facility for safety and usability after a disaster event.* Report to the Executive Director on the status of the facility after a disaster event.* Negotiate and maintain an agreement for use of an alternate facility in the event of an emergency.*
[Name] , Records manager or assigned staff	<ul style="list-style-type: none"> Ensure that all files are backed up daily and are available on a cloud-based platform that is accessible from remote locations. Maintain access to all necessary files and systems, including HUD's electronic line of credit control system (eLOCCS), the Client Management System, and HUD's Housing Counseling System in the event of an emergency.
[Name] , Training manager or assigned staff	<ul style="list-style-type: none"> Develop and lead training on implementing the COOP on an annual basis.

* These activities also are a part of the emergency response plan.

Alternate Facility (for use only if the Agency has identified an alternate facility): **[Agency Name]** has identified an alternate facility located at **[name and address of temporary facility]** if the existing facility is not operational.

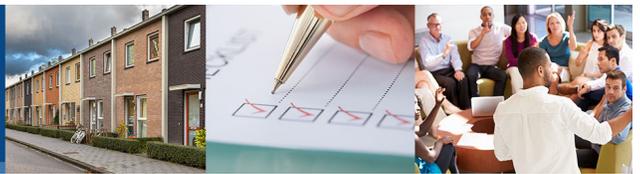
- The **[Executive Director or a designee]** will make the determination as to whether the existing facility is not operational.
- The **[Executive Director or a designee]** will work with HR to communicate location changes to all staff.
- All personnel have been informed of the alternate location and procedures for moving operations to the alternate facility.
- [Agency Name]** has entered into an agreement with **[Owner's Name]** for the use of the space on a temporary basis until such time as **[Agency Name]** is able to return to its primary location.

Emergency Staffing: The Emergency Staffing Plan, provided as Appendix 1, lists key functions and optimal staffing for those roles if some staff cannot fulfill their usual functions during the period following the disaster.

Teleworking Policy: In the case of a disaster or emergency event, staff may be asked to work from home until the **[Agency Name]**'s primary facility is operational, or the alternate facility is available and accessible. The **[Executive**



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Director or a designee will work with HR to provide the necessary information about how to access files and information from a remote location. Staff are expected to take their computers home with them, so they can continue to support ongoing operations in the case of a disaster or an emergency event. HR also will provide protocols on expectations regarding the use of personal phones for work-related communications.

III. COOP Activation

The Executive Director, or a designee, will activate the COOP when an emergency disrupts the Agency's routine activities and as outlined in the emergency response plan. Conditions for COOP activation include situations when the facility is inaccessible, unsafe for staff or housing counseling clients, or not functional. In some cases, when the event is predictable, the Executive Director may activate the COOP in advance of the event.

Communication: If the COOP is activated during work hours, while most staff are on the premises:

- The **[Executive Director, HR Manager, and Facilities Manager]** will review conditions, assess risks and scenarios, clarify roles, and coordinate their activities.
- The **[Facilities Manager]** will assess potential damage to the facility and make recommendations to the Executive Director and the HR manager about whether the facility can stay operational.
- The **[HR Manager]** will communicate alternate work arrangements and other personnel policies (including leave, insurance, and pay) to staff, provide copies of the COOP to employees, and instruct them on what equipment or files they can/should bring home with them.
- Time permitting, staff will communicate any disruptions in work hours or alternate locations to their housing counseling clients.
- The **[Executive Director]** will contact the Agency's partners to communicate the Agency's status.

If the COOP is activated during nonwork hours:

- The **[Executive Director]** will contact the HR manager and facilities manager by phone, if possible, to review conditions, assess risks and scenarios, clarify roles, and coordinate activities. If contact by phone is not possible, the Executive Director will make decisions about operations.
- The **[Executive Director and/or the HR Manager]** will contact personnel via email with a copy of the COOP and clear instructions about whether they should come to their usual place of work, go to the alternate facility, or work from home. If email is not possible, use the pre-established communication tree to reach all staff.
- The **[Executive Director and Facilities Manager]** will go the Agency's site, if it is safe, to assess damage and determine actions needed to bring operations back up and running.
- If work resumes offsite, the **[HR Manager]** will check in with staff to confirm that they have the resources they need to keep working.



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Emergency Acquisitions: During the period in which the COOP is activated, **[Agency Name]** may need to acquire the necessary personnel, equipment, and supplies on an emergency basis to sustain operations for up to 30 days or until normal operations can be resumed. The **[Executive Director]** maintains the authority for emergency acquisitions. During this same timeframe, **[Agency Name]** budgets for and acquires those resources and capabilities necessary for continuity of operations beyond the first 90 days using its standard budgeting format or until normal operations can be resumed.

Reporting: While operating from dispersed locations, personnel will report to their supervisors on a pre-agreed upon schedule, reporting their current location and the status of the activities for which they are responsible, and discuss any resources needed to accomplish **[Agency Name]**'s objectives. While specific incidents may create additional or specialized reporting requirements, the supervisors will inform personnel of the additional information that needs to be collected and the format in which to report it to **[Agency Name]** or other entities.

IV. Resumption of Operations

After the disaster event and only when safe conditions exist, the **[Facility Manager]** documents any damage to **[Agency Name]**'s primary operating facility and shares this report with the **[Executive Director]** and the **[Agency Name]**'s Board to determine whether **[Agency Name]** can return to its primary facility or if an alternate location is needed.

Operating Facility: The **[Facility Manager]** initiates and coordinates operations to salvage, restore, and recover the **[Agency Name]**'s primary operating facility. This includes:

- Documenting damage with photographs and preparing a written report as soon as possible, and beginning recovery with an emphasis on protecting properties from further damage.
- Assembling personnel at the main office or other designated area (to be determined at that time).
- Performing a damage/needs assessment of operations, support systems, and communications.

The **[Executive Director]** prepares claims reports for the insurance company to cover damages to the facility and property.

If it will take more than 90 days to return to **[Agency Name]**'s primary facility, the **[Facility Manager]** in coordination with the **[Executive Director]** identifies a new location for operations. Once identified, this location will be submitted for review and approval based on the organization's standard financial approval process. Once management notifies staff to either return to **[Agency Name]**'s existing permanent location or a new permanent location, the **[Agency Name]** will resume standard operations along with any long-term recovery counseling adopted by **[Agency Name]**.



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Communication With Clients: The **[Executive Director]** works with all housing counseling staff to develop a plan for following up with housing counseling clients that may have been affected by the disaster and that missed appointments during the event.

Staff Deployment: The **[Executive Director]** will assign the staff positions necessary to continue essential operational functions. The essential staff identified in the COOP Staffing Plan (see Appendix 1) are chosen by:

- *Key functions:* The staffing plan identifies the essential functions required to continue operations.
- *Staff availability:* Assignments will take into account the staff's ability to deploy to the operating facility.
- *Staff skills and experience:* Assignments will be consistent with staff skills and experience.

Determination of Inactive Status: As the Agency works to resume operations, the **[Executive Director]** and the **[Agency Name]**'s Board must determine whether the Agency can implement its housing counseling work plan. If the **[Executive Director]** and the **[Agency Name]**'s Board determine that **[Agency Name]** is incapable of carrying out its housing counseling work plan, the **[Executive Director]** submits a temporary inactive status request to **[HUD or a HUD intermediary]** in writing. If possible, the written temporary inactive status request should include documentation of evidence of the condition(s) that rendered the Agency incapable of carrying out its housing counseling work plan (HUD, Handbook 7601.1, Chapter 6-5, A & B, 2010).

Communication With HUD: Regardless of the inactive status determination, the **[Executive Director]** emails their HUD point of contact and copies housing.counseling@hud.gov using the subject line "DART" to provide a status update and any requests for assistance from HUD.



APPENDIX 1: EMERGENCY STAFFING PLAN

- During COOP preparation, identify key operational roles, responsibilities, and appropriate staff. Identify at least two staff members for each role so that backup is available.
- When the COOP is activated, determine which staff are available to fulfil their roles and adjust staffing as needed.

Role	Responsibilities	Staff Name	Phone	Email
<i>Executive Director</i>	<ul style="list-style-type: none"> • Provide strategic leadership. • Activate the COOP. • Determine the Agency's status. 	1.		
		2.		
<i>Communications</i>	<ul style="list-style-type: none"> • Notify the Agency's staff of updates. • Contact local public emergency services. • Update automated calling systems. 	1.		
		2.		
<i>Finance</i>	<ul style="list-style-type: none"> • Ensure that funds are available. • Procure additional equipment and staff. 	1.		
		2.		
<i>Facility Manager</i>	<ul style="list-style-type: none"> • Maintain facility attendance. • Determine the status of facility systems. 	1.		
		2.		
<i>Housing Counselors</i>	<ul style="list-style-type: none"> • Conduct outreach to clients. • Deliver counseling services. • Determine the status of facility systems. 	1.		
		2.		
		1.		
		2.		
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