

Continuity Capability Evaluation for the Emergency Services Sector

Based on the Federal Emergency Management Agency Continuity Guidance for Non-Federal Governments

2018



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Introduction

Continuity programs and operations are fundamental practices that allow critical services to remain available under all conditions. The Emergency Services Sector Continuity Planning Suite (ESS-CPS) provides a centralized collection of existing guidance, processes, products, tools, and best practices to support the development and maturation of continuity planning for the first responder community. The core of the ESS-CPS is the Continuity Capability Evaluation for the Emergency Services Sector (CCE), which provides an easyto-use and uniform method for Emergency Services Sector (ESS) organizations to evaluate continuity capability and identify and fill continuity gaps. Through identifying and filling these gaps, viable continuity programs can be established to help keep ESS organizations functioning during emergencies.

The CCE is derived from multiple continuity guidance documents from the Federal Emergency Management Agency (FEMA) and was developed through a partnership of the Emergency Services Sector-Specific Agency (SSA) and Sector Coordinating Council (SCC). First responders can use the CCE as it suits their organization to evaluate and improve their continuity capability and enhance their preparedness for emergencies. The CCE is useful for ESS organizations regardless of location, size, and status of existing continuity programs or plans. It describes the elements necessary to establish and maintain continuity capability, facilitates the evaluation of existing continuity capability and subsequent filling of capability gaps, and can assist with establishing a foundation and framework for building a continuity program. Periodic reevaluation of continuity capability through the CCE is useful in allocating limited resources and reviewing overall progress to keep the organization's continuity efforts focused and on track.

The information that an organization provides when completing the CCE is intended to be confidential and under the organization's complete control. Distribution of the CCE or any of the included information is at the organization's discretion. For more information on continuity planning, see the ESS-CPS at www.dhs.gov/emergency-services-sector-continuity-planning-suite.

Continuity Capability Elements

There are 11 major elements necessary for an ESS organization to establish and maintain comprehensive and effective continuity capability.

- 1. **Essential Functions** The limited set of organization-level functions that should be continued throughout, or resumed rapidly after, a disruption of normal activities.
- Orders of Succession Provisions that enable an orderly and predefined transition of organizational leadership positions if an organization's leader is incapacitated or becomes otherwise unavailable during an emergency.
- Delegations of Authority Identification, by position, of the authorities for making policy determinations and decisions at headquarters, field levels, and all other organizational locations. Generally, predetermined delegations of authority will take effect when normal channels of direction have been disrupted and will lapse when these channels have been reestablished.
- 4. **Continuity Facilities** Locations from which leadership and critical positions may operate during an emergency. These may include one or many facilities or virtual offices from which to continue essential operations.
- 5. **Continuity Communications** Systems that support full connectivity among leadership, internal elements, and other organizations to perform essential functions during an emergency.
- 6. **Essential Records Management** The identification, protection, and availability of information systems and applications, electronic and hardcopy documents, references, and records needed to support essential functions during an emergency.

- 7. **Human Resources** Policies, plans, and procedures that address human resources needs during an emergency, such as guidance on pay, leave, work scheduling, benefits, telework, hiring, authorities, and flexibilities.
- Test, Training, and Exercise The identifying, training, and preparing of personnel capable of performing their continuity responsibilities and implementing procedures to support the continuation of essential functions. Training provides the skills and familiarizes personnel with procedures and tasks. Tests and exercises assess and validate all of the components of continuity plans, policies, procedures, systems, and facilities.
- 9. **Devolution of Control and Direction** The capability to transfer statutory authority and responsibility for essential functions from primary operating staff and facilities to other employees and facilities. This also provides the means to sustain that operational capability for an extended period.
- 10. **Reconstitution Operations** The process by which the organization's personnel resume normal operations from the original or a replacement primary operating facility.
- 11. **Program Plans and Procedures** The effort to document the existence of, and seek the capability to continue, an organization's essential functions during a wide range of potential emergencies.

For each element, objectives supporting the element and practices fulfilling each objective have been identified. Objectives are broad criteria by which the performance of an element in a particular area can be addressed. Practices are detailed criteria that further clarify the area being assessed. The objectives and practices are subjective in nature. Therefore, it is reasonable to expect some variability from organization to organization when characteristics are reviewed. This flexibility is acceptable, as no two organizations' continuity programs are identical.

How to Use the Continuity Capability Evaluation for the Emergency Services Sector

The CCE directs an ESS organization to review the objectives and practices for the 11 continuity capability elements and select Yes, No, or N/A to denote whether the organization has completed each practice. ESS organizations are encouraged to review and provide input to all of the element <u>worksheets</u> as an initial evaluation and to follow up with individual worksheets for each element where gaps are identified.

In determining whether to select Yes or No for each practice, a rating scale of 0–10 for the level of completeness can be used. Table 1 describes this scale. For practices that receive a rating of 0–6, select No in the element worksheet. For practices that receive a rating of 7–10, select Yes.

After making selections for each practice, record tallies of Yes, No, and N/A in boxes next to the element description for each element, as well as in the <u>Continuity Capability Evaluation Results Summary</u> (Table 2). A percentage of completeness can be calculated from the tally of selections in Table 2 to assess the ESS organization's overall continuity capability for each element. A spreadsheet is available upon request from the Emergency Services SSA (<u>essteam@hq.dhs.gov</u>) to support making these calculations.

The following process is used to determine the percentage of completeness:

- Count the total number of Yes, No, and N/A selections for each element and record those tallies in the appropriate columns of Table 2.
- Determine the total number of applicable practices for each element by subtracting the number of N/A selections from the total number of practices (Table 2. Total Practices column).
- Divide the number of practices with Yes selected by the total number of applicable practices. Record the result in the % Complete column in Table 2.

Once the percentage of completeness has been calculated, color codes can be assigned to each element row in Table 2 for easy recognition major gaps in continuity capability.

- **Green:** At least 80 percent of all practices within the respective continuity element were selected as Yes, signifying that there are no significant deficiencies with the respective continuity element.
- **Yellow:** Fifty to 80 percent of all practices within the respective continuity element were selected as Yes, signifying that there are some compliance and/or implementation concerns that may hinder but not prevent continuity operations from occurring.
- Red: Less than 50 percent of all practices within the respective continuity element were selected as Yes, signifying that there are significant compliance and/or implementation concerns that will prevent continuity operations from occurring.

For those elements assigned as red, the ESS organization can choose to mitigate gaps in continuity capability by reviewing the practices selected as No and the associated comments for those practices in the worksheets, determining how to address the reasons they were selected as No, and implementing changes to close such gaps. Subsequently, the ESS organization can review the individual worksheets for those elements to update their continuity capability (in the <u>Continuity Capability Evaluation Worksheets</u> section that follows, see the links to individual worksheets at the end of each element section).

	No Progress	Limite	ed Prog	ress		loderat rogres			ibstant Progres		Objective Achieved
Explanation	0: No progress has been made toward achieving the identified continuity requirement or objective. This may be because there has been no activity in this area or because insurmountable barriers exist.	have be if any s implem success 3: Initia toward have be implem include develop the cap of resou identific person for achi	eliminary een initiat teps have ented sfully so f I specific the objec een succe ented. Ste initial pla o this aspo ability, all urces, and ation of nel respon evement ment or o	ed. Few been ar. steps tives essfully eps may ns to ect of ocation d msible of the	are und require yet bee Importa Challer potentia achieve have no resolve 6: Signi under v specific progres can be Strateg gaps an	ificant eff vay, and example ss in this identified ies for clo nd overco s have be	out the s not l. remain. could rmine ist and en orts are es of area l. osing oming	this obje establisi Some w barriers prevent success organiza levels. S critical, resolve docume under w 9: Effort are mat barriers are sign docume	ation con Shortfalls and strat them are inted and ay. is in this ure. Few remain. ificant. E inting this ess is re	e stable. ees or hat e nponent are not egies to d well area gaps or None svidence s level	10: Indicates the requirement and/or objective is fully achieved with regard to this capability. All barriers to success have been overcome. Strengths are robust and likely to be sustained. Evidence is readily available attesting to this level of achievement.
	0	1	2	3	4	5	6	7	8	9	10
			No							Ye	S

Table 1. Continuity Capability Practice Rating Scale

Continuity Capability Evaluation Results Summary

Use this section to record the results of the continuity capability evaluation. In Table 2, record tallies for the number of continuity practices receiving Yes, No, or N/A selections in the evaluation of each continuity capability element and the percentage of completeness for each element, as previously described in How to Use the Continuity Capability Evaluation for the Emergency Services Sector.

Number	Continuity Capability Element	Total Practices	Total Yes	Total No	Total N/A	% Complete
1	Essential Functions	5				
2	Orders of Succession	5				
3	Delegations of Authority	5				
4	Continuity Facilities	5				
5	Continuity Communications	5				
6	Essential Records Management	5				
7	Human Resources	5				
8	Test, Training, and Exercise	5				
9	Devolution of Control and Direction	5				
10	Reconstitution Operations	5				
11	Program Plans and Procedures	3				
Color Key:	: 80–100% complete	50–80% comp	lete	<50%	% complete	;

Table 2. Continuity Capability Evaluation Results

Continuity Capability Evaluation General Information

Use this section to document key information about the organization conducting a continuity capability evaluation.

Contact Information		
Organization Location	Continuity Manager Name	Continuity Manager Telephone
General Continuity Information	n	
In which FEMA region(s) is your organization's community located?	What are the primary natura hazards to your organization	Industrial nazards to volir
□ I □ II	Hurricane	Nuclear test site/ transportation route
	Tornado	Military bombing site
□ V □ VI	Flooding	Radioactive waste site
	Earthquake	Nuclear reactor
	Winter weather	Chemical storage and transportation
	Other	Other
		None None
What does the physical landscape your organization operates resemble Desert Flat/Treeless Grassy, plains	-	
		las your organization had to activate s continuity of operations plan? Yes No N/A
Who is in charge of your continuity		loes your organization use in of operations plans and programs?
Emergency management	Federal guidance	
Safety	State/Local/Triba	I/Territorial guidance
Security department	Private sector gui	dance
Other	Other	

Continuity Capability Evaluation Worksheets

This chapter describes the 11 continuity capability elements and provides worksheets for assessing the associated objectives and practices during a continuity capability evaluation.

Instructions

Review the element's definition, objectives supporting the element, objective and practice. Select or write Yes, No, or N/A in each box to represent if your organization has completed the action described in the practice. Include comments for information supporting how the practice is complete or why it is not complete. Tally all selections for the element and record them in the box to the right of the element definition. Aggregated tallies are entered in the <u>Continuity Capability Evaluation Results Summary</u>. Follow the process described in <u>How to</u> <u>Use the Continuity Capability Evaluation for the Emergency Services Sector</u> above to determine how to select Yes, No, or N/A for each practice for the element.

1. Essential Functions

The limited set of organization level functions that should be continued throughout, or resumed rapidly after, a disruption of normal activities.

The identification and prioritization of Essential Functions is the foundation for continuity planning. These functions enable the organization to provide vital services, exercise civil authority, maintain the safety of the community, and sustain the industrial/economic base during an emergency. The functions must be continued under any and all circumstances.

For guidance on the identification, prioritization, and resourcing of Essential Functions, See <u>Appendix A</u>. <u>Essential Functions</u>. For guidance on conducting business process analysis (BPA) to identify and document all that is necessary to perform an essential function, see <u>Appendix B</u>. <u>Business Process Analysis</u>. An individual worksheet for essential functions can be found at <u>www.dhs.gov/publication/emergency-services-sector-continuity-planning-suite</u>. These resources can support filling gaps in continuity identified in the initial evaluation.

Objective 1.1 Identify and prioritize all essential functions to enable the organization to provide vital services, exercise civil authority, maintain the safety of the general public, and sustain the industrial/ economic base during any emergency.

Practice 1.1.1 The organization has identified and prioritized its essential functions, using the methodology outlined in Appendix A, and documented them in its continuity plan.

Practice 1.1.2 The organization's BPA has identified and mapped the functional processes, workflows, activities, resources, personnel expertise, supplies, equipment, infrastructures, systems, data, and facilities inherent to the execution of each identified essential function.

Enter Tallies Here					
Yes					
No					
N/A					

Practice 1.1.3 The organization head or designee has validated and approved the identified essential functions and BPA.

Practice 1.1.4 The organization has conducted a business-process flow map to identify how each essential function is performed and executed.

Practice 1.1.5 The organization has determined the essential functions that need to be continued uninterrupted or resumed within 12 hours, regardless of circumstance.

Enter selection tallies <u>above</u> and in the <u>Continuity Capability Evaluation Results Summary</u>.

2. Orders of Succession

Provisions that enable an orderly and predefined transition of organizational leadership positions if an organization's leader is incapacitated or becomes otherwise unavailable during an emergency event.

Enter	r Tallies Here
Yes	
No	
N/A	

Orders of succession are an essential part of an organization's continuity plans and should reach to a sufficient depth and have sufficient breadth to ensure the organization can perform its essential functions during the course of any

emergency. Geographical dispersion, including use of regional, field, or satellite

leadership in the standard organization line of succession, is encouraged and ensures roles and responsibilities can transfer in all contingencies.

An individual worksheet for orders of succession can be found at <u>www.dhs.gov/publication/emergency</u>services-sector-continuity-planning-suite. It can be used to use to fill gaps after the initial evaluation.

Objective 2.1 Identify and document a clear line of succession, in the absence of leadership during the course of any emergency, to enable an orderly and predefined transition of leadership within the organization in accordance with applicable laws.

Practice 2.1.1 The organization has established and documented orders of succession in advance and in accordance with applicable laws to ensure that there is an orderly and predefined transition of leadership during any emergency.

Practice 2.1.2 The organization has established an order of succession for the position of organization head to ensure a designated official is available to serve as acting head of the organization until that official is appointed by the appropriate authority, replaced by the permanently appointed official, or otherwise relieved.

Practice 2.1.3 The organization has established orders of succession for other key organization leadership positions, including but not limited to administrators, regional or field directors, and key managers.

Practice 2.1.4 Within each order of succession, the organization has included at least three positions permitted to succeed to the identified leadership position.

Objective 2.2 Identify and acquire effective communications systems that support full connectivity, under all conditions, among key government leadership, internal elements, other agencies, critical customers, and the public.

Practice 2.2.1 The organization has described orders of succession by positions or titles, rather than by the names of the individuals holding those offices.

Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

3. Delegations of Authority

Identification, by position, of the authorities for making policy determinations and decisions at headquarters, field levels, and all other organizational locations.

Delegations of authority ensure the orderly and predefined transition of leadership responsibilities within an organization during an emergency and are closely tied to succession. Delegations of authority typically specify a particular function, including limitations, conditions, and restrictions, that an individual is deemed by the organization as qualified to perform. Generally, predetermined delegations of

Enter Tallies Here				
Yes				
No				
N/A				

authority will take effect when normal channels of direction have been disrupted and will lapse when these channels have been reestablished.

An individual worksheet for delegations of authority can be found at <u>www.dhs.gov/publication/emergency-</u><u>services-sector-continuity-planning-suite</u>. It can be used to use to fill gaps after the initial evaluation.

Objective 3.1 Identify and document the delegation of authority to make policy determinations and decisions for key organizational leadership positions at the headquarters, regional, field, satellite, and other levels and other organizations' locations, as appropriate. This action will ensure a rapid response to any emergency and to minimize disruptions that require continuity implementation.

Practice 3.1.1 The organization has established and documented, in advance, the legal authority for the position of organization head and other key supporting positions to make key policy decisions during a continuity situation.

Practice 3.1.2 The organization has established and documented, in advance, the legal authority for the position of organization head and other key supporting positions to direct the organization. This documentation explicitly states the authority of an official so designated, including any exceptions to that authority.

Practice 3.1.3 The organization has established and documented, in advance, the legal authority for the position of organization head and other key supporting positions to delineate the limits of authority and accountability.

Practice 3.1.4 The organization has established and documented, in advance, the legal authority for the position of organization head and other key supporting positions to establish the rules and procedures that designated officials must follow when facing the issues of succession to office.

Practice 3.1.5 The organization has established and documented, in advance, the legal authority for the position of organization head and other key supporting positions to define the authority of officials to re-delegate functions and activities, as appropriate.

Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

4. Continuity Facilities

Locations from which leadership and critical positions may operate during an emergency.

Continuity facilities may include one or many facilities or virtual offices from which to continue essential operations. The use of continuity facilities, alternate uses of existing facilities, and telework options enhances the resilience and continuity capability of organizations. Continuity facilities are typically classified as one of three types:

Enter Tallies Here		
Yes		
No		
N/A		

- Hot site: A facility that already has in place the personnel and physical, communication, and information technology (IT) infrastructure required to recover essential functions.
- Warm site: A facility that is equipped with some personnel and physical, communication, and IT infrastructure capable of providing backup after additional personnel, equipment, supplies, software, or customization are provided.
- Cold site: A facility that is not manned on a day-to-day basis by personnel from the primary operating facility. Before it can be used, organizations may be required to pre-install communication and IT infrastructure and deploy designated essential personnel to the facility to activate equipment or systems.

An individual worksheet for continuity facilities can be found at <u>www.dhs.gov/publication/emergency-</u><u>services-sector-continuity-planning-suite</u>. It can be used to use to fill gaps after the initial evaluation.

Objective 4.1 Identify alternate facilities, to include alternate uses of existing facilities and, as appropriate, virtual office options. The options would include telework, based on the findings of applicable risk assessments, to provide survivable protection and sustain continued, endurable operations under any circumstances.

Practice 4.1.1 At a minimum, the organization has identified, prepared, and maintained continuity facilities, including an alternate site for the relocation of its continuity emergency response group (ERG) and a devolution site for the devolution of essential functions to the devolution emergency response group (DERG). This capability can encompass separate facilities; alternate uses of existing facilities; and, as appropriate, work arrangements, including telework and mobile work.

Practice 4.1.2 The organization has reviewed its continuity facilities annually for suitability and functionality to ensure that the facilities meet its continuity requirements. In addition, the organization has documented the date of the review and names of personnel conducting the review.

Practice 4.1.3 The organization has chosen continuity facilities located in areas where the potential disruption of the organization's ability to initiate and sustain operations is minimized, based upon risk assessments.

Practice 4.1.4 The continuity facilities have sufficient distance, based upon risk assessments and as judged by the organization, from the primary operating facility, threatened area, and other facilities or locations that are potential sources of disruptions or threats.

Practice 4.1.5 The organization has all critical supplies and equipment pre-positioned or maintains detailed site preparation and activation plans in order to achieve full operational capability within 12 hours of notification.

Enter selection tallies <u>above</u> and in the <u>Continuity Capability Evaluation Results Summary</u>.

5. Continuity Communications

The systems that support full connectivity among the organization's leadership internal elements and other organizations to perform essential functions during an emergency.

Ente	Enter Tallies Here		
Yes			
No			
N/A			

The success of continuity programs is dependent on the availability of robust and

effective communications to provide internal and external connectivity. An organization's ability to execute its essential functions at its primary facility and

continuity facilities, as well as the ability of the organization's senior leadership to collaborate, develop policy and recommendations, and act under all-hazards conditions, depend upon the availability of effective communications systems.

An individual worksheet for continuity communications can be found at <u>www.dhs.gov/publication/</u> <u>emergency-services-sector-continuity-planning-suite</u>. It can be used to use to fill gaps after the initial evaluation.

Objective 5.1 Identify and acquire effective communications systems that support full connectivity, under all conditions, among key government leadership, internal elements, other agencies, critical customers, and the public.

Practice 5.1.1 The organization has considered and addressed communication services availability needs at primary and continuity facilities.

Practice 5.1.2 The organization has implemented minimum communications requirements for its primary facilities and its alternate and other continuity facilities, as appropriate, that support the continuation of the organization's essential functions.

Practice 5.1.3 The organization possesses interoperable and available communications capabilities in sufficient quantity and mode/media. These communications are commensurate with that organization's responsibilities during the conditions of an emergency.

Practice 5.1.4 The organization possesses communications capabilities that support the organization's senior leadership while they are in transit to continuity facilities.

Objective 5.2 Verify that the organization's communications systems meet all of the organization's needs, including those mandated by applicable directives and regulations, and train the organization's personnel on and test all continuity communications systems that support full connectivity under all conditions.

Practice 5.2.1 The organization has ensured that its communications capabilities are maintained, can be operational as soon as possible following a continuity activation, and are readily available for a period of sustained use (for up to 30 days) or until normal operations are reestablished. Organizations should plan accordingly for essential functions that require uninterrupted communications and information technology (IT) support, if applicable.

Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

6. Essential Records Management

The systems that support full connectivity among the organization's leadership internal elements and other organizations to perform essential functions during an emergency.

The identification, protection, and ready availability of essential records, databases, and hard copy documents needed to support essential functions under the full spectrum of all-hazards emergencies are critical elements of a successful continuity plan and program. Organizations should strongly consider multiple redundant

Enter Tallies Here		
Yes		
No		
N/A		

media for storing their essential records. Every organization has different functional responsibilities and

business needs. An organization should decide which records are essential to its operations and then assign responsibility for those records to the appropriate personnel.

For guidance on developing an essential records plan, see the Federal Emergency Management Agency (FEMA) <u>Essential Records Plan Packet Template</u>. An individual worksheet for essential records management can be found at <u>www.dhs.gov/publication/emergency-services-sector-continuity-planning-suite</u>. These resources can support filling gaps in continuity identified in the initial evaluation.

Objective 6.1 Establish an essential records program to ensure that records and databases essential to the continued functioning or the reconstitution of an organization during and after an emergency are identified, protected, and included in the organization's continuity plan.

Practice 6.1.1 The organization's official essential records program has identified and protected records that specify how the organization will operate in an emergency or disaster.

Practice 6.1.2 The organization's official essential records program has identified and protected

records necessary to the organization's continuing essential functions and resumption of normal operations.

Practice 6.1.3 The organization's official essential records program has identified records needed to protect the legal and financial rights of the organization and the public.

Practice 6.1.4 The organization's official essential records program has included appropriate policies, authorities, procedures and the written designation of an essential records manager.

Practice 6.1.5 The organization has incorporated its essential records program into its overall continuity plans.

Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

7. Human Resources

Policies, plans, and procedures that address personnel needs during an emergency, such as guidance regarding pay, leave, work scheduling, benefits, telework, hiring, authorities, and flexibilities.

Personnel are vital to the continuity capability of all organizations. Continuity coordinators at all organizations should be senior accountable officials responsible for working with the organization head to ensure the effectiveness and survivability of the organization's continuity capability. Continuity managers manage the day-to-

Enter Tallies Here			
Yes			
No			
N/A			

day continuity programs. During an emergency, organizations will activate emergency response group (ERG) members to perform their assigned duties. The ERG is composed of individuals who are assigned responsibility to relocate to an alternate site, as required, to perform the organization's essential functions or other tasks related to continuity operations. Personnel stationed at the devolution site who are identified to conduct essential functions during activation of devolution plans are classified as the devolution emergency response group (DERG). Organizations should have means and processes in place for employees to contact their organization in a timely and routine manner during emergencies.

An individual worksheet for human resources can be found at <u>www.dhs.gov/publication/emergency-services-</u> <u>sector-continuity-planning-suite</u>. It can be used to use to fill gaps after the initial evaluation.

Objective 7.1 Identify continuity leadership and staff and establish the organization's human resources procedures and considerations that are adaptable to changing circumstances and a variety of emergencies, for use during a continuity plan activation.

Practice 7.1.1 The organization has developed and implemented processes to identify, document, and prepare ERG members who are capable of relocating to alternate sites or teleworking, and DERG members at the devolution site to support the continued performance of essential functions.

Practice 7.1.2 The organization has clearly defined the expectations, roles, and responsibilities of ERG and DERG members during a continuity activation.

Practice 7.1.3 The organization has established and maintained appropriate point-of-contact rosters of trained ERG and DERG members who have the ability to perform essential functions. The organization has updated these rosters periodically and has included, at a minimum, member names and contact numbers (home, work, and cell phone).

Practice 7.1.4 The organization has ensured that ERG and DERG members were informed of and have officially accepted their roles and responsibilities, in writing.



Practice 7.1.5 The organization has identified replacement personnel and augmentees, as necessary.

Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

8. Test, Training, and Exercise

The identifying, training, and preparing of personnel capable of performing their continuity responsibilities and implementing procedures to support the continuation of essential functions.

The testing, training, and exercising of continuity capability is essential to demonstrating, assessing, and improving an organization's ability to execute its continuity program, plans, and procedures. The testing of an organization's ability to

Ente	Enter Tallies Here		
Yes			
No			
N/A			

demonstrate continuity capability in the performance of essential functions enables leadership to establish clear goals for the organization. This periodic testing also ensures that resources and procedures are kept in a constant state of readiness. Training familiarizes continuity personnel with their roles and responsibilities in support of the performance of an organization's essential functions during an emergency. Exercises prepare emergency response group (ERG) and devolution emergency response group (DERG) members to respond to all emergencies and disasters and ensure performance of the organization's essential functions. These include interdependencies both internal and external to the organization.

For a continuity plan template, see the <u>FEMA Continuity Plan Template and Instructions for Non-Federal</u> <u>Governments</u>. For more information on training, see the Knowledge Validation: Testing, Training, and Exercising section of the <u>ESS-CPS</u>. For more information on exercises, see the <u>Emergency Services Sector-Specific Tabletop Exercise Program (ES SSTEP)</u> and the <u>Homeland Security Exercise and Evaluation Program</u> (<u>HSEEP</u>). An individual worksheet for test, training, and exercise can be found at <u>www.dhs.gov/publication/</u> <u>emergency-services-sector-continuity-planning-suite</u>. These resources can support filling gaps in continuity identified in the initial evaluation.

Objective 8.1 Create, execute, and document an effective organization-wide continuity test, training, and exercise (TT&E) program that demonstrates, assesses, and improves an organization's ability to execute its continuity program, plans, and procedures and perform its essential functions during all emergencies.

Practice 8.1.1 The organization has developed and maintained a continuity TT&E program for conducting and documenting TT&E activities that identifies the components, processes, and requirements for the training and preparedness of personnel needed to support the continuation of the performance of essential functions.

Practice 8.1.2 As part of its TT&E program, the organization has documented all conducted TT&E events, including documenting the date of the event, those participating in the event, and the results of the event.

Practice 8.1.3 The organization's TT&E program has utilized an all-hazards approach to demonstrate the viability of its continuity plans and programs.

Practice 8.1.4 Continuity personnel have demonstrated their understanding of and ability to perform assigned roles and responsibilities through participation in their organization's continuity TT&E program.

Practice 8.1.5 The organization's testing program has included and documented the annual testing of alert notification and activation procedures for continuity and devolution personnel and quarterly testing of such procedures for personnel at the organization's headquarters.

Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

9. Devolution of Control and Direction

The capability to transfer statutory authority and responsibility for essential functions from primary operating staff and facilities to other employees and facilities.

Devolution planning supports overall continuity planning by addressing how an

organization will identify and transfer responsibility for the performance of essential functions to personnel at an alternate location that offers a safe and

secure environment in which essential functions can continue when the emergency response group (ERG) and primary operating facilities are unavailable. Personnel stationed at the devolution site who are identified to conduct essential functions are referred to as the devolution emergency response group (DERG).

An individual worksheet for devolution of control and direction can be found at <u>www.dhs.gov/publication/</u> <u>emergency-services-sector-continuity-planning-suite</u>. It can be used to use to fill gaps after the initial evaluation.

Objective 9.1 Develop a devolution plan or procedures that address the personnel and planning considerations needed to transfer the organization's essential functions and/or leadership authorities away from the primary facility or facilities and to a location that offers a safe and secure environment when catastrophes and other

Enter Tallies Here		
Yes		
No		
N/A		

all-hazards emergencies render an organization's leadership and key staff unavailable to or incapable of performing its essential functions.

Practice 9.1.1 The organization has developed a devolution option for continuity to address how it will identify and conduct its essential functions when the primary operating facility, alternate site, and/or ERG members are not available.

Practice 9.1.2 The organization has addressed the following elements of a viable continuity capability in its devolution option: program plans and procedures; risk management; budgeting and acquisitions; essential functions; orders of succession and delegations of authority specific to the devolution site; continuity communications; essential records management; human resources; test, training, and exercise (TT&E); and reconstitution.

Practice 9.1.3 For each identified essential function, the organization has determined the necessary resources to facilitate the immediate and seamless transfer of each function to the devolution site.

Practice 9.1.4 The organization has included a roster that identifies fully trained DERG members stationed at the designated devolution site who have the authority to perform essential functions when the devolution option of the continuity plan is activated.



Practice 9.1.5 The organization has identified what would likely activate or "trigger" the devolution option.

Enter selection tallies above and in the <u>Continuity Capability Evaluation Results Summary</u>.

10. Reconstitution Operations

The process by which the organization's personnel resume normal operations from the original or a replacement primary operating facility.

Reconstitution requirements address the need for organizations to identify, develop, and coordinate a plan to return to normal operations once leadership determines that the actual emergency, or the threat of an emergency, is over. Communication enables an organization to inform all personnel that the necessity for continuity operations no longer exists and to instruct personnel on how to

Enter Tallies Here		
Yes		
No		
N/A		

resume normal operations. The non-emergency response group (ERG) staff augments the ERG staff to begin the process of resuming nonessential functions. Leadership determines priorities and supervises the orderly return to normal operations. Organizations assess the status of affected facilities and transition back into the primary operating facility or a new facility.

An individual worksheet for reconstitution operations can be found at <u>www.dhs.gov/publication/emergency</u>services-sector-continuity-planning-suite. It can be used to use to fill gaps after the initial evaluation.

Objective 10.1 Identify and outline a reconstitution plan and procedures so that the organization is fully capable of accomplishing all essential functions and normal operations at the new or restored facility once the organization's heads or their successors have determined that it is acceptable to return from all alternate facilities.

Practice 10.1.1 The organization has developed a reconstitution plan that provides the ability to recover from the effects of an emergency for transitioning back to efficient normal operational status from continuity operations status, once a threat or disruption has passed.

Practice 10.1.2 The organization's reconstitution plan determines how the organization will assess the status of affected personnel, assets, and facilities.

Practice 10.1.3 The organization's reconstitution plan includes redeployment plans for phasing down continuity facility operations and supervising the return of operations, personnel, records, and equipment to the primary or other operating facility in a priority-based approach, when appropriate.

Practice 10.1.4 The organization's reconstitution plan outlines the necessary procedures for conducting a smooth transition from the continuity facility to either the normal primary operating facility, another temporary facility, or a new permanent facility.

Practice 10.1.5 The organization's reconstitution plan details how the organization will inform all personnel when the actual emergency (or the threat of an emergency) and the necessity for continuity operations no longer exist, and it instructs personnel on how to resume normal operations.

Enter selection tallies <u>above</u> and in the <u>Continuity Capability Evaluation Results Summary</u>.

11. Program Plans and Procedures

The effort to document the existence of, and seek the capability to continue, an organization's essential functions during a wide range of potential emergencies.

Enter Tallies Here		
Yes		
No		
N/A		

Continuity plans minimally provide an overview of the organization's approach to continuity operations, detail continuity and organization policies, describe the organization, and assign tasks. The plans are typically reviewed and annually and updated as necessary. Major sections of continuity plans generally address the 11 elements of continuity.

For a continuity plan template, see the Federal Emergency Management Agency (FEMA) <u>Continuity Plan</u> <u>Template and Instructions for Non-Federal Governments</u>. An individual worksheet for program plans and procedures can be found at <u>www.dhs.gov/publication/emergency-services-sector-continuity-planning-suite</u>. These resources can support filling gaps in continuity identified in the initial evaluation.

Objective 11.1 Develop and maintain comprehensive continuity plans, procedures, objectives, and requirements that, when implemented, will provide for the continued performance of an organization's essential functions under all circumstances.

Practice 11.1.1 The organization has developed and documented a continuity plan and its supporting procedures so that, when implemented, the plan and procedures will provide for the continued performance of an organization's essential functions under all circumstances and will provide for integration with Government and nongovernment organizations, as appropriate.

Practice 11.1.2 The organization head or designee has approved and signed the continuity plan, to include significant updates or addendums.

Practice 11.1.3 The organization has annually reviewed its continuity plan and updated it, if changes occur, documenting the date of the review and the names of personnel conducting the review.



Enter selection tallies above and in the Continuity Capability Evaluation Results Summary.

Appendix A. Essential Functions

Introduction

Essential functions are the limited set of organization-level functions that should be continued throughout, or resumed rapidly after, a disruption of normal activities. The identification and prioritization of essential functions is the foundation for continuity planning. These functions enable the organization to provide vital services, exercise civil authority, maintain the safety of the community, and sustain the industrial/economic base during an emergency. The functions must be continued under any and all circumstances.

While many functions are important during a disruption, organizations have to focus their efforts and limited resources on those functions that cannot be deferred. When identifying these functions, it is important to consider:

- If an organization identifies too many functions as essential, limited resources and/or staff availability during the emergency may not be sufficient to enable performance of all identified essential functions.
- If an organization fails to identify functions as essential and does not include them in emergency and continuity plans, these functions may not be performed during an emergency.

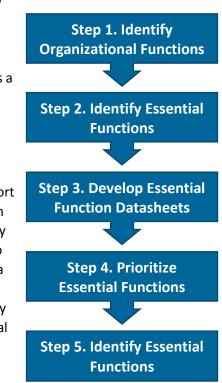
The key is to identify the highest-priority functions and the resources and capabilities required to ensure that they can be performed. During less severe disruptions, it may be possible for organization personnel to accomplish many nonessential functions as well, and this is to be expected and encouraged, as long as it does not interfere with the performance of those most critical functions that the organization has identified as essential functions.

Identifying, Reviewing, and Updating Mission-Essential Functions

The process focuses on five basic steps as a means of identifying, developing, and submitting an organization's essential functions for leadership approval. Organizations are encouraged to use this process to review, update, and revalidate essential functions. The process outcome is a leadership-approved, prioritized collection of essential functions that become the foundation for developing an effective continuity capability.

Step 1: Identify Organizational Functions

The first step is to identify and list all the functions that support and accomplish the organization's mission. To clarify responsibilities and support further continuity planning activities, the requirement for performing each function would be identified. Consideration would be given to how broadly or narrowly functions are defined and described. Describing a function too broadly may inadvertently include functions that are not essential during a disruption; describing a function too narrowly may result in too many functions to manage effectively. To simplify the process, organizations may choose to not include functions that clearly will not be considered essential functions. Each function would be described in basic terms and would identify products or services delivered or actions that the organization accomplishes. The product resulting from step 1 will be a list of important organization functions. Examples of organization function descriptions include:



• Provide training to outside organizations

- Maintain and ensure the operational capability of computer systems
- Provide Equal Employment Opportunity services
- Develop an organization budget for the next fiscal year

Step 2: Identify Essential Functions

The second step in the process focuses on reviewing each function identified in step 1 to determine which functions are essential functions. This process focuses on determining if a function is a mission, non-mission, or supporting activity, and then determining if the function is essential or nonessential. The process for making these determinations is described as follows.

Mission versus Supporting Activity

- If the function results in the delivery of service to the public or another organization, it probably is a mission activity.
- If the function results in a service being delivered to another part of the same organization, it likely is a supporting activity. Supporting activities are typically enablers that make it possible for an organization to accomplish its mission.

Supporting activities frequently are assigned as the principal function of components within an organization. The organization recognizes that it could not accomplish its missions efficiently without these supporting activities.

Essential versus Nonessential

The distinction between these two categories is whether a function must be performed during a crisis. Essential functions are those that have to be performed during emergencies. Essential functions are both important and urgent. If an organization determines that a function may have to be performed during or immediately after an emergency, it should be identified as essential. Functions that can be deferred until after the emergency should be identified as nonessential.

Step 3: Develop Essential Function Datasheets

The third step in this process involves conducting a detailed review of each of the essential functions to more fully describe each function that enables an organization's mission to be accomplished and documenting the results on the essential function datasheets.

Step 4: Prioritize Essential Functions

The fourth step in the process is to prioritize the essential functions based on the datasheets developed in step 3. While performance of all essential functions will need to be resumed following a disruption, if resources are limited, an organization may have to focus its attention on some essential functions before others. For example, some functions may require continuous performance (e.g., firefighting and 9-1-1 services); it may be possible to delay resumption of other functions for short periods of time (e.g., the resumption of water and power services, post-storm debris cleanup, and the resumption of public transportation services.) It may be possible to delay resumption of some essential functions (e.g., trash removal services) for several days.

Several factors are necessary to include in the essential function prioritization determination, including:

1. Recovery time objective: The Essential Function Datasheet identifies the required recovery time for each essential function. Those essential functions that must be continuously performed or those with

the shortest recovery times will generally be given priority over essential functions with longer recovery times.

- 2. Impacts if not conducted: The impacts of not conducting or delaying the performance of each essential function would be part of the prioritization determination. The more severe the impacts if not performed, the higher the priority of the essential function.
- 3. Management priority: Some missions will have a higher priority as a result of management preference and discretion.

The prioritization process will likely involve a combination of both objective and subjective decisions. It may be most efficient to group the essential functions into priority categories rather than attempting to establish a comprehensive linear list. Prioritizing the essential functions in this fashion will help planners develop emergency and continuity plans that are consistent with the organization's requirements and management priorities.

Step 5: Submit Essential Functions for Leadership Approval

The fifth step in the essential function identification process is obtaining senior organizational leaders' or elected officials' review, validation, and approval of the essential functions, their descriptions, and their prioritization. It is critical that leaders recognize the scope and effect of establishing and prioritizing essential functions for several reasons, including:

- Organizational leadership should be in full agreement with the organization's missions and priorities during a disruption or crisis.
- Continuity and emergency plans will be developed based on the organization's essential functions and priorities, which will involve assignment of personnel and resources.
- Organizational funds and resources may need to be allocated to ensure the performance of essential functions during a crisis.
- Organizational test, training, and exercise activities will focus on essential function performance.

Essential Function Datasheet

The following template datasheet can be used to document the details of a single essential function. The datasheet may be modified as appropriate based on the mission, needs, and other characteristics of the organization. A datasheet should be created for each essential function.

	Essential Function Datasheet
	Date:
Essential Function Statement	
Descriptive Narrative	
Impacts If Not Conducted	
Recovery Time Objective	
Partners	
Point of Contact	

Appendix B. Business Process Analysis

Introduction

A business process analysis (BPA) is a systematic method of identifying and documenting all of the elements necessary to perform each organizational essential function. The essential function identification process in Appendix A identifies what needs to be accomplished; the BPA process identifies how it is accomplished. A BPA is performed to ensure that the right people, equipment, capabilities, records, and supplies are identified and available where needed during a disruption so that essential functions can be resumed guickly and performed as required. In addition, the BPA is a method of examining, identifying, and mapping the functional processes, workflows, activities, personnel expertise, systems, data, partnerships, controls, interdependencies, and facilities inherent in the execution of an essential function. Each organization should look at the BPA process from the point of view of both the big picture (the overall process flow) and the operational details. Performing a BPA is not a minor undertaking and should be approached systematically and with a focus on clearly describing the details regarding how each essential function needs to be performed during a disruption. The results of the BPA will represent guidelines for performing a function.

Conducting the Business Process Analysis

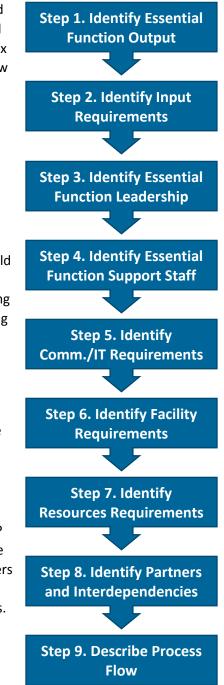
The nine-step process for conducting a BPA requires an in-depth understanding of each essential function and the ability to concisely and comprehensively describe and document each BPA process element in the BPA Datasheet.

Step 1: Identify Essential Function Output

This first step identifies what the essential function is intended to accomplish—what are the deliverables provided by the essential function? Deliverables may be a list of tasks to be completed, goods or services to be delivered, or information to be developed and provided to external partners or constituents. If possible, the essential function output descriptions will include metrics that identify specific performance measures and standards. If the essential function requires performance under specific conditions or within a specific time frame, that would be noted. The essential function outputs align with and expand on details in the essential function descriptive narrative documented on the Essential Function Datasheet developed in step 3 of the essential function identification process in Appendix A.

Examples of essential function outputs include:

- Provide emergency ambulance services for the county with response times under 10 minutes
- Provide mutual aid ambulance services to adjacent counties when requested and available in accordance with mutual aid agreements
- Provide statewide emergency public warnings for severe weather and other emergencies



- Provide the Governor's office with preliminary damage assessments within 12 hours following a destructive natural or manmade event
- Ensure that the State legislature is able to convene an emergency session within 24 hours of an emergency declaration
- Provide priority trash and refuse removal services within 3 days of a disruption

Step 2: Identify Input Requirements

This step describes the inputs required to accomplish the essential function outputs, which includes the information, guidance, and coordination from both internal (within the organization) and external (outside of the organization) partners. External partners include other components and organizations, such as Federal agencies, neighboring jurisdictions, the private sector, and even international entities, if appropriate. Input may include information, completed actions by partners, requests from constituents, hardware, materials, and so on. The input may be required at the beginning of the process or as the process proceeds. Specific information includes input supplier (i.e., organization, partner, and so on) and delivery time requirements. Examples of essential function input include:

- Damage assessments and situational awareness
- Public or business requests for government assistance
- Direction from higher authority to initiate a function
- Equipment or supplies (e.g., generators or food) to be delivered to constituents
- Work orders to inspect or repair infrastructure
- Support from law enforcement to secure an area
- Approval from inspectors that work can proceed

It is important to address the requirements from other entities to accomplish each essential function and to identify the organization's primary customers, suppliers, collaborators, and other partners as required.

Step 3: Identify Essential Function Leadership

This step identifies the senior organization leadership required to perform the essential function. Leadership includes the most senior leaders (elected officials, directors, policy makers, and so on), as opposed to mid-level and office managers, who are considered as part of the staff addressed in step 4. Note that the performance of many functions does not require direct leadership participation (e.g., damage assessments, emergency medical care, and infrastructure system operations); if leadership does not directly participate in essential function performance, do not identify this participation. Some essential functions require specific senior decision-making; therefore, the specific involvement of leadership will be identified. General oversight and supervision will not be considered direct involvement; this does not mean that leadership will not be part of the continuity team. Indicate whether leadership involvement is required but can be performed remotely or from a telework location, or if leadership presence at a specific location is essential. Examples of leadership requirements include:

- The presence of a quorum of the City Council Members is required for a City Council vote.
- A determination to close city offices requires action by the Mayor (or Deputy Mayor).
- The Governor must request a Presidential Disaster Declaration.

- The Director of Safety and Compliance must authorize entry of emergency workers into condemned buildings.
- The Police Commissioner must authorize the use of special security tactics during an emergency.

Step 4. Identify Essential Function Support Staff

This step captures the type of skills and the number of staff required to perform the essential function. This could be a lengthy list, depending on the nature of the mission, and may represent a significant portion of the organization's continuity team. It may be appropriate to make this list a separate attachment to the BPA Datasheet.

Consideration must be given to the following when identifying the required staff and skills, training, certifications, licensing, and clearances. The specific skill sets, expertise, and authorities required to support and perform each essential function should also be identified. Examples include:

- Contracting and purchasing authorities
- Signature authorities for emergency declarations
- Licensed medical personnel and other licensed or certified professionals needed to carry out specific tasks
- Engineering and technical knowledge
- Authority to detain and arrest individuals
- Pilots, drivers, divers, firefighters
- Special experience and skill sets

For operations involving a workforce (e.g., security guards), estimated staffing levels (to include supporting shift rotations) must be identified. For functions that support deployed personnel (e.g., search and rescue teams), identify the number of staff and specific capabilities required. For functions that require 24/7 operations, it is important to identify how many shifts are required and account for personnel required to support the operations. Examples of staffing requirements and skill descriptions include:

- 3 information technology (IT) staff to provide 24/7 network maintenance services
- 2 software specialists familiar with the organization's databases
- 15 drivers experienced in snow removal and road clearing operations
- 2 licensed civil engineers with experience in road and bridge safety and inspection requirements
- 3 budget analysts capable of accounting for and processing emergency expenditures

Step 5: Identify Communications and IT Requirements

Communications and IT requirements can include IT systems (data management and processing), radio, video, satellite, telephones, handheld devices, pagers, emergency notification systems, facsimile machines, and secure equipment. This category could also include publication of information if hard copy distribution is required. Step 5 indicates whether the communications are for internal or external use and the type of capability required (data, audio, and/or video), including the level of secure communications or data management necessary. Unique or unusual communications requirements should be specified (e.g., translation into multiple languages). Including data and information content requirements may be useful to provide a better understanding of the requirement. Identify specific or unique software and applications that are required to operate equipment.

Examples of communications and IT requirements include:

- Standard equipment found in most offices (such as unclassified telephones, facsimile machines, and desktop or laptop computers) can be identified as a standard office equipment package for a specific number of personnel so it is not necessary to identify every telephone individually. A detailed description of the standard office equipment package should be prepared as a reference.
- Communications equipment to support remote operations and anticipated telework capability.
- Complex printing or display equipment (for maps, damage assessments, or monitoring of multiple video inputs).
- Special or unique equipment (e.g., secure communications, conference bridges, radios, or terminals to monitor financial markets or business applications) can be identified, including details regarding the equipment capabilities.
- Unique software applications necessary to access critical records and databases and process incoming data.

Step 6: Identify Continuity Facility Requirements

A continuity facility refers to both continuity and devolution sites where essential functions are continued or resumed during a continuity event. "Alternate sites" are locations, other than the primary facility, used to carry out essential functions by relocating emergency response group (ERG) members following activation of the continuity plan. Facilities required by the organization to accommodate the performance of the essential function can be identified and described. It may be possible to perform some functions from remote locations or facilities other than the traditional continuity facility. Other functions may need to be performed at a facility with specific capabilities because of unique operating, security, or safety requirements. For many functions, the facility requirements may simply be general office space; in this instance, the specific space requirements can be noted, including information such as square footage to accommodate required personnel. A large emergency response organization may require operating facilities with support services, such as lodging, food services, and medical support. If access to warehouse, storage, or manufacturing facilities is essential to essential function performance, this can be indicated. For example, an emergency response organization may require to coordinate response operations.

Step 7: Identify Resources and Budgeting Requirements

This step includes identifying resources needed to perform the essential function and capabilities not already accounted for in the BPA process. Essential resources include plans and procedures, essential records, databases, and other types of reference and resource materials critical to essential function performance. Essential function performance will require supplies and materials that may have to be acquired as the emergency situation evolves. Therefore, the organization must have the capability to obtain, purchase, and reallocate these resources. Requirements not identified elsewhere can be included in step 7.

This step includes identifying funding sources to sustain the continuity capability throughout the disruption and to continue performance of the essential function and supporting activities. This may include purchasing materials, hiring additional staff or contractors, contracting for special services, and arranging for housing continuity personnel and emergency staff. Input from subject matter experts will be essential to ensure that all required resources and budget requirements are identified.

Step 8: Identify Partners and Interdependencies

This step focuses on identifying internal and external interdependencies with other organizations necessary to ensure the continued performance of the essential function. Most organizations interact with, and are

dependent on, other organizations or partners in a variety of ways. In some cases, supporting organizations provide critical information, authorization, or direction to initiate action. In other instances, partners provide a critical input or service during the process. Note that other organizations may include Federal departments and agencies, state or local organizations, public utilities, nonprofit organizations, and the private sector.

Example information to include for each interdependent relationship:

- Organization name
- Point of contact and contact information
- Types of information, data, services, and support provided
- Coordination requirements
- Timelines and due dates, as appropriate

Step 9: Describe Process Flow

Once steps 1–8 have been completed, a diagram or narrative description can be developed that combines all of the elements necessary to ensure essential function performance and outlines the process for ensuring essential function performance. Documenting the process serves two purposes: it not only describes how the essential function is accomplished, it also serves to validate the process and ensure that nothing critical has been omitted.

Consider several questions when documenting the elements and processes necessary to ensure performance of the essential function: (this is not an all-inclusive list; all pertinent procedures and processes must be determined and described):

- What initiates performance of the essential function?
- What inputs are required to perform the essential function?
- When are the inputs needed, and where do they come from?
- What people, facilities, resources, partners, and communications are required to support and perform the essential function?
- What processes are employed to perform the essential function?
- What are the essential function outputs or desired outcomes?
- What aspect(s) of the essential function could be supported through telework or another remote arrangement(s)?

In addition to tying together all of the elements necessary to perform each essential function, a well-prepared process flow will:

- Support development of effective continuity plans and procedures
- Provide an outline or checklist for emergency operations
- Serve as a turnover and shift-change checklist during disruptions and crises
- Support training for new emergency personnel
- Establish a briefing outline for management
- Serve as an operational guide for continuity or devolution personnel

To perform some essential functions, telework and other remote operational capabilities may provide flexibility that can be valuable during a disruption or crisis, including working from a telework facility, home, or another remote location. Based on the flexibility provided by a telework capability for certain categories of functions, organizations may consider including a discussion regarding how telework may support essential function performance. If a telework or remote capability is not feasible, this also may be noted.

Business Process Analysis Datasheet

The following template datasheet can be used to identify and document all of the elements necessary to perform an essential function. The datasheet may be modified as appropriate based on the mission, needs, and other characteristics of the organization. A BPA Datasheet should be created for each essential function.

	Business Process Analysis Datasheet
	Date:
Essential Function Statement	
Descriptive Narrative	
Essential Function Output	
Essential Function Input	
Leadership	
Staff	
Communications and Information Technology (IT)	

	Business Process Analysis Datasheet
	Date:
Facilities	
Resources and Budgeting	
Partners and Interdependencies	
Process Flow	
Telework Flexibilities	
Other Comments	