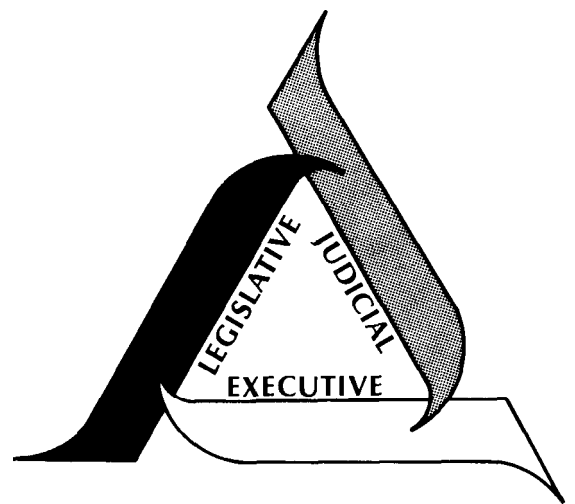


Guide For the Development of a State and Local Continuity of Government Capability





Civil Preparedness Guide

Federal Emergency Management Agency

Washington, D.C. 20472

CPG 1-10

July 27, 1987

Guide For the Development of a State and Local Continuity of
Government Capability

Foreword

Catastrophic disaster events can interrupt, paralyze, and/or destroy the ability of Federal, State, or local governments to carry out their executive, legislative, and judicial functions. Therefore, it is imperative that each level of government build a Continuity of Government (COG) capability to preserve, maintain, and/or reconstitute its ability to function under the threat or occurrence of any emergency that could disrupt government operations and services.

The development of a COG capability involves a series of preparedness and planning requirements that, when met, will reasonably ensure that the government has the capability to preserve civil government institutions and perform essential functions effectively under emergency conditions.

This Civil Preparedness Guide (CPG) supports the Integrated Emergency Management System approach to multihazard emergency operations planning. This CPG amplifies the COG capability indicators contained in CPG 1-35, Hazard Identification, Capability Assessment, and Multi-Year Development Plan for Local Governments, and CPG 1-36, Capability Assessment and Multi-Year Development Plan for State Governments. The preparedness and planning considerations detailed are intended to complement and supplement the planning guidance contained in CPG 1-8, Guide for Development of State and Local Emergency Operations Plans, and CPG 1-8A, Guide for the Review of State and Local Emergency Operations Plans.

This CPG clarifies the COG considerations that apply to State and local governments and quantifies the specific planning and preparedness measures that warrant consideration. It encourages emergency managers and planners to address COG requirements as a fundamental part of each jurisdiction's overall emergency operations planning process and not as a stand-alone requirement.

The planning and preparedness considerations addressed in this CPG directly support Federal COG needs and will enhance State and local governments' ability to protect people.

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CHAPTER 1

General Information

1-1. Purpose. This Civil Preparedness Guide (CPG) provides guidance and procedures for the preparedness and planning requirements (succession, predelegation of emergency authorities, emergency operating centers (EOC's), alternate EOC's, emergency action steps, protection of vital records, and the protection of government resources, personnel, and facilities) associated with Continuity of Government (COG) responsibilities. Elected and appointed government officials and emergency managers should use this guide to assess the jurisdiction's COG status, identify deficiencies, and prepare a remedial action plan to correct deficiencies.

1-2. Applicability and Scope.

a. Applicability. The provisions of this CPG are applicable to State and local government officials responsible for the protection of citizens, the continuation and reconstitution of government functions, and the restoration and recovery of public and private property. These officials, to the greatest extent possible, should ensure that their jurisdiction's laws, emergency operations plans (EOP's), and individual agency and organizational standard operating procedures (SOP's) that support the EOP thoroughly address COG requirements.

b. Scope. The rationale for COG is based on the nuclear attack threat. The dimensions of the problem related to support of the population after an attack will overwhelm a government's capability to respond unless it is prepared to deal with the situation. The guidance contained in this CPG should be used to heighten the awareness of State and local officials on the importance of COG. Preparedness and planning considerations should be addressed on a daily basis as a fundamental part of the jurisdiction's emergency operations planning process. In order for a jurisdiction to attain a viable COG capability, the following actions associated with COG preparedness and planning must be satisfied:

(1) Provisions to ensure continued leadership and preservation of records, thereby **maintaining** a viable system of government supported by law;

(2) The establishment of appropriate emergency authorities legally vested in government leaders so that they have prescribed powers to act;

(3) Provisions to ensure the survivability of mechanisms and systems for direction and control so that actions directed by leaders can be communicated and coordinated; and

(4) The capability to sustain essential emergency services and resources so that critical response and recovery actions can achieve the widest possible implementation, thereby ensuring support to the public.

CH 1-1

1-3. References.

- a. Executive Order (EO) 11490, October 28, 1969, Assigning Emergency Preparedness Functions to Federal Departments and Agencies,' 3 CFR 1966-1970 Comp., page 820, as amended 560 U.S.C. App. 2251 note.
- b. Civil Preparedness Guide 1-8, Guide for Development of State and Local Emergency Operations Plans.
- c. Civil Preparedness Guide **1-8A**, Guide for the Review of State and Local Emergency Operations Plans.
- d. Civil Preparedness Guide 1-20, Emergency Operating Centers Handbook
- e. Civil Preparedness Guide 1-35, Hazard Identification, Capability Assessment, and Multi-Year Development Plan for Local Governments.
- f. Civil Preparedness Guide 1-36, Multi-Year Development Plan for State Governments.

1-4. Background. Continuity of Government is directly concerned with the provisions of essential support services to the civilian population while assuring the survivability of the American constitutional and democratic form of government. During a national emergency, the continuation of Federal Government operations is not practical or possible unless such operations are directly supported by resources and information from State and local governments. Accordingly, national viability is dependent on the stability and survivability of State and local government institutions which, with the Federal institutions, share the constitutional responsibility to preserve the lives and property of the people. Most emergencies do not threaten the institutional integrity of State or local governments. However, the consequence of some major emergencies such as nuclear attack, catastrophic earthquake, hurricane, or terrorist attack could disrupt State and local governments' ability to function. Consequently, if a government is not prepared, most if not all of its critical executive, legislative, and judicial functions could be severely degraded. This situation could create a climate that could make the jurisdiction vulnerable to anarchy, lawlessness, and chaos.

CHAPTER 2

Continuity of Government Planning and Preparedness Considerations

2-1. Purpose. **This** chapter outlines the basic COG needs for State and local governments. It details the specific preparedness and planning measures that should be addressed to ensure that the government can preserve, maintain, or reconstitute its ability to carry out executive, legislative, and judicial functions under the threat or occurrence of any emergency condition that could disrupt such functions and services. The **specific** preparedness and planning measures have been separated into seven separate categories in order to provide the user of this CPG a practical means to assess the jurisdiction's COG status and to identify specific deficiencies that require remedial attention.

2-2. Introduction. COG preparedness and planning provisions for the Federal level of Government have been thoroughly provided for under the Constitution, Federal statutes, Executive orders, plans, and Federal agency SOP's. Similar provisions and guidance for State and local governments have not been addressed at the Federal level for over 20 years. Consequently, State and local governments have found it necessary to formulate their strategies for dealing with COG needs on an independent basis without the benefit of much Federal assistance. This has made it difficult for State and local governments to determine the adequacy of their COG provisions.

2-3. Relationship of the Executive, Legislative, and Judicial Functions. During the response and recovery periods generated by emergencies stemming from any of the threats associated with a national emergency or peacetime catastrophic disaster situation, the following tasking assigned to key members of the executive branch and the vital emergency functions associated with the legislative and judicial branches of State and local governments becomes critical:

a. Executive. The executive system which provides for the day-to-day management and functioning of State and local governments must be sustained through recovery and reconstitution. The executive is responsible for implementing emergency response operations and is necessary to maintain the system of checks and balances with other branches of government. Elements of the State/local executive system are discussed below.

(1) State Governor. The position of State Governor is critical to the continuity of Federal, State, and local levels of government. Usually, the following emergency powers and authorities are vested by law in the Office of the Governor:

(a) Direction over State operational forces;

(b) Declaration of a state of emergency as a basis to impose curfew, to evacuate, to restrict movement, to quarantine, to condemn, to declare powers of eminent domain, etc.; and

(c) Authority to make appointments or to designate potential appointees for vacated offices in the U.S. Congress, State departments and agencies, local government (elected positions), State legislature (elected positions), and State judicial system.

(2) Heads of State Departments, Agencies, and Bureaus. Heads of State departments, agencies, and bureaus responsible for emergency preparedness, response, recovery, and restoration of services are essential to manage execution of gubernatorial directives. They are also essential to direct critical support services and to provide State emergency services and resources required by the public. Responsibilities of these State entities may be technical or operational in nature, but each entity has its own appropriate emergency powers and authorities. Maintaining leadership to exercise these powers during emergencies is critical.

(3) Local Chief Executive. The position of local chief executive varies from State to State. In some local government structures, the chief executive is elected and singular--i.e., mayor, county executive, or county judge. Under a governing board of elected supervisors or under a council, the chief executive is one of the members of that body or is an appointed manager or chief administrator. Regardless of the form of local government, it is essential that a single authority be recognized to execute direction and control and emergency powers and that succession to office under emergency conditions be clearly prescribed.

b. Legislative. Laws provide the legal authority, requirements, and proscriptions under which public officials carry out their responsibilities and democratic societies function. The legislative system is important in the preparedness phase to legislate emergency powers and authorities and must be sustained through recovery and reconstitution to provide authority for implementation of necessary government actions not otherwise authorized by the law. It is also essential to maintaining the system of checks and balances with other branches of government. The order of succession for State and local chief executives under emergency conditions must be established pursuant to law.

c. Judicial. The judicial system is clearly a critical element of government because it implements due process and other basic tenets of the American form of government. The judicial system must be sustained through recovery and reconstitution and is necessary to maintain the system of checks and balances with other branches of government.

2-4. Preparedness and Planning Considerations. The preparedness and planning considerations enumerated in this CPG are based on the seven elements of COG that are contained in EO 11490. This EO details the specific requirements that **apply to the** Federal level of Government. These elements have been modified in this CPG to meet the needs of State and local governments. The

elements listed in paragraph 2-5 address the specific measures and provisions that should be satisfied in order to provide the jurisdiction with a viable COG capability. Each element is accompanied by a definition, objective statement, preparedness and planning standard, and supporting criteria which identify the specific considerations that apply to the element. The preparedness and planning criteria associated with each element have been organized in a manner to facilitate assessment of the status of the jurisdiction's COG capability.

a. The user of this CPG should review each criterion entry and determine if the appropriate action has been taken to satisfy the jurisdiction's requirement(s) associated with the criterion. The columns that are adjacent to each of the evaluation criteria should be used to reflect and record the jurisdiction's status on each criterion. These columns have been subdivided so that the planning and preparedness status related to each criterion can be easily identified. An "S" placed in the YES column would indicate that the criterion has been satisfactorily handled. A "V" placed in the NO column would indicate a capability void. A "D" placed in the NO column would indicate a specific deficiency. A capability void means the criterion has not been addressed. A specific **deficiency** means that some measures described in this chapter have been taken to address the criterion but further action is necessary. Each time a "D" is placed in the NO column a short statement that explains the nature of the deficiency should be entered in the comments column. If the criterion is not **applicable** to the jurisdiction, enter N/A in the comments column.

b. For each criterion that is identified as void or deficient, the user of this CPG should initiate the appropriate action to correct the problem. Corrective action may require a simple change to the jurisdiction's EOP or **agency's/organization's SOP's**. However, in some cases extensive revisions and/or additions to the jurisdiction's laws may be necessary. In those situations which require legislative action, the user must ensure that the senior elected and appointed leadership in the jurisdiction is aware of the need for change. Accordingly, extensive coordination with the appropriate elements/staff members of the executive, legislative, and judicial branches of government and interested elements of the public sector is essential.

2-5. Preparedness and Planning Elements.

a. The user of this CPG must remember that the planning and preparedness considerations contained in this CPG are intended to be incorporated in the emergency operations planning process. Therefore, corrective actions to fix COG deficiencies are a fundamental part of the jurisdiction's effort to build and maintain a viable emergency response mechanism.

b. The following elements identify the COG considerations for which State and local jurisdictions should make provisions, as appropriate, in their laws, **EOP's**, organization and agency SOP's that support the EOP, exercise and training activities, and other activities. Planning considerations that relate to the EOP complement those already addressed in CPG 1-8A.

THOSE COG CONSIDERATIONS THAT APPLY ONLY TO THE STATE LEVEL OF GOVERNMENT HAVE BEEN FOOTNOTED--(t). ALL OTHER CONSIDERATIONS APPLY TO STATE AND LOCAL GOVERNMENTS.

(1) Succession.

(a) Definition. The process established to list the order or line of those entitled to succeed one another under emergency conditions.

(b) Objective. To ensure that the civil political leadership will continue to function effectively under emergency conditions.

(c) Preparedness and Planning Standard. Emergency interim successors **have** been designated who are authorized to exercise all the powers and discharge **all, the duties** of the office whether executive, legislative, or judicial. When practical, there is a designation of at least three successors for each position. Provisions have been made to deal with vacancies and other contingencies such as absence or inability to act. Procedures have been enacted to divest the interim successor of his/her authority at the appropriate time.

(d) Evaluation Criteria.

(i) The jurisdiction's laws identify and designate the chain of successors to include the first, second, and third alternates by job title to ensure continuous leadership, authority, and responsibility for the senior elected executive position(s) and each department/agency chief who has **specific** responsibilities and functions in emergencies.

(ii) The jurisdiction's laws **identify** and designate the chain of succession to include the first, second, and third alternates by job title to ensure continuous leadership, authority, and responsibility for legislative positions.

(iii) The jurisdiction's laws identify and designate the chain of succession to include the first, second, and third alternates by job title to ensure continuous leadership, authority, and responsibility for judicial positions.

		Status
Yes	No	Comments

Legend: S = Yes; V = Capability Void; D = Specific Deficiency; N/A = Not Applicable

(2) Predelegation of Emergency Authorities.

(a) Definition. The process established to allow specific emergency-related legal authorities to be exercised by the elected or appointed leadership or their designated successors.

(b) Objective. To ensure that sufficient enabling measures are in effect to continue government operations under emergency conditions.

(c) Preparedness and Planning Standard. Emergency authorities have been enacted that specify the essential duties to be performed by the leadership during the emergency period and that enable the leadership to act if other government entities are disrupted, and to redelegate with appropriate **limitations**. Provisions have been made for activation and termination of successors' responsibilities and for establishing predelegations with the force of law.

(d) Evaluation Criteria.

(i) The jurisdiction's laws specify the extent and limits of authorities of the senior elected and appointed executive officials.

(ii) The EOP specifies the **administrative** and operational authorities of the chiefs of emergency services agencies/organizations.

(iii) The SOP for each emergency services agency/organization lists the specific authorities of designated successors to direct the agency/organization, and their authority to redelegate functions, activities, or operational procedures that are explicitly stated in the laws of the jurisdiction, in the agency/organization charter, or in the EOP.

(iv) The jurisdiction's laws specify the circumstances under which predelegated **authorities** for executive, legislative, and judicial officials would **become** effective and when they would be terminated.

		Status
Yes	No	Comments

†(v) State law provides for the continuation of judicial functions during a national emergency.

†(vi) State laws authorize the State to enter into bilateral or multilateral agreements with neighboring States to ensure continuation of government operations during emergency conditions.

(vii) Each jurisdiction should consider the need for:

- (a) Declaring a state of emergency;
- (b) Proclaiming and enforcing curfews;
- (c) Controlling population movement;
- (d) Permitting professional and business entities/organizations to operate without additional licenses;
- (e) Permitting local government personnel and property to be used outside of the jurisdiction;
- (f) Providing immunity for medical personnel from malpractice liability;
- (g) Shutting down nonessential government operations;
- (h) Making use of public and private property;
- (i) Issuing emergency EO's, proclamations, and regulations that have the full force and effect of law;
- (j) Invoking rationing, price controls, antiblack-marketing, and anti-hoarding regulations;

		Status
Yes	No	Comments

†Applicable only to State governments.

- (k) Directing redistribution of food and other essential commodities from hazard to reception areas in support of an evacuation; and
- (1) Identifying essential functions of government which must continue without interruption.

†(viii) Administrative actions have been taken by each State emergency services department/agency to ensure security clearances have been obtained for **employees who** require access to classified information in order to carry out their assigned duties during a national emergency.

		Status
Yes	No	Comments

(3) Emergency Action Steps.

(a) Definition. Those actions that facilitate the ability of government personnel to respond quickly and efficiently to emergencies.

NOTE: These actions are not unique to COG but are commonly associated with all emergency operations activities.

(b) Objective. To ensure that procedures exist that list and specify the actions that senior officials in leadership positions of the executive, legislative, and judicial branches of government must be prepared to take in response to emergency conditions.

(c) Preparedness and Planning Standard. Checklists or SOP's have been written that identify emergency assignments, responsibilities, and emergency duty locations. Procedures also exist for alerting, notifying, locating, and recalling these key members of the government. The SOP's and notification procedures cited here should be integrated with and complement those already developed and in use by members of the executive agencies/ organizations tasked in the jurisdiction's EOP.

(d) Evaluation Criteria.

(i) The EOC SOP's include an emergency notification list that describes how primary/alternate executive, legislative, and judicial decision makers will be notified/alerted during emergency conditions.

		Status
Yes	No	Comments

CH 2-5b(2)(d)(vii)(k)

†Applicable only to State governments.

(ii) The EOC SOP's provide for canned announcements and periodic (e.g., semiannual) review and update of notification/alerting list used to contact designated executive, legislative, and judicial decision makers.

(iii) The EOC SOP's provide for annual briefings of senior executive, legislative, and judicial officials on emergency authorities, their emergency duties, and duty locations, and on the procedures used by the jurisdiction's emergency management organization to respond to emergency situations. New officials should be briefed within 60 days of their election or appointment.

(iv) Each senior executive, legislative, and judicial official has available an emergency action checklist that details the incumbent's emergency authorities, responsibilities, duties, and duty location, and the specific circumstances, and/or sequences of events that require actions or implementation during a national emergency or catastrophic peacetime disaster situation.

		Status
Yes	No	

NOTE: All other requirements related to emergency action steps are thoroughly addressed in CPG's 1-8 and 1-8A.

(4) Emergency Operating Center.

(a) Definition. The protected site from which civil government officials (municipal, county, State, and Federal) exercise direction and control in an emergency.

(b) Objective. To ensure that the capability exists for the leadership to direct and control operations from a centralized facility in the event of an emergency.

(c) Planning and Preparedness Standard. A central facility exists that is self-sufficient for at least 14 days and that provides the capability to: receive and disseminate alerting to key officials and warnings to the general public; direct and control local operating forces; collect and analyze damage effects data; provide emergency information and instructions to the public; and maintain contact with support EOC's, neighboring jurisdictions, and higher levels of government.

(d) Evaluation Criteria.

(i) The EOC should be located as near as possible to the building(s) housing the primary offices of government, when practical.

(ii) The EOC facility includes operability and survivability features required to continue operating in emergencies, specifically:

(a) The EOC has been located outside of known hazard areas (i.e., nuclear attack target areas, flood plains, dam circulation zones, hazardous materials production/**storage/transshipment** facilities, earthquake fault lines, nuclear plants, airport flight approach paths, etc.).

(b) A security plan has been developed which details how access/entry will be controlled, and how staff members, communications, support systems, and the overall facility will be protected.

(c) The EOC has been **constucted** or located in a structurally sound building that provides staff members physical protection from the effects of severe weather emergencies, earthquakes, hazardous materials (if possible) and has a fallout protection factor of 100 or greater.

(d) Sufficient food, water, medical, bedding, and sanitation and welfare stocks are designated or in place to satisfy the needs (at least a 14-day food and water supply) of staff members.

		Status
Yes	No	Comments

(e) An emergency power supply (generator) and a 14-day fuel **supply** for the generator is designated or in place to support EOC operations.

(f) Radio-logical monitoring equipment is designated or in place to support EOC needs.

(g) Communications systems for communicating with the next level of government and the public (when practical) are available.

(h) Space in the EOC (when practical) has been made available to accommodate those key government officials, agency chiefs, department heads, support staff, and/or designated successors who are responsible for ensuring that essential services and functions continue under emergency conditions.

		Status
Yes	No	Comments

(5) Alternate Emergency Operating Center (AEOC).

(a) Definition. A facility that can be used to coordinate and direct all government emergency response efforts if the primary EOC facility becomes unoperable during emergencies. The facility also houses key governmental officials forced to evacuate from the primary EOC.

(b) Objective. To ensure that alternate headquarters are available for relocating government officials under emergency **situations.**

(c) Preparedness and Planning Standard. An alternate site for the relocation of government if an emergency exists. Provisions also exist for alternate site(s) for departments or agencies having emergency functions.

(d) Evaluation Criteria.

(i) The AEOC meets as many as practical of the criteria listed in subparagraph 2-5b(4)(d)(ii).

		Status
Yes	No	Comments

(ii) Each executive, legislative, and judicial organization/agency department that is tasked to relocate to the AEOC has prepared a relocation plan that details all of the necessary actions (logistics, personnel, communications, etc.) that must be taken in order to successfully relocate.

†(iii) Provisions have been made which provide State legislative authority to relocate the seat of government during an emergency.

(iv) Provisions have been made designating, pursuant to the law, the AEOC facility as the official dispersal site/operating location when relocation of emergency operations activities and/or government functions is necessary.

t(v) Provisions have been made to ensure that the AEOC facility has sufficient space to accommodate relocated key government officials, support staff, and/or designated successors. These include officials and support staff from State executive, legislative and judicial offices, organizations, agencies, and departments.

(vi) Agreements exist that legally authorize the local governments to relocate or establish temporary seats of governments in neighboring cities or counties.

		Status
Yes	No	Comments

(6) Safeguarding Vital Records.

(a) Definition. The measures that are taken by government to protect vital records that the government must have to continue functioning during emergency conditions and to protect the rights and interests of citizens during and after the emergency.

(b) Objective. To ensure the selection, preservation, and availability of records essential to the effective functioning of government and to the protection or rights and interests of persons under emergency conditions.

†Applicable only to State governments.

(c) Preparedness and Planning Standard. A records protection program has been established that provides for effective records protection standards, methods for updating the standards, and procedures for retaining and disposing records.

(d) Evaluation Criteria.

(i) Vital records are physically protected through one or more of the following: duplicate copies, dispersal, and safe/secure storage **facilities.** Also:

(a) Lists have been prepared by each branch of government that detail the records deemed essential for continuing government functions during emergency conditions and their location(s).

(b) A list has been prepared that details the records required to protect the rights and interests of individuals, such as vital statistics records, land and tax records, license registers, and papers of incorporation.

(c) Records required by such departments as health, fire, and public works to conduct emergency operations are immediately available. These records include utility system maps; locations of emergency supplies and equipment; emergency operations plans and procedures; lists of succession; and lists of regular and auxiliary personnel.

(d) Records which are **necessary** for governmental functions and to protect the rights and interests of the public are available. Such records include: constitutions; charters; statutes and ordinances; court records; official proceedings; and other legal records and financial records.

(ii) Reciprocal storage arrangements, where legally allowed, have been made between States and local governments as an additional safeguard measure.

		Status
Yes	No	Comments

(iii) Provisions have been made by executive, legislative, and judicial agency/department chiefs to relocate and protect their vital records as identified in paragraph 2-5b(6)(d)(i).

(iv) Provisions have been made for the continued operations of automated data processing (ADP) systems and records. Where possible, these provisions should include arrangements to protect ADP systems from damage caused by exposure to the electromagnetic pulse phenomenon associated with the high altitude detonation of nuclear weapons.

		Status
Yes	No	Comments

(7) Protection of Government Resources, Facilities, and Personnel.

(a) Definition. The measures that are taken to disperse resources, facilities, and personnel in a manner that will provide sufficient redundancy to ensure government can continue to function during emergency conditions.

(b) Objective. To ensure the protection of key personnel, facilities, and resources so governments may operate effectively to allocate needed resources and restore government functions during and after emergencies.

(c) Preparedness and Planning Standard. Plans are available that address deployment procedures to disperse resources or facilities, set standards for increasing protective capabilities of facilities, and inform and train personnel in protection measures.

(d) Evaluation Criteria.

(i) Each executive, legislative, and judicial agency/department chief with emergency responsibilities has:

(a) Identified personnel and specific types and amounts of assigned equipment, and supplies that must be dispersed.

(b) Selected viable dispersal location(s) for essential personnel, equipment, and supplies.

		Status
Yes	No	Comments

(c) Coordinated dispersal arrangements with the agency chief responsible for emergency operations planning in the jurisdiction.

NOTE: At a minimum, detailed dispersal procedures should be prepared for each of the emergency support services such as law enforcement, fire and rescue, health and medical, public works, and the Emergency Management Agency.

(d) Made arrangements for protecting the family members of essential personnel who may be required to relocate.

(e) Ensured that those individuals who are responsible for dispersal of the organization's/ agency's assets are annually familiarized with their responsibilities.

(ii) The jurisdiction's EOP includes provisions that will allow the government to use private business and industry resources needed to support movement to and operations at government dispersal sites.

(iii) Executive legislative, and judicial decision makers participate in periodic (e.g., annual) exercises to become familiar with their emergency roles.

		Status
Yes	No	Comments

2-6. Strategy for Correcting Continuity of Government Deficiencies.

a. Deficiency Identification. The large majority of States and local jurisdictions that objectively complete the self-assessment process provided by this CPG will find that they have significant deficiencies with respect to COG. Some may be quickly and easily remedied. Others may be resolved only with difficult, expensive, and long-term actions. Given this circumstance, it is recommended that each jurisdiction develop a remedial action plan tailored to its needs.

b. Remedial Action Plan. The purpose of this plan is to facilitate and simplify the decisionmaking process that should be used to determine when and how the jurisdiction's COG deficiencies will be corrected. The plan should provide the user a means to thoroughly examine all identified deficiencies; consolidate related deficiencies into common groups (e.g., EOP/SOP, laws, etc.);

and establish a priority for the correction of deficiencies. In order to ensure that a comprehensive plan is developed, it is recommended that the following corrective action steps be taken. This approach, however, is only a model, and users may develop their own corrective action steps if desired since there are a variety of other strategies for correcting COG deficiencies that will be equally effective:

(1) Step 1. Upon completion of the review of the planning and preparedness considerations listed in this CPG, the reviewer should assign each deficiency to one of the following deficiency groups. This activity provides the reviewer a method to visually examine the scope of the jurisdiction's deficiencies:

- (a) EOP/SOP;
- (b) Laws;
- (c) Equipment and Facilities;
- (d) Exercise;
- (e) Training; and
- (f) Other.

(2) Step 2. Once the deficiencies have been categorized, it will be necessary to set a priority for correcting the deficiencies in each group. At a minimum, the following factors should be considered when ranking deficiencies:

- (a) Impact of the deficiency on the jurisdiction's COG capability;
- (b) Estimate of the time required to correct the deficiency;
- (c) Estimate of the cost and/or amount of resources needed to correct the deficiency; and
- (d) Amount of difficulty associated with correcting the deficiency (e.g., changing a local EOP may be simple but a revision/change to the State law will be time consuming and difficult).

(3) Step 3. Prepare a corrective action log. This log should contain a short description of each deficiency, a synopsis of the corrective actions planned, and the estimated completion date for correcting each deficiency. Examples of corrective actions include the following: briefings and training for public officials to enhance their awareness of COG considerations; public information to increase public understanding and support for COG objectives; incorporation of COG considerations into plans on a continuing basis; designation of and planning for the use of interim EOC's and AEOC's; promotion of and participation in legislative programs as appropriate; and participation in studies to determine requirements for EOC's and AEOC's adequate to support COG.

(4) Step 4. Brief senior decision makers on the content distilled from steps 1-3. Normally, some or all of these officials will have been consulted when steps 2 and 3 were completed. Obtain approval to implement the corrective action log.

(5) Step 5. Monitor and **followup** as necessary to ensure the completion of required corrective actions. Ensure suspenses are met or **adjusted** when necessary.