Federal Continuity of Operations

Part 2 of 10: Start the COOP Program

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Topic Summary:

- Locate and motivate an organizational champion

- Create the team structure

- Establish the COOP Program groundwork

- Summary and Recommendations for next steps

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1.0 Introduction

For "national mission essential functions" (NMEFs), the Department of Defense (DoD) provides clear policy guidance on the need for a verifiable Continuity of Operations (COOP) program, which is the military and federal government equivalent of an implemented Business Continuity Management (BCM) plan. Establishing a COOP Program within a smaller Army program, with that Army program's less ambitious mission, can be challenging although still necessary for the Army program to achieve its mission. This paper, the second in a ten-part series, examines how such a program can be started within a small Army program.

Because a COOP Program affects the entire organization to which applies, one must have direct support from the top. In fact, a COOP Program works best when implemented in conjunction with a clear chain of command so that every person within the organization understands his or her role. This paper presents a simple and effective set of techniques to motivating one's "champion," tailoring Army policies to meet the local program's COOP requirements, and assigning responsibilities to key organizational stakeholders. The paper closes with a summary and recommendations for next steps.

2.0 Locate and Motivate the "Champion"

The Project Management Institute defines the first requirement of any successful project to be the identification of a *sponsor*[1] who "champions" the project by providing the funding resources and the executive support to prevent it from stalling in mid-execution. A fully-implemented COOP Program of any size, of course, cannot be considered a pure project because it is ongoing,[2] but the act of creating the COOP Program is indeed a project. This section provides strategies to use to find the champion for the COOP Program.

2.1 Analyze and Tailor the Driving Policies

Prior even to identifying the COOP Program sponsor, the COOP practitioner should be sure to understand the institutional landscape and create a notional set of COOP policies. These policies will evolve over time, but the due diligence required to research and create them aids the COOP practitioner in building relevant use cases.

For this paper's ongoing use case of a small Army Program, the relevant doctrine comes from Army Regulations (ARs) 500-3 ("U.S. Army Continuity of Operations Program Policy and Planning") and 25-2 ("Information Assurance"). From AR 500-3 one finds 32 "minimum requirements"[3] whose impact must be considered *prior* to finding a champion; the following table highlights and paraphrases a representative set from the Regulation:

Table 1: Preliminary COOP Program Policy Analysis

Army Policy Statement	"Champion" Impact
The COOP Program must be	Ongoing budgetary commitment required along with the inevitable

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[1] PMI, p 449.

[2] PMI, p 442.

[3] Adapted from the Regulation, p 11.

updated at least every two years	auditing requirements.
Identify / prioritize organizational mission essential functions (MEFs).	Impact analysis must be performed, with corresponding higher initial cost and impact on existing resources to provide subject matter experts (SMEs).
MEFs must perform under *all* circumstances.	Critical functions must effectively be "shadowed" such that a failure in one can be handled by a duplicate or substitute function very quickly.
Personnel relocation to alternate locations as necessary. These locations must conform to the Americans with Disabilities Act.	COOP Programs must have an emergency staffing plan along with an operational center. Moreover, the same laws, regulations, and policies that apply to the primary operational site will also apply to any alternate emergency site.
Department of Army Civilians and contractors must have COOP responsibilities clearly defined.	COOP Programs impact both acquisitions and human resources; in order for a COOP Program to be effective it must be accounted for with both contractors' statements of work and employee job description.

One specific recommendation the practitioner can apply is to review the policy statements closely to tailor them to fit the specific organization prior to meeting with the sponsor. This can help to reduce costs by eliminating clearly inapplicable statements immediately. For example, where an organization processes no classified data then there is no need to issue such workers the "Courier Cards" that normally permit this activity.
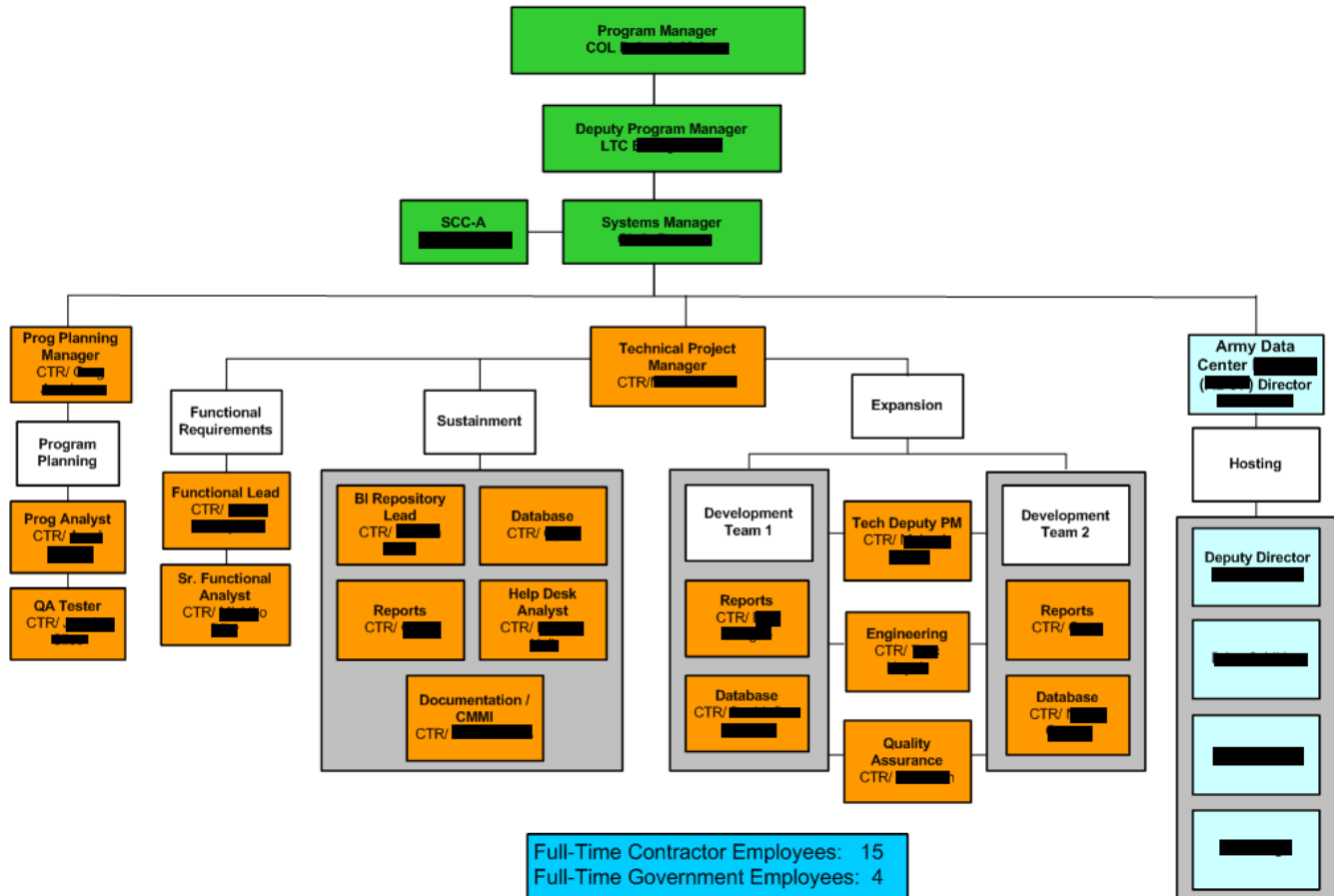
2.2 Examine the Organizational Chart

After the practitioner has reviewed and initially tailored policy, he or she must the COOP champion. In an organization of any size (even one as small as a few dozen people), this may be more difficult than expected. The sponsor must be high enough in the organization to drive the change, but must also be accessible during the critical period necessary to create the COOP Program and ensure its forward momentum. It does the COOP Program no good to have an executive sponsor who, after an initial show of support, becomes overburdened with other projects or who cannot be reliably informed on the COOP Program's progress. As a 2008 publication from The Institute of Internal Auditors notes, "[t]he key challenge is engaging corporate executives to make BCM a priority. Although most executives are likely to agree that BCM is a good idea, many will struggle to find the budget necessary to fund the program as well as an executive sponsor that has the time to ensure its success."[4]

The Army Program presents an interesting challenge in this regard. The redacted organizational chart shown below illustrates this problem:

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[4] The Institute of Internal Auditors, "Global Technology Audit Guide (GTAG) 10: Business Continuity Management," *The IIA Research Foundation Bookstore*, http://www.theiia.org/bookstore/product/global-technology-audit-guide-10-business-continuity-management-1324.cfm (accessed: June 22, 2011).

Program Team

Figure 1: Redacted Organizational Chart from an Army Program[5]

In the above figure, the first choice might be the Program Manager, but that would be a classic mistake. That individual is tasked with numerous projects and programs; without clear policy direction that the COOP Program is critical the program would not thrive. Likewise, the Deputy Program Manager (DPM), although heavily involved in ensuring operational success, is also overtasked; surprisingly enough, it turns out that the single best "champion" is a private contractor (the Program Planning Manager). That is because the Program Planning Manager (PPM) is a known and trusted deputy for the DPM and can ensure ongoing support for the COOP Program. Thus, the challenge is to convince the PPM of the need for a COOP Program and to keep that individual informed of the project's process. As the contractor's project manager for the Army program put it, "If you go for the colonel, you'll start by having a hard time getting a meeting and you'll end up by wishing you had gone to the planner in the first place."[6]

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[5] Source: U.S. Army program documentation.

[6] Source: Personal interview with the contractor's project manager, June 21, 2011.

2.3 Craft the COOP Case

BCM and COOP have an unfortunate reputation of being sold based solely on FUD: "Fear, Uncertainty, and Doubt." In general, people do not like being told that something unpleasant could possibly happen for the rational reason that the corollary becomes the event is much more likely *not* to happen. The following table provides the COOP practitioner with some strategies for creating a tailored COOP presentation that anticipates and avoids common avoidance responses.

Table 2: Strategies for handling negative COOP Program reactions

Common Sponsor Response	COOP Practitioner's Recommended Strategy
"A disaster like [X] has not happened before."	Instead of presenting generic statements like "a fire could wipe out the processing facility," research common dangers within the effected geographical area and present statistics.
"This type of program is too expensive for the benefit we get."	Prior to meeting with the sponsor, research the company's revenue figures (or budget allocation for government programs). Then research similar companies or government programs that have had documented disasters to gain a frame of reference. Next, identify some of the stakeholders and why they have an interest in the program; especially for government / DoD programs it may be easy to uncover quite a chain of dependencies between even a small program's output and downstream processing effects. Arrive at the meeting with estimates on downtime costs compared to anticipated COOP costs (basic cost/benefit analysis).
"We are not responsible for COOP."	For many small government and military programs, this can be expected as a common response. The answer is an extension on the basic cost-benefit analysis for the "this program is too expensive" response. The notion of diffused responsibility is also common and explains why it is possible for a crowd of people to stand idly by when someone is hurt; an effective response is to research who would likely be held accountable if the program or project fails. The COOP practitioner must ensure that the sponsor is clearly in that chain of responsibility (or represents an individual in that chain). Then, in addition to highlighting the negative effects on budget or mission execution if a failure occurs, it also becomes a matter of simple self-interest to the sponsor.
"We do not have extra resources for a COOP Program."	This is also a very common response; a similar response is "we cannot get approval for such a COOP Program in our budget." The COOP practitioner should respond by emphasizing that a COOP Program can be implemented in phases, and that the first phase involves creating a clear inventory of business assets and activities through an impact analysis. Such an analysis is typically required by most program management plans, so any additional initial expense is directly based on the current lack of such an impact analysis.

The COOP practitioner should then emphasize that the COOP Program can be applied based on the priority of identified activities to minimize the staffing and resource impact; in fact, British Standard (BS) 25999 identifies such a graduated |

	approach as a perfectly acceptable commercial BCM implementation program.[7]

The COOP practitioner can effectively anticipate these and other common negative reactions to ensure the best chance of demonstrating why a COOP Program is a prudent and necessary management planning tool that the sponsor can champion.

3.0 Create the Team Structure

After the COOP Program's "champion" has been identified and committed his or her sponsorship to the program, the COOP practitioner must define the COOP team's structure. This team must be capable of implementing the COOP Program and also to maintain the program's effectiveness over time.

3.1 Define Management Requirements

The COOP practitioner must ensure that an organizational infrastructure exists to implement the COOP Program. This structure consists of a Steering Committee to provide governance and to ensure that the COOP Program aligns to mission goals, a COOP Program Development Team to work with functional units within the organization for the COOP Program implementation, and a COOP Plan Owner to manage the overall COOP Program movement (this last could be the COOP practitioner).

- *COOP Steering Committee.* The International Consortium for Organizational Readiness (ICOR) defines a steering committee as responsible for "ensuring all pre-planning and mitigation is done *before* an event and becomes the Crisis Management team that leads the response effort *during* an event" (ICOR, p 46). This group provides a critical "window" into upper management and must consist of key stakeholders from around the organization; the executive sponsor should hold the lead position. As noted above, the executive sponsor may not be the same as the "champion", and in fact may delegate all responsibility entirely to the champion. (Accountability, which cannot be delegated, remains with the executive sponsor.) The COOP practitioner must work closely with the executive sponsor (or the "champion") to identify who these stakeholders will be.

- *COOP Program Development Team.* This team is responsible for the next phase of the COOP Program implementation; namely, the Risk Assessment (RA) and the Business Impact Analysis (BIA). This should be led by the COOP Plan Owner (discussed below).

- *COOP Plan Owner.* This role may be held by the COOP practitioner or by a trained organizational resource. The individual leads the COOP Program Development Team and ensures that the COOP Program maintains its momentum after implementation; also, that ITIL-based continuous improvement processes execute upon COOP Program (including COOP Program updates as required by policy or regulation).

3.2 Evaluate Team Responsibilities

Once the COOP Program's team structure has been defined, the COOP practitioner must ensure that

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[7] BURTLES, p 34 states "the whole organization is gradually dealt with as a series of relatively small projects rather than one single massive effort" and relates that to BS 25999's six stages for a full BCM program implementation (p 31).

responsibilities map to the COOP Program's required outputs. The practitioner must define the measurements that will ensure the COOP Program implementation is progressing effectively. These measurements can be categorized as current readiness, reporting, project plan creation and milestone tracking, and change management (governance). The following are some recommended approaches for each category:

- *Current Readiness.* The practitioner must evaluate the technology and management state of the program. A baseline capability level must be defined for software project management toolkits (such as Microsoft Project), Web-based collaboration capabilities (such as IBM SameTime), the training requirements based on the selected methodology (such as individuals with AR 300-5 in an Army environment, or BS 25999 in a corporate environment), and training program requirements (whether virtual training facilities exist). This can then be compared to actual organizational assets and capabilities to build a gap analysis which can then be submitted to the Steering Committee for initial evaluation and possible acquisitions.

- *Reporting.* The COOP practitioner must define how progress will be shared with the organization at the executive, stakeholder (to include external stakeholders), functional (line-of-business directors), and executable (mid-level management to individual contributors) levels. Additionally, effective communication must inform target audiences of upcoming COOP Program initiatives that may affect them (such as required survey responses). To be effective, these communications must have the imprimatur of the executive sponsor.

- *Project Plan Creation and Milestone Tracking.* The COOP practitioner can now create a preliminary project plan for the COOP Program, to include milestone estimates (such as "impact analysis to be completed by [X] date") and to ensure that the high-level program scope is understood. This plan will be refined over time.

- *Change Management (governance).* Once the Risk Assessment portion of the BIA has begun, all COOP Program changes must be reviewed to ensure that the organization's executive sponsor(s) receive the work product they approved. Within the Army Program for this use case, an existing Change Control Board (CCB) already exists and can be leveraged to handle COOP issues; the COOP practitioner should check for and suggest the use of existing change management processes within the organization. It is quite possible that overlap already exists between the CCB and the newly-defined Steering Committee.

4.0 Lay the COOP Program Groundwork

With a management structure in place, as well as a basic understanding of the COOP Program's management requirements (software, collaboration, reporting, and so on), the COOP practitioner can now prepare the organization for the start of the COOP Program implementation. This is accomplished by setting organizational expectations and ensuring that team members receive the encouragement they need to accomplish their jobs.

4.1 Set Expectations

The COOP practitioner must realize that the success or failure of the COOP Program will be judged based on the perceptions of its stakeholders. If the stakeholders and project management team believe that the COOP Program is incomplete, then that is what they will remember. The solution to avoid this kind of subjective analysis is threefold and taken directly from the Project Management Institute's (PMI) core project management foundation: document the *scope*, fully fund the *cost*, and communicate any known deviations

from the *schedule*.

Of the three, documenting the scope gives one the most "official protection" if the COOP Program is later questioned for its quality level (its conformance to requirements). However, documented or not, if the COOP Program's goals and objectives have not been effectively socialized within the organizational structure then it can be impossible to overcome a negative image due to misunderstandings. However, if the COOP Program exceeds its budget without all funding parties understanding why the cost deviation occurred, even the best-run and (ultimately) most cost-effective project will be deemed a failure. Thus, establishing and delivering a demonstrably effective communication plan provides the best overall insurance against the project dangers of "not knowing what we do not know."

The ICOR has some specific recommendations for use when creating a continuity plan (ICOR, p 52):

- *Clear and concise goals.* Continuity goals must be SMART: Specific, Measurable, Attainable, Realistic, and Time-focused. Any item within the Work Breakdown Structure (WBS), or activity decomposed from the WBS and placed as a line item on the project plan, must have these characteristics. It is not sufficient to have a line item of "Helpdesk needs to have a backup;" instead, have a main grouping on the project plan labeled "Helpdesk Continuity" with measurable line items such as "Customer access to first-line response will not degrade beyond 30 minutes, or the agreed-upon SLA, whichever is less."

- *Define the Assumptions.* "Assumptions" have a bad reputation in business (as well as an unprintable variation). That being said, no project exists that does not have a host of assumptions behind it; whether it be that sufficient storage already exists to manage continuity documents, or that power and heating-ventilation-air-condition (HVAC) is already available in a set of selected alternate sites, or even that the executive sponsor is not subject to summary withdrawal mid-project (as can often be the case in the military with its standard two-year tours of duty). The important thing is to document the assumptions one has identified and to track them periodically; in other words, to manage them as one would any other accepted risk.

- *Develop Scenarios.* For receiving the best possible response from survey and interview respondents during the risk assessment and BIA phase of the COOP Program implementation, one must provide worst-case scenarios tied to their functional areas. For example, the Information Technology (IT) Operations Manager for an Army program might receive a scenario in which a flood has completely destroyed all servers within the primary data center prior to a major troop deployment; while a Human Resources (HR) Manager should receive a scenario in which 75% of personnel in a given geographic area have been infected with a particularly nasty virus.

4.2 Encourage Organization Team Members

Finally, the COOP Program's team members need to be encouraged in their execution responsibilities. While the COOP Practitioner has exercised due diligence in creating a management structure based on sound good-practice, and the COOP Plan owner has ensured that team members understand their assignments and that the assignments are reasonable, implementing a COOP Program can be a time-consuming and difficult process. Oftentimes the COOP Program Development Team will consist of individuals who already have full-time responsibilities within the organization. In fact, that is likely to be the case as it will be these high-energy and expert individuals who understand the organization best of all.

To encourage these members, the COOP Plan Owner (working in conjunction with the COOP practitioner if they

are separate individuals) must:

- *Respect the team members' other commitments.* If the project plan must be adjusted to account for unrealistic deadlines, then the COOP Plan Owner must be prepared to do so.

- *Insist on regular meetings.* While team members' will have other duties and schedule conflicts, without direct communication between the different groups the COOP Program's implementation progress will be difficult or impossible to judge. Additionally, not holding regular meetings can lead to isolation of individual team members with a corresponding drop in morale.

- *Recognize accomplishments publicly.* Working with the IT department to integrate a "Good COOP Program News" area on the corporate intranet is a great way to disseminate recognition to individual COOP Program team members. For the Army program that serves as a use case for this set of white papers, an easy way to get this space is on the Army Knowledge Online (AKO) portal. AKO allows organizations to define their own online sharing areas, which can then be used like any other intranet-based portal.

5.0 Concluding Remarks

5.1 Summary

This paper has reviewed how a COOP practitioner can lay the groundwork for a successful COOP Program implementation. The COOP practitioner should analyze the organizational landscape carefully in order to locate the most effective "champion" sponsor for the COOP Program; this "champion" may very well not be the most obvious senior executive but instead a trusted deputy. The goal is to find an executive sponsor for the COOP Program who can be relied upon to stay focused and committed for the duration of the implementation project.

Prior to starting the COOP Program implementation, the practitioner must define an effective management structure. This management structure must include a "window" to the funding executives via a COOP Steering Committee; this committee provides governance to changes within the COOP Program and also becomes the Crisis Management team that leads the response effort during a COOP event. The practitioner must also work with the COOP Plan Owner (who may be the same as the COOP practitioner) to create the COOP Program Development Team to perform the Risk Assessment and BIA.

A key aspect of any project is managing expectations and keeping team members engaged and involved. This is no different for the COOP Program implementation project, and a tailored communication plan to each level within the organization (executive, functional, and operational) can make the difference between the perception of success and failure. Team member engagement is accomplished by requiring interaction via meetings, but not to the point where a team member cannot accomplish the other organizational tasks they have no doubt also been assigned.

5.2 Recommendations

This paper has recommended several approaches to resolve the problems in setting up a COOP Program as shown in the table below:

Table 3: Recommendations

Recommendation	Rationale
Construct a set of COOP Program policies crafted to the organization	The COOP practitioner can better understand the organizational constraints and identify possible cost avoidance by reviewing the existing higher-level guidance already available. In the case of the U.S. Army, this guidance comes from AR 500-3.
Find an appropriate COOP Program Sponsor "Champion"	Within an organization, the high-ranking individual who is the most obvious fit as the executive sponsor for the COOP Program may not be the best "champion" due to time and schedule conflicts. Look for trusted deputies who, once convinced of the importance of a project, can be relied upon to ensure that the executive sponsor does not lose sight of the COOP Program implementation effort.
Craft a compelling COOP Program business case for the sponsor	Be prepared for common reactions such as "it is not our job" or "we have no funding;" do not rely on FUD but instead come prepared with reasonable (albeit high-level) estimates on the possible occurrence rate and organizational impact of specific types of disasters.
Create the Steering Committee with the executive sponsor	The Steering Committee provides a "window" into the senior management within the organization and helps to ensure that the COOP Program is properly socialized as an organizational imperative. It also provides the governance to ensure that changes to the COOP Program continue to align to organizational goals and objectives.
Communications is the most critical element of the COOP Program's implementation	Unless the entire organization has received authoritative information about the COOP Program, then the success or failure of the program is open to interpretation and subject to misunderstandings. Communications can be sent via email, corporate intranet (or AKO groups within the U.S. Army), and from functional leads within the COOP Program Development Team.

5.3 Next Steps

The next paper in this series will identify how the small Army program can implement the single most critical element of a successful COOP Program: the Business Impact Analysis (BIA). An organization can only protect what it knows it has, and even then it must allocate scarce continuity dollars wisely. The BIA allows the organization to understand and prioritize its most critical business processes.

Appendix A: Acronyms and Abbreviations

AR	U.S. Army Regulation
BCM	Business Continuity Management
COOP	Continuity of Operations
DoD	Department of Defense
DPM	Deputy Program Manager
FUD	*Fear, Uncertainty, and Doubt*
HVAC	Heating-Ventilation-Air-Conditioning
IA	Information Assurance
ICOR	International Consortium for Organizational Readiness
IT	Information Technology
ITIL	IT Infrastructure Library
MEF	Mission Essential Function
MOA	Memorandum of Agreement
PPM	Program Planning Manager
SME	Subject Matter Expert
U.S.	United States

About the Author

Andrew Bruce is a Lead Scientist for Computer Sciences Corporation (CSC) in the Army Programs group of the North American Public Sector. CSC provides professional services to the Federal Government and the Department of Defense, specializing in customizing and developing architecture and governance models that enable tight integration to the Army's enterprise portfolio management initiatives. Mr. Bruce's job responsibilities include: working directly with customers and partners for new business development, supporting proposal efforts, overseeing Army customers' network infrastructure, working with project managers to ensure project completion, managing software development efforts throughout the entire system life-cycle, and leading new technology research and proofs-of-concept. After a career spanning three decades in shrink-wrap, commercial, and corporate software development, Mr. Bruce is focusing on Information Assurance to achieve his goal of building and managing large data centers providing cloud computing utility services for commercial and Government customers. Mr. Bruce holds the CISSP, PMP, and FITSP-D certifications and is currently pursuing a Master's Degree in Information Assurance from Norwich University.

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