



**DisAbility Solutions for  
Independent Living, Inc. (DSIL)  
Continuity of Operations Plan (COOP)**

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[www.disasterstrategies.org](http://www.disasterstrategies.org)

# **DSIL Continuity of Operations Plan (COOP)**

## **Introduction**

The purpose of a continuity of operations plan (COOP) is to preserve continuity of operations in an organization to the highest degree possible when a disruption occurs. Disruptions can be highly localized, such as DSIL's office becoming temporarily uninhabitable, or they can be broader, such as nearby buildings becoming uninhabitable and road ways becoming impassable because of hurricane damage. Disruption could impact an entire neighborhood, city, county, or even state. Major disasters will often cross state lines. Disruption can directly impact a single individual, or a large number of individuals. It can be caused by disasters and emergencies, including public health emergencies, as well as structural or infrastructure failure. It can also occur as a result of individual circumstances such as unanticipated incapacitation of a key DSIL staff member due to illness or an injury. This continuity of operations plan will support continuous provision of DSIL services during a wide variety of disruptions.

The Partnership for Inclusive Disaster Strategies (The Partnership) conducted interviews, had numerous virtual meetings, and email communications with DisAbility Solutions for Independent Living's (DSIL) CEO and other staff for the purposes of documenting any existing continuity of operations practices and assessing them to identify gaps and deficiencies. This plan was reviewed by the CEO and feedback was incorporated. Staff will be trained in the practices adopted in this COOP during 2024.

Some recommendations can be implemented immediately, some such as modifications to the CEO succession plan, require board approval. Others, such as minimizing use of paper documents will require training and will take time to put into place. The potential time frame of implementing a recommendation is noted throughout this document. Be aware that the time frame indicated is reflective of the feasibility of implementing the recommendation, not its urgency. For example, developing and exercising an evacuation plan is of the utmost urgency; however, a longer timeline for completing this task is anticipated because of resources it may require. This is also true of developing a shelter-in-place plan and providing shelter-in-place kits.

Areas where staff and board actions are recommended for the plan to become actionable are noted. A continuity of operations plan must address who will conduct DSIL administrative tasks, and who will provide DSIL services in the event of unplanned staff unavailability. It also should address how DSIL will continue to provide services in the event of emergencies and disasters that could render the office damaged or destroyed; communicate to staff and public without ability to engage electronically; the office inaccessible because roadway, bridges, and/or other infrastructure is damaged, destroyed, or inoperable; or the office uninhabitable because of a pandemic or other public health emergency, chemical spill, or radiation hazard.

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In the proposed continuity of operations plan, areas where staff and board actions are recommended for the plan to become actionable are noted.

### Overall Findings

DSIL has many existing practices that have and will facilitate continuity of operations. These include:

- a CEO succession plan that is incorporated into DSIL's bylaws,
- a comprehensive COVID-19 plan, and
- a comprehensive telework plan.

The Partnership recommends that these practices be enhanced by considering:

- assigning staff positions to succeed the CEO and providing training to these staff as necessary, see succession plan below,
- updating the COVID-19 plan to address other respiratory viruses or similar public health emergencies, and
- adding questions for [workstations](#) and [lighting](#) to the telework plan such as
  - Is there adequate privacy in the workspace?
  - Is there adequate seating, such as a desk chair in the workspace?
  - Is there adequate desk/surface space?

The Partnership identified areas where elements of a continuity of operations plan were absent or not yet complete. This includes that:

- Many aspects of a continuity of operations plan had existed in practice, but were not yet in writing.
- The CEO is often the single point of failure, the sole person who has information or skills set to carry out an organizational practice.
- Although a CEO succession plan exists in the organization's bylaws, it does not assign a staff member or position to succeed the CEO. It also does not include disaster or emergency as a reason that might activate the need for succession.
- There was no succession plan for staff other than the CEO.

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- There was no crisis communications plan for communicating with funders, staff, consumers, contractors, and the public.
- There was no shelter-in-place plan.
- There was no evacuation plan.
- Many documents exist only in paper format.
- The website is not up-to-date, may need work to meet [WCAG](#) AA or AAA standards, and is not used for crisis communications with consumers. The Community Connector used by consumers is not on the website.
- Information Technology:
  - There is an absence of an IT plan if primary IT support is unavailable. The CEO is the single point of failure.
  - There is not a kit that contains the essential materials (passwords, account information, documentation, and procedures) to carry out essential IT functions if IT staff, facilities, or both are unavailable.
  - Outsourced IT support is in a building that shares a parking lot with DSIL.

### **Staff Succession**

A first step in ensuring continuity of operations is for staff and board to understand which staff will move into a position that is unexpectedly vacant when a staff member becomes unavailable or incapacitated. Staff need to understand prior to unexpected unavailability what their new responsibilities may be as well as to whom they now report during this unexpected absence. The board needs to understand who will fulfill CEO responsibilities.

#### ***Staff Succession Plan***

It is expected that staff will give notices for planned absences, including vacations and planned medical leave. This plan should be implemented when there is unforeseen staff unavailability. "Unavailability" shall be defined as circumstances where staff is incapacitated due to illness, disaster, or death, or other unplanned circumstances.

#### CEO Succession

For the **CEO** succession plan, see attached document that has been adopted by the DSIL board of directors.

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### 1. Recommendation 1

**Implementation timeframe:** Upon board approval

Board should take action to modify the CEO succession plan in bylaws, by specifying which position will succeed the CEO and by adding “disaster or emergency” to list of reasons for an unplanned absence by the CEO.

### 2. Recommendation 2

**Implementation timeframe:** Upon board approval

The board should add language to its bylaws stating that any employee who is in a position where they may be asked to assume full or partial CEO responsibility be made aware of this and be trained for this occurrence. They should also have access and know how to access any information necessary for operations including financial information, payroll, bill paying, or any other information, records, and passwords necessary for the CEO to operate DSIL.

### Other Staff Succession

**Implementation timeframe:** Upon notification and training of staff

1. If **CFO** is unavailable, the fiscal assistant assumes CFO responsibilities under the supervision of the CEO. The fiscal assistant should be made aware of the possibility of them assuming the CFO’s responsibility in the event of the CFO’s unavailability. They should be trained to assume this responsibility. They should know how and be trained in how to access all necessary financial information, relevant staff contact information, and have access to all necessary passwords.
2. If both **CFO and CEO are unavailable**, the fiscal assistant assumes CFO responsibilities under the supervision of the board president.
3. If the **Director of Programs** is unavailable, their responsibilities shall be assumed by the CEO, who may delegate them to appropriate staff.
4. Generally, supervisors shall assume responsibility for **staff** that they supervise who are unavailable. Supervisors may delegate responsibility to staff with similar experience and qualifications, where feasible. All staff who may assume responsibility as the result of an unexpected absence shall be made aware that they may be asked to assume this responsibility. They should be trained on how to assume this responsibility, and have access to or know how to access any information including financial information, records, including consumer records,

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and passwords necessary to fulfill the responsibilities of the newly assumed position.

### **DSIL Crisis Communication Plan**

In order to maintain continuity of operations during and after a disaster or emergency, staff and board must have a plan by which to communicate even when power and connectivity are down or not fully operational. Staff and board should be trained in the following Crisis Communication Plan.

In the event of a disaster, emergency, or Public Health Emergency (PHE), DSIL will implement the following crisis communication plan. Crisis is defined as a disaster, emergency, public health emergency, active shooter event, or other situation that may cause disruption to the lives of consumers and staff or disruption of operations.

#### ***Communication with Staff***

**Implementation timeframe:** Upon selection of alternate venue and training of staff

1. Prior to crisis:

Instruct staff:

- to expect to be contacted by the CEO or their designee within 24 hours after the beginning of a crisis.
- to reach out to the CEO and or their designee if they have not been contacted by them within 72 hours of crisis, or as soon as feasibly possible.
- that if there isn't operable communication with DSIL, they should monitor their phones, computers, devices, and DSIL website for updates if they are able.
- to check the DSIL website for updates, if they are not able to be notified by other more direct means.
- to continue to provide IL services and disaster IL services as feasible during typical business hours until they have been contacted.
- that they may be required to work virtually or from an alternate venue in a crisis, and provide details about equipment and alternate venue (as available).

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Ensure that staff have completed a telework agreement and are adequately trained.

Following an event where the DSIL office must be closed but it is safe to travel, DSIL will be operating remotely from their homes or an alternative venue. If an alternative venue is selected, consideration should be given to the following factors:

- likelihood of flooding;
- structural integrity of building to withstand category 5 hurricane winds; and
- availability of necessary back-up power.

If an alternative venue(s) is identified, consider entering into a contract or MOU with it.

**Note:** While work from home options may be ideal during public health emergencies or when DSIL may need to be temporarily closed, an alternative site may be a desirable option following disruptions that only impact the DSIL office such as a fire or a building collapse.

Staff will be regularly trained in response services that DSIL may provide, including training on:

- registering consumers for FEMA and other services at gathering spaces and, if needed door-to-door;
- diverting consumers from institutionalization during a crisis;
- continuing to provide transition services out of nursing facilities; and
- how to continue providing core and other services during and following emergencies and disasters.

### 2. During and following crisis:

The CEO or their designee will reach out to staff via phone, text, or email, depending on which communication method is feasible.

- The CEO or designee will ask staff to report their situation as a result of the crisis. For instance, if they were displaced from their home, in a shelter, or sickened in case of a PHE.

Inquire about their wellbeing and any supports needed:

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- Are they able to work?
- Are they able to work remotely, in person, or on-site, if the site is open?
- Are they able to travel?
- Are they able to travel to the alternate site, should the main site be closed and an alternate physical location has been established?
- Do they need any additional reasonable accommodations?
- Whether or not they have work equipment and information available to them: Did they bring it home, if it was damaged or destroyed by a disaster?
- The CEO or designee will communicate changes in operation due to the crisis, including:
  - Changes in hours or days of operation.
  - Enacting telework plans for staff.
  - Moving to full virtual operation.
  - Moving to partial virtual operations.
  - Where and when staff should report to work (physical site or virtually). If an alternative site has been identified, state address.
  - New assignments due to the crisis including going to shelters, points of distribution, Disaster Recovery Centers, other gathering places or door-to-door to help people register for FEMA and/or other relief services.
  - Schedule of virtual, phone, or in-person meetings to coordinate crisis response.

### ***Communication with Board***

**Implementation timeframe:** Can take place immediately

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### 1. Prior to crisis:

- On an annual basis, review plans to communicate to the board president that there is a crisis and what the ramifications may be for DSIL and its consumers.

### 2. During and following crisis:

- Communicate to the board president that there is a crisis, what the ramifications may be for DSIL and its consumers, and what actions are being taken to support staff, volunteers, and consumers. Communication with the board president and executive committee may be more detailed and require one or more virtual meetings or phone calls.

### ***Communication with Funders***

**Implementation timeframe:** Can begin immediately

### 1. Prior to crisis:

- Discuss with the Administration for Community Living (ACL) and other funders DSIL's plan to notify and continuously update them in the event of a disruption of operations. This could range from a decision to move to virtual operations during a public health emergency to structural damage to the DSIL office from a windstorm.
- If an event has notice, such as a predicted hurricane, inform funders of this possibility.

### 2. During and following crisis:

- Communicate to ACL and other funders as soon as is feasible after an incident that disrupts operations. Arrange to provide them with regular updates.

### ***Communication with Contactors***

**Implementation timeframe:** Can begin immediately

### 1. Prior to crisis:

- Discuss with any external contractors DSIL's plan to notify and continuously update them in the event of a disruption of operations. This could range from a decision to move to virtual operations during a public

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health emergency to structural damage to the DSIL office from a windstorm.

- If an event has notice, such as a predicted hurricane, inform contractors of this possibility.

### ***Communication with Consumers***

**Implementation timeframe:** Can begin upon training of staff and conducting consumer outreach, can be fully operational after website is updated.

#### 1. Prior to crisis:

- Work with consumers on developing personal preparedness plans.
- Inform consumers where they can find information during a crisis.
- Inform consumers of DSIL's potential availability in crisis.
- Incorporate crisis communication information into the annual meeting agenda each year.

#### 2. During and following crisis:

Send email/text/phone/website communication that:

- Updates consumers in changes in office hours, meeting or event cancellations or postponements.
- Directs consumers to the website for additional information about the crisis.
- Check in with consumers and ask what support they need.

### ***Communication with Public and Consumers***

In a crisis, the public will be notified via the DSIL website of DSIL's hours of operation and any canceled events.

#### 1. Prior to crisis:

- Assess the accessibility of the website and resolve barriers to access.
- Develop website update templates.

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- Collect from consumers multiple methods of contact, ie. landline and cell phone numbers, email, social media platform, e.g. Facebook Messenger.
- Train staff, in addition to the CEO, to update the public section of the website with crisis communications and inform consumers and the public that they will be able to find crisis communications there.

### 2. During and following crisis:

Update front page of website to:

- Provide information about changes in:
  - DSIL's hours of operation.
  - The way core and other services will be provided (virtually, at another location, in consumer's homes).
  - If the office is not occupied, how messages will get to staff, consumers, funders, contractors, and the public.
  - Office address if an alternative site is being utilized.
  - Relevant disaster services.

Provide links to:

- important resources, including location of any shelters, FEMA (if there has been a presidential disaster declaration), or the American Red Cross (if they are activated).

Remind consumers and members of the public that that they have legal rights to:

- physically accessible services;
- equally effective communication (sign language interpreters; visually accessible materials etc.); and
- modifications to policies and practices including admitting service animals.

Provide links to resources to go to if they think their rights are being violated, including:

- [Disability Rights Florida](#)
- [Community Legal Services](#)

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- [The Partnership for Inclusive Disaster Strategies](#)

### ***Communication with Media***

**Implementation timeframe:** Ongoing and can begin immediately

1. Prior to crisis:

- Develop close relationships with local media.
- Update press contact lists.
- Develop a media advisory and press release template.

2. During and following crisis:

- Create and disseminate media advisory and press releases(s) that describe the crisis, and its potential impact on:
  - disabled people in affected areas,
  - resources, and
  - DSIL's availability to provide support as well as any changes in hours or operations or services.

### **Document Digitization**

**Implementation timeframe:** Ongoing, can begin upon initial staff training

In order to facilitate continuity of operations, the integrity of documents must be protected. Documents that exist solely on paper are at risk of destruction in a fire, water, or other emergency. With proper security, the confidentiality of digital documents is easier to maintain.

Many DSIL documents exist only in paper format. In order to facilitate continuity of operations, digitizing paper documents should be prioritized.

1. Digitizing paper documents

- Designate staff members who are responsible for digitizing paper documents.
- Train staff, who are not already trained, to digitize paper documents.

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- Promptly establish and maintain a schedule for digitizing paper documents.
2. Shredding paper documents
    - Establish and maintain a schedule for shredding paper documents that have been digitized.
  3. Staff will be trained to eliminate paper documents wherever possible.
    - Encourage staff, unless it is required as reasonable accommodation, to enter notes, records, reports, and other written material in digital format, and eliminate the use of paper to the highest degree possible. Note: This process will likely need to be phased in.

### Information Security

**Implementation timeframe:** Ongoing, can begin immediately

1. DSIL has a good information security foundation. The following recommendations will enhance information security during steady state as well as during disasters and emergencies.

### *Information Security Recommendations*

1. **Recommendation:** Prepare for disruption by:
  - Assembling a kit containing all necessary information and materials necessary to access data and applications if forced to work off site or from unconfigured computers. This kit should contain all the licensing information, installation media, account information, and access information necessary to recreate DSILs computers. This kit should be stored off site (i.e., a staff person's home and be protected from unauthorized access).
2. **Recommendation:** Enhance data security by:
  - Using a unique ID and password for each site (e.g., Google, Quickbooks, Onedrive). This will reduce the impact if one account is compromised.
  - Providing each user with a unique ID for each site whenever possible. Sharing IDs and passwords should be a last resort.
  - Using a password manager, such as 1Password, Keepass, or Norton.

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- Long (>14 character) and complex (including uppercase, lower case, numbers, and/or special characters) passwords are desirable for security but are onerous, especially for staff with disabilities that impact their ability to type or process information. Password managers can enter IDs and passwords into logon screens, and can store passwords securely.
3. **Recommendation:** Improve the security of laptops, tablets, phones, or other devices (“endpoints”)
- Institute procedures to be sure that all endpoints have all updates to operating systems and applications (e.g., Adobe, Chrome).
  - Make sure that all endpoints are running antivirus software. AV software should monitor web and email activity to help staff members avoid being exploited through these channels.
  - To the extent possible, require DSIL endpoints be used for DSIL business only. Require that DSIL endpoints only be used by DSIL personnel. If endpoints are to be used by consumers e.g. in a computer lab or independent living services class or group, these should not contain any sensitive data.
  - Hard drives should be encrypted whenever possible.
4. **Recommendation:** Develop contingency plan for Daytona Networks being unavailable.
- A widespread disaster could render Daytona Networks unavailable to provide support to DSIL. Disaster plans should include contingencies for this.

## Shelter-in-Place Plan

**Implementation timeframe:** Can be developed as DSIL has resources

**Need:** Urgent

1. Although a shelter-in-place plan may not typically be part of a continuity of operations plan, it should be considered that in order to best maintain continuity of operations staff should remain safe. A shelter-in-place plan can protect staff, consumers, and visitors during a variety of emergencies and disasters.

Reasons for sheltering in place can include:

- Tornados

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- Severe weather
- Hurricanes with rapid intensification
- Active shooter situations
- Radiation hazards
- Chemical spills

Below is a sample shelter-in-place plan for DSIL to consider in developing its shelter-in-place plan.

Instruct staff on the following shelter-in-place protocols as part of onboarding and annually thereafter.

- Notify staff that they will be provided a message and provide them with a message to shelter-in-place communicated by the most expedient means when the need arises. This can include verbal, text, email, and phone messaging. Specific instructions and information relevant to the incident such as the reason for shelter-in-place, anticipated duration of shelter-in-place, ways to communicate if power and/or internet connectivity is down, and other information pertinent to the incident such as area of the building in which to shelter, any areas of the building to avoid etc. should be included in the message.
- Provide office emergency kits scattered through the CIL, such as the waiting room/lobby, conference room, training room, etc.

“[Recommended emergency supplies include](#): water, food, both a battery-powered radio and a NOAA weather radio with tone alert, a flashlight, first aid kit, extra batteries, whistle, dust mask, wrench or pliers to turn off utilities, plastic sheeting and duct tape to shelter in place, manual can opener, local maps, cell phone with chargers and a backup battery, and moist towelettes, garbage bags and plastic ties for personal sanitation.”

Note: A NOAA weather radio is not required at each workstation.

- Emergency kits will be provided at every workstation, containing items needed if staff had to shelter-in-place.
  - In addition, The Partnership recommends high quality masks and mylar blankets.

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- Annually, office manager will conduct an inventory and list which items which are expired or missing, and report this to the office manager.
- Instruct the office manager to purchase new supplies as necessary.
- Instruct staff to identify their needs and to assemble a personal shelter-in-place supply kit that includes:
  - Individualized specific food (low sugar, low sodium, peanut or gluten -free, etc.)
  - medication,
  - personal hygiene supplies,
  - period, bladder, and bowel supplies supplies as needed, and
  - any other personal items they would require if they were required to shelter-in-place.
  - Entertainment items, e.g. playing cards, favorite book, fidget devices
- Conduct an inventory to monitor for expiration annually.
- Review shelter-in-place protocols with staff as part of onboarding and annually after that.

## **Evacuation Plan**

**Implementation timeframe:** Can be developed as DSIL has resources

**Need:** Urgent

1. Evacuation plans like shelter-in-place plans are necessary to protect the safety of staff, consumers, and visitors. Staff that stays safe during a situation where evacuation is required ultimately preserves continuity of operations. Development of an evacuation plan is beyond the scope of this project, however it is recommended that DSIL develop an evacuation plan.

In doing so it is recommended that DSIL:

- Consult with the fire department to develop an evacuation plan that is inclusive of the needs of staff, consumers, and visitors with all types of disabilities.

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- Ensure there is tactile signage where required in DSIL.
- Ensure there is a plan for notifying Deaf, Deafblind, and hard of hearing staff, consumers, and visitors.
- Ensure that there are designated assembly points or reunification and backup reunification sites established.
- Exercise and drill plan.
- Ensure that shelter-in-place and evacuation plans are regularly drilled and that tabletop (discussion-based) exercises are regularly conducted.