

CONTINUITY PLAN
for
IVY COLLEGE



John Yoo, Chief Operating Officer, Ivy College
October 2022

Ivy College

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Privacy Statement

Public disclosure of this document would have a reasonable likelihood of threatening public safety by exposing vulnerabilities. It contains sensitive and confidential information that is not subject to FOIA under Virginia Code §2.2-3705.2. Accordingly, the Ivy College is withholding this plan from public disclosure. Refer any request for a copy of this document to the College's legal counsel or the Virginia Attorney General's office.

Approvals

This Continuity of Operations (COOP) Plan was prepared by the Ivy College to develop, implement and maintain a viable COOP capability. This COOP Plan complies with applicable internal agency policy, local and state regulations, and supports recommendations provided in the Virginia Department of Emergency Management COOP Planning Manual for Institutions of Higher Education. We submit the plan with the understanding that a number of aspects of the plan remain to be fully developed and implemented.

I hereby approve this COOP Plan, which describes how the continuity of essential functions and activities of the Ivy College in Vienna, Virginia will be performed in the event of an emergency that prevents normal operations.

Approved:

Date:

John Yoo, Chief Operating Officer

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1. INTRODUCTION

The Ivy College is committed to the safety and protection of its employees, students, operations, and facilities. In support of this commitment, the College has critical operations that must be performed, or rapidly and efficiently resumed in an emergency. The changing threat environment and recent events has raised awareness to the need for continuity of operations (COOP) capabilities that will enable us to continue the performance of essential functions across a broad spectrum of emergencies. By planning for operations under such conditions, we hope to mitigate the impact of the incident on our people, our facilities and our mission.

1.1. PURPOSE

The College will continue the following essential functions during an emergency requiring continuity of operations:

- Sustain the safety and welfare of College employees, students, and visitors
- Maintain health services
- Deliver academic programs to students
- Preserve critical academic activities and training
- Maintain critical business, finance and infrastructure operations

This plan provides a framework to continue these essential functions in the event that an emergency at the College or in the region threatens operations or requires the relocation of select personnel and functions. The COOP Plan presents our approach to begin continuity operations within 12 hours of activation; continue essential functions within the identified recovery time objectives; and maintain essential functions for up to 30 days.

1.2. APPLICABILITY AND SCOPE

This plan is applicable to all College departments, divisions, units, personnel and contractors. The COOP Plan covers all facilities, systems, buildings and vehicles operated or maintained by the Ivy College. The COOP Plan supports the performance of essential functions from alternate locations and also provides for continuity of management and decision-making in the event that senior management or technical personnel are unavailable.

1.3. AUTHORITIES, GUIDANCE AND REFERENCES

Below are significant authorities, guidance and references that influenced the development of the COOP Plan.

IC Executive Committee	Provides guidance and structure to the response and actions taken by the College in an emergent situation
IC COOP Planning Manual for Institutions of Higher Education	Offers procedural and operational guidance for the preparation and implementation of a COOP Plan

Commonwealth of Virginia Office of the Governor Executive Order 44	Requires that institutions of higher education create and maintain Continuity of Operation Plans
Commonwealth of Virginia Emergency Services and Disaster Laws of 2000 (§ 44-146.13 to 44-146.29:2 of the Code of Virginia)	Mandates certain levels of preparedness for state and local government entities
Federal Continuity Directive 1– Federal Executive Branch National Continuity Program and Requirements	Discusses the elements of a viable continuity capability; while applicable to federal executive agencies, this directive provides useful guidance to State, local, territorial and tribal governments and the private sector.

1.4. SITUATION

The Ivy College is located in Vienna, Virginia. There is 1 building on 1.22 Acres lot. For the 2021-2022 academic year, a total of 233 students were enrolled in the College.

The College’s hazard identification and risk assessment resulted in a ranked and prioritized evaluation of hazards based on previous and anticipated impact to the College. Hurricane or high wind events, building fires and severe winter storms offer the most significant threats to the College.

1.5. PLANNING ASSUMPTIONS

Assumptions used to develop the COOP Plan include the following elements.

- Emergencies or threatened emergencies can adversely impact the College’s ability to continue essential functions and provide support to the day-to-day operations
- There will be a sufficient number of surviving and available senior managers with adequate supporting personnel to continue the essential functions of the College
- When an emergency incident occurs that impacts essential College functions, the College will implement the COOP Plan
- Communications capabilities, transportation, and other infrastructures will be sufficiently intact to allow implementation of this plan
- College personnel and federal, state, local, private, and military resources will be available as necessary to continue essential functions
- Recovery of a critical subset of the College’s functions and application systems will occur and allow essential operations to continue
- A disaster may require student, faculty, staff, and the public to function with limited support services and some degradation of service, until a full recovery is made

2. CONCEPT OF OPERATIONS

The COOP Plan provides a flexible, scalable strategy to manage and recover from situations or events that have a direct adverse impact on College operations. If an incident results in serious injury or loss of life of College leadership, reconstitution of the leadership position will be considered and appropriate personnel reassigned, in accordance with the chain of order: CEO, COO, Directors, department chairs, and senior staff.

Following initial crisis response and life safety efforts, focus will shift to continuity of operations, including the functions, systems, and facilities, in an effort to fully restore operations of the College. When necessary, reconstitution may require use of alternate locations, acquisition and installation of equipment and communications, and placement of personnel.

2.1. IMPLEMENTATION CONDITIONS

The COOP Plan is implemented in response to an emergent situation or any other situation that disrupts normal College operations. The plan can be implemented fully or partially. The decision to implement the COOP Plan is tailored to the specific situation and is based on the event's projected or actual impact and severity.

Activation of the COOP Plan can occur under any of the following conditions:

With Warning. It is expected that in many cases, the Ivy College will receive a warning of at least a few hours prior to an incident. This will enable full execution of the COOP Plan with the complete and orderly alert, notification, and deployment of key personnel to assembly sites or pre-identified deployment locations before the incident takes place. Notifications will occur through pager, email, telephonic, and other mass notification methods, using standard procedures developed by the College and authorized by the Chief Operating Officer.

Without Warning. Execution of the COOP Plan following an incident that occurs with little or no warning will depend on the severity of the event and the number of personnel affected. COOP team personnel should expect to be alerted at all hours, depending on the nature of the emergency. Notifications will include a specified report time and location. This communication may occur through pager, email, telephonic, and other mass notification methods. Under certain circumstances, in-person notification may be necessary.

During activation of the COOP Plan, the College's operating hours for essential functions will remain 24 hours a day, seven days a week. As additional services come become available, regular operating hours for each of these will be determined and announced. Regardless of the warning condition, the College will deploy the most critical resources first and other resources will follow as needed.

2.2. ORGANIZATION AND ASSIGNMENT OF RESPONSIBILITIES

Designated teams have been established by the College to manage COOP operations and perform essential functions. Teams are comprised of the CEO, Chief Operating Officer, and

Compliance Officer, who will establish essential functions within 12 hours of activation. Additional personnel will augment the initial COOP team to sustain essential functions for a period of up to 30 days.

2.2.1. Director of Emergency Services

The Chief Operating Officer (CEO) is the College Director of Emergency Services. In this role, the CEO is authorized to declare a College emergency and activate the College enterprise COOP Plan. The CEO communicates with the Executive Committee for reporting the status of the crisis response and recovery operations.

2.2.2. COOP Coordinator

The Chief Operating Officer (COO) is the College COOP Coordinator. The College COOP Coordinator assists the CEO to assemble and coordinate the activities of the Critical Incident Management Team (CIMT). The COOP Coordinator facilitates communication between the CIMT and the executive team, department chairs, and senior staff.

2.2.3. Critical Incident Management Team

The Critical Incident Management Team is a decision-making body for the College community on issues related to an emergency. The CIMT is responsible for:

- Determining the scope and impact of the incident
- Prioritizing emergency actions
- Identifying impacts to operations requiring continuity actions to be undertaken
- Managing and directing the activities of the departments that will be involved in response and recovery
- Disseminating timely, accurate and appropriate information through the College's communication system Populi College faculty, staff, students and clinic patients, and to the news media
- Coordinating with federal, state, and local officials, military, private businesses, and other institutions, as appropriate

The CIMT consists of the CEO, COO, Registrar, and Compliance Officer. The CIMT may be expanded to include others as needed.

2.2.4. Departmental COOP Teams

The Departmental COOP Teams are comprised of personnel from departments and units across the College. Any organizational element that has a role in continuing or restoring essential functions is considered part of this team. Specific responsibilities are assigned to the Department Directors. Overall, Departmental COOP Teams are responsible for:

- Determining the scope and impact of the incident on their operations
- Prioritizing and implementing continuity and recovery actions
- Managing and directing the activities of departmental personnel involved in continuity and recovery

- Deploying requested resources and equipment for continuity operations
- Providing status reports to the CIMT
- Requesting any additional resources and equipment needed to continue essential functions
- Implementing their departmental reconstitution plan
- Planning and conducting the demobilization process
- Providing facts to support the dissemination of timely, accurate and appropriate information

2.3. ESSENTIAL FUNCTIONS

The Ivy College will continue the following essential functions during an emergency requiring continuity of operations:

- Sustain the safety and welfare of College employees, students, and visitors
- Maintain health services
- Deliver academic programs to students
- Preserve critical academic activities and training
- Maintain critical business, finance and infrastructure operations

These essential functions guide the continuity planning efforts of all departments across the College. The supporting departmental COOP Plans capture unit-specific actions that will allow continuing functions.

2.4. ESSENTIAL PERSONNEL AND HUMAN CAPITAL MANAGEMENT

Essential personnel must be prepared to sustain essential functions remotely or from a relocation site for a period of up to 30 days. If a relocation site is used, staff will receive an orientation briefing from site staff upon arrival at the site regarding administrative issues. Supplies and equipment needed to perform essential functions will be pre-positioned, but individuals are responsible for their personal items.

The College relies on human capital resources and their flexibility to assist COOP team members and the rest of the College population in an emergency. College leadership is expected to:

- Be fully informed and understand human capital tools, flexibilities, and strategies
- Regularly review and update personnel contact information and notification protocols to assure that information remains current
- Ensure employees have a clear understanding of their role in an emergency
- Develop, review, and update emergency guides as needed

Additionally, the College units should identify which employees can conduct work from home or other remote locations. Units should take into consideration whether laptops or employees' own computers will be used, whether there are available internet and VPN connections, and what mechanisms are available to protect proprietary information and compliance with

sensitive/confidential data policies. Individuals not normally eligible for remote work due to position responsibilities may be eligible in emergency situations when agreed upon with the supervisor.

2.5. ALTERNATE FACILITIES

The Ivy College recognizes that normal operations may be disrupted and that there may be a need to perform essential functions at alternate sites or facilities. In the case of an emergency situation which requires the relocation of the College operations, the CIMT on ground command center will be established on other properties managed with the College located in Vienna, VA.

2.6. ORDERS OF SUCCESSION

In the absence of, or in the event that the CEO is unable to assume command in an emergency, the duties of the CEO will be assumed by administration staff in the following order:

1. Chief Operating Officer
2. Registrar
3. Compliance Officer
4. Director of Admission

5. ESSENTIAL EQUIPMENT AND INFORMATION

The entire College community relies heavily on the Office of Information Technology for communication and technological infrastructure, networking, data management, and information security, and help-desk support. As such, the College maintains a network security plan to establish conditions for use of and requirements for appropriate security for College computer and network resources. This policy provides guidance on how to properly maintain secure records as part of a records maintenance strategy. OIT also maintains a disaster continuity and contingency plan that supports the central OIT service applications.

A. VITAL RECORDS, SYSTEMS AND EQUIPMENT

The COOP Plan provides for the protection, accessibility, and recovery of the College's vital records, systems, and equipment. These are the records, systems, and equipment that if irretrievable, lost, or damaged will materially impair the College's ability to carry out essential functions and to continue to conduct business. The College has established the following maintenance strategy to protect these essential records, systems, and equipment and to ensure their availability in a continuity environment.

Vital Records Maintenance Strategy

Strategy	Tasks
Develop a process.	<ul style="list-style-type: none"> ■ If a vital records program is in place, detail how to assess its effectiveness. ■ If there is no program, outline the steps necessary to establish and maintain a vital records program.
Identify vital records.	<ul style="list-style-type: none"> ■ Identify records that support the performance of essential services. ■ Identify sensitive records that may have security requirements. ■ Utilize the COOP planning tool to associate essential services with their required vital records.
Review protection needs for each record.	<ul style="list-style-type: none"> ■ Classify records according to categories to simplify this process. ■ Group similar data types that have similar protection needs. ■ Develop a protection, preservation, and continuity sub-plan.

During the planning process, each unit [administrative and academic] must identify the business applications and technology resources required to support essential services. Access to critical information systems used to accomplish essential services during normal operations from the primary facility must be available at the continuity location. For these systems to be accessible, connectivity must be in place at the continuity location and system servers should be backed up on a frequent basis at more than one location. Each unit will coordinate with OIT on the specific technical support needed during Continuity of Operations Plan activation.

B. COMMUNICATIONS

Interoperable and resilient communications form a critical component for a successful College COOP capability. Internal communications systems must support connectivity to other departments, students, faculty, staff, patients, their families and visitors under all circumstances.

i. Communications Systems

To ensure the provision of critical emergency communications, the Ivy College relies on layers of technological tools with the expectation that different tools may work at different times during continuity operations. The following communication tools will support College COOP operations:

- Voice lines
- Fax lines
- Data lines
- Cellular phones
- Pagers
- E-mail
- College home page postings
- Populi Learning Management System communication service
- Instant messenger services
- Blackberry and other personal digital assistants (PDAs)

- Radio communication systems
- Government Emergency Telecommunications Service (GETS)

ii. Public Information

The CEO serves as the authorized Public Information Officer (PIO) for the College. All public information must be coordinated and disseminated by PIO coordinator with assistance primarily from COOP coordinator and other personnel.

In the event that regular telecommunications on College property are not available, PIO will center media relations at a designated location. Information will be available there for the news media and, where possible, for faculty, staff, and students.

During critical incidents, the PIO will work with each organizational unit to gather accurate and substantial information regarding the situation and details of the College response. The College PIO, working with other CIMT members and City and County PIOs, as appropriate, will provide notification to faculty, staff and students, and the general public on progress toward recovery, utilizing one or several of the following methods:

- Text alert using the Populi system.
- Mass e-mail message to the College community as a whole, or to Executive Leadership, as appropriate.
- College home page (www.ivy.edu).
- College's Social Network Services pages (Facebook, Twitter, Instagram)
- Radio, television and newspapers.

6. PLAN IMPLEMENTATION

Operational disruptions that exceed the capabilities of the affected units may require the activation of additional management resources. Activation occurs when the CIMT determines the need for management and oversight to restore critical infrastructure and essential services. The CIMT may identify a Continuity and Recovery Group to coordinate continuity and recovery strategies and objectives.

A. ACTIVATION AND COMMUNICATION

Internal processes for notification of faculty, staff, and other stakeholders is outlined below in accordance with the Emergency Operations Plan.

i. Notification Procedures

The CIMT representatives will collectively decide the best course of action to communicate pertinent information to department and unit leaders, faculty, staff, students, the media, and other external stakeholders.

ii. Communication with Media and External Stakeholders

The College's PIO will be responsible for managing all external communication to the media and other stakeholders. Any communication with the media from department leadership will be upon the recommendation of College PA. PA will be responsible for providing communication guidance to department leadership, faculty, and staff following an emergency to disseminate a uniform message to students and the public.

B. CONTINUITY OF OPERATIONS

This section describes the continuity of operations and the guiding principles.

i. Guiding Principles

Continuity of operations focuses on restoring essential services incorporating the following supportive principles:

- 1) Apply orders of succession and delegations of authority
- 2) Establish communication with supporting and supported organizations and stakeholders
- 3) Perform essential services (infrastructure, academic, and training) in order of prioritization
- 4) Manage human capital
- 5) Acquire space and equipment as necessary for essential services
- 6) Establish means for accessing vital records, files, and databases
- 7) Prepare for the reconstitution of essential services

To facilitate alignment with continuity of operations guiding principles, the College will utilize Administrative Management System tool called Populi (<https://icc.populiweb.com/>). Through the tool, the CIMT will provide a central planning location to identify unit essential services, recovery priorities, personnel and resource needs, and continuity strategies for common disruptive events. Each unit will consult and communicate with the CIMT through the tool to support the development of alternate strategies and standard procedures for disruptive events.

All units of the College are recommended to communicate continuity of operation in Populi, and academic operations can also benefit from the clarity and visibility of using the Populi tool. Priorities and strategies identified in the Populi tool may require additional internal procedures and plans to execute continuity strategies.

ii. Academic Continuity

A disruptive incident may affect the College's ability to offer instructional activities. Each academic unit is encouraged to identify essential services and supporting critical resources in order to develop academic continuity strategies, as described in the College Continuity of Operations Plan. In the event of a disruption, each unit leadership should work directly with the Academic Dean and CIMT to communicate priorities and resource needs. It is vital that each unit should know how to effectively respond to a disruption of their academic operations, as the inability to maintain functions puts the College at risk.

Alternative course delivery strategies, including distance-learning or self-study, should be considered where appropriate. In the event that an interruption renders it impossible to complete scheduled courses within normal parameters, the units must work closely with the Academic Dean and CIMT to address the interruption. If the disruption is expected to last less than four weeks, the units should utilize its continuity plan to restore operations as quickly as possible. If the interruption is expected longer than four weeks, the Academic Dean will direct strategies for those extenuating circumstances.

Any suspension of classes will create numerous and significant issues, including how to handle course credit, grades, course-prerequisites and requirements for programs and graduation. Because authority over such academic matters is highly distributed to departments and individual faculty members, rather than subject to central control, most such issues need to be addressed at the unit level. There may be some overall College mandates or decisions regarding such matters, but such actions will generally need to be determined at that time in light of the specific nature and timing of the disruptive event. As a very general presumption, if the suspension of instruction occurs within the first three weeks of a term, the academic term will be considered to be lost and will need to be repeated in its entirety. If the suspension of instruction occurs in the last three weeks of the term, the semester may be considered to be completed, subject to course-specific exceptions. If the suspension of instruction occurs in the interim period, the semester may be considered to be suspended rather than cancelled, with instruction resuming at an appropriate time following the end of the disruptive event.

If a decision is made to suspend instruction, existing policies and processes will apply to students who voluntarily leave campus based on concerns about the disruptive event and to courses and programs that are cancelled based on similar concerns by the instructor. Based on the magnitude of such problems, the College and the units may ultimately decide retroactively to modify normal outcomes.

There may be some instances in which individual faculty members may be able to continue instruction (e.g., distance learning, tutorials, supervised reading, and graduate seminars). Faculty are encouraged to make such efforts. However, no student who is unable to participate due to illness, lack of access to necessary technology, or any other reason may be disadvantaged. If some students are able to complete a class through

such means, departments are responsible for providing an equivalent opportunity for non-participating students to complete the necessary coursework following the disruptive event.

7. RECONSTITUTION AND RECOVERY

Reconstitution includes the process of returning essential services from the response and continuity environment back to the normal working environment. The reconstitution process begins as soon as the Continuity of Operations Plan is executed and all essential services have been restored.

Implementation actions associated with reconstitution include:

- Instructing personnel on how to demobilize resources and resume normal operations
- Supervising an orderly return to the normal operating facility, a move to another temporary facility, or a move to a new permanent operating facility
- Verifying that all systems, communications, and other required capabilities are available to allow operations of essential services at the new or restored facility
- Conducting an after-action review of the effectiveness of the Continuity of Operations Plan, identifying areas of improvement, documenting identified areas of improvement in a corrective action plan, and developing a remedial action plan as soon as possible after reconstitution

Through these actions, we strive to improve the efficiency and effectiveness of recovery operations across the entire College to make for a more resilient community.

Recovery is an ongoing process. The type and breadth of recovery activities will vary based on the nature and scope of the public health emergency. However, the goal of the recovery phase is to restore the academic learning environment, including physical and structural recovery, business recovery, and psychological and emotional recovery.

Appendix A: COOP personnel list

Name	Position	COOP personnel position
Byung Kim	CEO	COOP Director COOP Public Information Officer
John Yoo	Chief Operating Officer	CIMT executive member COOP Coordinator
Charlie Chi	Compliance Officer	COOP Personnel CIMT member
Yoomin Kim	Registrar	COOP personnel CIMT member
Nicoleta Ardelean	Director of Admission	COOP personnel
Yejin Shim	Director of Student Affair	COOP personnel
Steven Krompf	Director of Library	COOP personnel

Appendix B: Definitions

- Activation – When all or a portion of the plan has been put into motion.
- Application Continuity – The component of disaster continuity that deals specifically with the restoration of software systems and data after the processing platform has been restored and replaced. Similar term: business system continuity.
- Communications Continuity – The component of disaster continuity that deals with the restoration or rerouting of a unit’s telecommunications network, or its components, in the event of loss. Similar terms: telecommunications continuity, data communications continuity
- Continuity Location – A location, other than the normal facility, used to process data and/or conduct essential services in the event of a disaster.
- Continuity of Operations (COOP) – The activities of individual units and agencies and their sub-components to continue their essential services under all circumstances. This includes plans and procedures that delineate essential services, specify succession to office and the emergency delegations of authority, provide for the safekeeping of vital records and databases; identify alternate operating facilities, provide for interoperable communications, and validate the capability through tests, training, and exercises.
- Continuity of Operations Coordinator – The COOP coordinator may be responsible for overall continuity of a unit(s). This person also provides overall project management to address the quality and timely delivery of the business impact analysis, vulnerability/risk analysis, and Continuity of Operations Plan.
- Continuity of Operations (COOP) Plan – A plan to ensure the resumption of time-sensitive operations and services in case of emergencies.
- Continuity Strategies – Alternative operating method (that is, platform location, etc.) for facilities and system operations in the event of a disaster.
- Critical Equipment – Critical equipment includes specific equipment required to reestablish a mission essential function.
- Delegations of Authority –specifies who is authorized to act on behalf of the department head and other COOP critical officials for specific purposes.
- Disaster – Any event that limits an organization’s ability to provide critical business functions for some predetermined period. Similar terms: business interruption, outage, and catastrophe.
- Emergency Preparedness – The discipline that addresses an organization’s readiness to respond to an emergency in a coordinated, timely, and effective manner.
- Essential Services - Services that maintain security, safety, and critical operations during emergency and continuity conditions.
- File Continuity – The restoration of computer files using backup copies.
- Key Personnel – Personnel designated by their unit as critical to the resumption of essential services and services.
- Lines of Succession – Provisions for the assumption of senior and other key positions during an emergency in the event that any of those officials are unavailable to execute their legal and/or essential duties.
- National Incident Management System (NIMS) – NIMS provides a consistent nationwide template to enable federal, state, local, tribal governments, private sector, and

nongovernmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism.

- Record Retention – Storing historical documentation for a set period, usually mandated by state and federal law or the Internal Revenue Service.
- Recovery – Recovery, in this document, includes all types of emergency actions dedicated to the continued protection of the public or to promoting the resumption of normal activities in the affected area.
- Recovery Time Objective – The period of time that a function can be suspended before its operational impact is unacceptable.
- Response – Those activities and programs designed to address the immediate and short-term effects of the onset of an emergency or disaster.
- Risk Assessment/Analysis – The process of identifying and minimizing the exposures to certain threats. Similar terms: risk assessment, impact assessment, corporate loss analysis, risk identification, exposure analysis, and exposure assessment.
- Succession– A list that specifies, by position, who will automatically fill a position once it is vacated.
- Vital Records, Files, and Databases – Records, files, documents, or databases, which, if damaged or destroyed, would cause considerable inconvenience and/or require replacement or re-creation at considerable expense. For legal, regulatory, or operational reasons, these records cannot be irretrievably lost or damaged without materially impairing the organization's ability to conduct business