AGENDA ITEM B

APPROVAL OF SEPTEMBER 20, 2012, COMMITTEE MEETING MINUTES

STATE OF CALIFORNIA
dca
DEPARTMENT OF CONSUMER AFFAIRS

STATE AND CONSUMER SERVICES AGENCY • GOVERNOR EDMUND G. BROWN JR.

CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
2005 Evergreen Street, Suite 2050, Sacramento, CA 95815-3827
P [916-263-2294] F [916-263-2701] | www.bot.ca.gov

DISASTER PREPAREDNESS/DISASTER RESPONSE TELECONFERENCE MEETING MINUTES

Thursday, September 20, 2012

DRAFT

A. Call to order, roll call, establishment of a quorum

At 3:03 Mary Evert called the meeting to order.

Roll Call

Mary Evert, Board Member	Present
Kathay Lovall, Board Member	Present
Mohammed Khalifa	Absent
Carol Bartolo Loeffler	Present

B. Approval of June 26, 2012, Committee meeting minutes.

- Mary Evert moved to approve the June 26, 2012, Meeting Minutes as presented.
- Kathay Loval seconded the motion.

Roll Call Vote

Mary Evert	Aye
Kathay Lovell	Aye
Carol Bartolo-Loeffler	Aye

- The motion was approved by the Committee

C. Committee member updates/activities.

Carol Bartolo Loeffler reported she obtained informational material regarding disaster preparedness and would provide copies to Board staff at the end of the meeting.

D. Review of practitioner responses from facebook blast soliciting input whether the practitioner currently addresses disaster preparedness with their clients or what would motivate them to do so.

The Committee reviewed two responses from practitioners in response to a Facebook inquiry that was sent out asking for information from practitioners if they integrate disaster planning into client care.

E. Discussion and consideration of strategies, delivery modes, or development of requirements to encourage occupational therapy practitioners to become educated about disaster preparedness and response.

Ms. Evert summarized the Committee has considered ways to educate practitioners on integrating disaster preparedness into client care plans and the workplace. The Committee also has explored the possibility of establishing a post professional education requirement and/or establishing disaster preparedness as an ethical standard of practice. Ms. Evert opined that realistically, in order for the Board to pursue a regulatory requirement or ethical standard on disaster preparedness and planning, it should be established or incorporated into the framework of occupational therapy.

F. Discussion and consideration of strategies or methods for occupational therapy practitioners to incorporate disaster preparedness and response into client services or their work place.

Ms. Evert indicated the focus and goal of the Committee should be directed at bringing a resolution before the Representative Assembly of the American Occupational Therapy Association (AOTA) to incorporate disaster planning in patient or client plans. Carol Bartolo Loeffler indicated that such a resolution should also encourage occupational therapy practitioners to take an active role in participating in disaster planning in the workplace also. Ms. Evert indicated she would seek assistance from past and current Board Members that are AOTA members to take the steps that are necessary to introduce a resolution, which at a minimum, would elevate discussion on a national level.

- Mary Evert made a motion to pursue a resolution before the AOTA Representative Assembly that would seek to add language into the occupational therapy scope of practice to incorporate disaster preparedness and planning into patient/client planning.
- Carol Bartolo-Loeffler seconded the motion.

<u>Roll Call Vote</u>

Mary Evert	Aye
Kathay Lovell	Aye
Carol Bartolo-Loeffler	Aye

- The motion was approved by the Committee

G. Selection of future meeting dates/times.

The Committee decided to meet at 3:00 p.m., on Wednesday, October 24, 2012, for a quick meeting to review the Board's Continuity of Operations and Continuity of Government Plan (COOP/COG) and to get an update on the status of seeking a resolution with the AOTA (item F above).

H. Public comment on items not on agenda.

No one from the public was in attendance for this meeting.

I. Adjournment

At 3:58 p.m. the meeting was adjourned.

DRAFT

AGENDA ITEM D

REVIEW AND APPROVAL OF THE BOARD OF OCCUPATIONAL THERAPY CONTINUITY OF OPERATIONS AND CONTINUITY OF GOVERNMENT (COOP/COG) PLAN

BUSINESS CONTINUITY PLAN

FOR

California Board of Occupational Therapy

2012

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BUSINESS CONTINUITY PLAN APPROVALS

By their signatures below, the following senior level officials certify that they approve this Business Continuity Plan and fully understand the continuity of business operation procedures that are to be followed in the event of an emergency that impacts the facilities and employees for which they are responsible.

Approved: _____ Date _____
Heather Martin, Executive Officer

Approved: _____ Date _____
[Name/Title]

Approved: _____ Date _____
[Name/Title]

Approved: _____ Date _____
[Name/Title]

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I. EXECUTIVE SUMMARY

In the development of the Board's Business Continuity Plan it became clear that the Board would have difficulty meeting its obligations and restore essential functions within 24 hours after a disaster hits.

In preparing plans for operation, considerations were made about the various disaster possibilities. While possibilities range from moderate damage to complete destruction, for the purposes of this plan, the assumption was made that there would be complete destruction of the Board's headquarters, with no advance warning, and no ability to retrieve any equipment or materials from the building for at least 30 days.

In analyzing our essential functions, it became clear that our vital operations are dependent upon telecommunication and computer technology. Most of the Board's functions are performed through these technologies, and restoration of these functions are the most critical to restore Board services

Due to the fact that BOT operations are dependent on the services of various agencies, vendors, and most importantly, other divisions within the Department of Consumer Affairs (DCA), i.e., the Office of Information Services (OIS), the Office of Administrative Services (OAS), etc., it should be noted that the BOT's ability to provide its identified essential functions under emergency conditions is contingent upon the planning of those other entities and the successful activation of their emergency response plans. In order to ensure successful coordination between the CBOT and the organizations that they depend on, the CBOT is committed to ongoing communication and planning with those organizations.

In times of emergency or disaster, the most critical function of the Board is communication with the staff, Executives at DCA, the Board members, our licensees and the public. Verification of licensure and updating licensing information are critical operations. Once telephonic and computer communications are restored, it is likely that all of these operations may be performed. The Board entered into a Memorandum of Understanding (MOU) with DCA, which addresses our facility needs in the event of a major disaster. In the event we are unable to provide essential or vital services to the public because of a major disaster, we will have alternative office facilities and equipment available for our use.

This plan will be subject to modification and will be updated no less than annually. Some items mentioned in the report are works in progress and will become more fully developed as time permits.

In summary, the success of this plan to restore essential operations is dependent upon: 1) Establishing a temporary command headquarters; 2) Restoring telecommunication and computer system functions; and 3) Reestablishing mail service.

Business Continuity Organization and Content

In an effort to follow the Governor's Office of Emergency Services' Business Continuity guidelines and the federal COOP model, this plan includes the following planning concepts:

Consolidated Business Continuity Planning Concepts
1. Emergency Concepts, Actions and Procedures Provided in Emergency Plans and Emergency Action Plans
2. Identification and Prioritization of Essential Functions
3. Line of Succession to Essential Positions Required in an Emergency
4. Delegation of Authority and Pre-Delegation of Emergency Authorities to Key Officials
5. Emergency Operations Centers, Alternate (work-site) Facilities and Alternate Emergency Operations Centers
6. Interoperable Communications
7. Protection of Government Resources, Facilities, and Personnel
8. Safeguarding of Vital Records and Databases
9. Reconstitution Operations
10. Devolution of Control and Direction
11. Tests, Training, and Exercises

Definitions/Description

COOP and COG are defined as follows:
Continuity of Operations – an effort within departments and agencies to ensure the continued performance of minimum essential functions during a wide range of potential emergencies and disasters. Essentially, it is the capability of maintaining the business of government under all eventualities. This is accomplished through the development of plans, comprehensive procedures, and provisions for alternative facilities, personnel, resources, interoperable communications, and vital records/databases.

Continuity of Government – the preservation, maintenance, or reconstitution of the institution of government. It is the ability to carry out an organization's constitutional or statutory responsibilities. This is accomplished through succession of leadership, the delegation of emergency authority and active command and control.

Business Continuity planning ensures the continuation of essential functions through a wide range of emergencies and disasters. Today's changing threat environment and recent natural and man-made emergencies demonstrate the need for Business Continuity capabilities and plans at the local, state, and federal levels.

However, a Business Continuity Plan addresses more than just immediate emergency response. It must also:

- Take into consideration all business functions
- Effectively coordinate and implement the resumption of essential functions under "non-normal" conditions
- Achieve a timely and orderly recovery from an emergency and resume normal operating services to its constituents

II. INTRODUCTION

The CBOT was created by Senate Bill (SB) 1046, [Stats 2000, ch 697], which became operative January 1, 2001. The Board is responsible for the licensure and regulation of Occupational Therapists (OT) and Occupational Therapy Assistants (OTA) in California.

The CBOT is made up of seven members: Three occupational therapists, one occupational assistant, and three public members. The Governor appoints all four occupational therapy practitioners and one public member and the Senate Rules Committee and Speaker of the Assembly each appoint one public member.

The Mission of the California Board of Occupational Therapy is to protect the well-being of the public by regulating the practice of occupational therapy by:

- Enforcing the laws and regulations of occupational therapy; and providing effective means for resolving consumer complaints

- Ensuring that those entering the profession meet minimum standards of competency through education, fieldwork and examination

- Defining and upholding professional and ethical standards of practice

- Informing the public and other entities about the profession and standards of practice

The implementation of the Business Continuity plan will be at the direction of the Executive Officer. The first essential function identified in the Board Business Continuity that will need to be immediately resolved will be the administration and oversight to employees, licensees and consumers in a disaster.

For the employees it means communication of the disaster, whether to leave the building or relocate at an alternative work site and when the alternative work site is ready to be staffed. The workplace monitor(s) will help to communicate the oversight and direction to all employees if the disaster occurs during work hours.

Critical operations are almost entirely dependent upon telecommunication and computer technology. The Board's web site is housed at (Department of Technology Services) and will be a resource in an emergency. However, if the network is down due to power outage, sending/posting information poses challenges that are still being addressed. A backup work site is identified and access to a DTS shared web server should be available at the backup site. Additional web pages will need to be created to post information for employees, licensees and consumers for the type of emergency faced; these emergency pages will be developed and be available for future posting.

For the licensees who may leave the state due to the emergency, it is essential that the Board's License Verification system be restored.

CBOT's policies and procedures are being developed and will maintained in the *CBOT Policies and Procedures Manual* (CBOT PPM). The *CBOT Policies and Procedures Manual* will be maintained at the Board's office and copies will be stored in the Board's "*Go Box*" and at DCA.

The CBOT PPM contains, or will contain by May 1, 2010, the following information:

Licensing and Verifications

- Business Overview
- Policies and Procedures
- Process Flow Charts
- Screen Prints of the licensing database
- Form Letters
- Reports
- Wall Certificates
- Limited Permits
- Miscellaneous database/tracking file
- License verification information

Enforcement

- Business Overview
- Organization Charts
- Policy and Procedures
- Process Flow Charts
- Forms and Letters
- Screen Prints from the Enforcement Database (CAS)
- Probation Monitoring System
- Criminal Action Reporting System (if available)

Administration

Web Pages/Web Site Update

It is also anticipated that all of these items will be backed up to CD/DVD for offsite storage in another region of the state. Target due date for completion is December 31, 2011.

License lookup is also provided by the Department of Consumer Affairs, Office of Information Services and can be located at: http://www2.dca.ca.gov/pls/wllpub/wllqryna$lcev2.startup?p_qte_code=OT&p_qte_pgm_code=1475.

Mail will be redirected to the designated alternative work site and, if possible, cashiering functions will be performed by manual process or by DCA, if necessary.

III. PURPOSE & ASSUMPTIONS

PURPOSE

The changing threat environment and recent natural and man-made emergencies demonstrate the need for Business Continuity planning at the local, state and federal levels. By developing a Business Continuity consistent with the OES model it ensures plan consistence state-wide. This document will be reviewed and updated at least annually.

The Business Continuity plan is intended to address all hazard threats, known or unknown, which may involve a prolonged interruption of essential functions. Typical adverse conditions which the plan may address, include the following:

Natural Hazards	Technological Hazards	Human-Caused Hazards
Flood	Material Spill	Terrorism
Fire	Airplane Crash	Labor Strike
Earthquake	Power Outage	Sabotage
Hurricane	IT Technology Failure	Contractor Dispute
Tornado	Supply-Chain Failure	Regulatory Action
Severe Weather	Communication Outage	Civil Disobedience
Public Health Emergencies, e.g. Pandemic Flu		

The purpose of this Business Continuity plan is to:

- Ensure resumption of essential government functions
- Minimize harm (physical, financial, psychological) to employees and stakeholders who depend on our services
- Preserve trust in government
- Reduce anxiety and stress among affected employees and licenses
- Increase consistency of operations during normal operations
- Provide a good business practice
- Comply with Executive Order S-04-06

This plan also identifies, or will identify, recovery strategies for the Board's essential functions that are mission and time critical. An Essential Function is defined in *Federal Preparedness Circular 65* as a function that enables an organization to:

- Provide vital or "mission critical" services;
- Exercise civil authority;
- Maintain the safety of the general public; or
- Sustain the industrial or economic base during an emergency.

Resumption of the Board's essential functions are prioritized based on recovery time objectives (RTOs), which is an estimate of the maximum time between when a disruption occurs and when the function is resumed, i.e. the maximum amount of time the function can be down. The following RTO classification system is used to prioritize essential functions throughout this plan:

- A: Emergency response functions (less than 48 hours)
- B: High impact on public health or safety (48 hours - 1 week)
- C: Moderate to High impact on public safety and health, or on department critical operations (1 – 3 weeks)
- D: Low to Moderate impact on public safety, health or department critical operations (3 weeks or longer)

ASSUMPTIONS

The following are assumptions on which this Business Continuity Plan is based:

- Emergencies will be regional, and not statewide. For purposes of this plan, the assumption is the emergency will be at the Board's Sacramento facility.

- Emergencies or threat of an emergency may adversely affect the board's ability to continue licensing occupational therapy practitioners and to investigate complaints in a timely manner.

- Personnel and other resources from CBOT and the Department of Consumer Affairs affected by the emergency or threat will be made available if required to continue essential functions.

- Key staff will be available for work and have adequate resources available to carry out essential functions and duties.

- Emergencies and threatened emergencies differ in order of priority or impact, however, for purposes of this plan it is assumed that Board headquarters will be unable to be accessed for at least 30 days.

- Whereas this Business Continuity Plan may be activated in response to a wide range of possible emergencies, the disruption scenarios employed in the development of the Plan are described in Table 5-2.

- CBOT is heavily dependent upon resources provided by DCA and other state agencies for services such as access to computer servers, telecommunications access and database access. Therefore, this plan assumes that these various organizations are in compliance with their Business Continuity efforts and strategies.

- At the direction of the Executive Officer or EDT, Standard Operating Procedures (SOP) may be stood down, as long as they do not circumvent the laws and regulations governing the department, to expedite the resumption of critical functions.

IV. APPLICABILITY AND SCOPE

APPLICABILITY

The Business Continuity Plan is for extreme emergencies when the building used is unavailable or inaccessible for a prolonged period of time. The intent is to initially address the safety and well-being of staff, to protect its resources and provide essential services to its licensees, the public, and other regulatory agencies, and finally to resume normal operating functions when it is safe to do so.

The Business Continuity Plan will be used to restore essential services/applications and functions; the essential business functions identified will be completed by a few staff members with reliance upon DCA for a number of services, (i.e. telecommunications support, IT support, business services, central cashiering, etc.)

SCOPE

This Business Continuity plan will be activated in the event of a wide range of emergencies and disasters, with consideration given to the safety and well-being of its staff, relocation to an alternate site, continuation of essential functions at that site, and the reconstitution or resumption of normal activities. The scope of this plan is to restore essential operations classified as Priority A (previously defined) within 48 hours of the emergency/disaster. These essential functions are dependent upon restoration of communication and computer networks, and can only be successful if an alternate office site is available or when restoration occurs.

The limitations of this plan will be fully known after a disaster hits. After an analysis, it would appear that all essential operations could be performed if an alternate office site is available or when there is successful restoration of communication and computer networks. Several functions of the Board are maintained by third parties and it is unknown whether those parties would also be affected by the emergency. It is possible, and maybe likely, that those parties may also be affected by the emergency.

This Business Continuity plan identifies ways to support the essential business functions until operation at normal levels can resume. CBOT expects all Priority A essential functions identified in the plan to be implemented within 48 hours (at the most) and sustained for a minimum period of 30 days.

During a future revision, the Business Continuity plan will address emergencies that occur with or without warning and during on-duty and off-duty hours. Future revisions will also include scenarios as of yet unidentified and/or vulnerabilities that may be identified during the planning process for which solutions are not yet available.

V. ESSENTIAL FUNCTIONS

Essential functions are those organizational functions and activities that must be continued under any and all circumstances. The identification of essential functions is a prerequisite for all Business Continuity planning and establishes the parameters for our continuity planning efforts.

The CBOT's essential functions are prioritized based on RTO. However, these priorities are a guideline and subject to change based on damage assessment, assessment of recovery priorities and options, availability of resources, and initiation of specific Information Technology recovery actions.

In establishing mission essential functions, CBOT conducted a risk assessment ranking. To accomplish this, four rankings were established to assist in prioritizing the business functions that must resume operations within a specific time period. Essential functions were given the following priorities:

Table 5-1: Prioritized Essential Functions for CBOT

Unit	Essential Function	Priority (A, B, C, D)
Licensing	Verify if an individual is licensed	A
Licensing	Review applications and issue and renew licenses	A
Administration	Communicate with staff, Board members, DCA and other Board, and the public	A
Enforcement	Conduct investigation of complaints	C
Administration	Cashiering	D

It was determined that emergency communications must be established immediately and that essential functions identified as a Priority A or B would require contingency planning and operations within the first week.

Impact of Business Processes (Priority A only)

License Verification: Licensure is required to practice in California and employers could be hampered in their ability to hire licensed individuals. If a license is unable to be verified, it could result in unlicensed practice and impact health, safety, and welfare of California's consumers.

License Issuance: Licensure is required to practice in California and employers could be hampered in their ability to hire licensed individuals. Failure to issue and renew licenses could result in unlicensed practice and jeopardize the health, safety, and welfare of California's consumers.

Communication: Communication with staff, Board members, DCA and other Boards, and the public is critical and necessary to ensure the safety all impacted.

Risk Analysis

A risk analysis was conducted on the following types of disasters:

1. Natural hazards, such as hurricanes, earthquakes, floods, and snowstorms;
2. Human-related hazards, or technological events, the consequence of negligence and human error in managing and operating our "built" environment, such as electrical power failures, transportation failures, communications systems failures;

3. Pro-active human hazards, sometimes called threats, reflecting deliberate actions by individuals or groups to cause harm, such as workplace violence, bomb threats, and civil disturbances.

Table 5-2: Possible Hazards

Natural Hazards	Technological Hazards	Human-Caused Hazards
Flood	Material Spill	Terrorism
Fire	Airplane Crash	Labor Strike
Earthquake	Power Outage	Sabotage
Hurricane	IT Technology Failure	Contractor Dispute
Tornado	Supply-Chain Failure	Regulatory Action
Severe Weather	Communication Outage	Civil Disobedience
Public Health Emergencies, e.g. Pandemic Flu		

1. Any of the three categories would have an immediate impact on the Board and could require the implementation of the Business Continuity plan.
2. The Board has mitigated the natural hazards, technological hazards and human-caused hazards by having offsite storage of backup data and the CBOT PPM.
3. All of the events identified above have a remote chance of occurrence.

Vulnerability Assessment

Types of scenarios that that pose risks to the continuity of functions include the following:

1. Local facility disruptions, typically single buildings;
2. Region-wide disruptions affecting all or many government buildings in the region;
3. Disruption of a communications system;
4. Disruption of access to vital records or databases;
5. Disruption to availability of specialized equipment or systems, including computing systems (other than traditional communications systems);
6. Loss of services from a vendor or another government agency;
7. Unavailability of personnel.

Listed below are the vulnerabilities identified for each Essential Function identified in Table 5-1.

Table 5-3: Vulnerabilities:

Essential Function	Critical Vulnerabilities – Loss of:
License Verification	Communications, Personnel, Databases, Equipment, Departmental Support
License Issuance	Communications, Personnel, Databases, Equipment, Departmental Support
Communication	Communications, Personnel, Databases, Equipment, Departmental Support
Enforcement	Communications, Personnel, Databases, Equipment, Departmental Support
Cashiering	Communications, Personnel, Databases, Equipment, Departmental Support

Resource Requirements

In order to perform the Essential Functions identified above, the following necessary resources have been identified by function:

License Verification and License Issuance: License verification can be provided if the license database is available on one of the following media:

- Personal Computer (PC) and/or Local Area Network (LAN) and printers
- Teale Data Center (TDC) and Consumer Affairs System (CAS)
- Web site for web look up verifications - resources needed are DCA Web-server, Teale Data Center (mainframes and Web-servers) and CAS
- Download CAS database (to be updated quarterly) to one or more of the following media: (*need DCA – OIS agreement to provide to all Boards, Bureaus, and Commissions*)

If the database and communication systems identified above are available, one of the following tools could be used:

- PC/LAN
- Telephones
- Fax
- Mail

Enforcement Investigation: Investigations can be conducted if the license database is available on one of the following media:

- Personal Computer (PC) and/or Local Area Network (LAN)
- Teale Data Center (TDC) and Enforcement Tracking System (ETS)

Communication: Communication will be possible if one or more of the following mediums are available:

- Nextel Blackberry
- Phone Server
- Outlook email
- DCA Network connection to internet
- LAN servers

Cashiering of Funds:

- Electronic - Cashiering can be electronically processed if the Personal Computer (PC) / Local Area Network (LAN) is available - resources needed TDC, CAS, and ATS.
- Manual – Cashiering can be manually processed. The specific procedures and materials necessary are identified in the SOP.

The Board identified the following resources needed to perform essential functions during both normal operations and emergency conditions.

Table 5-4: Resource Requirements

Resource Type	Specific Resources/Equipment Needed-Normal Operations
Facilities	An office area for staff
Communications	Phone, Server, Lotus Notes email, DCA Network connection to Internet, and LAN servers, TEALE/CAS
Personnel	Trained staff to provide for continued delivery of the essential functions
Records and Databases	TEALE/CAS/ETS
Systems and Equipment	Telephones, PC's and printers with networking capability, copiers
State Departments	DCA OIS, DCA OAS Facilities and Contracts

The CBOT will work towards ensuring that resources identified above are protected at all times. For those resources that cannot be adequately safeguarded, the CBOT will identify an alternate or back-up resource(s) in order to ensure that essential functions can be performed at all times.

Function Dependencies

The Board depends on DCA offices for the following services:

- Mail Delivery/Pick-up
- Centralized Cashiering
- Accounting
- Office of Information Services
- Telecommunications Support
- Consumer Affairs System
- Department of Technology Services/TEALE
- Web Server
- DCA Emergency Response Team assistance

Table 5-5: Dependencies Identified by Function

Essential Function	Dependency	Priority
License Verification	Department OIS (network capability), TEALE/CAS databases	A
License Issuance	Department OIS (network capability), TEALE/CAS, CATS	A
Communication	Department OIS (network capability), TEALE/CAS, CATS	A

Essential Function	Dependency	Priority
Enforcement	Department OIS (network capability), TEALE/CAS, CATS	C
Cashiering	Department OIS (network capability), TEALE/CAS, CATS	D

VI. AUTHORITIES AND REFERENCES

Business Continuity planning ensures the continuance and uninterrupted delivery of critical services to the public, other state agencies, customers, and CBOT staff that is necessary to enable us to comply with existing statutes, executive orders, and mandates, and other applicable laws, statutes, and regulations.

The following references were also considered:

- Executive Order S-04-06
- Executive Order W-9-91
- Government Code Section 3100-3109
- DCA Emergency Preparedness and Evacuation Plan
- CBOT Emergency Response Plan

VII. CONCEPT OF OPERATIONS

The Concept of Operations specifies the steps for how the plan is activated, who can activate it and how they are notified; defines the Response Recovery Team (RRT), identifies its members and their responsibilities; provides for devolution – the complete transfer of command and control for the functions to another department or branch. The Concept of Operations outlines the steps for how a move to the alternate facility would be carried out both during work hours and after hours and details employee notification and call back procedures. The following sections detail the CBOT Concept of Operations in terms of phases, activation, relocation, reconstitution and resumption.

PHASE I: ACTIVATION AND RELOCATION

Decision Process

CBOT's Executive Officer is authorized to activate the Board's Business Continuity plan in the event of an emergency or threatening conditions or conditions that are not accompanied with any sort of warning. Typically, CBOT would be notified by DCA's Executive Decision Team of emergency conditions and would provide the Board with a recommendation regarding plan activation.

Table 7-1: Notification Procedure

Individual/Organization to be Notified:	To be Notified By:
Director, DCA	Executive Officer
Staff	Executive Officer
Board Members	Executive Officer
Licensees, professional associations and public	Executive Officer or Manager (via website)

The Executive Officer will coordinate the efforts of the Emergency Response Team (ERT). The ERT will be responsible for directing emergency response operations and for coordinating those efforts with key staff within the DCA and various state agencies and departments if needed.

Alert, Notification, and Implementation Process

The Executive Officer, or designated staff, would then coordinate efforts with CBOT's ERT who would be responsible for directing efforts for coordinating these efforts with key staff within DCA. The ERT will coordinate the evacuation, and ensure that all personnel and consumers/customers are evacuated following the safest route to the evacuation site. A head count will be taken to verify personnel and consumer/ customers have been evacuated. All emergencies will be handled using specific emergency instructions and procedures provided by DCA and in the CBOT's Emergency Response Plan (ERP).

If an emergency situation occurred during normal business hours that required evacuation of the CBOT office, the CBOT would comply with its own ERP and DCA's Emergency Preparedness and Evacuation Plan. The CBOT would also heed any other available regional information in the event that non-relocating personnel were required to leave the facility.

Table 7-2: Team Members and Responsibilities

Emergency Response Team Members	Direction and Control
Heather Martin Executive Officer	Coordinates efforts of the ERT and DCA regarding alternate sites Coordinates communication to be released to media/ stakeholders.
Jeff Hanson Staff Services Manager	Assists the Executive Officer with coordinating efforts of the ERT, as noted above, in addition to coordination of an alternate site in an emergency and accounts for Board staff.

CBOT's Emergency Response Team Responsibilities:
The CBOT's ERT's responsibilities shall commence from the time an emergency is established to the time all business operations are resumed.

Stabilize Work Force

In the event of a disaster, the first concern will be the health and safety of staff. The ERT will determine the emergency and which procedures to implement. Contact with the Department's Emergency Response Team and the California Highway Patrol will depend on emergency conditions. DCA will perform relay functions to other emergency service agencies.

Employee First Aid/CPR

Responsible for maintaining sufficient first aid supplies and staff trained in administering first aid and CPR.

Facilities

Responsible for identifying and coordinating efforts within the CBOT's facilities and for providing office space, acquiring emergency supplies/non-IT equipment, backup power, personnel, etc. Contact with the DCA Emergency Response Team members may be necessary if relocation is required.

Communications

Responsible for coordinating voice and data communications. If needed, contact and coordinate with DCA's Telecommunications Client Service Team Members.

Business / Program Functions

Responsible for identifying, prioritizing and coordinating the CBOT's business and program functions, which include affected licensing/renewal and cashiering processes.

Hardware / Operations Software

Responsible for replacement, repair, and temporary setup of personal computers and network software applications. Contact and coordination with DCA OIS/LAN staff, as necessary, to coordinate and facilitate restoration of off-site backup tapes.

IT Recovery Support

Responsible for assisting with team coordination, logistics, setup, and status reporting.

Mainframe Systems

Responsible for coordination efforts with applicable mainframe systems with DCA/OIS personnel. The mainframe system includes the Consumer Affairs System (CAS), which houses the licensing, renewal and enforcement tracking systems.

CBOT's Recovery Response Team Responsibilities

In addition to the ERT, the CBOT has designated a Response Recovery Team (RRT). Due to the small size of the CBOT, the same individuals are on both the ERT and the RRT. Responsibilities of the RRT and Program Coordinators are detailed below, including the responsibility of each RRT in the event of an emergency or disruption to normal operations. As the primary contact with DCA, the Executive Officer will alert the RRT who will assess the situation and work closely with DCA's ERT to determine when and where it is safe to allow essential personnel to return to the facility or if they need to report to an alternate location. Once the determination is made, the Executive Officer will provide direction to allow for continuity of the previously determined essential functions.

Assess Damage and Identify Operations Affected

The RRT will determine which resources are/are not available and when they can expect to be recovered to perform normal program functions. They will identify the actions that are required to recover IT services, and report to the Executive Officer.

Establish Communications/Command Post

If the building is to be evacuated, staff is to follow the Emergency Response Plan issued by the CBOT. The RRT will be notified and assembled as necessary at other DCA facilities, available State Buildings, schools or hotels. The specific location will be identified at the time a command post is established.

Determine Restoration Options and Priorities

Restoration options will begin immediately after a command post has been established and a determination of the extent of damage to facilities and IT systems and services by the Emergency Response Team and availability of staff existing at the time. The ERT in conjunction with the Executive Officer and the Manager will determine priorities for restoration, by referencing the list of essential functions and by assessment of available resources.

Establish Specific Work Plans

Once a determination is made as to the current priority of application recovery, a sequence of actions will be established and specific task plans devised to include the acquisition of required resources.

Assemble IT Recovery

In the event of a major disaster or prolonged interruption of automation services, the Executive Officer will determine which ERT members need to be involved and will direct the notification of team members. The Executive Officer will contact those control agencies for recovery of the affected IT systems. Key staff may be on stand by status and available by telephone or Blackberry.

Restore Operations

In the event of a major loss or prolonged outage affecting data center operations, the CBOT recovery plans and actions will be coordinated with DCA's OIS and TEALE Data Center.

Table 7-3: RRT & Program Coordinators Responsibilities, Direction, and Control

Recovery Response Team Members	Direction and Control
Heather Martin Executive Officer	Coordinates efforts of RRT and with the DCA regarding alternate sites; communication to be released to employees, board members, consumers, and licensees.
Jeff Hanson Manager	Assists the EO with coordinating efforts of RRT as described and in coordinating an alternate site and assist others as needed. Coordinates with the EO and orders replacement/new office and computer equipment; completes program assessments; coordinates LAN and telecommunications recovery with DCA and DTS TEALE Data Center.
Program Coordinators	**Responsibilities and Control**
Kristen Borges Associate Governmental Program Analyst	Coordinates the recovery of license verification procedures; also coordinates the recovery of the pending application procedures to ensure a minimum disruption in service.
Tabatha Montoya Staff Services Analyst	Processes incoming monies and cashier as needed to ensure a minimum of disruption of service, coordinates efforts of support staff.

Leadership - Lines of Succession

In the event that the Executive Officer is not present or has become incapacitated, Jeff Hanson would assume leadership of the CBOT essential functions and responsibilities.

Should Mr. Hanson in turn become incapacitated, then Kristen Borges would assume leadership of the CBOT to ensure a minimum of disruption of service and ensure the essential functions are performed.

Table 7-4: Key Positions & Lines of Succession:

Essential Function	Key Position	Successors
License Verification	Executive Officer	Manager/AGPA
License Issuance	Executive Officer	Manager /AGPA
Communication	Executive Officer	Manager /AGPA
Enforcement	Manager	Manager /AGPA
Cashiering	Manager	Manager /SSA

Delegations of Authority

There currently exists an informal delegation of authority when normal channels are disrupted and terminate when these channels have resumed, subject to DCA's control of the authorized signature form process. (This delegation of authority is not set forth in statute.)

Table 7-5: Delegations of Authority:

Authority	Type of Authority	Position(s) Holding Authority	Triggering Conditions	Limitations on Delegation
Implementation of Business Continuity	Administrative	Executive Officer	Disaster or Emergency	Practical
Invocation of Memorandum of Understanding with DCA for Facilities	Administrative	Executive Officer	Destruction or Lengthy Unavailability of Board Offices	Practical

Devolution

As the CBOT operates under the umbrella of DCA, following a major disruption and in the event the leadership of CBOT becomes incapacitated, the CBOT would pass on all of the essential functions and responsibilities to DCA or other agency personnel at the direction of DCA.

Relocation

If the CBOT's offices or DCA headquarters become inaccessible or unusable, then the CBOT will identify the most usable space or alternative site in conjunction with DCA. Coordination will be made to see if temporary relocation is possible to other outlying DCA facilities in the Sacramento area. The CBOT will have access to these outlying facilities in accordance with the DCA Memorandum of Understanding effective September 1, 2009.

The CBOT will assemble a "*Go Box*" no later than December 31, 2011, which will then be available for retrieval in order to conduct command post operations.

The CBOT may need to rent, borrow, or lease a variety of equipment for various periods of time to establish the command post before eventually migrating to the business resumption plan. As with space, it is impossible to predict what will be needed. However, the ERT will contact the DCA Emergency Response Team Leader/Damage Assessment Salvage Team and the Department of General Services Office of Procurement before decisions are made on acquiring equipment of any kind.

However, the following equipment, at a minimum, will be necessary to support the emergency response team and operate a command post:

- Two desks
- Two phones (desk or cell)
- Two laptops and one printer
- Fax machine
- Safe / Secure money bags
- Supplies identified in CBOT's "*Go Box*"

Phase II: Alternate Facility Operations and Recovery Strategies

Alternate Locations

In the event of an emergency, identifying an alternate facility capable of supporting essential operations, positions, and personnel is critical. These facilities must be capable of supporting operations in a threat-free environment, as determined by the geographical location of the facility and the collective protective characteristics of the facility.

DCA has provided a list of alternate facilities in which essential functions will be relocated and the required resources will be available. Upon DCA's direction, the Executive Officer will direct the ERT to coordinate the relocation to the identified alternate facility, which will be covered by the MOU between the CBOT and the various organizations within DCA.

Mission Critical Systems & Equipment

This section addresses CBOT's mission critical systems and equipment necessary to perform its essential functions and activities.

Table 7-6: Mission Critical Systems & Equipment

System or Equipment Name	Current Location	Other Locations
Telephones	CBOT Office	DCA
PC's with Networking Capabilities	CBOT Office	DCA
Laptop w/ printer capability	CBOT Office	DCA
Copiers & Printers	CBOT Office	DCA
CAS/ETS	DCA	DCA
TEALE	DTS	DCA

Vital Files, Records, and Databases

Listed below are vital files, records, and databases, including classified or sensitive data, which are necessary for the CBOT to perform its essential functions and activities and to reconstitute normal operations after the emergency ceases.

Table 7-7: Vital Files, Records and Databases

Vital File, Record, or Database	Form of Record	Pre-positioned at Alternate Facility	Hand Carried to Alternate Facility	Backed up at Third Location	Maintenance Frequency
Applicant Files	Hard Copy	No	If time and conditions permit (*ITCP*)	No	Regularly updated based on activity
CAS/ETS	Electronic	Yes – DCA locations	No	Yes	Determined by DCA-OIS
Applicant Files	Hard Copy	No	*ITCP*	No	Regularly updated based on activity
CAS/ETS	Electronic	Yes – DCA locations	No	Yes	Determined by DCA-OIS
Excel and Word Files	Electronic	Yes – DCA, OIS		No	
Cashiering Files	Hard Copy	No	*ITCP*	Yes – DCA's Central Cashiering	Regularly updated based on activity
Business Continuity Plan	Hard Copy	Yes – DCA	Yes	OES	Annual
CBOT Emergency Response Plan	Hard Copy	Yes – DCA	Yes	OES	Annual
DCA Emergency Preparedness and Evacuation Plan	Hard Copy	Yes – DCA	Yes	OES	DCA
Licensee Files	Hard Copy	No	*ITCP*	No	Regularly updated based on activity
Disciplinary Case Files	Hard Copy	No	*ITCP*	No	Regularly updated based on activity
Personnel Files	Hard Copy	Yes – DCA	*ITCP*	SCO (attendance only)	
Consultant Files	Hard Copy	Yes – DCA	*ITCP*	Yes – DCA's BSO	Infrequent
Contracts	Hard Copy	Yes – DCA	*ITCP*	Yes – DCA's BSO	Infrequent

Interoperable Communications

Listed below are the mission critical communication systems necessary to perform essential functions and activities. This includes both operable and interoperable communications, which includes equipment with voice and/or text capability.

- Mobile Telephone/Nextel Blackberry
- Secure Telephones
- Internet Connection for E-Mail and Web Access
- Facsimile

Table 7-8: Interoperable Communications Systems

Communications System	Current Provider	Services Provided	Alternate Providers
Executone Electronic Key Telephones	Verizon	Phone and Voicemail	DCA's OIS
Outlook email	DCA's OIS	Email	DCA's OIS
Blackberry Device	DCA's OIS Sprint	Phone, Email and Text	DCA's OIS
TEALE/CAS/ETS	Dept. of Technology Services - TEALE Data Center	Database for Licensee, Enforcement and Cashiering Records	DTS/TEALE DCA's OIS
Mail and Overnight Services	DCA Mail Room, Fed Ex, & UPS	Mail Sort and Delivery	United States Post Office and FedEx

Human Capital (Protection of Government Resources)

An Emergency Preparedness and Evacuation Plan (EPEP) is provided by DCA and is updated by the Executive Officer specific to the local building. The EPEP details procedures in place to protect the organization's human resources in the event of a number of emergency situations.

All personnel will be accounted for during an emergency via notification system [see CBOT's EREP (Annex E)].

Employees will receive annual notifications of preventative measures to ensure personnel safety in the event of an emergency. Employees are encouraged to adopt these preparedness practices both at home and at the workplace.

In the event of a public health emergency the CBOT will follow the directive of the California Department of Public Health (CDPH). If the working conditions pose a health risk to employees, employee safety shall be paramount, and alternative conditions will be established. In the even the health risk prevents the gathering of persons in a single location, e.g., pandemic influenza, employees will be directed to follow all health and

safety guidelines as outline in Annex E and will be required to work from home or an alternate location that provides isolation from said risk, as determined by the EDT at the direction of DPH. The CBOT will follow the directive of the DPH based on guidelines established by the State Personnel Board with regard to employment action to determine the conditions upon which and employee may be sent home ore return to work.

If the emergency poses the threat of physical harm to an employee, employee safety shall be paramount. The CBOT will follow the Emergency Evacuation Plan to ensure employee safety. Employees will be restricted from accessing any structure that is potentially hazardous and shall be directed to alternate locations as determined by the EDT.

In the event of a human-caused threat, e.g., terrorist attack, the EDT will work with the DCA's sworn peace officers, local law enforcement, and any and all military or federal officers to remove employees from the threat area nad resume operation of essential functions at alternate locations to be determined by the EDT.

Upon notification of the EDT, employees will be allowed to return to the designated worksite.

Vendors & Other Agency Functions

The Board does not rely on external contractors for day-to-day operations.

Phase III: Reconstitution & Resumption Strategies

The resumption of all functions of the CBOT, including the non-essential operations, would be dependent upon the nature of the disaster. Under most circumstances, one could expect that the facility may be salvageable or repairable. If the facility is completely destroyed, restoration would be more difficult and require more resources. An assessment of the damage would be done to determine if anything could be salvaged from the original facility and whether the facility could be repaired for future use.

If the nature of the disaster <u>completely destroys</u> the facility:

- Work with DCA (in accordance with the MOU) to locate another DCA facility that can provide the necessary essential and/or vital services until a permanent facility is located.
- Possibly provide telecommuting options to personnel who are willing to work out of their home until normal functions are restored.

If there is partial destruction of facility and relocation possible after repairs:

- Work with DCA (in accordance with the MOU) to locate another DCA facility that can provide the necessary essential and/or vital services until the CBOT facility is fully repaired.
- Work with landlord to facilitate repairs to develop a timeline for full restoration.
- Assessment of space not destroyed in the disaster and how it might be utilized for multiple purposes.
- Examine alternate work-week or adjust work-hours so that useable space may be utilized to its fullest.
- Assess the need for replacement equipment - Work with DCA and DGS to replace or repair damaged equipment needed for operations.
- In the interim, before equipment is replaced and facilities are not fully repaired, and if there is no temporary facility adequate to house all employees, even with alternative work-week and work hours provided, offer staff telecommuting options, where appropriate.
- If needed, contract with vendors who provide document preservation and restoration services.

Within the first 24 hours of the implementation of Business Continuity, all staff will be informed of the current status of operations and for what, if any, services they will be responsible for. Staff will be given the instruction that in the event of an emergency, they must check the Board's web site for information and direction. If the website is unavailable or they don't have Internet access, they must call the Executive Officer or the Manager. As the Executive Officer identifies alternative work sites or needs for employee services, employees will be notified through the web site or by telephone. As previously stated, most of the CBOT's functions are dependent upon telecommunication and computer technology, and if there is full telephone and network services, essential functions will be resumed.

VIII. Business Continuity Planning Responsibilities

Table 8-1: Key Positions & Description of Responsibilities

Position	Description of Responsibilities
Heather Martin Executive Officer	Coordinates direction and operations to normal conditions. Provides first line and direction control to the Emergency Response Team.
Jeff Hanson Manager	Assists with Executive Officer's listed responsibilities. In the event the Manager is incapable of fulfilling her responsibilities, the AGPA will assume the Executive Officer's responsibilities.

	Coordinates equipment & program recovery, relocation of staff & equipment; notification of Program Coordinators for the identified essential functions; procurement of equipment; LAN & telecommunications recovery with DCA and DTS TEALE Data Center. Processes incoming monies & cashier as needed to ensure a minimum disruption of service and coordinates efforts of support staff, as needed.

IX. Logistics

The logistics of the Business Continuity Plan is fairly simple. With relying on a small staff, equipment and space needs are minimal. Any of the alternative sites identified are sufficient to accommodate the essential personnel.

As previously stated, the CBOT has an MOU with the DCA for an alternative work site, should relocation be required. The MOU also allows the CBOT to utilize another DCA office that can provide essential or vital services during or after a major disaster.

The success of this plan to restore essential operations within 24-48 hours of a disaster is entirely dependent upon the success of staff to reestablish telecommunication service and network connections.

Alternate Location

Board Suite & DCA Headquarter Building: In the event a major disaster renders the CBOT office or 2005 Evergreen Street inaccessible, unusable, and office equipment inoperable, the Emergency Response Team will identify the most usable space or alternate site in conjunction with the DCA Emergency Response Team.

Coordination will be made to see if temporary relocation is possible to other outlying DCA facilities in the Sacramento area or statewide as described in a Memorandum of Understanding (MOU) by and between DCA and all other DCA Boards, Bureaus, and Commissions.

The Emergency Response Team shall examine the advantages and disadvantages. The Executive Officer, with DCA's guidance, must perform a risk assessment of the facility. At the minimum the facilities must provide:

Sufficient Space and Equipment:

1. Capability to perform essential functions within 24 hours, up to 30 days (or other time frame as determined by the organization);

2. Reliable logistical support, services, and infrastructure systems;
3. Consideration for health, safety, and emotional well-being of personnel;
4. Interoperable communications; and
5. Computer equipment and software.

Table 9-1: Minimum Facility Requirements

Essential Function	# of Staff	Equipment	Communications	Space Required	Security	Access
License Issuance/ Verification	1	PC with access to DCA Network, CAS; local or network printer; Telephones; access to fax machine and copier; "Go Box"	Phone w/ voicemail; fax machine; U.S./Overnight Mail	1 desk & chair or cubicle		Controlled Public Access
Pending Applications for Renewal or Licensure	1	PC with access to DCA Network, CAS; local or network printer; Telephones; access to fax machine and copier; "Go Box"	Phone w/ voicemail; fax machine; U.S./Overnight Mail	1 desk & chair or cubicle		Controlled Public Access
Incoming Checks and Cashiering	1	PC with access to DCA Network, CAS; local or network printer; Telephones; access to fax machine and copier; "Go Box"	Phone w/ voicemail; fax machine; U.S./Overnight Mail	1 desk & chair or cubicle	1 Safe or cabinet w/lock	Controlled Public Access
Communication	1	PC with access to DCA Network, CAS; local or network printer; Telephones; access to fax machine and copier; "Go Box"	Phone w/ voicemail; fax machine; U.S./Overnight Mail	1 desk & chair or cubicle		Controlled Public Access

Mission Critical Systems & Equipment

The mission critical systems and equipment section should identify available and redundant mission critical systems and equipment that are located at the alternate facility. These systems and equipment should provide the organization with the ability to perform its essential functions at the alternate facility, as well as to support the organization's resumption to normal operations. Mission critical systems and equipment should provide:

1. Capability commensurate with an organization's essential functions;
2. Ability for personnel to access systems and equipment;
3. Ability to support Business Continuity operational requirements; and

4. Ability to operate at the alternate facility within 12 hours and for up to 30 days (or the time frame determined by the organization).

Interoperable Communications

Communication for the CBOT during a disaster will be dependent upon telecommunication services, whether through cell or landline phones, and through Internet and Network connections. The Board does not communicate through any other communication technology and has no radio communications or other interoperable communication system. Dependent upon the disruption, the following should be done:

Data Communications:

Several circuits are maintained between the Teale Data Center, 1625 North Market Boulevard Building, and the CBOT office located at the 2005 Evergreen Street facility. In the event that portions of this network become inoperable, the Executive Officer or Manager will contact the DCA OIS personnel and DCA Emergency Response Team to identify if primary communication lines are inactive at the Teale Data Center. If so, DCA OIS staff will be requested to coordinate the reestablishment of the communication line or to provide a recommendation for alternate processing sites.

Voice Communications:

In the event that telephone communications are interrupted, the Executive Officer or the Manager, will contact a member of the DCA telecommunications unit to coordinate and determine which device is inoperable.

If the internal telephone system is unusable, DCA Telecomm Unit will be requested to correct the problem.

If external telephone lines are inoperable, then the appropriate Emergency Response Team member will coordinate with DCA staff in contacting the telephone company.

The Board has one Blackberry© cell phone, which can be utilized for establishing voice communications. If additional cell phones are needed, the Emergency Response Team will rent them on a temporary basis.

Personnel

Members of the CBOT's ERT and RRT will need to be cross-trained to perform the various responsibilities from the time an emergency response plan is implemented through business resumption. One lead person will be assigned to perform each essential function. In the event that key person is not available, the ERT Members are cross-trained to perform the essential functions.

When identifying key personnel, consider the following:

1. Specialized training or skills that are required to perform the essential function;
2. The minimum number of personnel required to perform the essential function;
3. Other personnel available with skills that are transferable to support essential functions; and
4. Whether performance of the essential function requires transfer of the personnel to an alternate site, i.e., personnel can perform tasks via telecommuting.

Vendors & Other Agency Functions

The vendor services necessary for essential operations are provided by Verizon, our telecommunication vendors for telephone services, Department of Consumer Affairs for maintaining the necessary databases (CAS), DTS for Network connectivity, and the US Postal Service for Mail delivery. If the disaster is regional and severe, it is likely that some of these services may also be affected. The success of Business Continuity implementation is dependent upon these vendors being able to restore their services.

X. TEST, TRAINING, AND EXERCISES

Testing
Internal organization testing and exercising of Business Continuity plans and procedures will occur annually to validate the plans, policies, procedures and systems; identify deficiencies in the Business Continuity Plan and allow for subsequent correction. Testing of alert and notification procedures will also occur annually.

Training
Members of the CBOT's ERT will be cross-trained to perform the various responsibilities from the time an emergency response plan is implemented through business resumption. Individual and team training of organization personnel will also occur as part of new employee checklist.

Annual staff meetings will be held to educate staff on the contents and purpose of the Business Continuity Plan. Periodic meetings will be held to update staff on any changes that may have occurred which would affect the Business Continuity Plan. Copies of pertinent memorandums, which affect emergency response, business contingency or business resumption, are provided to staff, as information becomes available.

The CBOT will require staff attend training offered by DCA, or its affiliates, to obtain any updates and keep current with procedures.

Exercises
The CBOT will participate in joint interagency exercises of Business Continuity plan which provide the following services under the Business Continuity Plan:

- Accounting
- Central Cashiering
- DCA Emergency Response Team Assistance
- IT Support
- Mail
- Web Server
- Mainframe systems, including Applicant Tracking System and Consumer Affairs System
- Office of Information Services
- Teale Data Center
- Telecommunications Support

Staff Preparedness
In the event of an emergency during non-work hours, all employees have been instructed to check the CBOT website, and if it is functional, emergency bulletins will be posted to instruct them in what they are to do. If the website is not functioning, employees are instructed to call the Executive Officer.

Plan Distribution
A copy of the Business Continuity Plan and updates thereto, are distributed to:

- Department of Consumer Affairs Emergency Response Team Leader
- Director, Department of Consumer Afairs
- Director, Office of Emergency Services
- Agency Secretary, State and Consumer Services Agency
- Executive Officer, Manager, and all Board staff
- CBOT President and Vice President
- CBOT "*Go Box*"

XI. MULTI-YEAR STRATEGY PROGRAM MANAGEMENT PLAN & BUDGET

The Executive Officer will ensure that staff will make content changes or updates to the CBOT's Business Continuity Plan and ensuring that the CBOT *"Go Box"* has current materials needed in the event of a disaster. In addition, staff will be given key evacuation routes, staff roster and telephone information, as well as maps and room/building designations of alternate locations are included in the Plan.

The Business Continuity Plan will be reviewed annually by the Executive Officer and Manager, and DCA's Business Continuity Coordinator. The Business Continuity Plan will be amended as significant changes occur to business operations, hardware, software, and communication systems in the CBOT's critical applications or recovery priorities. Staff changes affecting the membership of the ERT and the RRT will be noted and revised information will be distributed as appropriate. At least one member of the EDT and Business Continuity team shall be required to identify and secure any training that is made available that will enhance the CBOT's Business Continuity planning abilities.