



U.S. Department of Homeland
Security
425 I Street, NW
Washington, DC 20536



U.S. Immigration
and Customs
Enforcement

Fact Sheet

Continuity of Operations Planning for SEVP-Approved Schools

The Department of Homeland Security (DHS) urges all to plan for the unexpected. In recognition of this and being aware of the lessons learned during Hurricane Katrina in 2005, the Student and Exchange Visitor Program (SEVP) encourages all SEVP-certified schools to explore a Continuity of Operations (COOP) plan. The effects of a crisis can be lessened by planning; a COOP plan will allow your school to continue critical operations until the crisis situation normalizes. SEVP and DHS strongly encourage you to review the basic tenets of COOP planning and utilize the available COOP planning resources, such as those included with this Fact Sheet.

Hurricane Katrina

Large scale destruction of buildings, infrastructure and telecommunications systems during Katrina led to the displacement of many international students throughout the affected Gulf Coast region. In the aftermath of the storm, school officials and students had few lines of communication through which to share information and assistance. After resolving immediate safety concerns, schools created interim plans to either continue or cancel classes for the semester. Where schools were unable to reopen, SEVP provided emergency guidance on how to transfer students to other SEVP-certified schools around the country. Individual circumstances were resolved throughout the semester owing to the magnificent response from students and Designated School Officials (DSOs). For many, the magnitude of the event and lack of preparation for such a catastrophe led to an extended period of instability and confusion.

Lessons Learned

While the outcome of any catastrophic event cannot be predicted, planning does help. DSOs from the affected schools identified the following elements as necessary for an effective plan:

- Develop a method by which students can communicate their location, safety concerns, and short and long-term plans during a crisis.

- Designate alternate campus locations or meeting places where instruction can take place. In the event that this isn't feasible, school officials should have in place coordinated alternate arrangements with other SEVP-certified schools to accept the transfer of displaced students.
- Develop the ability to access SEVIS and electronic student records from alternate facilities or remote locations.

School officials need to monitor and update their plans. School officials and students must train to the plan — rehearse their actions.

Designing a COOP Plan

School officials should consider the following:

- √ **Communication is critical.** Can you easily contact your international student population? Do you have emergency contact information/email addresses for all students, an individual to be notified in case of an emergency or the student's next of kin? Do students have emergency points of contact at the school? Do they know how to contact SEVP?
- √ **Nonimmigrant documentation must be preserved.** Have students been instructed to hand carry their travel documents, including the passport, visa, I-20, I-94 card, immunization record, proof of personal finances and student ID?
- √ **Regulations must be observed.** Do your administrators and students know the basic rules governing how students can maintain status in the event of a crisis? Are both parties well-versed in the regulations with respect to transferring between SEVP-certified schools, the definition of a full course of study, student reporting and registration requirements, online training guidance and coordinating special tuition arrangements in the event that classes are postponed or cancelled?
- √ **Records must be accessible.** Do you have a backup server for electronic records/communication? Does the International Student Office (ISO) maintain copies of the students' documentation, including passport, visa, immunizations and emergency contact information? Is the ISO aware of the notice protocols involved if a death occurs? Does the ISO know which government agencies to contact?
- √ **Alternate arrangements should be pre-established.**
 - Do you have pre-arrangements with other schools by which instructors can provide offsite instruction to your displaced student population? If not, do you have agreements with other schools to which your displaced students could easily transfer?
 - Do you offer online classes that can be substituted for on-site training/education? Do these classes meet Code of Federal Regulation (CFR) requirements?

- Has your school considered the use of educational resources such as Blackboard (Bb)?
Can teachers go virtual?
 - Can your administrative staff operate remotely/virtually? This includes provisions for encrypted laptops for key personnel, communications equipment, Satcom phones, Blackberry devices for text messaging (Katrina-affected schools noted that instruments such as a Blackberry worked when cell phones could not) and cell phones with alternate area codes.
- √ **Emergency guidance should be disseminated ahead of time and during the crisis.** Can you post emergency instructions on your Web site from a remote location? Do you have an operational plan to do so?
- √ **All parties should be prepared.** Have you established a training program? Have you established a listserv and points of contact for communication?

Resources

Please reference the following information and guidance for further assistance in designing your COOP plan:

CFR Student and School Regulations are available at:

Record Keeping: 8 CFR 214.3(g)

Student Reporting: 8 CFR 214.3 (3)(g)

Online Training: 8 CFR 214.2(f)(6) for F students; 8 CFR 214.2(m)(9)(v) for M students

Transfers: 8 CFR 214.2(f)(8)

Federal Emergency Management Agency's (FEMA) Office of National Security Coordination (ONSC), available online at <http://www.fema.gov/government/coop/> is the lead COOP planning agent for DHS. FEMA has references and training courses available at the following links:

- [IS 546 Continuity of Operations \(COOP\) Awareness Course](http://www.training.fema.gov/EMIWeb/IS/is546.asp)
(<http://www.training.fema.gov/EMIWeb/IS/is546.asp>)
- [IS 547 Introduction to Continuity of Operations \(COOP\)](http://www.training.fema.gov/EMIWeb/IS/is547.asp)
(<http://www.training.fema.gov/EMIWeb/IS/is547.asp>)
- COOP Awareness Training ([PPT 1.2MB](http://www.fema.gov/txt/government/coop/coop_awareness_training.txt)) ([TXT 11 KB](http://www.fema.gov/txt/government/coop/coop_awareness_training.txt))
(http://www.fema.gov/txt/government/coop/coop_awareness_training.txt)
- COOP Training: Course Map ([DOC 202KB](http://www.gsa.gov/Portal/gsa/ep/contentView.do?P=CA&contentId=13544&contentType=GSA_BASIC))
- [COOP Training from gsa.gov](http://www.gsa.gov/Portal/gsa/ep/contentView.do?P=CA&contentId=13544&contentType=GSA_BASIC)
(http://www.gsa.gov/Portal/gsa/ep/contentView.do?P=CA&contentId=13544&contentType=GSA_BASIC)
- [Emergency Management Institute \(EMI\) 2006 Catalog of Activities](http://www.training.fema.gov/EMIWeb/EMICourses/EMICatalog.asp)
(<http://www.training.fema.gov/EMIWeb/EMICourses/EMICatalog.asp>)
- FEMA's Emergency Management Institute offers additional resources and training at <http://training.fema.gov>.
- In order to encourage Americans to prepare themselves, their families and their communities, the DHS, in partnership with the Advertising Council, has sponsored public service advertisements that educate and empower Americans to prepare for and respond to all kinds of emergencies. The *Ready* Campaign is available at the following link: www.ready.gov.
- Center for Disease Control and Prevention (CDC) has information and resources, regarding emergency preparedness and response, online at <http://emergency.cdc.gov/>.

SEVP Resources

The following guidance was created after Hurricane Katrina and is currently available on our Web site:

- [SEVIS Tips for Emergency Evacuations](http://www.ice.gov/sevis/emergency/evacuation.htm) (http://www.ice.gov/sevis/emergency/evacuation.htm)
- [FAQ for F/M Nonimmigrant Students Impacted by Hurricane Katrina](http://www.ice.gov/sevis/katrina/faq_student.htm)
(http://www.ice.gov/sevis/katrina/faq_student.htm)

Sample School Plans

The following three resources are actual COOP plans developed by the University of Florida, the University of Arizona, and George Washington University:

- <http://www.ehs.ufl.edu/RiskMgmt/COOP/>
- <http://cert.arizona.edu/2065.0.html>
- <http://www.gwu.edu/~response/contents.cfm>