CORNELL UNIVERSITY

CONTINUITY OF OPERATIONS PLAN

Cornell University
Environmental Health and Safety
v2.0

To report an EMERGENCY call 911

To report a campus emergency to Cornell Police using a cellular phone call (607)255-1111.

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1. Introduction

Cornell University understands that emergencies have the potential to disrupt operations and jeopardize the safety of faculty, staff, and students. Emergency planning, including continuity of operations (COOP), is critical to maintaining research, teaching, and service during disruptions.

This Continuity of Operations Plan is designed to help Cornell University mitigate the impacts of an emergency. The all-hazards approach to continuity planning allows for the continuation of essential services at some capacity regardless of the type of disruption.

This Continuity of Operations Plan is only one component of the campus's Emergency Management Program and works in conjunction with the University's Prevention/Mitigation, Preparedness, and Emergency Operations Plans. More information can be found at www.emergency.cornell.edu.

Purpose

This Continuity of Operations Plan provides the framework by which Cornell University will mitigate impacts and restore essential services and operations at the University, College, or Division level. This plan identifies the overall concepts to manage University continuity objectives, identify operational priorities, clarify continuity of leadership, and activate processes and procedures for use during continuity operations.

Applicability and Scope

This Continuity of Operations Plan applies to all Cornell University Colleges and Divisions, except Weill Cornell Medical College and Qatar operations. This plan describes actions that will be taken to activate continuity operations within 12 hours of a significant disruption, and sustain continuity operations for up to 30 days.

- This plan does not apply to short-term disruptions of service, including minor technology system or power outages or any other scenarios where essential services can be readily restored.

This plan is maintained by the Cornell University Department of Environmental Health and Safety, Office of Emergency Management. For further information, contact the department by phone at (607)255-8200 or e-mail askehs@cornell.edu.

2. Objectives

The objective of the Continuity of Operations Plan is to apply University and community resources to facilitate execution of academic, research, and business operations during and after an emergency or disruption.

3. Concept of Operations

Cornell University will strive to rapidly and effectively manage campus emergency incidents through clear leadership, effective management, and timely response. Management of emergencies and continuity operations at Cornell University will utilize best practices from the National Incident Management System (NIMS) and the National Disaster Recovery Framework.

4. Incident Management Personnel

Cornell University Environmental Health & Safety (EHS) Office of Emergency Management manages the ongoing development, improvement planning, and maintenance of the University Emergency Management Plans, including the Emergency Operations Plan (EOP) and the Continuity of Operations

Plan. Throughout the lifecycle of disruptive incidents, the Office of Emergency Management plays a coordinating role to integrate the efforts of the Incident Leadership Team, Incident Management Team, and the affected Colleges/Divisions. Incident Management Teams provide management of campus incidents and coordination of plans and personnel to maintain academic, research, and business operations.

A. Emergency Support Function (ESF) Personnel – support response to and management of campus emergency incidents.

B. Incident Management Team (IMT) – Team of personnel assembled to provide management of and support to campus emergency response, continuity, and recovery operations.

C. Incident Leadership Team (ILT) – Team of University executive level personnel assembled to provide strategic guidance and resources during and after emergency incidents.

D. President's Office – Determines policy and makes policy decisions as needed. Provide communications to and from the Board of Trustees. Provide strategic guidance for campus recovery.

More information regarding incident management personnel is maintained in the Emergency Operations Plan at www.emergency.cornell.edu.

5. Plan Activation and Communication

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

Notification Process

Internal processes for notification of faculty, staff, and other stakeholders is outlined below in accordance with the Emergency Operations Plan, Emergency Support Function #17 – Emergency Communications.

A. Notification Procedures
The Incident Management Team representatives will collectively decide the best course of action to communicate pertinent information to department and division leaders, faculty, staff, students, the media, and other external stakeholders.

B. Communication with Media and External Stakeholders
University Relations 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 University Relations. University Relations 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.

6. Continuity of Operations 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 research) 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 University provides a robust, web-based tool called C-COOP (www.coop.ehs.cornell.edu). The C-COOP tool provides a central planning location to identify unit essential services, recovery priorities, personnel and resource needs, and continuity strategies for common disruptive events. Unit C-COOP plans support the development of alternate strategies and standard procedures for disruptive events.

As defined in the Emergency Operations Plan (EOP), all Emergency Support Functions (ESF) must maintain continuity plans within the C-COOP tool. All Divisions and major administrative units are recommended to maintain a continuity plan in C-COOP, and research and academic operations can also benefit from the clarity and visibility of using the C-COOP tool.

A. Orders of Succession / Delegation of Authority

In order to maintain operations and appropriate decision making, colleges, divisions, and departments should define orders of succession for key positions when respective leadership is unable to execute their duties during or after an emergency.

The following table provides the University Order of Succession, as defined by University bylaws.

Table 6.1
University Order of Succession

Position	Incumbent	Successor 1	Successor 2	Successor 3
President	Provost	Secretary of the Corporation	Chief Financial Officer	Dean of Weill Medical College

Delegations of authority specify who is authorized to perform specific tasks or act on behalf of leadership personnel regarding a particular function. Succession pertains to overarching guidance; delegations are task-specific. Planning for delegations of authority involves the following:

- Identifying which authorities can and should be delegated to whom
- Describing the circumstances under which the delegation would be exercised, including when it would become effective and terminated
- Identifying limitations of the delegation
- Training designees to perform their essential services

B. Essential Services

Essential Services is defined as those services that:

- Are critical to the functioning of the University and the well-being of students, faculty, staff, and facilities
- Support specific mission essential service of each individual College/Division, unit, or department (e.g., research, teaching, feeding and housing students).

An essential service is one that must continue or resume quickly after a disruption of normal operations. These functions enable the university to provide vital services for students, faculty, staff, and visitors to support the teaching, research, and administrative operations of Cornell University. The level and manner of support needed to continue essential services is dependent on the nature of an event.

The university provides prioritization for the continuity and recovery of essential services. In the event of an emergency and subsequent recovery, essential services will be evaluated and prioritized based on the situation, and re-evaluated as necessary during the recovery or as the incident progresses. This serves as an operational guide to facilitate the allocation of resources in the event of a significant disruption, so that the most critical operations are recovered with priority.

Initial continuity priorities are identified as Emergency Support Functions (ESF) and have immediate recovery time objectives. These Emergency Support Functions are required for life safety, critical

infrastructure, and core University operations, and carry a common goal of the timely restoration of the academic learning environment. This prioritization is supported by a university business impact analysis and a university risk assessment matrix. See Table 6.2 for a list of Emergency Support Functions.

Table 6.2
Continuity of Emergency Support Functions (ESF)

Utilities	■ Potable Water ■ Electricity / Steam ■ Chilled Water
Cornell Police	■ Law Enforcement and Security ■ Telecommunication and Dispatch Services
Information Technology	■ Network & Data ■ Telephone ■ IT Services
Environmental Health & Safety	■ Fire Detection and Suppression Systems ■ Emergency Management Operations ■ Emergency Medical Services ■ Hazardous Materials Response ■ Search & Rescue
University Relations	■ Public Communications ■ Government & Community Relations
Campus Life Enterprise Services	■ Housing ■ Dining
University Health Services	■ Medical Services ■ Mental Health
Infrastructure, Properties & Planning	■ Transportation ■ Facilities Management
Procurement Services	■ Procurement Services
Center for Animal Resources & Education	■ Animal Care
Human Resources	■ Personnel & Volunteer Management
Dean of Students	■ Student & Community Crisis Support

Academic Continuity

An incident or disruption may affect the University's ability to offer instructional activities. Colleges are encouraged to identify essential services and supporting critical resources in order to develop academic continuity strategies. In the event of a disruption, College leadership should work directly with the Provost and Incident Leadership Team to communicate priorities and resource needs. Alternative course delivery strategies, including distance-learning or self-study, should be considered where appropriate.

Though Colleges share the common goals of academic course delivery and conducting research, there is a great deal of variability in these activities across Colleges. Some Colleges maintain complex research and academic operations that require unique space and equipment resources. These typically have complex business operations with a significant business impact analysis identified and require significant continuity planning efforts. Some Colleges utilize a more conventional model, with research and academic operations that have common space needs, such as lecture halls and wet/dry laboratories. These Colleges may rely on business and administration operations supported by central university systems, and thus may require less detailed continuity plans. It is vital that each College know how to effectively respond to a disruption of their academic operations, as the inability to resume functions in a timely manner puts the University at risk.

College and department plans should prioritize essential services and determine alternate strategies for common disruptions, such loss of facilities, reduced workforce, loss of utilities, and loss of technologies. The University C-COOP continuity planning tool is available to all Colleges and provides a platform to identify unit essential services, recovery time objectives, and continuity strategies for common disruptive events. Utilizing the C-COOP planning tool ensures clarity and visibility during University continuity and recovery efforts. www.coop.ehs.cornell.edu

In the event that an interruption renders it impossible to complete scheduled courses within normal parameters, the College must work closely with the Provost and Incident Leadership Team to address the interruption. If the disruption is expected to last less than four weeks, the College should utilize its continuity plan to restore operations as quickly as possible. If the interruption is expected longer than four weeks, the Provost will direct strategies for those extenuating circumstances.

Research Operations Continuity

Research operations present unique challenges in continuity efforts and prioritization. The University may prioritize which research has access to available resources based on research timing, criticality, grant value, and other factors. Research activity is almost completely distributed on an individual faculty basis and is highly dependent on non-interchangeable labor. As a result, planning for either the maintenance of research or the temporary suspension of research is primarily the responsibility of the college or division. Each college or division is encouraged to identify research continuity priorities and strategies, including:

- Document research space and equipment assets
- Identify type of space needed, including office, wet lab, dry lab, specialized lab, and research centers
- Identify research equipment requirements, including specialized or unique equipment and its availability
- Document alternate space and equipment for research continuity
- Document research related resources that could be lost, including data and organisms
- Identify strategies for backup of research related resources
- Identify key college representatives to manage research continuity
- Develop inter-college agreements to share similar space when needed
- Develop continuity and recovery written plans and procedures

The Office of the Vice Provost for Research will support unit-based continuity planning efforts as appropriate. When necessary, the Provost or the Incident Leadership Team may direct efforts to prioritize and implement continuity and recovery efforts for research activities.

All ongoing research must comply with appropriate environmental, health, and safety requirements mandated by University, local, state and federal authorities. If compliance in not possible, individual faculty members and units may be requested to suspend research operations.

C. Essential Services

Services that maintain security, safety, and critical operations will be maintained during emergency and continuity conditions. These are defined as services that:

- Are critical to the safety and security of the University, including law enforcement and security, emergency communications (Cornell University Police dispatch), life safety (EHS Emergency Services), and community communications (EHS Office of Emergency Management, University Communications).
- Maintain infrastructure and operations, including utilities, voice and data systems, and procurement.
- Support the physical and mental well-being of students, including housing, food service, medical and mental health.
- Provide continuity for physical care of patients at the Cornell University Hospital for Animals.
- Provide continuity for research projects that include feeding and care of animals and plants, or maintain safety of volatile equipment or experiments.
- Can be a regular and ongoing need, situational (e.g., snow removal, public health crisis), or time specific (e.g., peak periods of the year, academic semester, day of the week)

Employees who are designated as providing essential services are required to maintain scheduled work hours during emergencies or other interruptions in normal operations, or hours specified by their supervisor. Because the University depends on these employees to maintain a minimum level of operations, the provision of essential services must be considered a job requirement. Employees who provide essential services should be prepared to report to work during an emergency, or if applicable, provide essential services from home or a remote location as appropriate.

Employees may be reassigned to support essential services as needs arise either within or outside their particular department or unit as an incident evolves, to the extent they are qualified, available, and can safely perform the service activity. When employees are reassigned, all appropriate training and safety regulations will apply.

Cross-training / Reassignment

Unit continuity plans should identify essential services and job roles and plan for cross-training of employees to assume these critical roles in a reduced workforce event. Unit emergency plans should identify employees who have been cross-trained to perform intra-unit essential-services jobs, as well as employees willing to be cross-trained for roles outside the unit, along with any particular competencies that might be of particular value during reassignment.

D. Continuity Locations

Each college or division recognizes that normal operations locations may be disrupted and there may be a need to perform essential services at a continuity location. The potential costs for securing a continuity location when needed can be significant. Due to the criticality of the continuity location and the possible costs associated with that site, it is important that the affected Colleges and Divisions partner with the Incident Management Team, the Office of Space Planning, and the Registrar's Office, to evaluate the viability of continuity location facilities.

In the event that typical work space is not available, the affected unit should:

- Postpone activity aligned with the established recovery time objective; wait for space to be restored
- Utilize alternate work space locations pre-established in the unit continuity plan
- Utilize alternate work space controlled by the unit
- Utilize alternate work space controlled by the affected College/Division
- Utilize alternate work space controlled by the University (partner with IPP Facilities Management)

The following considerations should be made when planning for continuity locations:

- Pool resources among colleges/divisions to acquire space for a continuity location.
- Co-locate and combine resources with another department to increase efficiency.
- Essential services are prioritized at the continuity location.
- Provide virtual office option (telecommuting).

In support of continuity location planning, Cornell University maintains detailed descriptions in the Facilities Services Facilities Database, including:

- Building floor plans
- Construction date
- Occupancy date
- Number of floors
- Description of construction
- Total area in square feet
- Total volume and usable volume
- Description of HVAC system
- Summary of space types
- Description of the utilities

E. Critical Resources

Critical resources are the staff, equipment, and systems required to support essential services, and identified in the College/Division C-COOP continuity plans. During the planning process, key personnel evaluate each of the essential services and list the critical resources required to re-establish each function, including unique space and specialized equipment.

F. Vital Files, Records, and Databases

Vital records are necessary to carry out essential services, and if damaged or destroyed, would disrupt operations and information flow, and require replacement or re-creation at considerable expense or inconvenience. Content, not media, determines their criticality. The following maintenance strategy has been established for colleges and divisions to provide guidance for records maintenance.

Table 6.3
Vital Records Maintenance Strategy

Strategy	Tasks
Develop a process.	■ 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.	■ Identify records that support the performance of essential services. ■ Identify sensitive records that may have security requirements. ■ Utilize the C-COOP planning tool to associate essential services with their required vital records.
Review protection needs for each record.	■ 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.

G. Critical Business Applications and Technology Resources

During the planning process, each college and division 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 college or division will coordinate with CIT on the specific technical support needed during Continuity of Operations Plan activation.

Cornell University maintains a network security plan to establish conditions for use of and requirements for appropriate security for university computer and network resources. This policy provides guidance on how to properly maintain secure records as part of a records maintenance strategy. CIT also maintains a disaster continuity and contingency plan that supports the central CIT service applications.

7. Reconstitution and Recovery

Reconstitution includes the process of returning essential services from the COOP 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

Recovery is an ongoing process. The type and breadth of recovery activities will vary based on the nature and scope of the emergency. However, the goal of the recovery phase is to restore the learning environment. Recovery includes:

- Physical and Structural Recovery
- Business Recovery
- Restoration of the Academic-learning Environment
- Psychological and Emotional Recovery

8. Appendices

A. Procedures for Reporting an Emergency

B. Incident Management Structure

C. Emergency Support Functions Master Index

D. Authorities and References

E. Definitions

Appendix A: Procedures for Reporting an Emergency

Ithaca Campus

In the event of an emergency notify the Cornell 911 Center, operated by Cornell Police, by one of these methods:

- Call 911 from any campus phone
- Call 607-255-1111 from a cellular or off-campus phone
- Use a Blue Light Telephone or other campus Emergency Telephone
- In case of fire, activate the building fire alarm using a manual fire alarm pull-station

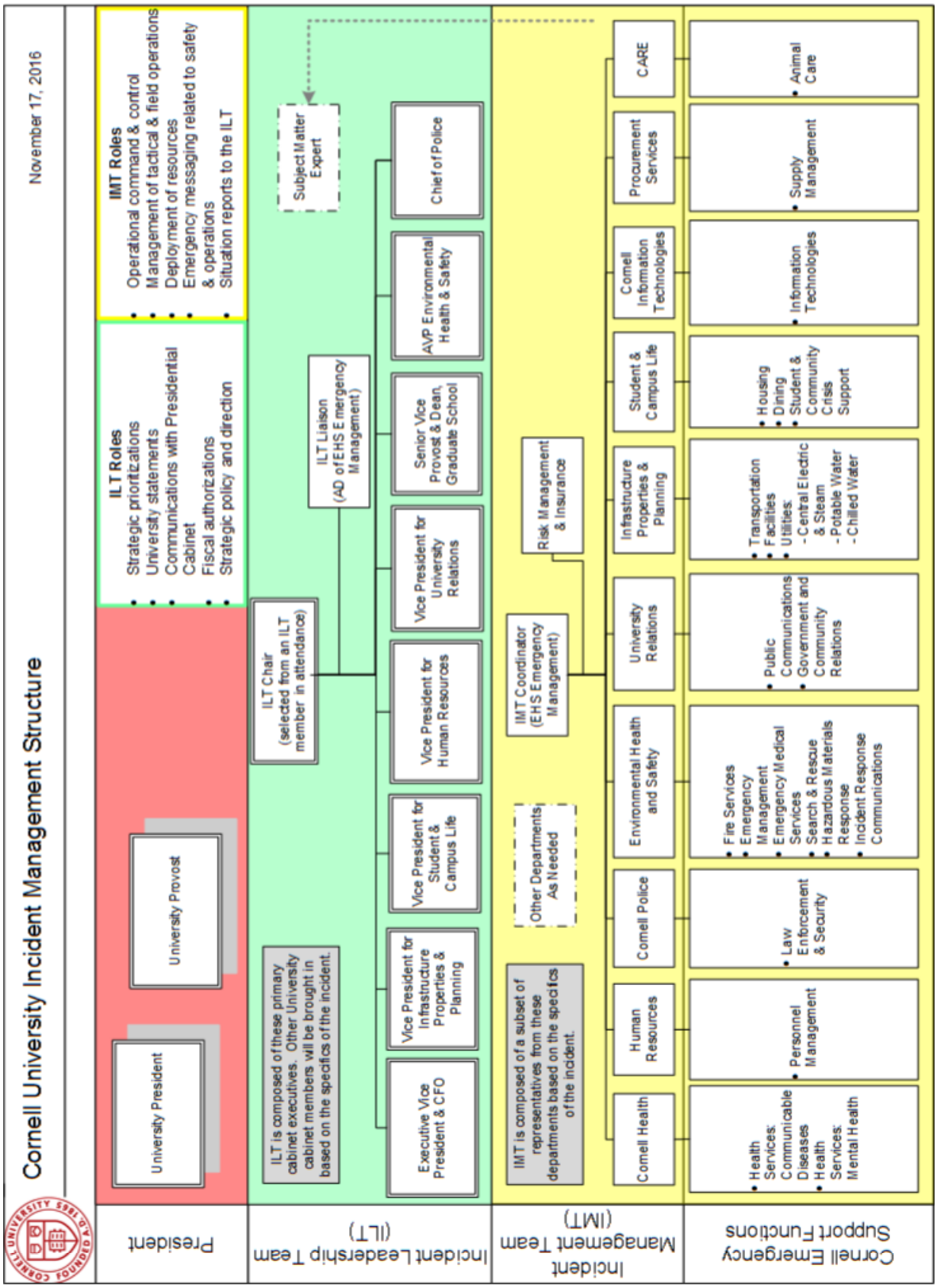
For further information on actions to take in an emergency refer to the Cornell University Emergency Action Guide at the Cornell University Emergency Program Web Page http://emergency.cornell.edu

Geneva New York Agricultural Experiment Station

In the event of a life threatening emergency call 9-911 from any campus telephone or 911 from a cellular telephone. After calling 911 call 315-787-2499 to notify station staff of the incident.

In the event of a non-life threatening incident call 315-787-2499 to notify station personnel.

Appendix B: Incident Management Structure



Appendix C: Emergency Support Function Index

ESF #	Support Function	Primary (Responsible) Department
1	Transportation	Transportation & Mail Services
2	Information Technologies	Information Technologies
3	Facilities	IPP Facilities Management
4	Fire Services	Environmental Health & Safety
5	Emergency Management	Environmental Health & Safety
6	Housing	Campus Life
7	Dining	Campus Life
8	Supply Management	Procurement Services
9	Health Services	
	9a Communicable Diseases	Gannett Health Services
	9b Mental Health	Gannett Health Services
10	Emergency Medical Services	Environmental Health & Safety
11	Search and Rescue	Environmental Health & Safety
12	Hazardous Materials Response	Environmental Health & Safety
13	Animal Care	Cornell Center for Animal Resources & Education
14	Utilities	
	14a Central Electric & Steam	Energy and Sustainability
	14b Potable Water	Energy and Sustainability
	14c Central Chilled Water	Energy and Sustainability
15	Law Enforcement & Security	Cornell Police
16	Community, State & Federal Relations	Cornell Government & Community Relations
17	Communications	
	17a Public & Media Communications	University Communications
	17b Incident Response Communications	Cornell Police
18	Volunteer Management	Human Resources
19	Student & Community Crisis Support	Dean of Students

Appendix D: Authorities and References

This plan is promulgated in compliance with Cornell University Policy 8.3: Emergency Planning under the authority of the Executive Vice President/CFO and is managed by the Department of Environmental Health and Safety under the direction of the Associate Vice President Environmental Health and Safety. The following authorities, standards, and references are used in the development and implementation of this plan.

Federal Authorities

- Presidential Policy Directive/PPD-8: National Preparedness
- Presidential Policy Directive/PPD-21: Critical Infrastructure Security and Resilience
- Homeland Security Presidential Directive/HSPD-5: Management of Domestic Incidents
- Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended
- Code of Federal Regulations (CFR), Title 44. Emergency Management Assistance
- Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), PL 99-499 as amended.
- Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), 20 USC § 1092(f)
- Occupational Safety and Health Administration
    - OSHA 29 CFR 1910.38 Emergency Action Plans
    - OSHA 29 CFR 1910.120 Hazardous Waste Operations and Emergency Response
    - OSHA 29 CFR 1910.146 Permit-Required Confined Spaces
    - OSHA 29 CFR 1910.151 Medical Services and First Aid
    - OSHA 29 CFR 1910.156 Fire Brigades

New York State Authorities

- NYS Executive Law Article 2-B
- NYS Executive Order #26.1 (adoption of NIMS)
- NYS Uniform Fire Prevention and Building Code

Standards and References used for guidance

- National Preparedness System
- State University of New York (SUNY) Emergency Response Plan Requirements Procedure
- National Fire Protection Agency (NFPA) 1600 Standard on Disaster/Emergency Management and Business Continuity Programs;
- Emergency Management Accreditation Program (EMAP) Emergency Management Standard
- U.S. Department of Education Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education
- U.S. Department of Education Readiness and Emergency Management for Schools Technical Assistance Center (REMS TA)
- FEMA Comprehensive Preparedness Guide 101 (CPG 101): Developing and Maintaining Emergency Operations Plans
- FEMA Comprehensive Preparedness Guide 201 (CPG 201): Threat and Hazard Identification and Risk Assessment Guide

Appendix E: 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.

-END-