

**AUDIT OF GSA's
CONTINUITY OF OPERATIONS PROGRAM
REPORT NUMBER A030160/A/W/F05016**

February 10, 2005



U.S. GENERAL SERVICES ADMINISTRATION
Office of Inspector General

Date: February 10, 2005

**Reply to
Attn of:** Regional Inspector General for Auditing
Washington Field Audit Office

Subject: Audit of GSA's Continuity of Operations Program
Report Number A030160/A/W/F05016

To: Edwin E. Fielder
Acting Chief of Staff (AC)

This report presents the results of our audit of GSA's Continuity of Operations Program. Our audit objective was to determine if GSA has viable regional continuity of operations programs in place; and if not, to determine the changes needed to improve the agency's regional ability to continue its mission critical essential functions. We found that more than one region showed a need for more complete identification of essential functions and the information systems that support those functions in their Continuity of Operations Plans (COOP). Also, that the testing and training necessary to validate COOP effectiveness needs to be implemented in a more uniform manner.

If you have any questions regarding this report, please contact myself or Paul Malatino, Regional Inspector General for Auditing, at (202) 708-5340.

A handwritten signature in blue ink that reads "Keith A. Amacher".

Keith Amacher
Audit Manager
Washington Field Audit Office (JA-W)

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EXECUTIVE SUMMARY

Purpose

Our objective was to determine if GSA has viable regional continuity of operations programs in place; and if not, to determine the changes needed to improve the agency's regional ability to continue its mission critical essential functions.

Background

According to Federal Preparedness Circular (FPC) 65¹: "It is the policy of the United States to have in place a comprehensive and effective program to ensure continuity of essential federal functions under all circumstances." Since January 2003, overall responsibility for emergency preparedness in GSA has resided in the Office of Emergency Management (OEM) within the Office of the Chief of Staff. There are 26 individual continuity of operations plans (COOP) that collectively represent GSA. This review focused on the COOP plans of GSA's 11 regional offices.

Results-In-Brief

Overall, the GSA regional offices have developed COOP plans that are in compliance with FPC 65 and, with refinement, will allow the agency to be prepared for, respond to, and recover from disasters. However, more than one region showed a need for more complete identification of essential functions and the information systems that support those functions. We also found that the testing necessary to validate COOP effectiveness needs to be implemented in a more uniform manner. Finally, we observed that while GSA is actively constructing viable Continuity of Operations Programs in each of its 11 regions, it has accomplished this without the benefit of effective centralized authority.

Recommendations

We recommend that the Chief of Staff establish an organization with authority, expertise and resources sufficient to direct emergency preparedness in GSA. Specifically, that entity should serve as a national focal point, capable of the following:

- a) Providing guidance, assistance and consultation to the regions through all stages of COOP exercises: setting objectives, selecting scenarios, determining what will be measured, how it is to be measured and how the results will be reported;
- b) Developing a training program for all regional emergency coordinators;
- c) Compiling and disseminating best practices and "things gone wrong";
- d) Formalizing the COOP plan review process to ensure that it incorporates the results of tests and exercises, verification of corrective actions taken, and timely feedback.

¹Federal Emergency Management Agency guidance provided to Federal Executive Branch departments and agencies for use in developing viable and executable contingency plans for the continuity of operations (COOP).

INTRODUCTION

Background

Emergencies can arise under a wide range of circumstances—some of them natural, others man made—all capable of interrupting government functions. In the event of an emergency, the General Services Administration's (GSA) essential functions must be maintained or rapidly and efficiently resumed. The primary emergency responsibilities of all GSA components are planning for and providing logistical and telecommunication support to Federal agencies, and the maintenance or resumption of its own activities during emergencies. This includes but is not limited to providing space, telephone, transportation, supplies, equipment, and procurement related services.

To maintain operational capacity during an emergency, advance preparation is not only key, but also a requirement of the federal government. According to FPC 65: "It is the policy of the United States to have in place a comprehensive and effective program to ensure continuity of essential federal functions under all circumstances." Since January 2003, overall responsibility for emergency preparedness in GSA has resided in the Office of Emergency Management (OEM) within the Office of the Chief of Staff². GSA further distributes the responsibility for implementing emergency management among the main organizational elements of services, staff offices and the regions. Each of these organizations appoints its own emergency coordinator who has overall responsibility for emergency management within his organization, and each creates its own COOP plan. For FY 2003, there were 26 separate COOP plans, reflective of GSA's organizational structure.

Common to all plans, GSA has developed a time-phased approach for COOP activation whereby critical resources are deployed early upon activation with other resources to follow as needed. Activation involves the deliberate and pre-planned movement of selected key principals and supporting staff to an alternative location facility. Additionally, GSA headquarters and each region have established a Senior Emergency Response Team (SERT). This group collectively reviews the emergency and determines the best course of action for response and recovery. This can prevent premature or inappropriate activation of the agency COOP plan. To ensure a logical sequence of events, the time-phased approach involves deploying:

- **Phase I** associates are those who have a defined response and management role and are essential to the agency's continued operations within the first 12 hours following an event that affects normal operations. These associates deploy to the alternate facility.

² GSA Order ADM 5440.569 established an Emergency Management Staff in the Office of the Chief of Staff. Within GSA this staff is referred to as the Office of Emergency Management (OEM) so we have followed that usage throughout this report.

- **Phase II** associates are those who have a functional specialty of operational skills that may be required based on the event from 12 hours to termination of the COOP. These associates may also deploy to the alternate facility or work at home.
- **Phase III** associates are the balance of staff. These may be asked to remain at home until normal operations resume.

Objective, Scope and Methodology

The overall objectives of our audit were to determine: (a) if GSA has viable regional continuity of operations programs in place that will allow the agency to be prepared for, respond to, and recover from disasters resulting from natural, human, or technological events; (b) if not, what changes are needed to improve the agency's regional ability to continue its mission critical essential functions. To maintain a viable sample size and facilitate comparative analysis, we limited our scope of review to the regional COOP plans. Given its decentralized, regionally oriented operating environment, the regional COOP plans logically encompass a wide cross-section of GSA essential functions.

In order to accomplish our objectives, we performed the following:

- (1) Obtained and reviewed continuity of operations plans and test, training and exercise guidance issued by FEMA and GSA;
- (2) Reviewed and compared each regions' 2003 contingency plans with the elements of FPC 65, and then followed up with a review of the regions' 2004 plans;
- (3) Compared how well the plans addressed the elements identified in FPC 65; and compared how each region addressed each element to how the other regions addressed the same element;
- (4) Observed COOP deployment exercises performed in Regions 6, 9, and 10;
- (5) Interviewed Office of Emergency Management personnel, Regional Emergency Coordinators, and Regional Service personnel; and
- (6) Reviewed After Action Reports for all regional deployment exercises conducted in 2003.

Our review was conducted between March 2003 and April 2004, in accordance with generally accepted government auditing standards and in compliance with the laws and regulations to the extent necessary to satisfy the review objectives.

RESULTS OF REVIEW

Summary

Overall, the GSA regional offices have developed COOP plans that are in compliance with FPC 65 and, with refinement, will allow the agency to be prepared for, respond to, and recover from disasters. However, more than one region showed a need for more complete identification of essential functions and the information systems that support those functions. In addition, the testing necessary to validate COOP effectiveness should be expanded and standardized.

We also found that while GSA is actively constructing viable continuity of operations programs in each of its 11 regions, it has accomplished this without the benefit of effective centralized authority. Nominal authority is vested in OEM, but as that organization has struggled to establish itself, real authority has remained with the regions collectively. It would be beneficial to arrive at a consensus as to the role OEM is to play. It is well positioned to compile best practices and lessons learned from the various regional exercises and offer suggestions for improving individual COOP plans. It has a logical role to play in supporting the development of a test, training and exercise program, and particularly in assuring that all COOP plans meet or exceed a defined standard.

Uniform COOP Template and Checklist Facilitate Planning

Since the events of September 11, 2001, the GSA regional emergency coordinators have acted to continuously improve the agency's Continuity of Operations Program and COOP readiness. To begin the enhancement process, in 2002, the regional administrator for the Heartland Region was temporarily detailed to head a task force comprised of associates from each service or staff office as necessary. The task force also formed a smaller working group to formulate strategy, draft materials, and do research.

This effort produced a uniform COOP shell and checklist template that was distributed to all organizations for GSA-internal as well as other federal agencies' use. The uniform shell is a sample continuity of operations plan that was prepared in accordance with Presidential Decision Directive 67 and subsequent implementing guidance in FPC 65. The document contains general emergency language to be used by all GSA components, but can also be tailored as necessary by each component. The checklists, also designed to address the critical elements of FPC 65, are used to complement the COOP but not replace it. They are an added feature of the COOP that provides a ready reference. GSA institutionalized the use of the checklists by requiring them as part of its COOP certification process.

Important information is provided at a glance in the checklists. For example, the "*rapid recall plan*" is a checklist that provides a listing of emergency numbers for the region, local utility companies, and federal, state and local agencies. The "*key personnel and essential functions*" is a checklist that provides the position title and function of key staff during Phase I and Phase II of an emergency. The "*cascade plans*" are phone trees that

reach throughout the organization. These checklists allow for employee notification and accountability.

The objective of COOP planning is to direct and guide appropriate actions to assure the capability exists to continue *essential* agency functions across a wide range of potential emergencies. COOP planning also includes: reducing loss of life and minimizing damage; protecting essential facilities, equipment, and records; and reducing or mitigating disruptions to operations. As described in FPC 65, a viable COOP plan will at a minimum encompass the following:

- PLANS AND PROCEDURES;
- IDENTIFICATION OF ESSENTIAL FUNCTIONS;
- DELEGATION OF AUTHORITY;
- ORDERS OF SUCCESSION;
- ALTERNATE FACILITIES;
- INTEROPERABLE COMMUNICATIONS;
- VITAL RECORDS AND DATABASES; AND
- TESTS, TRAINING AND EXERCISES.

The guidance provides a general definition of each element and identifies several measures that should be satisfied to address each topic.

Areas to Improve: Essential Functions, Vital Records and Testing

Our review of the 2003 and 2004 regional COOP submissions and subsequent testing is summarized in the following table. Overall the regional COOP plans adhere to the FPC 65 criteria. Two of the first seven COOP elements showed a need for improvement in more than one region: the identification of “essential functions” and access to “vital records and databases” needed to support those functions. We did not attempt a qualitative evaluation of COOP elements. Our results simply depict whether the plan addressed the element or not. More specifically, our results show that not all regions have differentiated their essential functions from their normal business operations, and not all regions have determined how they will provide the system applications and access to records needed to support essential functions from a remote location. This is a daunting task, and one that will require continual updating. These elements represent the core of COOP preparedness.

We evaluate the eighth element, COOP testing, as it relates to the testing of all other elements. In this instance we limit our results to the three regional exercises we were able to observe. To do otherwise would interject an additional audit risk factor; i.e., placing reliance on documentation that does not fairly represent the results of actual testing. As above, our review does not attempt a qualitative evaluation of regional tests or exercises. We simply record whether the tests contemplated an assessment of the element in question. For example, an exercise that does not include the deployment of all essential personnel to the alternate facility has not fully tested the capabilities of the alternate facility. On the whole, the results display a less uniform implementation than was seen for the seven primary elements. We consider this a symptom of organizational conflict, a topic that we address later in this report under our discussion of the Office of Emergency Management.

See Appendix B for a description of the specific criteria and basis for the scoring that appear below.

COOP Element		R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	R11	COOP	Testing
<i>Plans and Procedures</i>	Addressed in COOP	2	2	2	2	2	2	2	2	2	2	2	100%	
	Tested						2			2	2			100%
<i>Essential Functions Identified</i>	Addressed in COOP	1	2	2	2	2	2	2	1	2	1	1	82%	
	Tested						2			2	0			67%
<i>Delegations of Authority</i>	Addressed in COOP	2	2	2	2	2	2	2	2	2	2	2	100%	
	Tested						2			2	0			67%
<i>Orders of Succession</i>	Addressed in COOP	2	2	2	2	2	2	2	2	2	2	2	100%	
	Tested						2			2	2			100%
<i>Alternate Facilities</i>	Addressed in COOP	2	2	2	2	2	2	2	2	2	2	2	100%	
	Tested						2			2	1			83%
<i>Interoperable Communications</i>	Addressed in COOP	2	2	2	2	0	2	2	2	2	2	2	91%	
	Tested						1			1	1			50%
<i>Vital Records and Databases</i>	Addressed in COOP	2	2	2	2	2	2	1	1	1	2	2	86%	
	Tested						1			2	1			67%

2 = addressed
 1 = partially addressed
 0 = not addressed

We observed that while the Regional Emergency Coordinators were eager to find out how their respective COOP plans could be improved, they had received minimal guidance or feedback from OEM. However, this condition does not appear to be a function of neglect or inattention on the part of OEM. In our opinion, OEM’s impact on emergency management was handicapped during 2003 because it was a newly established organization and still in the process of recruiting staff. OEM was also assigned additional responsibilities that had only a tangential relationship to emergency management such as parking and security in the central office building. It has yet to cultivate the necessary experience or develop the resources needed to provide effective feedback.

The creation of a robust and complete COOP plan requires a significant investment of time, labor, and detailed technical knowledge of the organization’s operation. It is a challenging task. The typical region will have its own Federal Supply Service, Public Buildings Service, and Federal Technology Service components, which are separately addressed in the region’s COOP plan. Predictably, different regions will attempt to solve similar tasks in different ways. Inevitably, some will be better than others. As it develops the necessary expertise, OEM in our opinion has an opportunity to add real value to emergency management in general and COOP plans in particular, by virtue of its expected role as a central clearinghouse for emergency management. Organizationally, OEM is in

the logical position to spot systemic problems early and to share best practices effectively. In our comparison of COOP plans in force during 2003 to those in 2004, we found general improvement. However, we were unable to identify a significant role played by OEM in that improvement.

COOP Testing Should Also Be Standardized Across Regions

The Office of Emergency Management has not yet proven itself effective in establishing an active COOP training and exercise program. Since the events of September 11, 2001, GSA has drawn on three different sources or methodologies for organizing, testing and evaluating its COOP capability. In 2002, a temporary task force was convened to expedite COOP development and testing. In 2003, a newly staffed OEM assumed a dominant role subsequently plagued by controversy. In 2004, a collaborative effort by the regional emergency coordinators effectively supplanted OEM's role with respect to development of a COOP test, training and exercise program. The three approaches are discussed in greater detail below.

Task Force

Following the first emergency management conference in November 2001, as part of the administrator's goal of having the COOP plans for all areas of GSA fully updated and operable, the administrator established an emergency preparedness detail. Under the direction of the regional administrator of the Heartland Region the team's goals were to jumpstart, maintain, and refine the momentum of COOP preparedness and development in the regions and central office. As part of this effort, tabletop exercises³ were held in each of the regions to evaluate the critical elements within their COOP plans. The same objectives were used for each of the regional COOP exercises, and the resultant feedback played a large role in shaping the agenda for GSA's second annual emergency management conference in December 2002. Among the desired outcomes identified at the conference were well-defined tests and exercises that detect program weaknesses and reveal whether associates understand their roles and have the tools needed to conduct essential functions during emergencies.

Office of Emergency Management

A more permanent structure to replace the task force emerged from the second emergency management conference in December 2002. The lead responsibility to develop a COOP drill and exercise plan for 2003 was assigned to OEM, incorporating the objectives identified at the conference. The assignment proved difficult. OEM did not issue its guidance until May 2003, guidance that even then only provided the regions with general deployment instructions advising the regions with respect to, "alerting, mobilizing, deploying, in-processing, bedding down, testing connectivity, and standing down." There were no objectives or performance measures linked with this guidance. Regions were

³ Tabletop exercises simulate an emergency situation in an informal, stress-free environment. They are designed to elicit constructive discussion as participants examine and resolve problems based on existing plans. There is minimal attempt at simulation, no utilization of equipment or deployment of resources, and no time pressures.

essentially on their own in developing and designing specific exercises and objectives. The results varied widely.

An important component of a robust COOP plan is the capability of personnel to carry out their minimum essential functions from an alternate site. Although OEM instructed the regions to deploy all essential personnel (SERT, Phase I and Phase II), the instructions were not uniformly adhered to. For example, among the eleven regional offices deploying to alternate sites in 2003, five regions deployed the required essential personnel, three deployed only SERT and Phase I, while three deployed SERT only.

Another component of a robust COOP plan is the capability to maintain critical communications to internal organizations, customers, and the public from an alternate facility. During the 2003 COOP exercises, ten out of eleven regions were able to successfully achieve some degree of connectivity. However we found that there were variations among the regions in how connectivity was tested. Variances in connectivity testing ranged from a region testing its ability to operate e-mail from the alternate site, to being able to access its vital records by computer from the alternate site. Because different regions tested connectivity differently GSA's ability as a whole to connect from the alternate site remains unclear.

For COOP exercises in 2004 the Chief of Staff/Office of Emergency Management directed that GSA would fulfill its exercise requirement by having all of GSA's components⁴ simultaneously participate in the May 2004 Department of Homeland Security/FEMA's Forward Challenge 04 exercise. The Chief of Staff presented this plan to the Regional Administrators and Heads of Services and Staff Offices (HSSOs) as a "stepping stone approach to more complicated training and tests" in the future. Instead of having exercise scenarios and predefined events to test specific objectives, the participants would actually "run GSA real world business operations for two days from the COOP locations." In particular, the plan specified that the associates deployed to the alternate sites, should work in shifts "that should be a minimum of 12 hours each to give a bit of additional reality to the play and stress the system a bit."

In our opinion this plan was not viable because: 1) it was not a "stepping stone" but a quantum jump from the very modest and informal objectives OEM sent out in May of 2003 as discussed above, and 2) it abruptly changed the standard of operations at the alternate sites from maintaining "essential functions" to something never planned for, never designed for, and never tested for: "normal business."

Regional Emergency Coordinators Collaboration

Regional dissatisfaction with the 2004 Forward Challenge exercise combined with OEM's inability to coordinate a response to the regions' rejection of that plan diminished OEM's effective authority. The regional administrator for the Heartland Region, after consulting with the other regional administrators, took the lead in organizing the regional emergency

⁴ All components with the exception of the New England Region, which was hosting the Democratic National Convention.

coordinators to develop an exercise plan with goals, objectives and a methodology. It was not the intent of the regional administrators to develop an exercise plan in opposition to OEM but to “remain open to working constructively with OEM.” The regional emergency coordinators developed a proposed regional test, training, and exercise program, which the Heartland Region regional administrator forwarded to the other regional administrators for feedback.

As subsequently described by the Acting Chief of Staff the new COOP exercise plan is a collaborative effort in process between the Regions and Headquarters. It identifies four overall objectives and 21 sub-objectives, which will raise the bar substantially higher for the exercises than in 2003. The four overall objectives are:

- 1) Assess and validate regional/HSSO COOP plans and procedures;
- 2) Assess and validate the interoperability at the regional/HSSO alternate facility, including communications to successor elements and other elements of the federal government;
- 3) Assess and validate the process for receiving, processing, analyzing and disseminating information from internal and external customers; and
- 4) Assess and validate the ability to develop policy options in coordination with other efforts to reconstitute regional/HSSO offices.

Performance measures will be established for each objective and sub-objective. The plan also establishes an evaluation team, addresses the team make-up and assigns responsibilities for the main exercise activities. It allocates costs and makes provision for developing exercise handbooks, scenarios, and training for the evaluators. The plan also requires associates from each region’s backup region to be evaluators. We expect that after this test cycle has run, GSA management will have a better basis to judge how well it can continue to sustain its essential functions in at least a minimal form in an emergency situation. In our opinion this program significantly improves on the program in place during our review, and will give GSA the ability to better identify COOP weaknesses and take constructive action to either eliminate them or mitigate their impact.

Conclusion

Overall, the GSA regional offices have developed COOP plans that are in compliance with FPC 65. However, more than one region showed a need to more completely identify its essential functions and the information systems that support those functions. In addition, we found that the testing necessary to validate COOP effectiveness was inconsistently administered from region to region. All COOP elements should be subjected to testing, to the extent practicable, and held to a common standard. An encouraging indication is the more uniform test, training and exercise program that has emerged from the emergency coordinators’ most recent collaborative effort.

While the regions have succeeded in continuous improvement of their individual plans, they have done so without effective centralized program management. At the time of our review, OEM was still in its formative stage. Accordingly, the regions have had to improvise an emergency management forum, and the regional emergency coordinators

assumed much of the role that would more naturally have fallen to OEM. As the only entity in a position to observe all regional exercises and experience those lessons learned first hand, it is the logical lead and should in the long run render real value-added assistance and guidance. We expect that as the test cycle runs for the most recent collaborative effort of the emergency coordinators, OEM will gradually assume a focal position.

Recommendations

We recommend that the Chief of Staff establish an organization with authority, expertise and resources sufficient to direct emergency preparedness in GSA. Specifically, that entity should serve as a national focal point, capable of the following:

- a) Providing guidance, assistance and consultation to the regions through all stages of COOP exercises: setting objectives, selecting scenarios, determining what will be measured, how it is to be measured and how the results will be reported;
- b) Developing a training program for all regional emergency coordinators;
- c) Compiling and disseminating best practices and “things gone wrong”;
- d) Formalizing the COOP plan review process to ensure that it incorporates the results of tests and exercises, verification of corrective actions taken, and timely feedback.

Management’s Comments

The Acting Chief of Staff has provided comments to this report, which we have included in their entirety as Appendix A. While there is concurrence with the audit recommendations listed in the report, the Acting Chief of Staff feels many of the findings reflected have been addressed prior to release of our report. To address the issue of a lack of effective centralized program management, a new Office of Emergency Management (OEM) Director was hired. With this new leadership comes the opportunity and responsibility to implement consistent emergency management policies and practices and provide support to the operational elements of GSA.

Management Controls

Our objectives did not include evaluating the management controls over the GSA Continuity of Operations Program, and accordingly we do not provide an opinion.

APPENDIX A

Management's Response To Draft Report

**General Services Administration
Comments regarding OIG Report
"Audit of GSA's Continuity of Operations Program"**

The following comments are offered in response to the subject report recommendations:

Recommendation a): Providing guidance, assistance and consultation to the regions through all stages of COOP exercises; setting objectives, selecting scenarios, determining what will be measured, how it is to be measured and how the results will be reported.

A working group of representatives of Office of Emergency Management (OEM), several regions and Central Office Emergency Coordinators was established in the summer of 2004 and charged with developing a Test, Training, and Exercises (TT&E) Program that addresses the need for continual testing, training, and exercising of GSA's essential functions and emergency personnel to ensure capable response mode. This team drafted the Exercise Study Guide, Evaluator's Checklists, Exercise Agenda, and proposed Exercise Schedule. As a part of this package, goals and supporting objectives and performance measures were established upon which to benchmark the program. In addition, to ensure adherence to the prescribed exercise schedule, OEM will coordinate the development of exercise scenarios and plans as well as the final after action reports.

Subject matter expertise for the evaluation teams will be drawn from the backup region and will consist of representatives from PBS, FTS, FSS, the Regional Emergency Coordinators (REC) or their Deputies and, in some cases, the Regional Administrator. Central Office will supply representatives from OEM, the Chief Information Officer, Human Resources and the Chief Financial Officer, for those backup regions without those elements.

Recommendation b): Developing a training program for all regional emergency coordinators.

As with the COOP TT&E Program, OEM is in the process of identifying and/or developing consistent training standards and programs.

APPENDIX A

Management's Response To Draft Report



GSA Chief of Staff

February 4, 2005

MEMORANDUM FOR PAUL J. MALATINO
REGIONAL INSPECTOR GENERAL
WASHINGTON FIELD AUDIT OFFICE (JA-W)

FROM: ED FIELDER
ACTING CHIEF OF STAFF (AC)

SUBJECT: Comments on Draft Audit Report A030160/AW/Z05###,
"Audit of GSA's Continuity of Operations Program"

Thank you for the opportunity to comment on the draft report entitled: "Audit of GSA's Continuity of Operations Program." We agree with the recommendations as listed in the report. Your review was conducted between March 2003 and April 2004. While many of the findings reflected in the report were applicable during this time, many of them have been addressed prior to release of your report.

To address the issue of a lack of effective centralized program management, in November 2004, a new Office of Emergency Management (OEM) Director was hired to provide oversight, policy and guidance, and direction for, among other things, GSA's COOP Program. In addition, the Director will be responsible for ensuring that GSA's emergency programs are staffed and funded to achieve an appropriate level of response capability.

With this new leadership comes the opportunity and responsibility to implement consistent emergency management policies and practices and provide support to the operational elements of GSA. We welcome your assistance in helping us achieve this goal.

The attached comments are offered to reflect those actions that have been taken or are planned based on the report recommendations.

Should you have any questions, please feel free to contact Mark Russo, Director, Office of Emergency Management, on 202-501-0012.

Attachment

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

APPENDIX A

Management's Response To Draft Report

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Recommendation c): Compiling and disseminating best practices and "things gone wrong"

The process of sharing best practices and lessons learned began in 2002 with the round of exercises conducted under the direction of the Regional Administrator, Region 6, and will be continued by OEM as we implement the formal TT&E Program. This practice is critical to maintaining consistency, improving response activities, and continual enhance of our program.

Recommendation d): Formalizing the COOP plan review process to ensure that it incorporates the results of test and exercises, verification of corrective actions taken, and timely feedback.

While we have had a COOP plan review process, wherein each Region and Central Office activity provided a copy of their COOP plans to OEM for review prior to the Administrator validating such plans, the process needed some enhancements and consistency. At the recent GSA Emergency Management Conference held in Dallas, TX, in December 2004, it was agreed that all regions would begin using the 17-chapter COOP shell, bringing consistency to the plans. In addition, GSA's Emergency Coordinators were instructed to provide samples of tests, drills and exercises in their 2004 submissions, along with a copy of any exercise after action reports. Our revised review plan/process calls for COOP plans, validated by the Heads of Regional or Central Office organizations, to be submitted to OEM for review. OEM will provide feedback and required plan revisions will then be resubmitted to OEM for a final review prior to submission to the Administrator for final validation.

The exercise after action reports will highlight the strengths as well as the deficiencies and time frames for correcting any deficiencies. Action items will be distributed to the appropriate service or staff office for completion. The COOP review teams for the designated regions, services and staff offices will take the lead on ensuring that all deficiencies are corrected.

APPENDIX B

Elements of a Viable COOP Capability

Criteria:

Federal Preparedness Circular – FPC 65 (Federal Emergency Management Agency)

Elements:

A viable COOP capability at a minimum should encompass:

- | | |
|--|----------------------------------|
| a. Plans and Procedures | e. Alternate Facilities |
| b. Identification of Essential Functions | f. Interoperable Communications |
| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

a. Plans and Procedures - A COOP plan shall be developed and documented that when implemented, will provide for continued performance of essential Federal functions under all circumstances. *At a minimum, the plan should:*

- 1) Delineate essential functions and activities;
- 2) Outline a decision process for determining appropriate actions in implementing COOP plans and procedures;
- 3) Establish a roster of fully equipped and trained emergency personnel with the authority to perform essential functions and activities;
- 4) Include procedures for employee advisories, alerts, and COOP plan activation, with instructions for relocation to pre-designated facilities, with and without warning, during duty and non-duty hours;
- 5) Provide for personnel accountability throughout the duration of the emergency;
- 6) Provide for attaining operational capability within 12 hours; and,
- 7) Establish reliable processes and procedures to acquire resources necessary to continue essential functions and sustain operations for up to 30 days.

Review Notes:

With respect to plans and procedures, GSA’s regional components adhere to the FPC 65 criteria. We considered this element addressed if the region kept to the uniform COOP template. The specific steps for this element, as highlighted in the above criteria, are addressed in greater detail throughout the remainder of this appendix. Overall, we found that GSA does have a documented plan in place that will provide for continued performance of essential functions when implemented.

APPENDIX B

Elements of a Viable COOP Capability

Criteria:

Federal Preparedness Circular – FPC 65 (Federal Emergency Management Agency)

Elements:

A viable COOP capability at a minimum should encompass:

- | | |
|---|----------------------------------|
| a. Plans and Procedures | e. Alternate Facilities |
| b. Identification of Essential Functions | f. Interoperable Communications |
| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

b. Identification of Essential Functions - All agencies should identify their *essential functions* as the basis for COOP planning. Essential functions are those functions that enable Federal Executive Branch agencies to provide vital services, exercise civil authority, maintain the safety and well being of the general populace, and sustain the industrial/economic base in an emergency. *When identifying essential functions, agencies should:*

- 1) Identify all functions performed by the agency, then determine which must be continued under all circumstances;
- 2) Prioritize these essential functions;
- 3) Establish staffing and resources requirements needed to perform essential functions;
- 4) Identify mission critical data and systems necessary to conduct essential functions;
- 5) Defer functions not deemed essential to immediate agency needs until additional personnel and resources become available; and,
- 6) Integrate supporting activities to ensure that essential functions can be performed as efficiently as possible during emergency relocation.

Review Notes:

GSA generally adheres to FPC 65 criteria, except that it’s regional COOP design does not identify functions in a prioritized manner, nor require the identification of deferred (non-essential) functions. Similarly, its COOP design does not address mission critical data and systems as part of “essential functions” per se; these were instead identified in the vital records section.

These “global” exceptions aside, we focused on whether the regions:

- Identified core business functions and minimum essential functions separately;
- Identified the position/title of the essential function;
- Provided general or detailed descriptions of the functions;

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Elements of a Viable COOP Capability

- Identified the required number of staff; and
- Provided the above information for each service and staff office (FTS, PBS, FSS, etc.). If only one service provided detailed information, and the other services were general, the Region received a rating of “partially addressed.”

The following Regions were determined to have “partially addressed” their essential functions:

- Region 1 provided a general list of functions with no descriptions; the number of staff required is listed, but not the position/title.
- Region 8 provided detailed descriptions of all the major organizational units and the principal functions performed by these units in the text of the COOP. However, the key personnel and essential functions checklist provided a general description of functions for Phase 1 only.
- Region 10 provided the position/title, but did not describe the actual function to be performed. Essential operation procedures for conducting limited essential functions were provided for each Phase.
- Region 11 provided a general description of functions and the required number of staff for Phase I only.

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Elements of a Viable COOP Capability

Criteria:

Federal Preparedness Circular – FPC 65 (Federal Emergency Management Agency)

Elements:

A viable COOP capability at a minimum should encompass:

- | | |
|--|----------------------------------|
| a. Plans and Procedures | e. Alternate Facilities |
| b. Identification of Essential Functions | f. Interoperable Communications |
| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

c. Delegations of Authority - To ensure rapid response to any emergency situation requiring COOP plan implementation, agencies should pre-delegate authorities for making policy determinations and decisions at headquarters, field levels, and other organizational locations as appropriate. *These delegations of authority should:*

- 1) Identify the programs and administrative authorities needed for effective operations at all organizational levels having emergency responsibilities;
- 2) Identify the circumstances under which the authorities would be exercised;
- 3) Document the necessary authorities at all points where emergency actions may be required, delineating the limits of authority and accountability;
- 4) State explicitly the authority of designated successors, referred to in paragraph 10d (Orders of Succession), to exercise agency direction, including any exceptions, and the successor's authority to re-delegate functions and activities as appropriate;
- 5) Indicate the circumstances under which delegated authorities would become effective and when they would terminate. Generally, pre-determined delegations of authority would take effect when normal channels of direction are disrupted and would terminate when these channels have resumed;
- 6) Ensure that officials who may be expected to assume authorities in an emergency are trained to carry out their emergency duties; and,
- 7) Specify responsibilities and authorities of individual agency representatives designated to participate as members of interagency emergency response teams.

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Review Notes:

Delegations of authority along with orders of succession were present in all regional COOP plans.

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Elements of a Viable COOP Capability

Criteria:

Federal Preparedness Circular – FPC 65 (Federal Emergency Management Agency)

Elements:

A viable COOP capability at a minimum should encompass:

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| a. Plans and Procedures | e. Alternate Facilities |
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| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

d. Orders of Succession - Agencies are responsible for establishing, promulgating, and maintaining *orders of succession* to key positions. Such orders of succession are an essential part of an agency's COOP plan. Orders should be of sufficient depth to ensure the agency's ability to perform essential functions while remaining a viable part of the Federal Government through any emergency. Geographical dispersion is encouraged, consistent with the principle of providing succession to office in emergencies of all types. ***Each agency should:***

- 1) Establish an order of succession to the position of Agency Head. A designated official serves as acting head of the agency until appointed by the President or relieved. Where a suitable field structure exists, appropriate personnel located outside the Washington, DC area should be considered in the order of succession;
- 2) Establish orders of succession to other key headquarters leadership positions;
- 3) Establish, for agencies organized according to the standard Federal regional structure, an order of succession to the position of regional director or equivalent;
- 4) Identify any limitation of authority based on delegations of authority to others;
- 5) Describe orders of succession by positions or titles, rather than names of individuals;
- 6) Include the orders of succession in the vital records of the agency;
- 7) Revise orders of succession as necessary, and distribute revised versions promptly as changes occur;
- 8) Establish the rules and procedures designated officials are to follow when facing the issues of succession to office in emergency situations;

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- 9) Include in succession procedures the conditions under which succession will take place; method of notification; and any temporal, geographical, or organizational limitations of authorities;
- 10) Assign successors, to the extent possible, among the emergency teams established to perform essential functions, to ensure that each team has an equitable share of duly constituted leadership; and,
- 11) Conduct orientation programs to prepare successors for their emergency duties.

Review Notes:

Delegations of authority along with orders of succession were present in all regional COOP plans.

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Elements of a Viable COOP Capability

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| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

e. Alternate Facilities - All agencies shall designate alternate operating facilities as part of their COOP plans, and prepare their personnel for the possibility of unannounced relocation of essential functions and/or COOP contingency staffs to these facilities. Facilities may be identified from existing agency local or field infrastructures, or external sources. Facilities shall be capable of supporting operations in a threat-free environment, as determined by the geographical location of the facility, a favorable assessment of the local threat, and/or the collective protection characteristics of the facility. In acquiring and equipping such facilities, agencies are encouraged to consider cooperative interagency agreements and promote sharing of identified alternate facilities. *Alternate facilities should provide:*

- 1) Immediate capability to perform essential functions under various threat conditions, including threats involving weapons of mass destruction;
- 2) Sufficient space and equipment to sustain the relocating organization. Since the need to relocate may occur without warning, or access to normal operating facilities may be denied, agencies are encouraged to pre-position and maintain minimum essential equipment for continued operations at the alternate operating facilities;
- 3) Interoperable communications with all identified essential internal and external organizations, critical customers, and the public;
- 4) Reliable logistical support, services, and infrastructure systems, including water, electrical power, heating and air conditioning, etc.
- 5) Ability to sustain operations for a period of up to 30 days;
- 6) Consideration for the health, safety, and emotional well-being of relocated employees; and,
- 7) Appropriate physical security and access controls.

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Review Notes:

We determined that each region had effectively identified and equipped a location that is capable of supporting essential operations and personnel. All but two regions identified at least two alternate facilities. A deployment exercise was conducted for essential personnel in each region. This allowed the regions to test their alternate facilities to see if requirements have been met.

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Criteria:

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| a. Plans and Procedures | e. Alternate Facilities |
| b. Identification of Essential Functions | f. Interoperable Communications |
| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

f. Interoperable Communications - The success of agency operations at an alternate facility is absolutely dependent upon the availability and redundancy of critical communication systems to support connectivity to internal organizations, other agencies, critical customers, and the public. When identifying communications requirements, agencies should take maximum advantage of the entire spectrum of communications media likely to be available in any emergency situation. These services may include, but are not limited to secure and/or non-secure voice, fax, and data connectivity; Internet access; and electronic mail.

Interoperable communications should provide:

- 1) Capability commensurate with an agency's essential functions and activities;
- 2) Ability to communicate with COOP contingency staffs, management, and other organizational components;
- 3) Ability to communicate with other agencies and emergency personnel; and,
- 4) Access to other data and systems necessary to conduct essential activities and functions.

Review Notes:

GSA applies the same criteria as FPC 65. All regions adequately addressed this element in their COOP plans except for one. Although we believe it to be an oversight, the Great Lakes Region identified the phone and data lines at the Willow Woods facility (FTS headquarters in Virginia) as the interoperable communications plan it has in place. Willow Woods was the default entry in the COOP template, meant to serve only as an example to guide the regions in preparing this section.

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Elements of a Viable COOP Capability

Criteria:

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| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

g. Vital Records and Databases - The protection and ready availability of electronic and hardcopy documents, references, records, and information systems needed to support essential functions under the full spectrum of emergencies is another critical element of a successful COOP plan. Agency personnel must have access to and be able to use these records and systems in conducting their essential functions. *Categories of these types of records may include:*

- 1) **Emergency Operating Records.** *Vital records*, regardless of media, essential to the continued functioning or reconstitution of an organization during and after an emergency. Included are emergency plans and directives; orders of succession; delegations of authority; staffing assignments; and related records of a policy or procedural nature that provide agency staff with guidance and information resources necessary for conducting operations during an emergency, and for resuming formal operations at its conclusion.
- 2) **Legal and Financial Records.** *Vital records*, regardless of media, critical to carrying out an organization's essential legal and financial functions and activities, and protecting the legal and financial rights of individuals directly affected by its activities. Included are records having such value that their loss would significantly impair the conduct of essential agency functions, to the detriment of the legal or financial rights or entitlements of the organization or of the affected individuals.

Plans should account for identification and protection of the vital records, systems, and data management software and equipment, to include classified or sensitive data as applicable, necessary to perform essential functions and activities, and to reconstitute normal agency operations after the emergency. To the extent possible, agencies should pre-position and update on a regular basis duplicate records or back-up electronic files.

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Review Notes:

GSA applies the same criteria for vital records as FPC 65. We found in most regional COOP plans that FPC 65 is cited verbatim. The regions' vital records information can be found in this location and/or in an appendix/checklist of Emergency Operating Records.

The following Regions were determined to have "partially addressed" vital records and databases in their COOP plans:

- Region 7 did not address the restoration of PBS specific applications. None of the services addressed IT readiness on the emergency operating records and IT checklist. Last, we could not determine if records are accessible from the alternate facility.
- Region 9 provided a sufficient list that identified the region's vital records, but maintenance frequency and retrieval procedures are not included in the plan.

Though more preparation in the area of vital records and databases is required, IT contingency plans in Region 2 for PBS and FSS were very thorough in addressing procedures for emergency response and LAN/WAN connectivity. We believe all COOP plans should include instructions or procedures for retrieving and accessing vital records.

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Elements of a Viable COOP Capability

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A viable COOP capability at a minimum should encompass:

- | | |
|--|---|
| a. Plans and Procedures | e. Alternate Facilities |
| b. Identification of Essential Functions | f. Interoperable Communications |
| c. Delegations of Authority | g. Vital Records and Databases |
| d. Orders of Succession | h. Tests, Training and Exercises |

h. Tests, Training and Exercises – Testing COOP capabilities is essential to demonstrating and improving the ability of agencies to execute their COOP plans. Training familiarizes contingency staff members with the essential functions they may have to perform in an emergency. Tests and exercises serve to validate, or identify for subsequent correction, specific aspects of COOP plans, policies procedures, systems, and facilities used in response to an emergency situation. Periodic testing also ensures that equipment and procedures are maintained in a constant state of readiness. All agencies shall plan and conduct tests and training to demonstrate viability and interoperability of COOP plans. COOP test, training, and exercise plans should provide for:

- 1) Individual and team training of agency COOP contingency staffs and emergency personnel to ensure currency of knowledge and integration of skills necessary to implement COOP plans and carry out essential functions. Team training should be conducted at least annually for COOP contingency staffs on their respective COOP responsibilities;
- 2) Internal agency testing and exercising of COOP plans and procedures to ensure the ability to perform essential functions and operate from designated alternate facility(ies). This testing and exercising should occur at least annually;
- 3) Testing of alert and notification procedures and systems for any type of emergency at least quarterly;
- 4) Refresher orientation for COOP contingency staffs arriving at an alternate operating facility. The orientation should cover the support and services available at the facility, including communications and information systems for exchanging information if the normal operating facility is still functioning; and administrative matters, including supervision, security, and personnel policies; and,
- 5) Joint agency exercising of COOP plans, where applicable and feasible.

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Review Notes:

We observed three regional tests (the Heartland Region, the Pacific Rim Region, and the Northwest/Arctic Region) during this review. Each region developed a scenario that led the regional administrators (or a backup) to convene their SERTs, and ultimately activate the COOP. Although all three regions developed scenarios simulating an emergency, only two of the regions developed scenario events. These events are injected when necessary to keep the exercise on track and ensure objectives are met. Each region developed its own exercise objectives and methods for testing those objectives.

The Heartland and Pacific Rim Regions both time phased their essential personnel to the alternate facility. An exercise controller guided the emergency simulation by progressively injecting action items or scenario events into play. There was a slight difference in the way both regions conducted their exercises.

The Heartland Region's exercise objectives were to test deployment to the alternate site, and from there demonstrate connectivity to various GSA interoperable communications and IT systems. The exercise commenced on Monday, July 28, 2003, when the regional administrator activated his SERT. The following morning, the SERT, convened from the alternative site, and called in phase I employees followed by phase II employees to deploy to the alternate site. The SERT operated in one room and phase I and II associates operated in their separate rooms according to Service. The SERT delegated actions to the appropriate Service personnel and the Service sent its response back to the SERT. Tracking this information is a very important part of the exercise. The Heartland Region created an email account to track all COOP related correspondence. The Public Buildings Service assigned two associates as scribes to record and track action items received. Another associate was assigned as a "runner" to relay communications between PBS and the SERT. The region prepared and conducted a very well planned and organized exercise. The two elements we deemed partially tested were "interoperable communications" and "vital records and databases." There was some confusion as to how the region determined connectivity. Although some associates had Internet access, there was doubt that they had full access to the servers and associated programs, data, and communication beyond email.

The Pacific Rim Region's exercise objectives were to practice the deployment of phase I and phase II personnel to the alternate site, and to practice response activities using the technology that would be used in a real event. The exercise began on Monday, October 20, 2003, with the SERT initiation. The following morning the SERT, convened at the alternate site. As scenario events came in, SERT was required to complete some actions and leave instructions for phase I and II associates. Phase I and II essential personnel deployed to the alternate facility and continued the exercise without the SERT. The instructions were grouped according to Service, and phase I and II associates were required to assign the actions to the appropriate personnel.

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Elements of a Viable COOP Capability

The Pacific Rim Region also prepared and conducted a very well planned and organized exercise. The one element we considered partially tested was “interoperable communications”. The SERT experienced difficulty making secured and cellular calls from the alternate facility.

The Northwest/Arctic Region’s exercise objectives were to evaluate the ability to contact the SERT during non-duty hours and to test their ability to travel to the alternate site without using the primary interstate highway on a weekday. The exercise began on Sunday afternoon September 28, 2003, when the regional administrator activated his SERT while at the airport. Our observation began the following morning when the SERT assembled at the alternate site. Unlike the previous exercises, the SERT in this region did not convene to discuss the emergency and then deploy all the phase I and II personnel to the alternate site; instead, only the SERT team and a few phase I associates deployed to the alternate facility the following morning. Once at the alternate site, exercise participants were asked to verify the contacts in their “Jump Start Plans” and check the contents of their “Fly-Away Kits.” Afterwards, additional exercise objectives were addressed by allowing each participant the opportunity to express their experience with: a) the SERT notification; b) travel routes and times commuting to the alternate site without using the main thoroughfare; and c) the condition of “Jump Start Plans” and “Cascade Lists.”

There was some confusion among participants with regard to when the COOP was actually activated. It is imperative that the SERT convenes and, through extensive discussions, determine the appropriate time to activate the COOP. Since no scenario events were used for this exercise, we consider the “essential functions” and “delegations of authority” elements not addressed. As some participants were able to obtain connectivity to the Internet or access the COOP using their laptops, we consider “interoperable communications” and “vital records and databases” partially addressed. Last, because only the SERT and a few phase I essential personnel deployed to the “alternate facility,” we consider this element partially addressed.

Following the exercises, all regions held a “hot wash” or after action review to discuss lessons learned and other improvements to their COOP programs.

APPENDIX C

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