

Evaluating Continuity of Operations Plans and Programs

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COOP: All Levels of Government

- Federal guidance requires all federal agencies to have in place a viable COOP capability
- Federal viability is dependent in part upon the survivability of State and local government institutions
- Local governments are responsible for creating continuity plans that can be integrated into State-wide plans
- In turn, State plans have to integrate into the national survivability strategy

But Not Just for the Government...

- COOP is also critical to the private sector
- Many business operations also need to minimize the effects of disruptions in service to maintain public trust and confidence
- Critical infrastructure protection and COOP are inseparable
- *Katrina* - Significant COOP event with important lessons:
 - Cannot absolutely rely on any level of government for basic services
 - Did not anticipate effect of massive relocation of their employees
 - Supporting infrastructure was disrupted or lost
 - No alternate sites, no IT redundancy
 - COOP plans did not anticipate a large, region-wide disaster

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But Not Just for the Government...

- Despite this, many private concerns and critical infrastructure owners lack viable COOP plans:
 - 33% lack a COOP plan
 - 40% have not established redundant IT capabilities
 - 49% of CIOs stated they “didn’t have time” to plan for emergencies
 - 60% have never tested their plans
 - 33% of critical infrastructure operators do not have a COOP plan
 - 40% have budgeted no funds for COOP/disaster planning
 - 70% lack a dedicated business continuity board or committee
 - 33% stated an internal communication plan and training for employees on business continuity was poor or non-existent.
 - 50% of companies without business continuity plans go out of business within 2 years after a disaster

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Federal Sector COOP



- **Government-wide surveys and audits of Federal COOP plans and programs identified major deficiencies:**
 - FEMA's role in overseeing COOP status
 - GAO found that most Federal COOP plans had major problem areas or gaps
 - No plan was found to be fully "viable"
 - Many Federal IGs have audited Department/agency COOP plans since 9/11 (reports can be found on IG websites)



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Why Evaluate COOP Plans?

- Most agencies and many private sector concerns lack a viable COOP
- To focus your organization's attention on COOP planning
- Lessons learned and then learned again
- Potential for future disasters, man-made and natural
- Continuous process
- Audit and review criteria – voluminous and detailed

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Role of the Evaluator

- **Internal auditors/evaluators play a key role**
 - Assist with risk analysis during COOP development
 - Provide an independent, objective evaluation of the plan
 - Provide continuous assurance that the plan is kept up to date through regular audits

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COOP Criteria

- **Presidential Decision Directive 67 (October 1998) Federal Preparedness Circular 65 (FPC-65) – June 2004**
- **Department and agency-specific criteria**
- **Other criteria can be found in FEMA guidance on the FEMA website, such as its agency “COOP Self-Assessment Tool” – found at:**
<http://www.fema.gov/government/coop/>
- **Private Sector Guidelines – multiple sources, for example:**
<http://www.oregon.gov/DAS/EISPD/BCP/resources.shtml>
<http://www.auditnet.org/drp.htm>
- **A COOP plan itself becomes a critical criterion for an audit or evaluation**

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Overall Objective and Sub-Objectives

- **Overall Objective:**
 - Determine whether the entity has a viable COOP capability that ensures the performance of its mission-essential functions during any emergency situation that may disrupt normal operations
- **Sub-Objectives:**
 - Does the component's COOP plan meet FPC-65 or other requirements?
 - Were the specifics in the COOP plan mirrored in reality by funding, facilities, documentation, systems, and dedicated people?

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Critical Elements of COOP

- Essential Functions
- Alternate Facilities
- Orders of Succession
- Delegations of Authority
- Devolution of Control and Direction
- Vital Records
- Interoperable Communications
- Tests, Training and Exercises
- Reconstitution
- Human Capital
- Plans and Procedures

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COOP Element 1: Mission-Essential Functions

- **Definition:** Those functions that must be performed during, and in the immediate aftermath of an emergency
- **Criteria:** FPC-65 requires agencies to:
 - Identify, prioritize, and validate their organization's essential functions as a basis for COOP planning, and
 - Identify resource requirements, and other supporting activities necessary to perform such functions

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COOP Element 1: Mission-Essential Functions

- **Audit Approach:**
 - Catalogued agency's mission-essential functions in COOP plan
 - Interviewed office-level COOP representatives to verify functions listed in plan and had associated plans and documentation
 - Determined whether COOP managers validated functions
 - Determined whether functions appeared to be "mission-essential"
 - Determined whether plan included resource requirements for each function
- **Example Conclusions:**
 - Numerous problems

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COOP Element 2: Alternate Operating Facility

- **Definition:** Facilities used to carry-out mission-essential functions when primary facility is unavailable
- **Criteria:** FPC 65 and FEMA guidance require agencies' COOP plans to identify and prepare Alternate Operating Facilities (AOFs) with the capability to perform their mission-essential functions within 12 hours of COOP activation and to sustain these functions up to 30 days

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COOP Element 2: Alternate Operating Facility

- **Audit Approach:**
 - Toured facilities to determine whether it:
 - Could accommodate the staff identified in COOP plan
 - Had adequate IT and associated resources
 - Was sufficiently distant from primary facility
 - Had adequate security
- **Conclusions:**
 - AOF was too small to accommodate planned emergency staff
 - AOF was not ready to host COOP staff

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COOP Element 3: Orders of Succession

- **Definition:** Orders of Succession ensure continuity by identifying individuals authorized to act for agency officials in case those officials are unavailable
- **Criteria:** Under FPC-65:
 - Agencies are responsible for establishing, promulgating, and maintaining orders of succession to key positions
 - Orders should be of sufficient depth to ensure the agency's ability to manage and direct its essential functions and operations while remaining a viable part of the Federal government throughout any emergency

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COOP Element 3: Orders of Succession

- **Audit Approach:**
 - Evaluated the agency's Orders of Succession to determine whether they were accurate.
 - Determined whether senior officials were trained and briefed annually on their potential succession responsibilities.

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COOP Element 4: Delegations of Authority

- **Definition:** Predetermined statements that specify who is authorized to act on behalf of agency leadership for specific purposes
- **Criteria:** Under FPC-65:
 - Agencies should pre-delegate authorities for making policy determinations and decisions at headquarters, regional, field, satellite, and other agency locations, as appropriate
 - Delegations must document the legal authority for officials to make key policy decisions and state the circumstances under which delegated authorities would be exercised and when they would terminate

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COOP Element 4: Delegations of Authority

- **Audit Approach:**
 - Evaluated agency's Delegations of Authority to determine whether they were accurate and included required elements
 - Determined whether senior officials were trained and briefed annually on their potential delegation responsibilities
- **Conclusions:**
 - Delegations of Authority and Orders of Succession were missing or inaccurate for the vast majority of the agency's offices
 - Training and annual briefings of senior officials had not occurred for more than 2 years

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COOP Element 5: Devolution

- **Definition:** Refers to how an organization is prepared to transfer all of their essential functions and responsibilities to personnel at a different office or location during an emergency situation rendering the primary and alternate operating facility unusable
- **Criteria:** Under FPC-65, an agency/organization must have a devolution plan that should identify:
 - A prioritized list of essential functions;
 - A roster identifying fully equipped and trained personnel at the designated devolution site;
 - Necessary resources to facilitate transfer to a devolution site; and
 - The likely triggers that would initiate or activate the devolution option, and eventually, deactivate it

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COOP Element 5: Devolution

- **Audit Approach:**
 - Identify whether the agency had a devolution plan as part of its COOP
 - Determine whether essential functions to be performed in the event of devolution site activation had been identified, including associated resources and personnel
 - Determine whether identified personnel had been trained in devolution responsibilities
 - Determine whether devolution site had necessary infrastructure to accommodate site activation
- **Conclusions:** Agency had no devolution plan.

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COOP Element 6: Vital Records

- **Definition:** Addresses the protection and availability of electronic and hardcopy documents, references, records, and information systems that are needed to support mission-essential functions under a variety of emergency situations
- **Criteria:**
 - FPC-65 requires agencies to identify, protect, and make readily available vital records and databases to support mission-essential functions during COOP emergencies
 - To the extent possible, agencies should pre-position and regularly update duplicate records or backup electronic files

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COOP Element 6: Vital Records

- **Audit Approach:**
 - Interviewed individual agency offices to determine whether they had implemented the agency's vital records program
 - Determined whether agency offices had up-to-date vital records stored at the alternate operating facility
- **Conclusions:**
 - COOP Plan itself was silent on vital records
 - Most offices had done very little to identify, catalogue, and preposition vital records

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COOP Element 7: Interoperable Communications

- **Definition:** Alternate communications that provide the capability to perform essential functions until normal operations can be resumed
- **Criteria:** Under FPC- 65, agencies must:
 - Ensure that communication systems exist to support the ability to communicate with employees, agency leadership, and other elements and locations during an emergency situation
 - Ensure the backup of critical applications are available to provide access to data, systems, and services necessary to support mission-essential functions
- Also, OMB Circular A-130, *Management of Federal Information Resources* and the National Institute of Standards and Technology Special Publication 800-34, *Contingency Planning Guide for Information Technology Systems*

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COOP Element 7: Interoperable Communications

- **Audit Approach:**
 - Catalogue agency's interoperable systems
 - Determine whether interoperable systems are sufficient for the plan and redundant to overcome unanticipated circumstances
 - Determine if major IT systems had backup plans and systems
- **Conclusions:**
 - Agency had only partially established interoperable and redundant communications and systems available to support communication with employees, agency leadership, and other elements and locations during an emergency
 - Some critical systems were vulnerable to disruption during an emergency
 - Major data centers had no redundancy plans or systems

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COOP Element 8: TT&E

- **Definition:** Training, Tests and Exercises. Measures to ensure that an agency's COOP program can implement the COOP plan and support mission-essential functions during an emergency situation
- **Criteria:** FPC-65 requires that agencies must plan, conduct, and document periodic tests, training, and exercises to demonstrate COOP plan viability, identify deficiencies, and ensure personnel are able to implement COOP plans to carry out mission-essential functions
 - The circular also instructs agencies to develop a multi-year plan that addresses TT&E requirements and resources to support these activities

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COOP Element 8: TT&E

- **Audit Approach:**
 - Determine if the agency had implemented a multi-year TT&E plan
 - Determine if COOP personnel had been trained
 - Determine if COOP awareness training provided to workforce
 - Determine whether plans have been tested, if the agency has a mechanism to catalogue, address, and follow-up on identified deficiencies
- **Conclusions:** The agency did not have a comprehensive TT&E Program
 - Participated in several government-wide exercises, but had no action plan to follow-up on identified COOP plan deficiencies
 - Did not have a multi-year TT&E plan
 - Had not ensured that agency personnel are trained to implement COOP plans and carry out mission-essential functions in a COOP situation

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COOP Element 9: Reconstitution

- **Definition:** Process by which an agency transitions from COOP implementation to resumption of normal operations.
- **Criteria:** FPC-65 requires that agencies:
 - Coordinate and pre-plan options for reconstitution and outline procedures for a smooth transition from a relocation site to the new or restored HQ facility
 - Inform and instruct all personnel for resumption of normal operations and supervise the orderly return to the primary location
 - Verify that all systems, communications, and other required capabilities are available and operational at the new facility
 - Conduct an after-action review to identify areas for correction and develop a remedial action plan

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COOP Element 9: Reconstitution

- **Audit Approach:**
 - Determine whether COOP plan addressed reconstitution
 - If so, determine if the plans had procedures for transitioning back to a HQ facility; procedures for informing affected personnel; procedures to verify the availability of all required systems and capabilities at HQ; and procedures for conducting after-action reviews
- **Conclusions:** Agency's reconstitution plans were incomplete:
 - COOP plan did not provide plans for reconstitution from the AOF or devolution site to the new or original HQ facility
 - Plan had no procedures for informing personnel, verifying the presence of all necessary systems and capabilities, or conducting an after-action report

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COOP Element 10: Human Capital

- **Definition:** Plans and actions to respond to threats that employees are most likely to face during COOP activation, such as dismissal procedures, agency guidelines for communicating to employees, and staffing flexibilities, such as telework
- **Criteria:** FPC requires each agency:
 - To design, update, and carry out comprehensive plans to respond to the threats that its employees are most likely to face during an emergency situation
 - Ensure COOP capabilities take maximum advantage of existing agency field infrastructures and give consideration to other options, such as telecommuting locations, work-at-home, virtual offices, and joint or shared facilities

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COOP Element 10: Human Capital

- **Audit Approach:**
 - Determine whether Agency's COOP plan addressed human capital issues, were up to date, and had been tested
- **Conclusions:**
 - Agency COOP Plan did not include any of the human factors that need to be considered during a crisis, such as expected roles and responsibilities, staffing, pay, and notification protocols
 - Did not consider telework as a COOP strategy

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COOP Element 11: Plans and Procedures

- **Definition:** Plans and procedures to be developed and documented so that agency personnel will know what to do in an emergency situation
- **Criteria:**
 - Plans and procedures are required for the three phases of COOP implementation: activation and relocation; AOF operations; and reconstitution
 - The COOP plan must be reviewed and approved annually by senior agency officials

COOP Element 11: Plans and Procedures

- **Audit Approach:**
 - Did agency have COOP plans and procedures?
 - Was their plan complete, up-to-date, and comprehensive?
 - Was it reviewed annually by upper management?
 - Did it include plans and procedures for the three phases of COOP activation?
- **Conclusions:**
 - As developed throughout the other elements, we concluded it was not complete or up-to-date.
 - Plan never completed or approved.

QUESTIONS?



The report: http://www.dhs.gov/xoig/assets/mgmttrpts/OIGr_06-60_Aug06.pdf

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