

GAO

Report to the Ranking Member,
Committee on Oversight and Government
Reform, House of Representatives

November 2007

CONTINUITY OF OPERATIONS

Selected Agencies
Tested Various
Capabilities during
2006 Governmentwide
Exercise





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Selected Agencies Tested Various Capabilities during 2006 Governmentwide Exercise

Highlights of [GAO-08-185](#), a report to the Ranking Member, Committee on Oversight and Government Reform, House of Representatives

Why GAO Did This Study

To ensure the availability of essential government services in emergencies, federal agencies are required to develop continuity of operations (COOP) plans. The Federal Emergency Management Agency (FEMA), under the Department of Homeland Security (DHS), is responsible for disseminating guidance to federal agencies on developing plans, as well as conducting governmentwide exercises every other year to assess federal continuity readiness. In June 2006, FEMA conducted an exercise called Forward Challenge 06, to allow agencies to activate COOP plans, deploy essential personnel to alternate facilities, and perform essential functions.

GAO was asked to describe the extent to which agencies tested continuity plans and procedures, personnel, and resources during the June 2006 exercise. To do this, GAO selected the eight civilian agencies with significant responsibilities during national disasters, analyzed agency exercise documentation, and interviewed officials to determine which test and exercise activities each agency included in its participation.

What GAO Recommends

GAO recommends that FEMA require agencies participating in future governmentwide exercises to document the specific test and exercise activities conducted. In commenting on a draft of this report, DHS agreed with GAO's recommendation and stated that it intends to refine its assessment program and improve the level of evaluation documentation.

To view the full product, including the scope and methodology, click on [GAO-08-185](#). For more information, contact Linda Koontz at (202) 512-6240 or koontzl@gao.gov.

What GAO Found

During Forward Challenge 06, the eight agencies GAO reviewed performed various test and exercise activities related to COOP plans and procedures, personnel, and resources. In many cases, agencies provided documentation to substantiate the specific test and exercise activities performed. However, in other cases, agencies reported conducting such activities but did not provide supporting documentation. Finally, agencies also reported not testing or exercising certain capabilities during the exercise. In these cases, participating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of GAO's review. The table below presents a summary of the extent to which agencies conducted various test and exercise activities during the governmentwide exercise.

Agencies' inability to substantiate many of the test and exercise activities that they reported performing during Forward Challenge 06 was due in part to the absence of specific guidance on what should be documented in such exercises. While FEMA directed participating agencies to document issues and requirements for corrective action, significant findings, and important observations during the Forward Challenge 06 exercise, it did not require participating agencies to document the specific activities from their test and exercise programs that they conducted during the exercise. Without adequate records of what has been tested during a major governmentwide exercise, agencies lack assurance that they have adequately tested their continuity capabilities at the frequency outlined in FEMA guidance, which may limit their ability to fully evaluate their readiness to respond to a disruption. In addition, adequate records can reduce the potential negative impact of turnover in key personnel due to attrition or change in administration, and strengthen agency internal control capabilities.

Agency Testing and Exercising of COOP Plans and Procedures, Personnel, and Resources

Category	Test and exercise activities	Tested and documented	Tested but not documented	Not tested during exercise ^a
Plans and Procedures	Essential Functions	4	4	0
	Activation and Notification:			
	Activation	4	3	1
	Notification—COOP Personnel	3	4	1
	Notification—Non-COOP Personnel	1	5	2
	Notification—Alternate Facility	2	2	4
	Notification—FEMA Operations Center	6	1	1
	Debriefing	8	0	0
Personnel	COOP Personnel Participation	5	3	0
Resources	Interoperable Communications:			
	Communications Capabilities	8	0	0
	Communication with Internal Contacts	6	2	0
	Communication with External Contacts	4	4	0
	Vital Records	6	2	0
	Backup Power	1	1	6

Source: GAO.

^aParticipating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of GAO's review.

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Abbreviations

COOP	continuity of operations
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency

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United States Government Accountability Office
Washington, D.C. 20548

November 19, 2007

The Honorable Tom Davis
Ranking Member
Committee on Oversight and Government Reform
House of Representatives

Dear Mr. Davis,

As you know, essential government services can be interrupted by a range of events, including terrorist attacks, severe weather, or building-level emergencies. To ensure that these services are available in emergencies, federal agencies are required to develop continuity of operations (COOP) plans. The Federal Emergency Management Agency (FEMA), under the Department of Homeland Security (DHS), is responsible for disseminating guidance to federal agencies on developing COOP plans as well as conducting governmentwide exercises every other year as an assessment of federal continuity readiness. In June 2006, FEMA conducted an exercise, called Forward Challenge 06, designed to allow agencies to activate their plans, deploy essential personnel to alternate facilities, and perform essential functions.

We previously reported on COOP test, training, and exercise requirements at your request,¹ and determined that agency plans did not generally comply with FEMA's guidance. We reported that although a governmentwide continuity exercise hosted by FEMA in May 2004 helped agencies comply with test, training, and exercise requirements, few agencies had documented that they conducted internal tests, training, and exercises at the recommended frequency.

You requested that we evaluate agency participation in Forward Challenge 06. Specifically, we agreed to describe the extent to which selected agencies tested their continuity plans and procedures, personnel, and

¹GAO, *Continuity of Operations: Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies*, [GAO-05-577](#) (Washington, D.C.: Apr. 28, 2005), and *Continuity of Operations: Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework during Disruptions*, [GAO-06-713](#) (Washington, D.C.: May 11, 2006).

resources during the governmentwide exercise. For purposes of our review, we selected eight civilian agencies because of their significant responsibilities under the National Response Plan, which outlines the roles of federal agencies in response to national disasters. Specifically, these eight agencies were designated as coordinators of emergency support functions and as such, have responsibilities for coordinating federal interagency support to states and other federal agencies during emergencies of national significance. For example, DHS is responsible for coordinating urban search and rescue efforts.²

To address our objective, we obtained and reviewed documentation regarding test and exercise activities during Forward Challenge 06 from the selected agencies. We analyzed the documentation and interviewed agency officials to determine which of the test and exercise activities each agency included in its participation in Forward Challenge 06.

We conducted our review from May 2006 through September 2007 in accordance with generally accepted government auditing standards. The extended period of time for our analysis was due to a delay in receiving documentation from DHS. First, 2 days before the exercise, we were informed by DHS that we would not be able to observe agencies' participation, despite a previous agreement to do so. Subsequently, we requested documentation on agencies' participation. As we testified in April 2007, this documentation was not provided until March of this year.³ Based on our review of the documentation, we were able to address the objective.

On October 4, 2007, we provided your office with a briefing on the results of this review. This report provides the briefing slides to you and officially transmits our recommendation to the Secretary of Homeland Security. The slides from the briefing are included as appendix I.

In summary, we determined that during Forward Challenge 06, the eight agencies performed various test and exercise activities related to COOP plans and procedures, personnel, and resources. In many cases, agencies provided documentation to substantiate the specific test and exercise

²DHS, *National Response Plan* (Washington, D.C.: December 2004).

³GAO, *Department of Homeland Security: Observations on GAO Access to Information on Programs and Activities*, [GAO-07-700T](#) (Washington, D.C.: Apr. 25, 2007).

activities performed. However, in other cases, agencies reported conducting such activities but did not provide supporting documentation. Finally, agencies also reported not testing or exercising certain capabilities during the exercise. In these cases, participating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of our review.

Agencies' inability to substantiate many of the test and exercise activities that they reported performing during Forward Challenge 06 was due in part to the absence of specific guidance on what should be documented in such exercises. While FEMA directed participating agencies to document issues and requirements for corrective action, significant findings, and important observations during the Forward Challenge 06 exercise, it did not require participating agencies to document the specific activities from their test and exercise programs that they conducted during the exercise. Without adequate records of what has been tested during a major governmentwide exercise, agencies lack assurance that they have adequately tested their continuity capabilities at the frequency outlined in FEMA guidance, which may limit their ability to fully evaluate their readiness to respond to a disruption. In addition, adequate records can reduce the potential negative impact of turnover in key personnel due to attrition or change in administration, and strengthen agency internal control capabilities.

Recommendation for Executive Action

To better assist agencies in assessing their readiness to respond to disruptions, we recommend that the Secretary of Homeland Security direct the FEMA Director to require agencies participating in future governmentwide exercises to document the specific test and exercise activities conducted.

Agency Comments and Our Evaluation

We received written comments on a draft of our report from the Director of the Department of Homeland Security's GAO/OIG Liaison office. (These comments are reproduced in app. II) In commenting on the report, the Director stated that the department agreed with our recommendation. In addition, the Director stated that the department had already complied with the recommendation during Forward Challenge 06, citing the general

guidance provided in Federal Preparedness Circular 65⁴ as well as evaluations compiled by internal and external evaluators during the exercise. The Director stated further that the level of documentation was higher than we reported as demonstrated by external evaluations that he said did not meet GAO audit standards.

We disagree that FEMA provided adequate guidance on documentation and that the level of documentation was higher than we reported. While the guidance provided general direction to agencies to document their test, training, and exercise programs, it did not specify that agencies were to document the extent to which each essential function and supporting capability was tested during this exercise. In addition, we considered the results of the exercise evaluations in our analysis; but in many cases, these evaluations did not specify which essential functions and supporting capabilities were tested during the exercise. The value of such documentation is not to meet GAO audit standards, as the Director asserts. Instead, as noted in our briefing, agencies need to fully document their exercise activities to ensure that they are following FEMA guidance, to mitigate the effects of potential staff turnover, and to ensure appropriate internal controls. Nevertheless, the Director stated that FEMA intends to refine its assessment program, giving specific attention to improving the level of evaluation documentation. The Director also included technical comments that we have addressed, as appropriate.

As agreed with your staff, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days after its date. At that time, we will send copies of this report to the Secretary of Homeland Security, and other interested parties. This report will also be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6240 or koontzl@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page

⁴Federal Preparedness Circular 65 is guidance to the federal executive branch for use in developing viable and executable contingency plans that facilitate the performance of essential functions during any emergency.

of this report. Key contributions to this report were made by James R. Sweetman, Jr., Assistant Director; Lorne Cammack; Alma Cole; Barbara Collier; Matthew Grote; Sairah Ijaz; Nick Marinos; Morgan Walts; and Kim Zelonis.

Sincerely yours,

A handwritten signature in cursive script that reads "Linda D. Koontz".

Linda D. Koontz
Director, Information Management Issues

October 4, 2007, Briefing to Staff of the Ranking Member, House Committee on Oversight and Government Reform



Continuity of Operations: Selected Agencies Tested Various Capabilities During 2006 Governmentwide Exercise

Briefing for the Staff of the
Ranking Member
Committee on Oversight and Government Reform
House of Representatives

October 4, 2007



Outline of Briefing

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Results in Brief

Background

Agencies Tested Various Capabilities

- Plans and Procedures
- Personnel
- Resources

Conclusions

Recommendation

Agency Comments and our Evaluation

Attachment 1: Agencies Reviewed

Attachments 2 to 9: Individual Agency Results



Introduction

Events in recent years have underscored the need for federal agencies to be prepared to respond effectively to a variety of emergency situations. Specifically, federal operations and facilities have been disrupted by a range of events, including

- the terrorist attacks on September 11, 2001, and at Oklahoma City on April 19, 1995;
- severe weather events, such as hurricanes Katrina, Rita, and Wilma in 2005; and
- building-level events, such as asbestos contamination at the Department of the Interior's headquarters.

Such disruptions, particularly if prolonged, can lead to interruptions in essential government services. Prudent management, therefore, requires that federal agencies develop plans for ensuring the continuity of such services in emergency situations. These are referred to as continuity of operations (COOP) plans. These plans lay out an agency's approach to maintaining services, ensuring proper authority for government actions, and protecting vital assets.



Introduction

Presidential Decision Directive 67 established the Federal Emergency Management Agency (FEMA) as the lead agency for COOP planning across the executive branch. FEMA's Federal Preparedness Circular (FPC) 65 provides guidance to federal agencies on developing COOP plans and carrying out test, training, and exercise programs to ensure their effectiveness. The guidance states that agencies are to test and exercise plans and procedures, personnel, and resources at specific frequencies during each year. These tests and exercises should include the following capabilities:

Plans and Procedures. Each agency is to exercise the capability to continue its essential functions—those functions that enable it to provide vital services, exercise civil authority, maintain safety, and sustain the economy during an emergency—on an annual basis. In addition, each agency should test its continuity plan's activation and notification procedures on a quarterly basis, including notifying COOP personnel (that is, staff needed to perform essential functions, as designated by the agency), non-COOP agency employees, the alternate facility, and the FEMA Operations Center.¹ For each exercise performed, a debriefing should be conducted for participants to identify weaknesses in plans and procedures and recommend plan revisions.

Personnel. Each agency should conduct an annual exercise that involves the movement of COOP personnel to the agency alternate facility² to ensure the agency's ability to perform essential functions during an emergency.

¹ The FEMA Operations Center is responsible for, among other things, facilitating information sharing between FEMA and non-FEMA entities, and providing a status of on-going incidents, responses or potential events, during an emergency.

² An alternate facility provides a physical location from which to conduct essential functions if the agency's usual facilities are unavailable.



Introduction

Resources. Each agency should conduct tests of resources required to perform essential functions. These tests should include quarterly tests of its communications capabilities, such as secure and non-secure voice, video, fax, and data connectivity, Internet access, and email; as well as annual exercises of its ability to communicate with internal and external key contacts. Each agency should also test access to vital records and critical information systems (electronic and hard-copy records and information systems needed to support essential functions) semi-annually, and backup power annually.

FPC 65 further requires FEMA to conduct a governmentwide continuity exercise every other year as a tool to assess and validate federal continuity readiness. In June 2006, FEMA conducted Forward Challenge 06, a governmentwide continuity exercise designed to allow agencies to activate their COOP plans, deploy essential personnel to alternate facilities, and perform essential functions as a means of assessing their mission readiness. FEMA guidance for this exercise required agencies to respond appropriately to the exercise scenarios using their existing plans. Agencies also had the option to test additional capabilities or address internal scenarios if they did not interfere with the overall exercise or the activities of other agencies.



Objective, Scope, and Methodology

As agreed with your office, our objective was to describe the extent to which selected agencies tested their continuity plans and procedures, personnel, and resources during the Forward Challenge 06 governmentwide exercise.

For purposes of our review, we selected eight civilian agencies because of their significant responsibilities under the National Response Plan, which outlines the roles of federal agencies in response to national disasters.³ Specifically, these eight agencies were designated as coordinators of emergency support functions and as such, have responsibilities for coordinating federal interagency support to states and other federal agencies during emergencies of national significance. For example, DHS is responsible for coordinating urban search and rescue efforts. The eight selected agencies and their respective responsibilities for emergency support functions are listed in attachment 1.

³ DHS, *National Response Plan* (Washington, D.C.: December 2004).



Objective, Scope, and Methodology

To address our objective, we obtained and reviewed documentation regarding test and exercise activities during Forward Challenge 06 from the agencies. Documentation included internal and external agency after action reports and results of external evaluations conducted during the exercise. We analyzed the documentation to determine which of the test and exercise activities each agency included in its participation in Forward Challenge 06 and interviewed officials about gaps in their documentation. We then created summary tables outlining activities that were supported by documentation (identified as “tested and documented”), and activities that agencies reported as having conducted during the exercise but for which they did not provide documentation (identified as “tested but not documented”).

We did not identify and assess other tests and exercises that agencies may have conducted during the year and thus, did not assess their compliance with the requirements in FPC 65. As a result, we are providing only a description of the capabilities tested during Forward Challenge 06.



Objective, Scope, and Methodology

We conducted our review from May 2006 through September 2007 in accordance with generally accepted government auditing standards. The extended period of time for our analysis is due to a delay in receiving documentation from DHS. First, we were informed by DHS two days before the exercise that we would not be able to observe agencies' participation, despite a previous agreement to do so. Subsequently, we requested documentation on agencies' participation. As we testified in April 2007, this documentation was not provided until March of this year.⁴ Based on our review of the documentation, we were able to address the objective.

⁴ GAO, *Department of Homeland Security: Observations on GAO Access to Information on Programs and Activities*, GAO-07-700T (Washington, D.C.: Apr. 25, 2007).



Results in Brief

During Forward Challenge 06, the eight agencies performed various test and exercise activities related to COOP plans and procedures, personnel, and resources. In many cases, agencies provided documentation to substantiate the specific test and exercise activities performed. However, in other cases, agencies reported conducting such activities but did not provide supporting documentation. Finally, agencies also reported not testing or exercising certain capabilities during the exercise. In these cases, participating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of our review. The following table presents a summary of the extent to which agencies conducted various test and exercise activities during the governmentwide exercise.



Results in Brief

Agency Testing and Exercising of COOP Plans and Procedures, Personnel, and Resources

Category	Test and exercise activities	Tested and documented	Tested but not documented	Not tested during exercise ⁵
Plans and Procedures	Essential Functions	4	4	0
	Activation and Notification:			
	Activation	4	3	1
	Notification—COOP Personnel	3	4	1
	Notification—Non-COOP Personnel	1	5	2
	Notification—Alternate Facility	2	2	4
	Notification—FEMA Operations Center	6	1	1
	Debriefing	8	0	0
Personnel	COOP Personnel Participation	5	3	0
Resources	Interoperable Communications:			
	Communications Capabilities	8	0	0
	Communication with Internal Contacts	6	2	0
	Communication with External Contacts	4	4	0
	Vital Records	6	2	0
	Backup Power	1	1	6

⁵ Participating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of our review.



Results in Brief

While FEMA directed participating agencies to document issues and requirements for corrective action, significant findings, and important observations during the Forward Challenge 06 exercise, it did not require participating agencies to document the specific activities from their test and exercise programs that they conducted during the exercise. The absence of specific guidance on what agencies should document contributed to the lack of documentation to support many of the test and exercise activities agencies described undertaking during Forward Challenge 06. Without adequate records of what has been tested during a major governmentwide exercise, agencies lack assurance that they have adequately tested their continuity capabilities at the frequency outlined in FEMA guidance, which may limit their ability to fully evaluate their readiness to respond to a disruption. In addition, adequate records can reduce the potential negative impact of turnover in key personnel due to attrition or change in administration, and strengthen agency internal control capabilities.



Results in Brief
Recommendation and Agency Comments

We are making a recommendation to the Secretary of Homeland Security aimed at improving the ability for agencies to fully assess their readiness to respond to disruptions by documenting the specific test and exercise activities they conduct during future governmentwide exercises.

In written comments on a draft of this briefing, the Director of the Department of Homeland Security's GAO/OIG Liaison office stated that the Department agreed with our recommendation but has already provided adequate guidance on documentation requirements. Among other things, the Director also stated that the level of documentation was higher than we reported as demonstrated by external evaluations that the Director said did not meet GAO audit standards. We disagree that FEMA provided adequate guidance on documentation and that the level of documentation was higher than we reported. FEMA's guidance did not specify that agencies were to document the extent to which each essential function and supporting capability was tested. Similarly, the results of the evaluations did not document the extent to which agencies tested these functions and capabilities. The value of such documentation is not to meet GAO audit standards, as the Director asserts. Instead, as described in our briefing, agencies need to fully document their exercise activities to ensure that they are following FEMA guidance, mitigate the effects of potential staff turnover, and ensure appropriate internal controls. Nevertheless, the Director stated that FEMA intends to refine its assessment program, giving specific attention to improving the level of evaluation documentation. In addition, the Director provided technical comments, which we incorporated as appropriate.



Background Guidance

Testing and exercising continuity capabilities are essential to demonstrating, assessing, and improving the ability of agencies to execute their COOP plans. Tests and exercises serve to assess, validate, or identify for subsequent correction specific aspects of COOP plans, procedures, and resources. FPC 65 outlines various tests and exercises of continuity capabilities (including plans and procedures, personnel, and resources) that agencies are to conduct throughout the year; they are not required to perform these activities during a governmentwide exercise. These activities include the following:

Plans and Procedures

- **Essential functions.** On an annual basis, agency personnel must exercise the agency's capability to continue its essential functions.
- **Activation and notification.** In order to ensure proper activation of COOP plans, agencies must have a decision-making process for activating their plans, as well as procedures for notifying personnel designated as being on the COOP team (COOP personnel), non-COOP agency employees, the alternate facility, and the FEMA Operations Center. The guidance calls for each agency to test such procedures on a quarterly basis.
- **Debriefing.** For each exercise performed by an agency, a comprehensive debriefing for participants should be conducted to identify systemic weaknesses in plans and procedures and recommend COOP plan revisions.



Background Guidance

Personnel

- **COOP personnel participation.** Each agency should conduct an annual exercise that involves the movement of COOP personnel to the agency alternate facility to ensure the agency's ability to perform essential functions during an emergency.

Resources

- **Interoperable communications.** Each agency should conduct quarterly tests of its communications capabilities and annually exercise its ability to communicate with internal and external key contacts.
- **Vital records and critical information systems.**⁶ Each agency should perform semi-annual tests of plans for the recovery of vital records and critical information systems at alternate facilities.
- **Backup power.** Each agency should ensure that its alternate facility has the ability to run emergency power to allow essential functions to continue in any environment. The guidance states that such infrastructure systems are to be tested on an annual basis.

⁶ FPC 65 states that agency personnel must have access to and be able to use electronic and hard-copy records and information systems needed to perform their essential functions.



Background
Forward Challenge 06

FPC 65 requires FEMA to conduct a governmentwide exercise every other year as a tool to assess and validate federal continuity readiness. From June 19 to 22, 2006, FEMA conducted Forward Challenge 06, a governmentwide continuity exercise designed to allow agencies to activate their COOP plans, deploy essential personnel to alternate facilities, and perform essential functions as a means of assessing their mission readiness. FEMA guidance for this exercise required agencies to respond appropriately to the exercise scenarios using their existing plans. Agencies also had the option to test additional capabilities or address internal scenarios if they did not interfere with the overall exercise or the activities of other agencies.

The scenario for the exercise involved the simulation of agency continuity response to heightened alert conditions involving weapons of mass destruction within the United States. During the exercise, each participating agency's activities were observed by an official from another agency. These external evaluators provided the agency they observed with a checklist indicating which activities it included during its participation in the exercise. Forward Challenge 06 was conducted as a component of TOPOFF 4, a national homeland security preparedness exercise sponsored by DHS designed to, among other things, exercise the national ability to prevent, respond to, and recover from a weapon of mass destruction incident.



Background Previous GAO Reports

We previously reported on COOP test, training, and exercise requirements at the request of the Chairman, House Committee on Government Reform,⁷ and determined that agency plans did not generally comply with FEMA's guidance regarding tests, training, and exercises. We reported that although a governmentwide COOP exercise hosted by FEMA in May 2004 helped agencies comply with test, training, and exercise requirements, few agencies had documented that they conducted internal tests, training, and exercises at the recommended frequency. We recommended that FEMA develop a methodology for individual COOP assessments that independently evaluates executive branch agencies' compliance with FPC 65, including the extent to which agencies plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency.

In response to this recommendation, before Forward Challenge 06 FEMA coordinated independent evaluations of participating agency COOP plans in an effort to review the extent to which elements of a viable COOP capability were addressed. These assessments included a review of whether agency plans called for test, training, and exercise activities at the frequencies outlined in FEMA's guidance. FEMA included the results of these assessments in the individual agency after-action reports it prepared following the governmentwide exercise.

⁷ GAO, *Continuity of Operations: Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies*, GAO-05-577 (Washington, D.C.: Apr. 28, 2005), and *Continuity of Operations: Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework during Disruptions*, GAO-06-713 (Washington, D.C.: May 11, 2006).



Background
2008 Continuity Exercise

FEMA is currently planning for a governmentwide continuity exercise for 2008. According to FEMA officials, the continuity exercise will take place over 3 days in late April 2008 and will include objectives similar to those of Forward Challenge 06.



Agencies Tested Various Capabilities

During Forward Challenge 06, the eight agencies performed various test and exercise activities related to COOP plans and procedures, personnel, and resources. In many cases, agencies provided documentation to substantiate the specific test and exercise activities performed. However, in other cases, agencies reported conducting such activities but did not provide supporting documentation. Finally, agencies also reported not testing or exercising certain capabilities during the exercise. In these cases, participating agencies may have addressed these capabilities in other test and exercises conducted during the year, which were outside the scope of our review. The following slides summarize the test and exercise activities agencies conducted during the governmentwide exercise.



Agencies Tested Various Capabilities Plans and Procedures

Essential Functions

Essential functions are those functions that enable 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.

- Four of the agencies performed at least one essential function during the exercise. Some of the essential functions performed included ensuring command and control of the organization and providing information to the public.
- The remaining four agencies reported exercising their essential functions but did not provide documentation substantiating which essential functions were exercised.



Agencies Tested Various Capabilities Plans and Procedures

Activation and Notification Procedures

Each agency develops a decision process for determining when to activate its COOP plans and procedures and, following activation, must notify appropriate points of contact: COOP and non-COOP employees, its alternate facility, and the FEMA Operations Center.

Activation

- Four agencies exercised activation procedures. For example, three agencies activated their plans as result of a change in exercise threat level conditions.
- Of the remaining four agencies, three reported exercising their activation procedures, but did not provide documentation substantiating the reported activity.

Notification—COOP Personnel

- Three agencies exercised notification procedures for COOP personnel. For example, one agency used an automated notification system to contact personnel by phone and email upon COOP activation.
- Of the remaining five agencies, four reported exercising the notification of their COOP personnel, but did not provide documentation substantiating the reported activity.



Agencies Tested Various Capabilities Plans and Procedures

Activation and Notification Procedures (continued)

Notification—Non-COOP Personnel

- One agency exercised notification procedures for non-COOP personnel by sending a mass e-mail notifying nonessential personnel of the exercise and activation of its COOP plan.
- Of the remaining seven agencies, five reported exercising the notification of their non-COOP personnel, but did not provide documentation substantiating the reported activity.

Notification—Alternate Facility

- Two agencies exercised notification procedures for their alternate facilities by notifying personnel present at the alternate facility of COOP activation, triggering preparations.
- Of the remaining six agencies, two reported exercising the notification of their alternate facility, but did not provide documentation substantiating the reported activity.

Notification—FEMA Operations Center

- Six agencies exercised notification procedures for the FEMA Operations Center. For example, one agency notified FEMA of COOP activation by e-mail one morning during the exercise.
- Of the remaining two agencies, one reported exercising the notification of the FEMA Operations Center, but did not provide documentation substantiating the reported activity.



Agencies Tested Various Capabilities Plans and Procedures

Comprehensive Debriefing

A comprehensive debriefing after agency COOP exercises allows participants to identify systemic weaknesses in plans and procedures and recommend plan revisions.

- All eight agencies identified strengths in their continuity capabilities and areas for improvement using questionnaires completed by participants or meetings with participants following the exercise. Each of the agencies outlined their results in bullets identifying the top three strengths and top three areas for improvement. For example, strengths identified by the agencies included conducting essential functions and the performance of alternate facility support staff; areas for improvement included notification procedures and communication with external contacts.



Agencies Tested Various Capabilities Personnel

COOP Personnel Participation

COOP personnel are agency officials assigned responsibility to report to an alternate site, as required, to perform agency essential functions.

- Five agencies moved COOP personnel to alternate facilities to participate in the exercise. For example, one agency participated with 13 percent of its COOP personnel, while another agency participated with 89 percent.
- The remaining three agencies reported exercising with their COOP personnel, but did not provide documentation substantiating the extent of COOP personnel participating in the exercise.



Agencies Tested Various Capabilities Resources

Interoperable Communications

The success of agency operations at an alternate facility depends on available and redundant communications with internal organizations, other agencies, critical customers, and the public.

Communications Capabilities

- All eight agencies tested communications capabilities during the exercise. Equipment tested by the agencies included secure video teleconference, phone, e-mail, and an online emergency collaboration system.



Agencies Tested Various Capabilities Resources

Interoperable Communications (continued)

Communication with Internal Contacts

- Six agencies exercised communication with internal contacts, such as field offices, during the exercise.
- The remaining two agencies reported exercising communication with internal contacts, but did not provide documentation substantiating the reported contacts.

Communication with External Contacts

- In addition, four agencies exercised communication with external contacts, such as the White House.
- The remaining four agencies reported exercising communication with external contacts, but did not provide documentation substantiating the reported contacts.



Agencies Tested Various Capabilities Resources

Vital Records and Critical Information Systems

Vital records are electronic and hardcopy documents, references, records and information systems needed to support essential functions during an emergency.

- Six agencies tested access to vital records during the exercise.
- The remaining two agencies reported testing access to vital records but neither provided documentation substantiating the reported activities.

Emergency Backup Power

Emergency backup power ensures that an agency's alternate facility can allow essential functions to continue in any environment.

- One agency's primary power source unintentionally went out during the exercise, triggering the use of backup power for several hours.
- Of the remaining seven agencies, one agency reported testing its backup power, but did not provide documentation substantiating the reported test.



Agencies Tested Various Capabilities FEMA Provided Limited Guidance on Documentation

FEMA published and disseminated an exercise plan prior to the start of Forward Challenge 06, outlining information regarding the scope and methodology of the exercise as well as the responsibilities of officials from participating agencies. Within the plan, FEMA stated that participating agency officials were to document issues and requirements for corrective action, significant findings and important observations during the Forward Challenge 06 exercise. In response, each agency we reviewed documented the main strengths and weaknesses of its exercise participation.

In contrast, FEMA did not direct participating agencies to document the specific activities from their test and exercise programs that they conducted during Forward Challenge 06. The absence of guidance in this area contributed to the lack of documentation to support many of the test and exercise activities agencies described undertaking during Forward Challenge 06. Without adequate records of what has been tested during a major governmentwide exercise, agencies lack assurance that they have adequately tested their continuity capabilities at the frequency outlined in FEMA guidance, which, in turn, can limit the agencies' assurance that the procedures, people, and resources they need to respond to a disruption will be available when needed. Developing and maintaining such documentation can also reduce the potential negative impact of turnover in key personnel—for example, turnover caused by attrition or a change in administration—by providing new staff with information regarding the status of their agency's test and exercise program and overall continuity capability. Finally, such documentation can strengthen an agency's internal control capability, by ensuring that relevant, reliable, and timely information is available for management decision-making and for external reporting purposes such as congressional oversight.



Conclusions

Agencies took advantage of the opportunity to test a number of their continuity capabilities during FEMA's Forward Challenge 06 governmentwide exercise. The strengths and weaknesses each agency identified as a result of its participation can provide the basis for improvements in their continuity programs. However, in many cases, agencies reported conducting test and exercise activities but had not documented their efforts, due in part to FEMA's guidance not requiring them to do so. Without adequate records of what has been tested during a major governmentwide exercise, agencies may lack assurance that they have adequately tested their continuity capabilities at the frequency outlined in FEMA guidance, which may limit their ability to fully evaluate their readiness to respond to a disruption.



Recommendation

To better assist agencies in assessing their readiness to respond to disruptions, we recommend that the Secretary of Homeland Security direct the FEMA Director to require agencies participating in future governmentwide exercises to document the specific test and exercise activities conducted.



Agency Comments and Our Evaluation

In written comments on a draft of this briefing, the Director of the Department of Homeland Security's GAO/OIG Liaison office stated that the Department agreed with our recommendation. In addition, the Director stated that the Department had already complied with the recommendation during Forward Challenge 06, citing the general guidance provided in FPC 65 as well as evaluations compiled by internal and external evaluators during the exercise. The Director stated further that the level of documentation was higher than we reported as demonstrated by external evaluations that he said did not meet GAO audit standards. Finally, the Director stated, with respect to our assertion that FEMA did not specify which aspect of an agency's test and exercise program should be included in the exercise, that FEMA provided guidance to departments and agencies for the overarching objectives of the exercise.

We disagree that FEMA provided adequate guidance on documentation and that the level of documentation was higher than we reported. While the guidance provided general direction to agencies to document their test, training, and exercise programs, it did not specify that agencies were to document the extent to which each essential function and supporting capability was tested. In addition, we considered the results of the exercise evaluations in our analysis, but in many cases these evaluations did not specify which essential functions and supporting capabilities were tested during the exercise. The value of such documentation is not to meet GAO audit standards, as the Director asserts. Instead, as noted in our briefing, agencies need to fully document their exercise activities to ensure that they are following FEMA guidance, to mitigate the effects of potential staff turnover, and to ensure appropriate internal controls. Nevertheless, the Director stated that FEMA intends to refine its assessment program, giving specific attention to improving the level of evaluation documentation.



Agency Comments and Our Evaluation

Regarding the Director's statement that FEMA provided guidance to departments and agencies through the exercise objectives and FPC 65, we agree that FEMA provided guidance that required agencies to respond to exercise scenarios using their continuity plans. As a result, we have revised the introduction and background sections of the briefing to clarify the scope of FEMA's guidance.

The Director also provided technical comments, which we incorporated as appropriate. [The Director's comments are reproduced as appendix II].



Attachment 1
Agencies Reviewed

The National Response Plan designates the following eight civilian agencies as coordinators of emergency support functions identified to provide support to states and other federal entities during national disasters.

Agency/Coordinator	Emergency Support Function Responsibilities
Department of Agriculture	Firefighting; Agriculture and Natural Resources
Department of Energy	Energy
Department of Health and Human Services	Public Health and Medical Services
Department of Homeland Security	Communications; Emergency Management; Mass Care, Housing, and Human Services; Urban Search and Rescue; Public Safety and Security; Long-Term Community Recovery and Mitigation; and External Affairs
Department of Justice	Public Safety and Security
Department of Transportation	Transportation
Environmental Protection Agency	Oil and Hazardous Materials Response
General Services Administration	Resource Support

Source: DHS, *National Response Plan* (Washington, D.C.: December 2004).



U.S. Department of Agriculture (USDA)
 Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	USDA Action
Plans and Procedures				
1. Essential Functions	X			Exercised all 43 of its essential functions during the exercise.
2. Activation and Notification Procedures				
a. Activation Procedures	X			Exercised its COOP activation procedures one morning during the exercise.
b. COOP Personnel Notification		X		Reported exercising the notification of its COOP personnel but did not provide documentation substantiating this activity.
c. Non-COOP Personnel Notification		X		Reported exercising the notification of its non-COOP personnel, but did not provide documentation substantiating this activity.



Attachment 2
 U. S. Department of Agriculture

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	USDA Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification			X	Did not exercise the notification of its alternate facility during the exercise. According to USDA officials, personnel deployed to the alternate facility prior to the exercise.
e. FEMA Operations Center Notification	X			Exercised the notification of the FEMA Operations Center one morning during the exercise.
3. Debriefing	X			Conducted a debriefing identifying strengths and areas of improvement from the exercise.
Personnel				
4. COOP Personnel Participation	X			Exercised with 67 of its 75 COOP personnel. This is an 89 percent participation rate.



Attachment 2
 U. S. Department of Agriculture

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	USDA Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested multiple forms of communication capabilities, including telephone, fax, and e-mail.
b. Communication with Internal Contacts	X			Exercised communication with internal entities, including the Animal and Plant Health Inspection Service.
c. Communication with External Contacts	X			Exercised communication with external contacts, including the White House.
6. Vital Records	X			Tested access to vital records pre-positioned at the alternate facility.
7. Backup Power		X		Reported that the backup power at its alternate facility was tested during the exercise by the facility's host, but did not provide documentation substantiating this testing.



Attachment 3
 Department of Energy

Department of Energy (DOE)
 Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOE Action
Plans and Procedures				
1. Essential Functions		X		Reported exercising its essential functions but did not provide documentation substantiating which essential functions were performed during the exercise.
2. Activation and Notification Procedures				
a. Activation Procedures	X			Exercised its COOP activation procedures one morning during the exercise.
b. COOP Personnel Notification		X		Reported exercising the notification of its COOP personnel but did not provide documentation substantiating this activity.
c. Non-COOP Personnel Notification		X		Reported exercising the notification of its non-COOP personnel but did not provide documentation substantiating this activity.



Attachment 3
 Department of Energy

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOE Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification			X	Did not exercise the notification of its alternate facility.
e. FEMA Operations Center Notification	X			Exercised notification of the FEMA Operations Center one morning during the exercise.
3. Debriefing	X			Used questionnaires completed by exercise participants that identified main strengths and areas for improvement.
Personnel				
4. COOP Personnel Participation		X		Reported exercising with over 220 personnel during the course of the exercise, but did not provide documentation substantiating a level of participation by COOP personnel.



Attachment 3
 Department of Energy

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOE Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested communications capabilities, including satellite phones and secure video teleconferencing.
b. Communication with Internal Contacts	X			Exercised communication with internal contacts, including agency personnel using a web-based communication tool.
c. Communication with External Contacts	X			Exercised communication with external contacts, including other agencies such as the Nuclear Regulatory Commission.
6. Vital Records	X			Tested access to vital records during the exercise.
7. Backup Power			X	Did not test backup power during the exercise.



Attachment 4

Department of Health and Human Services

Department of Health and Human Services (HHS)
 Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	HHS Action
Plans and Procedures				
1. Essential Functions	X			Exercised one of its essential functions during the exercise.
2. Notification Procedures				
a. Activation Procedures		X		Reported exercising activation procedures but did not provide documentation substantiating this activity.
b. COOP Personnel Notification		X		Reported exercising notification procedures for COOP personnel but did not provide documentation substantiating this activity.
c. Non-COOP Personnel Notification		X		Reported exercising non-COOP personnel notification procedures, but did not provide documentation substantiating this activity.



Attachment 4

Department of Health and Human Services

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	HHS Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification		X		Reported exercising notification procedures for the alternate facility but did not provide documentation substantiating this activity.
e. FEMA Operations Center	X			Exercised the notification of the FEMA Operations Center during the exercise.
3. Debriefing	X			Conducted a debriefing and provided a summary list of strengths and areas for improvement.
Personnel				
4. COOP Personnel Participation	X			Deployed 105 COOP personnel for the exercise.



Attachment 4
 Department of Health and Human Services

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	HHS Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested several communications capabilities, including telephone and fax.
b. Communication with Internal Contacts	X			Exercised communication with internal entities, such as the Centers for Disease Control and Prevention.
c. Communication with External Contacts	X			Exercised communication with external contacts, such as the Homeland Security Operations Center.
6. Vital Records	X			Tested access to vital records during the exercise.
7. Backup Power			X	Did not test backup power during the exercise. HHS reported that backup power is tested on a monthly basis at the alternate facility.



Attachment 5
 Department of Homeland Security

Department of Homeland Security (DHS)
 Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DHS Action
Plans and Procedures				
1. Essential Functions		X		Reported exercising its essential functions, but did not provide documentation substantiating this activity.
2. Activation and Notification Procedures				
a. Activation Procedures		X		Reported exercising its activation procedures, but did not provide documentation substantiating this activity.
b. COOP Personnel Notification	X			Exercised the notification of its COOP personnel.
c. Non-COOP Personnel Notification		X		Reported that DHS headquarters COOP team personnel provided notification and individual instructions to non-COOP personnel within their respective organizations. DHS did not provide documentation substantiating this activity.



Attachment 5
 Department of Homeland Security

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DHS Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification	X			Exercised the notification of its alternate facility.
e. FEMA Operations Center Notification		X		Reported exercising the notification of the FEMA Operations Center, but did not provide documentation substantiating this activity.
3. Debriefing	X			Conducted a debriefing identifying strengths and areas of improvement from the exercise.
Personnel				
4. COOP Personnel Participation	X			Exercised with 24 of its 184 COOP personnel. This is a 13 percent participation rate. DHS officials stated that additional COOP personnel participated in the exercise, but did not sign in.



Attachment 5
 Department of Homeland Security

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DHS Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested its communications capabilities, including secure video conferencing.
b. Communication with Internal Contacts		X		Reported exercising communication with internal contacts as it exercised essential functions, but did not provide documentation substantiating the communication.
c. Communication with External Contacts		X		Reported exercising communication with external contacts as it exercised essential functions, but did not provide documentation substantiating the communication.
6. Vital Records		X		Reported testing access to its vital records, but did not provide documentation substantiating this testing.
7. Backup Power			X	Did not test its backup power during the exercise. DHS reported that the host of the alternate facility conducts regular tests of the backup power.



Attachment 6
 Department of Justice

Department of Justice (DOJ)

Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOJ Action
Plans and Procedures				
1. Essential Functions		X		Reported exercising its essential functions as if conducting a usual work day but did not provide documentation substantiating which essential functions were performed.
2. Activation and Notification Procedures				
a. Activation Procedures			X	Reported that exercising activation procedures was not part of the agency's exercise plan.
b. COOP Personnel Notification			X	Reported that exercising notification procedures was not part of the agency's exercise plan.
c. Non-COOP Personnel Notification			X	Reported that exercising notification procedures was not part of the agency's exercise plan.

Appendix I
 October 4, 2007, Briefing to Staff of the
 Ranking Member, House Committee on
 Oversight and Government Reform



Attachment 6
 Department of Justice

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOJ Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification			X	Reported that exercising notification procedures was not part of the agency's exercise plan.
e. FEMA Operations Center Notification			X	Reported that exercising notification procedures was not part of the agency's exercise plan.
3. Debriefing	X			Conducted a debriefing and provided a summary list of strengths and areas for improvement.
Personnel				
4. COOP Personnel Participation		X		Reported exercising with COOP personnel but did not provide documentation substantiating this activity.



Attachment 6
 Department of Justice

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOJ Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested multiple communication capabilities including cell phones, and a secure radio system.
b. Communication with Internal Contacts	X			Exercised communication with internal entities, including the U.S. Marshals Service.
c. Communication with External Contacts		X		Reported exercising communication with external contacts as it exercised essential functions, but did not provide documentation substantiating the communication.
6. Vital Records	X			Tested access to vital records during the exercise.
7. Backup Power			X	Did not test its backup power capabilities during the exercise. DOJ stated that the alternate facility's backup power is tested regularly by the site host.



Attachment 7
 Department of Transportation

Department of Transportation (DOT)
 Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOT Action
Plans and Procedures				
1. Essential Functions		X		Reported exercising its essential functions, but did not provide documentation substantiating which functions were performed during the exercise.
2. Activation and Notification Procedures				
a. Activation Procedures		X		Reported exercising its activation procedures, but did not provide documentation substantiating this activity.
b. COOP Personnel Notification		X		Reported notifying 90 percent of its COOP personnel through its alert system, but did not provide documentation substantiating the notification.
c. Non-COOP Personnel Notification			X	Did not test the notification of its non-COOP personnel during the exercise.



Attachment 7
 Department of Transportation

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOT Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification			X	Did not exercise the notification of its alternate facility. DOT officials reported that the notification of the alternate facility was not applicable to the exercise because the facility managers were the leaders of the exercise.
e. FEMA Operations Center Notification	X			Exercised the notification of the FEMA Operations Center during the exercise.
3. Debriefing	X			Conducted a debriefing identifying strengths and areas of improvement from the exercise.
Personnel				
4. COOP Personnel Participation		X		Reported that it exercised with 90 percent of its COOP personnel, but did not provide documentation substantiating this level of participation.



Attachment 7
 Department of Transportation

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOT Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested its communications capabilities.
b. Communication with Internal Contacts		X		Reported exercising communication with internal contacts but did not provide documentation substantiating this communication.
c. Communication with External Contacts		X		Reported exercising communication with external contacts but did not provide documentation substantiating this communication.
6. Vital Records		X		Reported testing access to its vital records, but did not provide documentation substantiating the testing.
7. Backup Power			X	Did not test its backup power during the exercise. According to DOT officials, testing backup power is the responsibility of the host of the alternate facility.



Attachment 8
 Environmental Protection Agency

Environmental Protection Agency (EPA)

Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	EPA Action
Plans and Procedures				
1. Essential Functions	X			Exercised seven of its eight essential functions during the exercise.
2. Activation and Notification Procedures				
a. Activation Procedures	X			Exercised its COOP activation procedures.
b. COOP Personnel Notification	X			Exercised the notification of its COOP personnel by telephone and e-mail.
c. Non-COOP Personnel Notification	X			Exercised notification of its non-COOP personnel by sending an e-mail out to all EPA employees during the exercise.



Attachment 8
 Environmental Protection Agency

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	EPA Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification	X			Exercised the notification of its alternate facility by notifying personnel at the facility prior to COOP personnel deployment.
e. FEMA Operations Center Notification	X			Exercised the notification of the FEMA Operations Center.
3. Debriefing	X			Used questionnaires completed by exercise participants to identify main strengths and areas for improvement.
Personnel				
4. COOP Personnel Participation	X			Exercised with 77 of its 109 COOP personnel. This is a 71 percent participation rate.



Attachment 8
 Environmental Protection Agency

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	EPA Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested its communications capabilities, including secure fax.
b. Communication with Internal Contacts	X			Exercised communication with internal contacts, including agency field offices.
c. Communication with External Contacts	X			Exercised communication with external contacts, including the Nuclear Regulatory Commission.
6. Vital Records	X			Tested access to vital records during the exercise.
7. Backup Power	X			Tested its backup power capabilities when its primary power source unintentionally went out, triggering the use of backup power for several hours.



Attachment 9
 General Services Administration

General Services Administration (GSA)

Forward Challenge 06 Test and Exercise Activities

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	GSA Action
Plans and Procedures				
1. Essential Functions	X			Exercised all six of its essential functions.
2. Activation and Notification Procedures				
a. Activation Procedures	X			Exercised its activation procedures on one morning of the exercise.
b. COOP Personnel Notification	X			Exercised the notification of its COOP personnel through an email sent on one morning of the exercise.
c. Non-COOP Personnel Notification		X		Reported exercising the notification of its non-COOP personnel but did not provide documentation substantiating this activity.



Attachment 9
 General Services Administration

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	GSA Action
2. Activation and Notification Procedures (continued)				
d. Alternate Facility Notification		X		Reported exercising the notification of its alternate facility personnel but did not provide documentation substantiating this activity.
e. FEMA Operations Center Notification	X			Exercised the notification of the FEMA Operations Center on one morning of the exercise.
3. Debriefing				
	X			Used questionnaires completed by exercise participants to identify main strengths and areas for improvement.
Personnel				
4. COOP Personnel Participation				
	X			Exercised with 92 of its 153 COOP personnel. This is a 60 percent participation rate.



Attachment 9
 General Services Administration

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	GSA Action
Resources				
5. Interoperable Communications				
a. Communications Capabilities	X			Tested multiple forms of communication capabilities, including cell phones and email.
b. Communication with Internal Contacts	X			Exercised communication with internal contacts, including non-COOP personnel.
c. Communication with External Contacts		X		Reported exercising communication with external contacts, but did not provide documentation substantiating this communication.
6. Vital Records	X			Tested access to vital records during the exercise.
7. Backup Power			X	Did not test its backup power during the exercise.

Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

November 2, 2007

Ms. Linda D. Koontz
Director, Information Management Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, D.C. 20548

Dear Ms. Koontz:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO's) draft report GAO 08-185SU entitled *Continuity of Operations: Selected Agencies Tested Various Capabilities During 2006 Governmentwide Exercise*. Technical comments have been provided under separate cover. We appreciate GAO's review of our previous comments on GAO's briefing slides and the changes made in this draft report in response to our comments.

The Department of Homeland Security agrees with GAO's one recommendation "to require agencies participating in future government wide exercises to document the specific test and exercise activities conducted." Further, the Department believes that the Federal Emergency Management Agency (FEMA) has complied with this recommendation with respect to Forward Challenge 2006 (FC 06) and will continue to do so in future exercises.

Federal Preparedness Circular 65 (FPC-65), dated June 15, 2004, is very specific on Federal Executive Branch Test, Training, and Exercise (TT&E) requirements. The FC 06 exercise was specifically designed to allow Departments and Agencies (D/As) to conduct their continuity of operations tests, training, and exercise activities in this internally and externally evaluated exercise.

FPC 65 states on page 8 that, "All agencies must plan, conduct, and document periodic tests, training, and exercises to demonstrate the plan's viability and identify deficiencies. Deficiencies and actions taken to correct them must be documented." FPC 65 states on page I -1 that, "Agencies must develop and maintain a COOP test, training and exercise program for conducting and documenting TT&E." FPC 65 provides an entire annex (Annex I) directing comprehensive components of an agency Test, Training and Exercise programs. All agencies were provided FPC 65 prior to the exercise. The Evaluation Plan (EVALPLAN) provided guidance to organizations to test and evaluate FC 06 in accordance with the standardized published Exercise Evaluation Guides (EEG) and the self-assessment checklist. The Exercise Evaluation Guide/self-assessment checklist, included specific requirements for a department and agency's COOP program. This Guide/checklist is very specific and included Green, Yellow, and Red evaluation ratings for performance of these requirements. Exercise guidance was very clear that the checklist was to be used to assist the departments and agencies in their exercise planning/development to meet the continuity requirements, and that the assessment would document to the President

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Appendix II
Comments from the Department of Homeland
Security

2

their ability to conduct these requirements. FPC 65 further requires all departments and agencies to document performance of continuity of operations exercise activities and include corrective actions in their Corrective Action Program (CAP). The FC 06 exercise was designed with the departments and agencies to facilitate the performance of their required essential functions and other supporting continuity of operations requirements.

The eight departments/agencies reviewed by GAO for this exercise are all Level 1 and 2 organizations and all were required to participate in the exercise, participate in the required assessments, with reports on their capabilities to be submitted to the President. Again, FPC 65 requires all organizations that participate in COOP exercises to document their performance of exercise objectives in a Corrective Action Plan (CAP) and to develop and document corrective actions.

Each agency evaluation team was made up of external and internal evaluators. The external evaluators were responsible for providing feedback to FEMA's National Continuity Programs (NCP) to develop the external After Action Reports (AARs); and the internal evaluators were provided the same forms/training to conduct their internal portion of the evaluation to include self-assessments on Primary Mission Essential Functions and internally developed Master Scenario Events Lists. They were also directed to prepare an internal AAR, which was to be provided to NCP.

GAO indicated that D/As tested, but did not document, many components of their continuity exercises. GAO however, also acknowledged during their exit conference that many components were documented by external evaluators but not to GAO auditing standards. Thus, the level of documentation for Forward Challenge 06 was higher than reported by GAO, sufficient to evaluate performance and general lessons learned, but perhaps not uniformly at the level sufficient to meet GAO standards.

FEMA intends to continue to refine upon its assessment program that was initiated during the Forward Challenge 2004 exercise, giving specific attention to improving the level of evaluation documentation.

DHS welcomes the opportunity to provide GAO with appropriate and meaningful access so that GAO may effectively assess emergency preparedness and response activities. As an example, GAO observers were provided access to the recent TOPOFF 4 exercises which were held October 15-20, 2007.

Thank you again for the opportunity to comment on this draft report and we look forward to working with you on future homeland security issues.

Sincerely,



Steven J. Pecinovsky
Director
Departmental GAO/OIG Liaison Office

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