

GAO

Report to the Chairman, Committee on
Government Reform, House of
Representatives

May 2006

CONTINUITY OF OPERATIONS

Selected Agencies
Could Improve
Planning for Use of
Alternate Facilities
and Telework during
Disruptions





Highlights of [GAO-06-713](#), a report to the Chairman, Committee on Government Reform, House of Representatives

Why GAO Did This Study

To ensure that essential government services are available in emergencies, federal agencies are required to develop continuity of operations (COOP) plans. The Federal Emergency Management Agency (FEMA), within the Department of Homeland Security (DHS), is responsible for overseeing and assessing the status of COOP capabilities of federal executive branch agencies. It has developed guidance stating that agency COOP plans must designate alternate facilities and prepare personnel for unannounced relocation to these facilities. The guidance also states that agencies should consider the use of telework in their continuity plans.

GAO was asked to follow up on its previous work on COOP planning and determine, among other things, to what extent (1) 6 selected agencies prepared their alternate facilities and (2) 23 major agencies made preparations necessary to effectively use telework in emergency situations.

What GAO Recommends

GAO is making recommendations to DHS aimed at improving the assessment and oversight of agency continuity planning and developing guidance on including telework in such planning. In commenting on a draft of this report, DHS partially agreed with GAO's recommendations and described actions to implement them.

www.gao.gov/cgi-bin/getrpt?GAO-06-713.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Linda Koontz at (202) 512-6240 or koontzl@gao.gov.

CONTINUITY OF OPERATIONS

Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework during Disruptions

What GAO Found

All six agencies GAO reviewed took steps to prepare their alternate facilities for use in emergencies. However, none of the agencies followed all of FEMA's guidance. For example, none conducted all the applicable tests and exercises, such as annual exercises that involve moving COOP personnel to alternate facilities. Further, agencies did not fully identify the resources necessary to support their essential functions, which reduces assurance that their facilities are adequately prepared.

Although individual agencies are ultimately responsible for preparing their plans and alternate facilities, FEMA's limited efforts to oversee and assess agency COOP capabilities contributed to agencies' incomplete compliance with its guidance. According to an official from the Department of Homeland Security, FEMA recently developed a schedule of oversight activities that includes conducting assessments of agency continuity plans starting in July 2006. However, the assessment's methodology is not yet finalized. If FEMA does not develop an assessment methodology that effectively evaluates agencies' compliance, it will have limited assurance that agencies have taken the steps necessary to ensure that they will be able to perform essential government operations following a disruption.

Although agencies are not required to use telework in continuity planning, 9 of the 23 agencies surveyed reported plans for essential team members to telework during a COOP event, compared with 3 in GAO's previous survey. However, few documented that they made the necessary preparations to effectively use telework during such an event (see table). For example, only one agency documented that it had notified its team members of their expectation to telework during a COOP event. The lack of specific guidance on preparations for telework during such an event contributed to the low levels of preparation that agencies reported. If agencies do not make adequate preparations, they may not be able to use telework effectively to ensure the continuity of their essential functions in emergencies.

Agency Responses to Selected Questions on Telework in COOP Plans

Question	Year	Yes	Yes (no doc) ^a	No
Are any of the agency's essential team members expected to telework in a COOP event?	2005	3	6	14
	2004 ^b	1	2	19
Were staff informed of their responsibility to telework during a COOP event?	2005	1	10	12
	2004	1	3	18
Has the agency ensured that it has adequate technological capacity for staff to telework during a COOP event?	2005	0	14	9
	2004	0	5	17
Will the agency provide technological assistance to staff during a COOP event?	2005	3	11	9
	2004	0	5	17
Has the agency tested the ability of staff to telework during a COOP event?	2005	3	7	13
	2004	0	2	20

Source: GAO.

^a Agencies responded positively but did not provide adequate documentation in support.

^b In 2004, one agency did not respond, resulting in a total of 22 responses.

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Abbreviations

COOP	continuity of operations
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
FPC	Federal Preparedness Circular
OPM	Office of Personnel Management
PDD	Presidential Decision Directive

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United States Government Accountability Office
Washington, DC 20548

May 11, 2006

The Honorable Tom Davis
Chairman
Committee on Government Reform
House of Representatives

Dear Mr. Chairman:

As you know, essential government services can be interrupted by a range of events, including terrorist attacks, severe weather, or building-level emergencies. Federal agencies are required by Presidential Decision Directive (PDD) 67 to develop plans for ensuring the continuity of such services in emergency situations. This directive also designated the Federal Emergency Management Agency (FEMA) as lead agent for executive branch continuity of operations (COOP) planning, which includes the responsibility for formulating guidance on such planning and for assessing the status of executive branch COOP capabilities.¹

In response, FEMA issued COOP guidance to agencies in July 1999: Federal Preparedness Circular (FPC) 65. The circular states that, in order to have a viable COOP capability, agencies should identify their essential functions, which then provide the basis for subsequent planning steps. The circular further states that agencies must designate alternate facilities as part of their continuity plans and prepare their personnel for the possibility of unannounced relocation of essential functions to these facilities.

In June 2004, FEMA released an updated version of FPC 65, providing additional guidance to agencies on each of the topics covered in the original guidance, including an annex on alternate facilities. According to the guidance, an agency must identify an alternate facility that provides sufficient space for relocated personnel to perform essential agency functions during a COOP event. The guidance also directs agencies to identify the levels of staff and resources required at the alternate facility to support the performance of these functions. The identification of staff and

¹Although the 2004 version of FPC 65 refers to FEMA as the “lead agent” for federal executive branch continuity efforts, the 1999 version used the term “executive agent.”

resources—including equipment, critical information systems and data, and vital records—establishes the preparation requirements for an alternate facility. For example, in order for an agency to determine that it has an adequate number of computers present at the alternate facility, it must first establish how many are required to support personnel in the performance of essential functions. Once critical resources are identified, pre-positioning them is necessary to preparing an alternate facility.

The 2004 version of FPC 65 also states that agencies should consider telework (also known as work-at-home or flexiplace) as an option in their COOP planning. Although FPC 65 does not require agency plans to incorporate telework, using this option can allow employees to contribute to the performance of agency essential functions without having to physically relocate to an alternate operating facility. As we reported in April 2004, telework is an important and viable option for federal agencies in continuity planning and implementation efforts, especially as the duration of an emergency event is extended.² We recommended in that report that the Secretary of Homeland Security direct the Under Secretary for Emergency Preparedness and Response to complete efforts to revise federal COOP guidance to more fully address human capital considerations by incorporating six organizational actions, the scope of which included telework.

In 2002 and 2004, we reviewed the extent to which agency COOP plans complied with FEMA's continuity guidance at the request of the Chairman, House Committee on Government Reform. In both reviews, we reported that agency plans did not generally comply with FEMA's guidance. In 2004, we also surveyed agencies to determine how they planned to use telework during COOP events and reported that, although agencies were not required to address telework in their continuity plans, 2 of the 22 responding agencies did so in the plans that were in place on May 1, 2004.³

For the current review, as agreed with the committee, our objectives were to determine to what extent agencies have

²GAO, *Human Capital: Opportunities to Improve Federal Continuity Planning Guidance*, [GAO-04-384](#) (Washington, D.C.: Apr. 20, 2004).

³GAO, *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: Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies*, [GAO-05-619T](#) (Washington, D.C.: Apr. 28, 2005).

-
- prepared alternate facilities where they can perform their essential functions in emergencies and
 - made preparations necessary to effectively use telework in emergency situations.

To achieve our first objective, we obtained and reviewed headquarters contingency plans from 23 of the largest civilian departments and agencies to identify the population of alternate facilities; verified alternate facilities information with each agency; and selected, from the population of alternate facilities, six alternate facilities illustrating variations in several attributes, including agency budget size, distance from respective primary work facility, and facility type. For the selected alternate facilities, we evaluated compliance with FPC 65 criteria by analyzing agency COOP plans and other documentation and by visiting alternate facilities. Finally, we obtained and analyzed FEMA's COOP guidance and documents describing its efforts to provide oversight and assessments of federal planning efforts, and conducted interviews with FEMA officials to clarify the activities described in these documents.

For our second objective, we reviewed prior GAO work on telework to determine key practices for the development of an effective telework program; developed a series of questions regarding agency plans and preparations to use telework during a COOP event; surveyed agency officials responsible for continuity planning at 23 of the largest civilian departments and agencies to determine to what extent key telework practices were used in making continuity preparations; reviewed supporting documentation submitted by agency officials to support their responses; and created tables that compared this year's survey responses with those from our previous survey in 2004.

We conducted our review between July 2005 and February 2006 in the Washington, D.C., area and at several agency alternate facilities in accordance with generally accepted government auditing standards.

On April 13, we provided your office with a classified briefing on the results of this review. The purpose of this letter is to provide you with the unclassified material from our briefing. (See app. I.)

In summary, all six agencies we reviewed had identified alternate facilities and took steps to prepare their alternate facilities for use in emergencies. For example, most agencies documented plans and procedures related to these facilities, including site preparation and activation plans. However,

none of the agencies followed all of FEMA's guidance. For example, none conducted all of the applicable tests and exercises outlined in FPC 65, including annual exercises that incorporate the deliberate and preplanned movement of COOP personnel to the agencies' alternate facilities. Further, agencies did not fully identify the levels of resources necessary to support their essential functions (e.g., the number of computers to support the performance of essential functions), creating a lack of assurance that the agencies' facilities are adequately prepared.

Although each agency is responsible for developing a viable COOP plan and ensuring that its alternate facilities are adequately prepared, FEMA's limited efforts to oversee and assess agency COOP capabilities contributed to the agencies' lack of compliance with all of the FPC 65 guidance. For example, FEMA has continued to rely on agency-reported information as the basis for its assessments. In addition, two planned oversight efforts—a readiness reporting system operated by FEMA and a review of agency essential functions by the White House—have been delayed.

According to an official from the Department of Homeland Security (DHS)—the parent agency of FEMA—FEMA plans to expand its oversight activities to include the evaluation and assessment of individual agency COOP capabilities. As part of the methodology for an upcoming interagency exercise, known as Forward Challenge 06, FEMA officials anticipate using independent observers to evaluate agency plans and their implementation during the exercise. In addition, officials plan to conduct individual agency COOP assessments starting in July 2006. However, details regarding the assessment's methodology have yet to be finalized. If FEMA does not develop an assessment methodology that evaluates agencies' compliance with FPC 65—including the extent to which agencies (1) identify essential functions; (2) identify the levels of staff and resources required at their alternate facilities; and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency—it will have limited assurance that agencies have taken the steps necessary to ensure that they will be able to perform essential government operations following a disruption.

Finally, more agencies reported plans for essential team members to telework during a COOP event than in our previous survey, but few documented that they made the necessary preparations to effectively use telework during an emergency. Nine of the 23 agencies reported that some of their essential team members are expected to telework during such an event. However, only 1 agency documented that it had communicated this

expectation to its emergency team members. In addition, only 3 of the 23 agencies documented testing the ability of staff to telework during a COOP event.

The lack of specific guidance on the steps that agencies should take to ensure that they are fully prepared to use telework during a COOP event contributed to the low levels of preparation that agencies reported. FEMA recently disseminated guidance to agencies regarding the incorporation of pandemic influenza considerations into COOP planning. However, while the guidance does suggest the use of telework during such an event, it does not address the steps agencies should take when preparing to use telework during a COOP event. If agencies do not make adequate preparations, they may not be able to use telework effectively to ensure the continuity of their essential functions in emergencies.

Recommendations for Executive Action

To ensure that agencies are adequately prepared to continue performing essential functions following an emergency, we recommend that the Secretary of Homeland Security direct the FEMA Director to improve the oversight of agency COOP planning by taking the following three actions:

- Before the upcoming interagency exercise, conduct an assessment of the COOP plans of the six agencies whose alternate facilities were included in our review and report any deficiencies to the head of the agency for correction.
- Develop a methodology for individual agency COOP assessments that independently evaluates executive branch agencies' compliance with FPC 65, including the extent to which agencies (1) identify essential functions; (2) identify the levels of staff and resources required at their alternate facilities; and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency. The methodology should include a mechanism for reporting any deficiencies to the head of the agency for correction.
- Establish a time line for developing, in consultation with the Office of Personnel Management (OPM), guidance on the steps that agencies should take to adequately prepare for the use of telework during a COOP event.

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 DHS partially agreed with our recommendations.

In commenting on oversight of COOP planning, the Director wrote that PDD 67 directed that an interagency advisory group shall provide coordination, oversight, and management for COOP-related activities of executive branch agencies. He added that although FEMA is designated as chair of this group, participating agency coordinators are designated with the authority to represent and commit their agencies in COOP-related matters. However, as we point out in our report, according to FPC 65, the presidential directive also established FEMA as the lead agency for executive branch continuity planning. Included in this responsibility is the specific requirement for FEMA to oversee and assess the status of COOP capabilities of executive branch agencies.

In responding to our first recommendation, the Director stated that DHS partially agreed and that FEMA will be conducting assessments of the six agencies in conjunction with its upcoming interagency exercise.

Regarding our recommendation on developing an assessment methodology, the Director wrote that FEMA currently has an assessment program and a methodology that includes (1) a self-assessment tool to assist senior leaders in performing internal assessments, (2) the governmentwide exercise planned for June 2006, and (3) a plan for an expanded comprehensive department and agency assessment program. He added that FEMA plans to continually refine this methodology and expand the program through additional funding and resources. In addition, the Director stated that the agency's efforts are constrained by resources. He stated that to improve the readiness of the federal government's COOP program, additional resources are required to support the large number of federal offices and facilities that could benefit from recurring COOP assessments.

However, while these steps outline an overall approach to assessing agency plans, they do not constitute a methodology for assessing agency compliance with FPC 65—including the extent to which agencies (1) identify essential functions; (2) identify levels of staff and resources required at their alternate facilities; and (3) plan, conduct, and document the necessary tests and exercise at the appropriate scope and frequency, as we have recommended. Without such a methodology, the agency will have limited assurance that agencies have taken the necessary steps to prepare for an emergency. While we did not review the adequacy of FEMA's resources for conducting oversight of agency planning, DHS

should review how FEMA prioritizes its currently available funding for COOP activities and to the extent it agrees that additional funding is needed, pursue justifying increases.

In responding to our recommendation on developing guidance on agencies' use of telework, the Director partially agreed and stated that FEMA will coordinate with OPM in the development of a timeline for further telework guidance. In addition, he stated that both FEMA and OPM have provided guidance on the use of telework. However, as stated in our report, present guidance does not address the preparations agencies should make for using telework during emergencies and it is unclear whether and when FEMA will release such guidance.

The Director also included technical comments that we have addressed, as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, and the Director of the Office of Personnel Management, and will make copies available to others on request. In addition, the report will 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. Key contributions to this report were made by James R. Sweetman Jr., Assistant Director; Barbara Collier; Nick Marinos; and Kim Zelonis.

Sincerely yours,



Linda D. Koontz
Director, Information Management Issues

Appendix I: Unclassified Version of April 13, 2006, Briefing to Staff of the House Committee on Government Reform



Continuity of Operations: Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework During Disruptions

Briefing for the Staff of the
Committee on Government Reform,
House of Representatives

April 13, 2006



Outline of Briefing

Introduction

Objectives, Scope, and Methodology

Results in Brief

Background

Results

- Alternate Facilities Compliance
- Telework

Conclusions

Recommendations

Agency Comments and Our Evaluation

Attachment 1: Agencies Participating in Telework Survey



Introduction

Federal operations and facilities have been disrupted by a range of events, including

- the terrorist attacks on September 11, 2001, and at Oklahoma City;
- 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

In October 1998, Presidential Decision Directive (PDD) 67 identified the Federal Emergency Management Agency (FEMA) as the executive agent for federal COOP planning across the federal executive branch.

FEMA's responsibilities include

- formulating guidance for agencies to use in developing viable plans,
- coordinating interagency exercises and facilitating interagency coordination as appropriate, and
- overseeing and assessing the status of COOP capabilities across the executive branch.

In July 1999, FEMA first issued Federal Preparedness Circular (FPC) 65. FPC 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. Some of the elements of a viable continuity of operations capability, according to the guidance, include the identification of essential functions; provision for alternate facilities; provision of interoperable communications; availability of vital records; and conduct of regular tests, training, and exercises.



Introduction

FEMA released an updated version of FPC 65 in June 2004, providing additional guidance to agencies on each of the topics covered in the original guidance, including an annex on alternate facilities. The annex states that all agencies must designate alternate operating facilities as part of their COOP plans and prepare their personnel for the possibility of an unannounced relocation to these facilities. When agencies identify and prepare their alternate facilities, they should consider a number of items, including geographical location of the facility, the availability of necessary logistics and infrastructure, and the safety and security of relocated personnel, in an effort to ensure that essential operations can be performed during an emergency.

Telework can allow employees to contribute to the performance of agency essential functions without having to physically relocate to an alternate operating facility. Although the 2004 version of FPC 65 does not require agencies to use telework (also known as work-at-home or flexiplace) as an element of their COOP planning, it states that agencies should consider telework as an option. According to the Office of Personnel Management's (OPM) guidance on Washington, D.C., area closures, one of the major benefits of a telework program is the ability of employees to continue working at their alternative work sites during a disruption to operations.¹ In recognition of the growing importance of teleworkers to the continuity of agency operations, OPM states that agencies may require personnel to telework when the agency is closed.

¹ OPM, *Washington, DC, Area Dismissal or Closure Procedures* (Washington, D.C.: November 2005).



Objectives, Scope, and Methodology

Objectives

In 2002 and 2004, we reviewed agency COOP plan compliance with FEMA's guidance at the request of the Chairman, House Committee on Government Reform. In both reviews we reported that agency plans did not generally comply with FEMA's guidance. In 2004, we also conducted a survey of agency planned use of telework during COOP events and reported that, although not required to do so, 2 of the 22 responding agencies addressed telework in the continuity plans that were in place on May 1, 2004.

For the current review, as agreed with the Committee, our objectives were to determine to what extent agencies have

- prepared alternate facilities where they can perform their essential functions in emergencies and
- made preparations necessary to effectively use telework in emergency situations.



Objectives, Scope, and Methodology

To assess the preparation of agency alternate facilities, we

- obtained and reviewed headquarters contingency plans from 23 of the largest civilian departments and agencies to identify the population of alternate facilities;
- verified alternate facilities information with each agency;
- selected, from the population of alternate facilities, six alternate facilities illustrating variations in several attributes, including agency budget size, distance from respective primary work facility, and facility type;¹
- for the selected alternate facilities, evaluated compliance with FPC 65 guidance through analysis of agency COOP plans, other documentation, and through observation during alternate facility visits; and
- obtained and analyzed FEMA's COOP guidance and documents describing its efforts to provide oversight and assessments of federal planning efforts, and conducted interviews with FEMA officials to clarify the activities described in these documents.

¹ Because of the method of selection for the six alternate facilities we reviewed, we cannot conclude that our results represent any larger group of alternate facilities. However, the six facilities we reviewed illustrate some of the ways in which agencies comply with FPC 65 guidance related to alternate facility identification and preparation.



Objectives, Scope, and Methodology

For each of the six selected agency alternate facilities, we assessed compliance with FPC 65 guidance using questions based on the guidance. These questions address topics related to the preparation of an alternate operating facility:

- site selection;
- facility plans and procedures;
- employee health, safety, security, and emotional well-being;
- space;
- equipment;
- vital records;
- voice and data communications; and
- tests and exercises.

These eight areas are our categorization of topics covered in the FEMA guidance on alternate facilities. Each topic area included two to seven questions.



Objectives, Scope, and Methodology

We used the following steps to evaluate each agency alternate facility's compliance and assign answers to each of the questions:

- Documents were reviewed and compared independently by two analysts. A third analyst reviewed documentation where the initial two could not reach consensus.
- Initial assessments were shared with each agency during structured interviews.
- Agency officials had the opportunity to provide additional documentation to demonstrate compliance.
- Analysts then visited alternate facilities to measure compliance with agency plans and continuity guidance (e.g., identify the pre-positioning of equipment at the facilities).
- Any supplemental information provided by the agencies was again reviewed by multiple analysts.



Objectives, Scope, and Methodology

Based on the agency contingency plans, other related documents, and physical observation during facility visits, we used content analysis to assign answers to the FPC 65-based questions. Answers were assigned as follows:

- yes (compliant with all of the guidance related to that question),
- no (not compliant with any of the guidance related to that question),
- partial (compliant with some, but not all of the guidance).

Based on this analysis, we created tables that summarized the results of the six assessments. In some cases, agencies had not established clear requirements (for example, they did not fully identify the necessary equipment, vital records, or number of personnel needed to perform essential functions from their alternate facilities). In those cases, we were unable to determine compliance; these are indicated by footnotes in our summary tables.



Objectives, Scope, and Methodology

To accomplish our objective on the use of telework, we

- reviewed prior GAO work on telework¹ to determine key practices for the development of an effective telework program;
- developed a series of questions regarding agency plans to use telework during a COOP event;
- surveyed agency officials responsible for continuity planning at 23 of the largest civilian departments and agencies² to determine to what extent telework key practices were used in making continuity preparations;
- reviewed supporting documentation submitted by agency officials to support their responses; and
- created tables that compared this year's survey responses with those from our previous survey in 2004.³

We conducted our review between July 2005 and February 2006 in the Washington, D.C., area and at several agency alternate facilities, in accordance with generally accepted government auditing standards.

¹ GAO, *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts*, [GAO-03-679](#) (Washington, D.C.: July 18, 2003).

² The 23 agencies that participated in the survey are listed in attachment 1.

³ 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).



Results in Brief: Objective 1

All six agencies we reviewed took steps to prepare their alternate facilities for use in emergencies. For example, most agencies documented plans and procedures related to these facilities, including site preparation and activation plans. However, none of the agencies followed all of FEMA's guidance. For example, none conducted all the applicable tests and exercises required by FPC 65, including annual exercises that incorporate the deliberate and preplanned movement of COOP personnel to an alternate facility. Further, agencies did not fully identify the levels of resources necessary to support their essential functions, creating a lack of assurance that their facilities are adequately prepared.

While individual agencies are responsible for developing a viable COOP plan and ensuring that their alternate facilities are adequately prepared, FEMA's limited efforts to oversee and assess agency COOP capabilities contributed to agencies' lack of compliance with all of the FPC 65 guidance. For example, FEMA has continued to rely on agency-reported information as the basis for its assessments. In addition, two planned oversight efforts—a readiness reporting system operated by FEMA and a review of agency essential functions by the White House—have been delayed.



Results in Brief: Objective 1

FEMA recently developed a schedule of COOP oversight activities that includes conducting individual agency COOP assessments starting in July 2006. However, details regarding the assessment's methodology have yet to be finalized. If FEMA does not develop an assessment methodology that evaluates agencies' compliance with FPC 65—including the extent to which agencies (1) identify essential functions, (2) identify the levels of staff and resources required at their alternate facilities, and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency—it will lack assurance that agencies have taken the steps necessary to ensure that they will be able to perform essential government operations following a disruption.



Results in Brief: Objective 2

More agencies reported plans for essential team members to telework during a COOP event than in our previous survey, but few documented that they made the necessary preparations to effectively use telework during an emergency. While FPC 65 does not require agencies to telework during a COOP event, it does state that they should consider the use of telework in their continuity plans and procedures. All of the 23 agencies that we surveyed indicated that they considered telework as an option during COOP planning. In addition:

- 9 of the 23 agencies reported that some of their COOP essential team members are expected to telework during a COOP event. However, only 1 agency documented that it had notified its team members of their expectation to telework during a COOP event.
- None of the 23 agencies demonstrated that they can ensure adequate technological capacity to allow designated personnel to telework during a COOP event.
- Only 3 of the 23 agencies documented testing the ability of staff to telework during a COOP event.

The lack of specific guidance from FEMA on the preparations necessary to ensure an effective telework program contributed to the low levels of preparation that agencies reported. If agencies do not make adequate preparations, they may not be able to use telework effectively to ensure the continuity of their essential functions in emergencies.



Results in Brief
Recommendations and Agency Comments

We are making recommendations to the Secretary of Homeland Security aimed at improving the assessment and oversight of agency continuity planning and developing guidance on including telework in such planning.

In written comments provided on a draft of this briefing, the Director of the Department of Homeland Security's GAO/OIG Liaison Office commented that departments and agencies are responsible for their own COOP plans. We agree and we clarified the briefing to reflect this point. The Director also commented on recent actions FEMA has taken to fulfill its responsibilities for executive branch continuity planning. The Director's comments, however, did not address FEMA's responsibility to oversee and assess the status of COOP capability across the federal executive branch, which is outlined in FPC 65. Finally, the Director identified recent guidance related to telework. However, none of the guidance addresses the preparations agencies should take to use telework effectively during an emergency.



Background Guidance

In 1988, Executive Order 12656 established policy for preparedness to address emergencies that affect national security, including technological emergencies and natural disasters. The order identified the National Security Council as the agency responsible for developing and administering a national security emergency preparedness policy, with the assistance of FEMA.

In October 1998, according to FEMA officials, PDD 67 established a requirement that agencies have COOP plans in place by October 1999. It identified FEMA as the executive agent for federal COOP planning across the federal executive branch, responsible for formulating guidance for agencies to use in developing viable plans, coordinating interagency exercises and facilitating interagency coordination as appropriate, and overseeing and assessing the status of COOP capabilities across the executive branch. FEMA's Office of National Security Coordination executes these COOP responsibilities.

In July 1999, FEMA issued FPC 65 to assist agencies in meeting the deadline established by the directive. The guidance stated that COOP planning should address any emergency or situation that could disrupt normal operations, including localized emergencies; thus, it extended the scope of the required planning beyond the national emergencies described in the Executive Order. The guidance included topic areas such as plans and procedures; identification of essential functions; delegations of authority; orders of succession; alternate facilities; interoperable communications; vital records and databases; and tests, training, and exercises. In June 2004, FEMA released an updated version of FPC 65, providing additional guidance to agencies on each of the topics covered in the original guidance.



**Background
Guidance**

FPC 65 states that agencies must identify essential functions and develop plans that ensure that these functions will resume within 12 hours of COOP activation and continue for up to 30 days. The guidance states that the identification and prioritization of essential functions are prerequisites for continuity planning because these establish the parameters that drive the agency's efforts in all other planning areas.

Furthermore, the guidance states that an agency must identify an alternate facility that provides sufficient space for relocated personnel to perform agency essential functions. The guidance also directs agencies to identify the levels of staff and resources required at the alternate facility to support the performance of these functions. The identification of staff and resources—including equipment, critical information systems and data, and vital records—establishes the preparation requirements for an alternate facility. For example, in order for an agency to determine that it has an adequate number of computers present at the alternate facility, it must first establish how many are required to support personnel in the performance of essential functions. Once critical resources are identified, pre-positioning them is necessary to preparing an alternate facility.

The guidance requires agencies to review their alternate facilities for suitability and functionality. Tests and exercises allow specific aspects of COOP plans, procedures, and facilities to be assessed, validated, or identified for subsequent correction. Periodic testing also ensures that equipment and procedures are maintained in a constant state of readiness.



Background Guidance

The guidance states that an agency must select an alternate facility and develop site preparation and activation plans that provide the agency with the capability to perform its essential functions within 12 hours of COOP activation. The following bullets categorize key areas identified in FPC 65 that an agency must consider when selecting and preparing its alternate facility:

- **Site selection.** Before an agency selects a location for its alternate facility, it should perform an all-hazard risk assessment for each facility considered to determine, among other things, any natural hazards that may affect the facility and the ability to secure the facility against crime, sabotage, and terrorist attacks. When selecting a location, an agency should consider access to essential resources—such as food, water, and fuel—from the alternate facility. Finally, the agency should be able to run emergency power at the facility.
- **Facility plans and procedures.** An agency must have detailed site preparation and activation plans in order to achieve full operational capability within 12 hours of notification. An agency must have plans (1) for notifying its alternate facility upon COOP activation of plans to relocate, (2) for reception and in processing of COOP personnel upon arrival, and (3) to address housing for the relocated personnel.
- **Employee health, safety, security, and emotional well-being.** An agency must provide consideration for the health, safety, and emotional well-being of its relocating COOP personnel, and ensure that physical security at the alternate facility meets all requirements established by annual threat assessments and physical security surveys.



Background Guidance

- **Space.** An agency should ensure that space at its alternate facility is adequate for supporting the number of relocating COOP personnel identified in the agency's staffing plans.
- **Equipment.** An agency should identify the critical resources—including information technology (IT) and telecommunications equipment—needed to perform essential functions. An agency must pre-position critical resources at its alternate facility and have procedures for ordering equipment not already in place.
- **Vital records.** Agency personnel must have access to electronic and hard-copy vital records and databases needed to perform the agency's essential functions from the alternate facility. In order for an agency to establish access requirements for vital records and databases at the alternate facility, it must develop a vital records inventory with location and access information for each vital record.
- **Voice and data communications.** An agency must have redundant communications providing the capability to communicate with key contacts, including agency staff, critical customers, and the public. It must also provide access to a local area network, electronic vital records, critical information systems and data, and internal and external e-mail and archives.
- **Tests and exercises.** An agency must conduct and document tests and exercises of its COOP plans and procedures to ensure that, among other things, requirements at the alternate facility are adequate for performing essential functions.



Background Previous GAO Reports

We previously reported on federal agency headquarters contingency plans in place in May 2004 at the request of the Chairman, House Committee on Government Reform.¹ At that time, we determined that agencies had made progress in improving compliance with FPC 65, but significant weaknesses remained. For example, only 3 out of the 45 agency COOP plans we reviewed documented that their alternate facilities could provide previously identified equipment and space for COOP personnel responsible for performing essential functions. In addition, only 8 out of 45 COOP plans we reviewed adequately documented that the agencies could provide interoperable communications from their alternate facilities with internal and external organizations, critical customers, and the public.

During our previous reviews of agency COOP plans, we reported that insufficient oversight by FEMA contributed to agencies' lack of compliance with the continuity guidance. Specifically, we noted that FEMA had not conducted an assessment of agency contingency plans since 1999. In response, FEMA officials reported that they were developing a readiness reporting system—a system used to collect data from agencies on the readiness of their continuity plans that would evaluate compliance with the guidance—which was to be completed in March 2005. The system was expected to be operational and certified by October 2005, at which time there would be seven locations (including two FEMA locations) using the system.

¹ 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: Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies*, [GAO-05-619T](#) (Washington, D.C.: Apr. 28, 2005).



Background
Telework

Telework, also referred to as telecommuting or flexiplace, has gained widespread attention over the past decade in both the public and private sectors as a human capital flexibility that offers a variety of potential benefits to employers, employees, and society. In a 2003 report to Congress on the status of telework in the federal government, the Director of OPM described telework as “an invaluable management tool which not only allows employees greater flexibility to balance their personal and professional duties, but also allows both management and employees to cope with the uncertainties of potential disruptions in the workplace, including terrorist threats.”¹ The 2005 OPM report on telework notes the importance of telework in responding flexibly to emergency situations, as demonstrated in the wake of the devastation caused by Hurricane Katrina, when telework served as a tool to help alleviate the issues caused by steeply rising fuel prices nationwide.²

¹ OPM, *Report to the Congress: The Status of Telework in the Federal Government* (Washington, D.C.: January 2003).

² OPM, *Report to the Congress: The Status of Telework in the Federal Government* (Washington, D.C.: 2005).



**Background
Telework**

According to OPM's guidance on Washington, D.C., area closures, one of the major benefits of a telework program is the ability of employees to continue working at their alternative work sites during a disruption to operations.¹ In recognition of the growing importance of teleworkers to the continuity of agency operations, OPM states that agencies may require personnel to telework when the agency is closed. According to OPM guidance, telework enabled employees to continue working after being displaced during events such as the terrorist attacks and subsequent anthrax problems of 2001.²

In November 2005, the White House issued a national strategy to address the threat of pandemic influenza.³ The strategy states that social distancing measures may be appropriate public health interventions for infection control and containment during a pandemic outbreak. Telework is an example of social distancing. The strategy requires federal departments and agencies to develop and exercise preparedness and response plans that take into account the potential impact of a pandemic on the federal workforce. It also tasks the Department of Homeland Security (DHS)—the parent department of FEMA—with developing plans to implement the strategy in regard to domestic incident management and federal coordination.

¹ OPM, *Washington, DC, Area Dismissal or Closure Procedures* (Washington, D.C.: November 2005).

² OPM, *Telework: A Management Priority, A Guide for Managers, Supervisors, and Telework Coordinators* (Washington, D.C.: May 2003).

³ Homeland Security Council, *National Strategy for Pandemic Influenza* (Washington, D.C.: Nov. 1, 2005).



**Background
Telework**

As we reported in April 2004, telework is an important and viable option for federal agencies in COOP planning and implementation efforts, especially as the duration of an emergency event is extended.¹ In a July 2003 report, we defined 25 key telework practices for implementation of successful federal telework programs.²

In our April 2005 report on continuity of operations, we reported that although agencies were not required to use telework in their continuity plans, 1 of the 21 agency continuity plans in place on May 1, 2004, documented the agency's intention to address some essential functions through telework.³ In addition, 10 agencies reported that they intended to use telework following a COOP event, but those intentions were not documented in their continuity plans. The plans reviewed were created before the issuance of FEMA's revised continuity planning guidance, which includes the recommendation that agencies consider options such as work-at-home and virtual offices when establishing continuity plans.

¹ GAO, *Human Capital: Opportunities to Improve Federal Continuity Planning Guidance*, [GAO-04-384](#) (Washington, D.C.: Apr. 20, 2004).

² GAO, *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts*, [GAO-03-679](#) (Washington, D.C.: July 18, 2003).

³ 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).



Objective 1: Alternate Facilities Compliance

All six agencies we reviewed took steps to prepare their alternate facilities using practices identified in the FPC 65 guidance. Agency use of these practices, which fall into the eight topic areas presented earlier, are presented in the following slides.

Among the eight areas, the extent to which agencies performed the practices varied. For example, most agencies documented plans and procedures related to their alternate facilities, including site preparation and activation plans. In contrast, none conducted all the applicable tests and exercises required by FPC 65, including annual exercises that incorporate the deliberate and preplanned movement of COOP personnel to an alternate facility. Furthermore, agencies did not fully identify the levels of resources necessary to support their essential functions.

Although individual agencies are responsible for developing a viable COOP plan and ensuring that their alternate facilities are adequately prepared, FEMA's limited efforts in overseeing and assessing agency COOP capabilities contributed to agencies' lack of compliance with all of the FPC 65 guidance.



Objective 1: Alternate Facilities Compliance Site Selection

Site Selection

FPC 65 states that agencies must identify and prepare alternate facilities as part of their COOP plans. The guidance requires that if the selected facility is not owned or leased by the agency, a signed memorandum of agreement/understanding (MOA/MOU) must be prepared with the owner or occupant of the facility and reviewed annually. Furthermore, agencies should consider access from the alternate facility to essential resources—such as food, water, fuel, medical facilities, and municipal services. Agencies should also have the ability to run emergency power at their alternate facilities. When selecting their alternate facilities, agencies should perform an all-hazard risk assessment for any facility considered for COOP use. This assessment should consist of an analysis that includes identification of all natural hazards that may affect each facility.

All six agencies identified their alternate facilities, and the one agency that shares its alternate facility with its owners had a documented MOA. Most agencies considered access to essential resources and had the ability to run emergency power. However, only one of the agencies documented that it had performed the required all-hazard risk assessments when selecting the identified alternate facilities. If an agency does not conduct an all-hazard risk assessment before selecting a facility, it may select a site that is unduly susceptible to (1) natural hazards; (2) accidents, such as releases of hazardous materials; (3) crime, sabotage, and terrorist attacks; or (4) inadequate capabilities of on-site and/or local first responders to accommodate the needs of the relocating agency.



Objective 1: Alternate Facilities Compliance
Site Selection

Site Selection: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency identify an alternate facility as a part of its COOP plan?	6	0	0	0
If an alternate facility is not owned or leased by the agency, does the agency have a signed Memorandum of Agreement/Understanding (MOA/MOU)?	1	0	0	5
Did the agency consider access to essential resources such as food, water, fuel, medical facilities, and municipal services from the alternate facility?	5	1	0	0
Does the agency have the ability to run emergency power at the alternate facility to allow essential functions and operations to continue?	4	1	0	1 ^a
Did the agency perform an all-hazard risk assessment for the alternate facility?	1	2	3	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.

^a One agency documented that it would relocate to its alternate facility selected for this assessment only if the building is operational; otherwise it would relocate to one of its other alternate facilities.



Objective 1: Alternate Facilities Compliance Facility Plans and Procedures

Facility Plans and Procedures

FPC 65 states that agencies must have detailed site preparation and activation plans in order to achieve full operational capability within 12 hours of notification. Additionally, the agency must plan for notifying the alternate facility upon COOP activation and provide instructions to COOP personnel for relocating to its alternate facility. Furthermore, an agency must have plans for in-processing of COOP personnel upon arrival at the alternate facility and plans to address the housing of COOP personnel, if applicable.

Most agencies documented site preparation and activation plans and procedures, documented plans to notify their alternate facilities upon COOP activation, and provided instructions for relocating to their alternate facilities. Most agencies also documented plans for reception and in-processing of COOP personnel. Three agencies reported that housing plans were not applicable because their alternate facilities were at a commutable distance for COOP personnel. Of the other three agencies, two documented plans to address housing for the relocated employees.



Objective 1: Alternate Facilities Compliance
Facility Plans and Procedures

Facility Plans and Procedures: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency have a site preparation and activation plan pre-positioned at the alternate facility?	5	1	0	0
Does the agency have a plan for notifying alternate facilities at the time of COOP activation?	5	0	1	0
Does the agency provide instructions for relocating to alternate facilities?	5	1	0	0
Does the agency have procedures for the reception and in-processing of personnel at the alternate facility?	4	2	0	0
Does the agency have a plan to address housing for COOP personnel, if applicable?	2	1	0	3

Source: GAO analysis of agency alternate facilities and continuity planning documents.



Objective 1: Alternate Facilities Compliance
Employee Health, Safety, Emotional Well-being, and Security

Employee Health, Safety, Emotional Well-being, and Security

FPC 65 states that alternate facilities must provide consideration for the health, safety, emotional well-being, and security of relocated employees. The guidance calls for agencies to have sufficient personnel and technology to provide perimeter and access control, internal security functions, and surveillance of the facility. Physical security at the alternate facility must meet the requirements established by annual threat assessments and physical security surveys by the agency's security office, the Federal Protective Service, or a qualified contractor.

All six agencies provided consideration for the health and safety of relocated COOP personnel. For example, one agency's alternate facility provided medical support on site while another was equipped with first aid supplies. In addition, the six agencies provided consideration for the emotional well-being of relocated COOP personnel. For example, one agency's facility included an employee assistance program office staffed with counselors, while another provided a recreation area for off-shift relaxation.

At all six agency alternate facilities that we visited, physical access to the facilities was controlled through the use of guards, identification badges, or entry devices such as key cards. Three agencies documented that they had conducted all of the required physical security surveys and threat assessments. If an agency does not conduct the necessary physical security assessments and surveys, it may be unaware of vulnerabilities at its alternate facility and, therefore, unable to address them.



Objective 1: Alternate Facilities Compliance
Employee Health, Safety, Emotional Well-being, and Security

Employee Health, Safety, Emotional Well-being, and Security: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency provide consideration for the health and safety of relocated COOP personnel?	6	0	0	0
Does the agency provide consideration for the emotional well-being of relocated COOP personnel?	6	0	0	0
Is access to facilities controlled through the use of guards, identification badges, or entry devices such as key cards or biometrics?	6	0	0	0
Does the agency provide physical security that meets all requirements established by annual threat assessments and physical security surveys?	3	3	0	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.



Objective 1: Alternate Facilities Compliance Space

Alternate Facility Space

FPC 65 requires agencies to establish staffing requirements needed to perform essential functions within 12 hours of COOP activation and for up to 30 days. In addition, the guidance states that agencies must ensure that alternate facilities have enough space to accommodate the maximum number of relocating personnel they require.

All six agencies identified the maximum number of COOP personnel that could relocate to their alternate facilities. Four of those agencies provided adequate space to accommodate the maximum number of staff indicated in their staffing plans. The other two agencies did not provide enough space at their alternate facilities to accommodate all of the relocating COOP personnel. Officials from those two agencies stated that the number of COOP personnel simultaneously relocating to their facilities would be less than the maximum number of personnel identified, although they were unable to provide documentation to support this.

If agencies do not establish clear staffing requirements for their alternate facilities, the allocated space at the facilities may be insufficient to accommodate COOP personnel needed to perform agency essential functions.



Objective 1: Alternate Facilities Compliance
Space

Alternate Facility Space: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency identify the maximum number of personnel that could relocate to the alternate facility?	6	0	0	0
Does the agency identify sufficient space at the alternate facility to accommodate the number of personnel identified to relocate there?	4	2	0	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.



Objective 1: Alternate Facilities Compliance Equipment

Equipment

FPC 65 requires that agencies identify the critical resources—including IT and telecommunications equipment—needed to perform essential functions. Agencies must pre-position critical resources at the alternate facility to ensure the availability of services. In addition, agencies should (1) have procedures for ordering equipment and supplies not already in place at the alternate facility and (2) annually review their lists of resources required to perform essential functions and update them as necessary.

All six agencies identified types of equipment they would need to perform essential functions at their alternate facilities, but four agencies did not identify both types and quantities. For example, one agency required computers at its facility but did not specify how many. Because of the unclear requirements for the four agencies, we were unable to determine whether all necessary resources were pre-positioned at their facilities. In addition, four agencies had procedures for ordering equipment and supplies, and one agency demonstrated that it annually reviewed its lists of equipment. If an agency does not identify equipment requirements for the alternate facility, it cannot be assured that the current level of resources present at its alternate facility is adequate for performing the essential functions.



Objective 1: Alternate Facilities Compliance
Equipment

Equipment: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency establish requirements for equipment (including IT and telecommunications hardware) needed to perform essential functions?	2	4	0	0
Has the agency pre-positioned equipment, as identified, at the alternate facility? ^a	2	—	—	—
Does the agency identify the office supplies needed to perform essential functions?	2	3	1	0
Does the agency have procedures for ordering equipment and supplies not already in place at the alternate facility?	4	2	0	0
Does the agency annually review its lists of equipment required to perform essential functions and update them as necessary?	1	0	5	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.

^a 4 of the 6 agencies did not document specific requirements for pre-positioned equipment, so we could not assess their compliance for this question.



Objective 1: Alternate Facilities Compliance Vital Records

Vital Records

FPC 65 states that agency personnel must have access to electronic and hard-copy vital records and databases needed to perform their essential functions from the agency alternate facility. In order for an agency to establish access requirements for vital records and databases at the alternate facility, it must develop a vital records inventory with location and access information for each vital record. The guidance also states that an agency must develop and maintain a vital records plan packet that includes—among other items—agency contact information, lists of records recovery experts and vendors, and its vital records inventory.

One of the six agencies maintained an inventory that included location and access information for each vital record and database required to perform essential functions at the alternate facility. For the remaining five agencies, which lacked complete inventories, we could not fully assess whether the necessary electronic and hard copy vital records would be available at the facilities. Furthermore, only one out of the six agencies had a complete vital records plan packet at its alternate facility. If an agency does not maintain a complete inventory of the vital records and databases needed to perform essential functions, it will be unable to determine whether the records necessary for performing agency essential functions will be available at the alternate facility.



Objective 1: Alternate Facilities Compliance
Vital Records

Vital Records: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency establish requirements for vital records and databases needed to support its essential functions in an inventory that includes location and access information?	1	5	0	0
Does the agency provide the capability to access its classified and unclassified vital records and databases from the alternate facility? ^a	1	—	—	—
Does the agency have a vital records plan packet?	1	4	1	0
Does the agency provide the procedures for moving non-pre-positioned vital records from the primary to the alternate facility in event of COOP activation?	2	1	3	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.

^a 5 of the 6 agencies did not adequately document requirements for vital records and databases, so we could not assess their compliance for this question.



Objective 1: Alternate Facilities Compliance
Vital Records

Vital Records: Responses by Question (continued)

Question	Yes	Partial	No	N/A
Does the agency outline procedures for updating vital records to ensure that they always contain the most current information?	2	3	1	0
Did the agency conduct a risk assessment for its vital records?	1	0	5	0
Does the agency identify individuals that can assist with recovery from potential records damage?	3	0	3	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.



Objective 1: Alternate Facilities Compliance Voice and Data Communications

Voice and Data Communications

The success of agency operations at an alternate facility depends on the availability of voice and data communication methods. FPC 65 states that an agency must have redundant communications systems at its alternate facility. Furthermore, an agency must have the ability to communicate with key contacts, including (1) agency staff—such as COOP personnel, agency leadership, and other employees operating from different locations—and (2) external entities, such as the FEMA Operations Center, the Homeland Security Operations Center, critical customers, and the public. The guidance also states that an agency must be able to access from its alternate facility its critical information systems and data, a local area network, and internal and external e-mail and archives.



Objective 1: Alternate Facilities Compliance Voice and Data Communications

Although most agencies provided redundant emergency communications methods at their alternate facilities, four agencies did not fully document procedures for how they would communicate with key internal and external entities using these methods. For example, two agencies provided information on how to contact others but did not have clear procedures demonstrating how they would receive incoming communications at their alternate facilities.

In addition, three out of the six agencies did not specifically document the data and critical information systems needed for essential functions. For example, one agency identified a general need for access to file servers, but did not identify the specific critical information systems and data within the servers. As a result, we were unable to determine whether all necessary systems and data would be accessible from the alternate facilities. Most agencies provided access to a local area network, and two provided access to internal and external e-mail and archives.

If the ability to communicate with internal and external entities is limited, essential agency operations may also be limited. Furthermore, if agencies do not identify the critical information systems and data needed to perform essential functions, they cannot ensure that personnel will be able to access the information resources necessary to perform these functions at the alternate facility.



Objective 1: Alternate Facilities Compliance
Voice and Data Communications

Voice and Data Communications: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency provide communications capabilities at the alternate facility of sufficient quantity and mode/media to effectively interface with key contacts?	2	4	0	0
Does the agency provide redundant communications systems for use in COOP implementation within 12 hours of COOP activation and sustained for up to 30 days?	5	1	0	0
Does the agency establish requirements for data and critical information systems needed to conduct essential functions and support activities?	3	2	1	0
Does the agency provide access to critical information systems and data within 12 hours of COOP activation? ^a	—	1	2	—
Does the agency provide access to a local area network within 12 hours of COOP activation?	4	2	0	0
Does the agency provide access to internal and external e-mail and archives within 12 hours of COOP activation?	2	2	2	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.

^a 3 of the 6 agencies did not adequately document requirements for critical information systems and data, so we could not assess their compliance for this question.



Objective 1: Alternate Facilities Compliance Tests and Exercises

Tests and Exercises

Tests and exercises of continuity of operations capabilities are essential to demonstrate and improve an agency's ability to execute its COOP plans and procedures. FPC 65 provides for multiple test and exercise requirements that directly impact the preparedness of agency alternate facilities, including (1) annual exercises that incorporate the deliberate and preplanned movement of the COOP personnel to an alternate facility; (2) quarterly validation of internal and external communications capabilities at an alternate facility; and (3) tests to ensure that vital records and data to support essential functions are sufficient, complete, current, and available at an alternate facility.

None of the agencies documented that they conducted all of the required tests and exercises related to the preparation of alternate facilities that are required by FPC 65, including annually testing primary backup infrastructure systems and services at the alternate facilities. If an agency does not plan, conduct, and document the necessary tests and exercises of its COOP plans and procedures, it will be unable to ensure that (1) agency personnel are familiar with alert, notification, and deployment procedures; (2) resource requirements at the alternate facility are adequate for performing essential functions; and (3) any deficiencies in their plans and procedures are identified and corrected.



Objective 1: Alternate Facilities Compliance
Tests and Exercises

Tests and Exercises: Responses by Question

Question	Yes	Partial	No	N/A
Does the agency test annually its primary and backup infrastructure systems and services at its alternate facility (e.g., power, water, fuel)?	0	2	4	0
Does the agency conduct annual exercises that incorporate the deliberate and preplanned movement of the COOP personnel to an alternate facility?	0	5	1	0
Does the agency annually test/exercise its required physical security capabilities?	3	0	3	0
Does the agency test to ensure that vital records and data are sufficient, complete, current, and available?	0	2	4	0
Has the agency documented the quarterly validation of its internal and external communications capabilities at its alternate facility?	0	4	2	0

Source: GAO analysis of agency alternate facilities and continuity planning documents.



Objective 1: Alternate Facilities Compliance Readiness Reporting System

Although individual agencies are responsible for developing a viable COOP plan and ensuring that their alternate facilities are adequately prepared, FEMA's limited efforts in overseeing and assessing agency COOP capabilities contributed to agencies' lack of compliance with all of the FPC 65 guidance. For example, FEMA has continued to rely on agency-reported information as the basis for its assessments. According to DHS comments on a draft of this briefing, FEMA uses its Forward Challenge series of interagency COOP exercises, which occur every 2 years, as its external assessment for all executive branch agencies. However, participating agencies completed assessments of their own COOP capabilities during the most recent exercise. In addition, FEMA collects COOP readiness status reports from agencies and provides consolidated reports to White House and DHS officials.

During our previous reviews of agency COOP plans in 2002 and 2004, we raised similar concerns. In response, FEMA officials reported that the agency was developing a readiness reporting system to assist it in assessing agency plans. FEMA officials reported that the online system was to be completed in March 2005 and to be operational and certified by October 2005.

However, FEMA recently terminated testing and development of its readiness reporting system, citing design issues and stating that the system could not be implemented at the required scale. According to Office of National Security Coordination officials, an internal working group was established to develop system requirements and a new statement of work, although no time line has been established for development of a new system.



Objective 1: Alternate Facilities Compliance Interagency Tests and Exercises

FEMA officials previously identified the agency's coordination of interagency COOP exercises as an effort that helps in ensuring the COOP readiness and capabilities of executive branch agencies. According to officials from the Office of National Security Coordination, the agency coordinated Determined Challenge, an interagency table-top exercise conducted in November 2005 that included participants from 46 departments and agencies. FEMA also continues its planning efforts for Forward Challenge 06, its upcoming interagency exercise in June 2006. Officials stated that about 60 departments and agencies will participate in the exercise from their alternate facilities. Officials anticipate using independent observers to evaluate agency plans and their implementation during the exercise.

Although participation in FEMA's interagency exercises can help agencies to assess and validate their COOP plans and procedures, it does not ensure that agencies meet all FPC 65 requirements for tests and exercises. For example, the guidance calls for agency exercises to incorporate the movement of COOP personnel to their alternate operating facilities, and for these exercises to be conducted annually. However, FEMA coordinates such exercises only every 2 years.¹

¹ Forward Challenge 06 and its predecessor, Forward Challenge 04, are examples of exercises that can incorporate the movement of COOP personnel to agency alternate facilities.



Objective 1: Alternate Facilities Compliance Essential Function Review

We previously reported that the White House initiated an effort—in coordination with FEMA—to identify and validate the mission essential functions of executive branch agencies. In a memorandum issued on January 10, 2005, the Assistant to the President for Homeland Security initiated the process, stating that once identified, mission essential functions would serve as key continuity planning factors for agencies' determination of the appropriate level of staffing, communications, and facilities. Initial plans were to use the validated functions to support, among other things, the development of new continuity policy and to develop and implement improved requirements.

However, officials from FEMA's Office of National Security Coordination stated that oversight efforts to review agency essential functions were postponed until the council develops and releases further continuity policy. One official stated that the council informally reviewed essential functions for four agencies before the postponement, but did not provide formal written comments or revisions of essential functions to the agencies. No time line has been set for resuming the essential function review.

Identification of essential functions is crucial to the development of continuity plans and preparation of alternate facilities. Thus, until essential functions are reviewed and validated against consistent criteria, FEMA and the Homeland Security Council will lack assurance that agencies have made adequate preparations for alternate facilities, including provisions for necessary resources and staffing levels.



Objective 1: Alternate Facilities Compliance FEMA COOP Oversight Plan

In his comments on a draft of this briefing, the Director of the Department of Homeland Security's GAO/OIG Liaison Office stated that FEMA has plans to expand its COOP oversight activities to include the evaluation and assessment of individual agency COOP capabilities. He added that, as part of the methodology for the upcoming interagency exercise, Forward Challenge 06, agency COOP plans will be externally evaluated before the exercise. In addition, officials plan to conduct individual agency COOP assessments starting in July 2006. These assessments will include the evaluation of, among other things, agency COOP plans and procedures; essential functions; alternate facilities; and tests, training, and exercises. FEMA officials plan to conduct two agency assessments per month, with assessment reports to be provided beginning in late August 2006. However, according to an Office of National Security Coordination official, details regarding the assessment's methodology have yet to be finalized.

Conducting assessments of agency COOP capabilities can help agencies validate their plans and procedures and identify any deficiencies for correction. However, if FEMA does not develop a methodology for individual agency COOP assessments that evaluates agencies' compliance with FPC 65—including the extent to which they (1) identify essential functions, (2) identify the levels of staff and resources required at their alternate facilities, and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency—it will lack assurance that agencies have taken the steps necessary to ensure that they will be able to perform essential government operations following a disruption.



Objective 2: Telework

More agencies reported plans for essential team members to telework during a COOP event than in our previous survey, but few documented that they had made the necessary preparations to effectively use telework during an emergency. Although FPC 65 does not require agencies to use telework during a COOP event, it does state that they should consider the use of telework in their continuity plans and procedures. All of the 23 agencies that we surveyed indicated that they considered telework as an option during COOP planning. In addition:

- Nine of the 23 agencies reported that some of their COOP essential team members are expected to telework during a COOP event. However, only one agency documented that it had notified its team members of their expectation to telework during a COOP event.
- None of the 23 agencies demonstrated that they can ensure adequate technological capacity to allow designated personnel to telework during a COOP event.
- Only 3 of the 23 agencies documented testing the ability of staff to telework during a COOP event.

Reasons cited for not planning to use telework during a COOP event included (1) the need to access classified information—which is not permitted outside of secured areas—in order to perform agency essential functions and (2) a lack of funding for the necessary equipment acquisition and network modifications.



Objective 2: Telework
Telework Practices

Telework: Responses by Question

The following tables summarize the most recent agency responses to questions on the use of telework in responding to disruptions to operations. For comparison, we also provide responses from the survey we conducted in 2004.

Question	Year	Yes	Yes ^a (no doc)	No
Does the agency have a telework policy?	2005	22	1	0
	2004 ^b	19	3	0
If yes, does the policy specifically address COOP events?	2005	2	6	15
	2004	1	2	19
Does the COOP plan specifically address telework?	2005	12	3	8
	2004	2	1	19
Does the agency coordinate its COOP and telework planning processes?	2005	4	13	6
	2004	0	5	17
Was the agency's telework coordinator involved in COOP planning?	2005	1	14	8
	2004	0	6	16

Source: Analysis of agency responses to GAO questions.

^a Agencies provided a positive response but did not provide adequate documentation to support their response.

^b In 2004, one agency did not respond, resulting in a total of 22 responses for that year versus 23 responses for 2005.



Objective 2: Telework
Telework Practices

Telework: Responses by Question (cont'd)

Question	Year	Yes	Yes ^a (no doc)	No
Are any of the COOP essential team members expected to telework in a COOP event?	2005	3	6	14
	2004	1	2	19
Were staff informed of their responsibility to telework during a COOP event?	2005	1	10	12
	2004	1	3	18
Has the agency ensured that it has adequate technological capacity for staff to telework during a COOP event?	2005	0	14	9
	2004	0	5	17
Will the agency provide technological assistance to staff during a COOP event?	2005	3	11	9
	2004	0	5	17
Did the agency train staff how to telework during a COOP event?	2005	0	13	10
	2004	0	3	19
Has the agency tested the ability of staff to telework during a COOP event?	2005	3	7	13
	2004	0	2	20

Source: Analysis of agency responses to GAO questions.

^a Agencies provided a positive response but did not provide adequate documentation to support their response.



Objective 2: Telework
Telework Practices

Telework: Responses by Question (cont'd)

Question	Year	Yes	Yes ^a (no doc)	No
Are any personnel not designated essential for COOP purposes expected to telework during an emergency?	2005	0	11	12
	2004	0	7	15
Were staff informed of their responsibility to telework during a COOP event?	2005	1	5	17
	2004	0	3	19
Has the agency ensured that it has adequate technological capacity for staff to telework during a COOP event?	2005	0	8	15
	2004	0	7	15
Will the agency provide technological assistance to staff during a COOP event?	2005	0	7	16
	2004	0	5	17
Did the agency train staff how to telework during a COOP event?	2005	0	4	19
	2004	0	1	21
Has the agency tested the ability of staff to telework during a COOP event?	2005	0	4	19
	2004	0	3	19

Source: Analysis of agency responses to GAO questions.

^a Agencies provided a positive response but did not provide adequate documentation to support their response.



Objective 2: Telework Telework Guidance

No guidance addresses the steps that agencies should take to ensure that they are fully prepared to use telework during a COOP event. When we reported the results of our 2004 survey, we recommended that the Secretary of Homeland Security direct the Under Secretary for Emergency Preparedness and Response to develop, in consultation with OPM, guidance on the steps that agencies should take to adequately prepare for the use of telework during a COOP event. However, to date, no such guidance has been created nor has a time line been established for its creation.

FEMA recently disseminated guidance to agencies regarding the incorporation of pandemic influenza considerations into COOP planning. While the guidance does suggest the use of telework during such an event, it does not address the steps agencies should take when preparing to use telework during an emergency.

Without guidance on what constitutes adequate preparation, including tests and training, agencies are unlikely to take all the steps necessary to ensure that employees will be able to effectively use telework to perform essential functions during any COOP event, including an influenza pandemic.



Conclusions

All six agencies we reviewed took steps to prepare their alternate facilities for use in emergencies. However, none of the agencies followed all of FEMA's guidance. For example, none conducted all the applicable tests and exercises required by FPC 65, including annual exercises that incorporate the deliberate and preplanned movement of COOP personnel to an alternate facility. Furthermore, agencies did not fully identify the levels of resources necessary to support their essential functions, creating a lack of assurance that their facilities are adequately prepared to support agency essential functions.

Although individual agencies are responsible for developing viable COOP capabilities, FEMA's limited oversight contributed to the lack of agency compliance with all of the FPC 65 guidance for alternate facilities. FEMA recently announced plans to expand its assessments of individual agency COOP plans, but has not yet determined how these new assessments will take place. If FEMA does not conduct timely assessments of the plans developed by the six agencies included in our review, it will lack assurance that those agencies are fully prepared to use the upcoming interagency exercise to demonstrate their readiness. Also, until FEMA conducts independent assessments of all agencies' compliance with FPC 65—including the extent to which agencies (1) identify essential functions, (2) identify the levels of staff and resources required at their alternate facilities, and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency—it will lack assurance that agencies have taken the steps necessary to ensure that they will be able to perform essential government operations following a disruption.



Conclusions

After the 2004 version of FPC 65 was issued, which included a requirement to consider the use of telework, more agencies than in our previous survey reported plans to use telework to some extent during COOP events. However, although some of these agencies reported making related preparations, the general lack of documentation to support their responses indicates that few are likely to have fully implemented the telework preparations that we have previously found to be effective. Although FEMA recently provided additional guidance on the use of telework, it did not address the steps agencies should take to prepare to use telework during an emergency event, nor has a time line been established for when such guidance may be written. Without guidance on what constitutes adequate preparation for using telework during an emergency situation, it will be difficult for agencies to identify and perform the necessary steps to ensure that their teleworking staff will be able to perform essential functions during a COOP event.



Recommendations for Executive Action

To ensure that agencies are adequately prepared to continue performing essential functions following an emergency, we recommend that the Secretary of Homeland Security direct the FEMA Director to improve the oversight of agency COOP planning by taking the following actions:

- Before the upcoming interagency exercise, conduct an assessment of the COOP plans of the six agencies whose alternate facilities were included in our review and report any deficiencies found to the head of the agency for correction.
- Develop a methodology for individual agency COOP assessments that independently evaluates executive branch agencies' compliance with FPC 65, including the extent to which agencies (1) identify essential functions; (2) identify the levels of staff and resources required at their alternate facilities; and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency. The methodology should include a mechanism for reporting any deficiencies found to the head of the agency for correction.
- Establish a time line for developing, in consultation with OPM, guidance on the steps that agencies should take to adequately prepare for the use of telework during a COOP event.



Agency Comments and Our Evaluation

In written comments provided on a draft of this briefing, the Director of the Department of Homeland Security's GAO/OIG Liaison Office stated that continuity planning is the responsibility of individual departments and agencies. We agree and we clarified our draft to more clearly identify the responsibility of agencies for their own continuity planning. The Director also identified actions that FEMA had taken to fulfill its responsibilities for coordination, guidance and advice, support, and periodic assessment of agency continuity planning. However, the list of responsibilities provided by the Director excludes the responsibility to oversee and assess the status of COOP capability across the federal executive branch, which is outlined in FPC 65. We revised our briefing to emphasize our conclusion that FEMA's ongoing reliance on self-reported information from the departments and agencies constitutes a limited level of oversight that contributes to the lack of full compliance with FEMA's continuity planning guidance.

The Director also identified recently published guidance on telework, as well as FEMA's guidance to agencies regarding continuity considerations for pandemic influenza. We updated our briefing to include these recent developments. However, neither the guidance issued by FEMA nor the additional telework guidance addresses the preparations necessary for agencies to ensure that they are prepared to use telework following a COOP event.



Attachment 1: Agencies Participating in Telework Survey

Department of Agriculture	Agency for International Development
Department of Commerce	Environmental Protection Agency
Department of Education	General Services Administration
Department of Energy	National Aeronautics and Space Administration
Department of Health and Human Services	National Science Foundation
Department of Homeland Security	Nuclear Regulatory Commission
Department of Housing and Urban Development	Office of Personnel Management
Department of Justice	Small Business Administration
Department of Labor	Social Security Administration
Department of State	
Department of the Interior	
Department of the Treasury	
Department of Transportation	
Department of Veterans Affairs	

Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, D.C. 20472



Homeland
Security

May 5, 2006

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-06-713 entitled *Continuity of Operations (COOP): Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework During Disruptions*. The Department of Homeland Security (DHS) recommends the following changes be made to the report's recommendations and findings:

Comments on GAO Recommendations

GAO Introduction: To ensure that agencies are adequately prepared to continue performing essential functions following an emergency, we recommend that the Secretary of Homeland Security direct the Federal Emergency Management Agency (FEMA) Director to improve the oversight of agency COOP planning by taking the following actions:

DHS Comment: Presidential Decision Directive 67 (PDD 67) directs that an Interagency Advisory Group (IAG) shall provide coordination, oversight, and management for COOP related activities of executive branch civil departments and agencies. Although FEMA is designated as chair of this group, principal members' departments and agency emergency coordinators are designated with the authority to represent and commit their departments and agencies in matters relating to COOP. Since departments and agencies have the ultimate authority to commit their organizations to the coordination, oversight, and management recommendations of the IAG, recommend the GAO recommendation be changed to read, "...FEMA Director to improve the readiness of agency COOP programs by taking the following actions:"

GAO Recommendation One: Before the upcoming interagency exercise, conduct an assessment of the COOP plans of the six different agencies whose alternate facilities were included in our review and report any deficiencies found to the head of the agency for correction.

DHS Comment: We partially concur with this recommendation. FEMA will conduct the assessment of the six agencies in conjunction with the upcoming Top Officials/Forward Challenge 06 Exercise.

GAO Recommendation Two: Develop a methodology for individual agency COOP assessments that independently evaluates executive branch agencies' compliance with Federal Preparedness Circular 65 (FPC 65), including the extent to which agencies (1) identify essential functions; (2) identify the levels of staff and resources required at their alternate functions; and (3) plan, conduct, and document the necessary tests and exercises at the appropriate scope and frequency. The methodology should include a mechanism for reporting any deficiencies found to the head of the agency for correction.

DHS Comment: We partially concur with this recommendation. FEMA currently has an assessment program and plans to continually refine its assessment methodology and expand the program through additional funding and resources. We believe the recommendation should reflect this reality by beginning, "Refine the methodology for individual agency COOP assessments...".

GAO Recommendation Three: Establish a timeline for developing, in consultation with the Office of Personnel Management (OPM), guidance on the steps that agencies should take to adequately prepare for the use of telework during a COOP event.

DHS Comment: We partially concur with this recommendation. FEMA will continue to work with the government lead agent for telework, OPM, to provide further guidance on telework, recognizing that this is a valuable tool for improving continuity preparedness. FEMA will coordinate with OPM in the development of the timeline for telework guidance. In FPC 65, FEMA provides guidance to departments and agencies to consider when identifying and preparing alternate operating facilities for continuity operations. Options include giving consideration to telecommuting locations, work at home agreements, virtual offices, and joint or shared facilities (FPC 65, page E-1). FEMA and OPM provided further guidance and instruction on the potential use of telework during a COOP event, along with other personnel management options, during several Interagency COOP Working Group meetings during the past two years. These meetings were well attended by the COOP community and the presentation material received high praise for its usefulness. Minutes and presentation material from all meetings were distributed to all Interagency COOP Working Group members, even if not in attendance at a particular meeting. This includes guidance and consideration for telework during this and other continuity events.

Comments on GAO Findings

In addition to the Department's comments on the recommendations, we believe that a number of findings should be changed to more accurately reflect FEMA's actions in support of COOP preparedness, as well as our assigned responsibilities.

- Where GAO refers to "FEMA's limited efforts..." DHS believes this verbiage should be changed to "FEMA's limited resources..."

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Washington, D.C. 20472

FEMA's efforts are constrained by resources. Notwithstanding this limitation, FEMA has provided extensive guidance and assistance and conducted numerous training and exercise activities across the country to assist the Federal executive branch in its COOP preparedness (see DHS's April 10, 2006 reply to the GAO's draft briefing entitled *Continuity of Operations: Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework During Disruption*). To improve the readiness of the Federal government's COOP program, additional FEMA resources are required to support the large number of Federal offices and facilities that could benefit from recurring COOP assessments throughout the nation.

- References to FEMA as "executive agent" should be changed to FEMA as "lead agent."

Presidential Decision Directive 67 identifies FEMA as the lead agent for COOP. Although previous indications have been made referencing FEMA as executive agent, Presidential direction specifies FEMA as lead coordinating agency for COOP activities.

- References to tests and exercises "required" by FPC 65 should be reworded to indicate that such efforts are "recommended" by FPC 65.

Federal Preparedness Circulars are guidance and coordination documents and not directives per guidance in FPC 1A, *Federal Preparedness Circular*.

- DHS suggests that references to FEMA's assessment methodology utilize the following language: "If FEMA does not refine its current assessment methodology...it will diminish the capability to assure agencies have taken the steps ..."

FEMA currently has an assessment methodology, which includes:

FEMA Assessment Methodology

- FEMA developed a COOP Self-Assessment Tool in 2004 (updated in 2005) to assist senior leaders and their COOP coordinators in performing internal reviews/audits of their COOP plans and programs.
- FEMA will continue to use the Forward Challenge series of exercises as its biennial COOP external assessment for executive branch departments and agencies. Planning is well along on completing this during the June 2006 Top Official 4/Forward Challenge 06 (T4/FC06) exercise. In March 2006, FEMA completed development of its plan for an expanded comprehensive department and agency COOP assessment program. FEMA will provide further COOP assessment guidance to departments and agencies in addition to the requirements associated with the biennial full-scale COOP exercises. The table below outlines the major components of this program.

Appendix II: Comments from the Department of Homeland Security

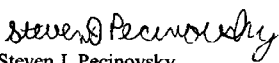
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Compile Department and Agency COOP Plans (Part of T4/FC06 exercise evaluation methodology)	May 1, 2006
Complete External COOP Plan Evaluation for each Department and Agency (T4/FC06 Assessments)	May 31, 2006
Schedule published for the expanded Department and Agency External Assessment Program (New External Assessment Program)	June 15, 2006
Conduct external COOP evaluations for Departments and Agencies during T4/FC06 Exercise	June 20 – 21, 2006
Conduct Department and Agency COOP Assessments to include: Plans and Procedures; Essential Functions; Delegations of Authority; Orders of Succession; Alternate Operating Facilities; Interoperable Communications; Vital Records and Databases; Human Capital; Test, Training, and Exercises; Devolution of Control and Direction; Reconstitution; and Telework	July 30, 2006 Assess 2 Departments and Agencies per month
Provide Assessment Reports	Beginning August 31, 2006

Through this program, FEMA will continue to refine upon its assessment program that was initiated during the Forward Challenge 2004 exercise.

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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