

GAO

Report to the Chairman, Subcommittee
on Oversight of Government
Management, the Federal Workforce, and
the District of Columbia, Committee on
Governmental Affairs, U.S. Senate

April 2004

HUMAN CAPITAL

Opportunities to Improve Federal Continuity Planning Guidance



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HUMAN CAPITAL

Opportunities to Improve Federal Continuity Planning Guidance

Highlights of [GAO-04-384](#), a report to the Chairman, Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Governmental Affairs, U.S. Senate

Why GAO Did This Study

Federal agencies must have the capacity to serve the public during disruptions to normal operations. This depends, in part, on continuity efforts that help agencies marshal, manage, and maintain their most important asset—their people, or human capital. GAO identified the human capital considerations relevant to federal continuity efforts; described efforts by the Federal Emergency Management Agency (FEMA) and the Office of Personnel Management (OPM) to address these considerations relevant to continuity of operations (COOP); and described the role Federal Executive Boards (FEB) play in coordinating such efforts outside Washington, D.C.

What GAO Recommends

GAO recommends that FEMA and OPM more fully address human capital considerations in emergency preparedness guidance, including COOP, by incorporating key actions identified in this report. GAO also recommends that OPM clearly define the role FEBs play in improving emergency preparedness coordination and address any resulting capacity issues. FEMA agreed to implement our recommendations. OPM said its guidance already incorporates the key actions and highlighted its leadership role with respect to FEBs. GAO maintains that OPM has opportunities to address a fuller range of human capital considerations related to resuming broader agency operations and to clearly define the role of FEBs.

www.gao.gov/cgi-bin/getrpt?GAO-04-384.

To view the full product, including the scope and methodology, click on the link above. For more information, contact J. Christopher Mihm at 202-512-6806 or mihmj@gao.gov.

What GAO Found

According to recognized experts from the private and public sectors, continuity efforts should give priority to the immediate aftermath of a crisis—securing the safety of all employees and addressing the needs of employees who perform essential operations. However, experts noted that additional human capital considerations, especially those associated with the majority of an organization’s employees who would be needed to resume all other operations, are also crucial and have not been well developed by many public and private sector organizations. To more fully address human capital considerations, experts identified two human capital principles that should guide all continuity efforts—demonstrating sensitivity to individual employee needs and maximizing the contributions of all employees—and six key organizational actions designed to enhance continuity efforts.

Key Organizational Actions to Enhance Continuity Efforts

Demonstrate top leadership commitment	<ul style="list-style-type: none"> Instill an approach to continuity planning that includes human capital considerations Allocate resources and set policies Set direction and pace of recovery
Seek opportunities for synergy	<ul style="list-style-type: none"> Integrate continuity efforts with broader decision making Consider how continuity investments benefit other program efforts
Maintain effective communication	<ul style="list-style-type: none"> Build relationships through two-way communication Establish roles, responsibilities, and expectations Develop redundant communication vehicles
Target investments in training and development	<ul style="list-style-type: none"> Raise awareness of continuity efforts Build skills and competencies to increase flexibility Foster a culture that values flexible employees who are empowered to make effective decisions
Leverage the flexibility of human capital	<ul style="list-style-type: none"> Enable employees associated with resumption activities to contribute to mission results in alternate assignments Sustain the contribution of employees associated with essential operations Maintain organizational knowledge of staffing requirements and availability
Build process to identify and share lessons	<ul style="list-style-type: none"> Create a learning environment Make learning explicit and shared

Source: GAO.

FEMA and OPM have exhibited leadership in addressing human capital considerations relevant to COOP, but opportunities to improve exist. For example, while both agencies have issued guidance that addresses securing the safety of all employees and responding to the needs of personnel performing essential operations, neither agency’s guidance addresses human capital considerations related to resuming broader agency operations.

Although not specifically tasked with coordinating emergency preparedness efforts, including COOP, FEBs are uniquely positioned to do so, given their general responsibility for improving coordination among federal activities in areas outside of Washington, D.C. While some FEBs already play an active role in coordinating such efforts, the current context in which FEBs operate, including the lack of a clearly defined role and varying capacities among FEBs, could lead to inconsistent levels of preparedness across the nation.

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Abbreviations

AFGE	American Federation of Government Employees
COOP	continuity of operations
CTAP	Career Transition Assistance Plan
CWG	COOP Working Group
DHS	Department of Homeland Security
EMA	Emergency Management Alberta
FEB	Federal Executive Board
FEMA	Federal Emergency Management Agency
FPC	Federal Preparedness Circular
GS	General Schedule
GSA	General Services Administration
HR	human resources
ICTAP	Interagency CTAP
IRS	Internal Revenue Service
KSA	knowledge, skills, and abilities
NAPA	National Academy of Public Administration
NTEU	National Treasury Employees Union
OEP	Occupant Emergency Program
OPM	Office of Personnel Management
PDD	Presidential Decision Directive
PSC	Private Sector Council
RPL	Reemployment Priority List
SARS	severe acute respiratory syndrome
SSA	Social Security Administration
VSIP	voluntary separation incentive payment

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United States General Accounting Office
Washington, D.C. 20548

April 20, 2004

The Honorable George V. Voinovich
Chairman, Subcommittee on Oversight of Government Management,
the Federal Workforce, and the District of Columbia
Committee on Governmental Affairs
United States Senate

Dear Mr. Chairman:

The events of September 11, 2001, vividly demonstrated how important it is, both symbolically and functionally, for federal government agencies to continue to serve the American public during any emergency or situation that may disrupt normal operations. Yet terrorist-related incidents are only one in a broad spectrum of emergencies that can disrupt an agency's normal operations. Agencies need a high level of preparedness to deal with the full range of emergencies, including man-made disasters, whether intentional or not; acts of nature, such as hurricanes, earthquakes, or disease; and technological emergencies, including cyber-attacks or computer viruses.

Continuity of operations (COOP) efforts are a comprehensive set of steps agencies must undertake to help ensure that they can continuously provide essential operations and resume full services to the American public in the face of long-term, severe emergencies requiring agencies to occupy alternate facilities.¹ This capacity to serve the public during any type of disruption to normal operations depends, in part, on the ability of federal agencies to marshal, manage, and maintain their most important asset—their people, or human capital. The planning efforts that help agencies build the capacity to effectively implement COOP may also help agencies more effectively implement basic emergency preparedness procedures in dealing with less severe disruptions to normal operations.

In response to your request that we identify the human capital considerations in COOP emergencies, this report (1) identifies the human capital considerations that are relevant to federal agencies' continuity

¹ The House Committee on Government Reform also asked us to review agency headquarters COOP plans. We reported on that review in U.S. General Accounting Office, *Continuity of Operations: Improved Planning Needed to Ensure Delivery of Essential Services*, GAO-04-160 (Washington, D.C.: Feb. 27, 2004).

planning and implementation efforts; (2) describes the COOP guidance provided by the Federal Emergency Management Agency (FEMA)² and emergency preparedness guidance and activities of the Office of Personnel Management (OPM) to address human capital considerations relevant to COOP; and (3) describes the role Federal Executive Boards (FEB) play, relevant to COOP, in coordinating efforts outside the Washington, D.C., area.

To address human capital considerations that are relevant to continuity planning and implementation efforts, we reviewed relevant literature, such as industry journals, federal guidance, and codes of standards on disaster/emergency management and continuity programs. Because the available literature was limited in its attention to human capital, we conducted semistructured interviews and held a 1-day interactive working session with experts from the private sector, federal agencies, and other public sector organizations. With input from the National Academy of Public Administration, the Private Sector Council, and FEMA, the experts were selected based on their experience and knowledge of human capital or emergency management as it relates to continuity.

Individuals from a total of 15 organizations, in addition to FEMA, provided their expertise. The organizations included five federal agencies—the Centers for Disease Control and Prevention, the Department of Housing and Urban Development, the Department of Veterans Affairs, the General Services Administration, and the Social Security Administration; five private sector businesses—the Gillette Company, Lockheed Martin Corporation, Macy's West, Marsh & McLennan Companies, Inc., and Science Applications International Corporation; and five public institutions—the Business Continuity Institute, the Disaster Recovery Institute International, Emergency Management Alberta (Canada), Clark-Atlanta University, and the University of Tasmania (Australia). We supplemented the information from the expert panel by interviewing officials from OPM, representatives from FEBs, and representatives from federal employee unions.

To describe the COOP guidance issued by FEMA and the emergency preparedness guidance and activities of OPM, we interviewed officials from both agencies and analyzed relevant documents, including Federal

² In March 2003, FEMA became a part of the Department of Homeland Security within the Directorate of Emergency Preparedness and Response.

Preparedness Circular (FPC) 65, which is the primary federal COOP guidance, and a series of emergency preparedness memorandums issued by the Director of OPM. To describe the role FEBs play in coordinating federal efforts relevant to COOP, we interviewed officials from OPM and the Chicago, Cleveland, and Philadelphia FEBs.

Our review was conducted from February through December 2003 in accordance with generally accepted government auditing standards. Appendix I provides additional information on our scope and methodology.

Results in Brief

According to experts from private sector businesses, federal agencies, and other public sector organizations with knowledge of human capital or continuity planning, continuity planning efforts should and do give priority to the immediate aftermath of a crisis—securing the safety of all employees and addressing the needs of employees who perform or directly support essential operations. However, the experts also note that other human capital considerations, especially those associated with the efforts of an organization to resume all other operations, are also crucial and often have not been well developed. Given that the majority of employees would be associated with resumption efforts rather than essential operations, considering this segment of the organization is an important part of continuity planning. The experts we contacted identified two key human capital principles that should guide all continuity efforts: demonstrate sensitivity to individual employee needs and maximize the contributions of all employees to mission results.

The experts also identified six organizational actions, which are listed in table 1, to enhance continuity efforts by addressing additional human capital considerations that are relevant to continuity.

Table 1: Key Organizational Actions to Enhance Continuity Efforts

Demonstrate top leadership commitment	<ul style="list-style-type: none">• Instill an approach to continuity planning that includes human capital considerations• Allocate resources and set policies• Set direction and pace of recovery
Seek opportunities for synergy	<ul style="list-style-type: none">• Integrate continuity efforts with broader decision making• Consider how continuity investments benefit other program efforts
Maintain effective communication	<ul style="list-style-type: none">• Build relationships through two-way communication• Establish roles, responsibilities, and expectations• Develop redundant communication vehicles
Target investments in training and development	<ul style="list-style-type: none">• Raise awareness of continuity efforts• Build skills and competencies to increase flexibility• Foster a culture that values flexible employees who are empowered to make effective decisions
Leverage the flexibility of human capital	<ul style="list-style-type: none">• Enable employees associated with resumption activities to contribute to mission results in alternate assignments• Sustain the contribution of employees associated with essential operations• Maintain organizational knowledge of staffing requirements and availability
Build process to identify and share lessons	<ul style="list-style-type: none">• Create a learning environment• Make learning explicit and shared

Source: GAO.

In the federal government, FEMA, as executive agent for COOP, and OPM, as the President’s agent and advisor for human capital matters, have exhibited leadership in addressing human capital considerations relevant to COOP. For example, FEMA issued FPC 65, which is the primary guidance for federal agencies to use in developing a viable COOP capability, to address significant disruptions requiring relocation to an alternate facility. However, the guidance does not recognize significant disruptions that do not require relocation to an alternate facility. Regarding human capital considerations, this guidance directly addresses the need to secure the safety of all employees and respond to the needs of personnel performing or supporting essential operations. OPM has similarly addressed these primary considerations through several initiatives, including establishing the Emergency Preparedness subcommittee of the Chief Human Capital Officers Council, releasing emergency guides for federal employees and managers, and issuing a series of memorandums

outlining the existing human resource management flexibilities that agencies might employ in emergency situations. However, neither FEMA's nor OPM's guidance to date has adequately addressed the human capital considerations related to the resumption of agency operations that are not considered essential. Recognizing this, they are working together, as well as with other federal partners, to more fully address the considerations inherent in these resumption activities. One expected outcome of this partnership is an updated and augmented federal COOP guidance that will more fully address human capital considerations, particularly those regarding employees who will be involved with broader resumption efforts.

Although not specifically tasked with coordinating COOP efforts, FEBS are generally responsible for improving coordination among federal activities in areas outside of Washington, D.C. Officials at OPM, which provides direction to FEBS, have recognized that the boards can add value to regional emergency preparedness efforts, including COOP, as vehicles for communication, coordination, and capacity building. The FEBS that we visited in Chicago, Cleveland, and Philadelphia are already playing active roles in emergency preparedness and COOP efforts by holding COOP training seminars, creating emergency preparedness committees, and developing and activating emergency dismissal and closure procedures. However, the lack of a specific role and defined responsibilities for FEBS with regard to emergency preparedness efforts, including COOP, as well as a funding structure that results in differing capacities among FEBS, may lead to inconsistent levels of preparedness across the nation.

Given the importance of human capital in maintaining essential functions and resuming full operations during an emergency, we recommend that the Secretary of Homeland Security direct the Under Secretary of Emergency Preparedness and Response to expand the definition of a COOP event to recognize severe disruptions that do not affect facilities and complete efforts to revise federal COOP guidance to more fully address human capital considerations by incorporating the six actions identified in this report. We also recommend that the Director of OPM more fully address human capital considerations in emergency preparedness guidance by incorporating the six actions identified in this report; and determine the appropriate role for FEBS in coordinating emergency preparedness efforts, including COOP, and address resulting capacity issues.

On March 10, 2004, we provided a draft of this report to the Secretary of Homeland Security and the Director of OPM. We received written comments from the Under Secretary of Emergency Preparedness and

Response on behalf of the Department of Homeland Security (DHS) and FEMA and from the Director of OPM. In his comments, which are reprinted in appendix III, the Under Secretary agreed that the report addresses the human capital considerations that are relevant to COOP guidance and coordination. He added that DHS and FEMA would incorporate our recommendations in federal COOP guidance, work jointly with OPM and other federal partners to improve the federal government's COOP program, and expand the agency's efforts to improve coordination of COOP program efforts at the regional level.

In her comments, which are reprinted in appendix IV, the Director of OPM said the agency has already carried out our recommendation to more fully address human capital considerations in emergency preparedness guidance, including COOP, by incorporating the key actions identified in the report. Most of the supporting examples provided by OPM were included in the draft report and deal largely with human capital considerations related to life safety and the needs of personnel performing essential operations. While such initiatives are important first steps, there remain opportunities to improve OPM's emergency preparedness guidance to include a fuller range of human capital considerations. As such, our recommendation to develop additional emergency preparedness guidance that incorporates the key actions identified in the report remains unchanged. The Director also stated that the leadership role that OPM plays with respect to FEBs was not sufficiently developed in the report. Most of the supporting examples that the Director provided were included in the draft report. Moreover, the additional examples generally do not address our larger point that the role of FEBs in coordinating emergency preparedness efforts, including COOP, needs to be clearly defined. As such, we maintain our conclusion that the context in which FEBs currently operate, including the lack of a clearly defined role in emergency preparedness efforts and the varying capacities among FEBs, could lead to inconsistent levels of preparedness across the nation. The Director of OPM also suggested several clarifications to the report. We considered these suggestions and made changes to the report where appropriate.

Background

The policy of the U.S. government is to have in place a comprehensive and effective program to ensure continuity of essential federal functions under

all circumstances.³ COOP planning is an effort conducted by individual agencies to fulfill that policy and assure that the capability exists to continue essential agency functions across a wide range of potential emergencies. COOP has been closely associated with continuity of government programs, which are meant to ensure the survival of our constitutional form of government. COOP was first conceived during the Cold War to ensure that the U.S. government would be able to continue to function in case of a nuclear war. However, in the wake of the demise of the Soviet Union and the reduced threat of nuclear attack in the early 1990s, COOP planning languished.

Following the World Trade Center bombing in 1993 and the Oklahoma City bombing in 1995, COOP as a program was given renewed attention based on the recognition of emerging threats and the need to continue essential functions of the federal government in an all-hazards environment, which includes acts of nature, accidents, technological emergencies, and incidents related to military or terrorist attacks. A series of Presidential Decision Directives (PDD) was issued that began to link programs for terrorism, critical infrastructure protection, and COOP.⁴ In addition, as we approached the turn of the century, federal agencies also dealt with the Year 2000 computer problem by developing business continuity and contingency plans to ensure program delivery in the event of a technology failure or malfunction. Federal COOP efforts have evolved by building upon the planning for each of these events that focused on protecting critical infrastructure, both physical systems and cyber-based systems. The events of September 11, 2001, highlighted in dramatic fashion the vulnerabilities agencies face in each of these areas and focused new attention on the effects such events have on agencies' most important assets—their people, or human capital.

FEMA, the General Services Administration (GSA), and OPM are the three agencies that have the most direct impact on individual agency efforts to develop viable COOP capabilities. PDD 67, which outlined individual

³ U.S. Federal Emergency Management Agency, *Federal Preparedness Circular 65* (Washington, D.C: July 26, 1999), 2.

⁴ See PDD 62, Protection Against Unconventional Threats to the Homeland and Americans Overseas, dated May 22, 1998; PDD 63, Critical Infrastructure Protection (CIP), dated May 22, 1998, which has been superseded by Homeland Security Presidential Directive 7, Critical Infrastructure Identification, Prioritization, and Protection, dated December 17, 2003; and PDD 67, Enduring Constitutional Government and Continuity of Operations, dated October 21, 1998.

agency responsibilities for COOP, identified FEMA as the executive agent for federal COOP planning. As executive agent, FEMA has the responsibility for formulating guidance, facilitating interagency coordination, and assessing the status of COOP capability across the federal executive branch. PDD 67 also required GSA to work with FEMA in providing COOP training for federal agencies and to assist agencies in acquiring alternate facilities. In addition, the Federal Management Regulation requires GSA to lead federal Occupant Emergency Program (OEP) efforts, which are short-term emergency response programs that establish procedures for safeguarding lives and property during emergencies in particular facilities.⁵ As the President's agent and advisor for human capital matters, OPM has been actively involved in federal emergency preparedness efforts. OPM has issued a series of emergency preparedness guides for federal managers, employees, and their families; issued a number of memorandums relating to planning, preparedness, and the flexibilities available to agencies in emergency situations; and held emergency planning and preparedness forums to help agencies select emergency personnel. In addition, FEMA, GSA, and OPM collaborate to implement the Federal Workforce Release Decision and Notification Protocol when emergency situations occur in the Washington, D.C., area.

Human Capital Considerations Are Relevant to Continuity Planning and Implementation Efforts

The current literature indicates, and experts that we consulted confirmed, that the immediate response to a crisis should give priority to securing the safety of all employees and addressing the needs of employees who perform or directly support essential operations. For example, the standard for emergency management and business continuity, which was developed by the National Fire Protection Association and endorsed by FEMA, recommends that organizations include the following priorities in their continuity program: ensuring the safety and health of employees,

⁵ As the lead agency for federal OEP efforts, GSA issued the *Occupant Emergency Program Guide* in March 2002. This guidance defines an occupant emergency, details the roles of GSA and individual agencies with regard to OEP, and provides step-by-step guidance for agencies to use in carrying out their responsibilities for the program. An occupant emergency is defined as an event that may require evacuation of occupied space or relocation to a safer area. Under OEP, agencies are required to establish an occupancy emergency plan designated official, an occupancy emergency plan, and an occupancy emergency organization. GSA's responsibilities include helping agencies to establish and maintain the plans and organizations, offering policy guidance about the program, ensuring proper administration of the program, reviewing agencies' plans and organizations annually, and helping to train employees and others for emergencies.

establishing critical functions and processes, and identifying essential representatives.⁶

Consequently, the experts said that these priorities have received most of the human capital attention in continuity efforts for both the private and public sectors, including federal agencies. Appropriately, organizations focus on minimizing the loss of life and injuries, which is key to all other recovery efforts. Such efforts commonly include first aid training, evacuation plans and drills, and dismissal policies. Organizations also focus on identifying the core group of employees that will establish and maintain essential operations as dictated by an organization's mission. Organizations, for example, commonly identify leadership structures to manage crisis response. Even so, experts noted that organizations vary widely in their effectiveness in addressing these priorities.

The continuity process, however, extends beyond the goals of life safety and the performance of essential operations. The experts identified a number of human capital considerations beyond these goals that are not well addressed. For example, the priorities discussed above do not address human capital considerations for employees who are not involved in providing essential functions. Such employees would be associated with efforts to fully resume all other operations and represent the majority of an organization.

The experts identified two principles that should guide actions to more fully address human capital considerations applicable to all continuity planning and implementation efforts. The first is recognizing and remaining sensitive to employees' personal needs during emergencies when shaping the appropriate organizational expectations of employees. The emergency event that activates continuity plans may also cause emergency events in the personal lives of individual employees. Similar to an organization placing its highest priority on the safety and well-being of its employees, employees may have high-priority responsibilities to others. These personal responsibilities may limit employees' ability to contribute to mission accomplishment until these other obligations are satisfied.

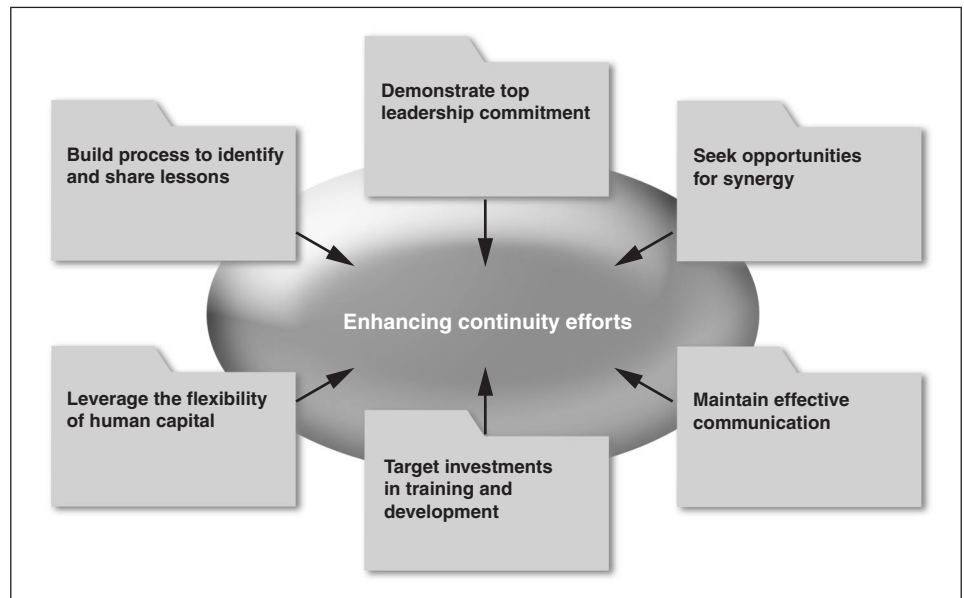
The second principle experts identified is maximizing the contributions of all employees, whether in providing essential operations or resuming full

⁶ National Fire Protection Association, *NFPA 1600: Standard on Disaster/Emergency Management and Business Continuity Programs* (Quincy, Mass.: February 2000).

services. This should be done within the limits of an employee’s ability to contribute given the situation, as described in principle one, and within the limits of the organization to use those contributions effectively. According to the experts, the experience of organizations during emergencies has been that employees remain motivated to contribute to organizational results, which is increasingly felt the longer the emergency continues. Enabling employees to contribute promotes more effective delivery of essential operations and more rapid resumption of full operations. In addition, in extreme disruptions of employees’ personal circumstances, providing purposeful activities helps avoid the debilitating affects of a disruption on employees, including job-related anxiety and post-traumatic stress disorder.

The experts we interviewed also identified six organizational actions to enhance continuity planning and implementation efforts, listed in figure 1.

Figure 1: Six Organizational Actions to Enhance Continuity Efforts



Source: GAO.

Each of these actions is described in more detail below.

Demonstrate top leadership commitment

- Instill an approach to continuity planning that includes human capital considerations
- Allocate resources and set policies
- Set direction and pace of recovery

Our past work has shown that the demonstrated commitment of top leaders is perhaps the single most important element of successful change management and transformation efforts.⁷ Effective continuity efforts have the visible support and commitment of their organization's top leadership. According to the experts, traditional continuity planning focuses on the operations side of recovery and often overlooks human capital considerations. As such, it is important for top leadership to ensure that the appropriate balance is achieved in considering physical infrastructure, technology, and human capital. In providing leadership prior to the emergency, leaders demonstrate their commitment to human capital by establishing plans that value the organization's intention to manage employees with sensitivity to their individual circumstances, recover essential operations on a priority basis, and resume other operations as quickly as possible.

Organizational leaders show commitment to continuity planning by allocating resources and setting policies that effectively meet the organization's continuity needs. The experts told us that committed leaders provide sufficient funding and staff to conduct planning and preparation efforts effectively. While the resources needed vary from location to location within an organization, the experts said that organizations should have enough resources available to develop effective plans, test critical systems, train all staff, and conduct simulation exercises. Committed top leadership also ensures that clear policies and procedures are in place for all aspects of continuity to ensure that quick and effective decisions are made during times of emergencies. Those policies and

⁷ See, for example, U.S. General Accounting Office: *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003); *Highlights of a GAO Forum: Mergers and Transformation: Lessons Learned for a Department of Homeland Security and Other Federal Agencies*, [GAO-03-293SP](#) (Washington, D.C.: Nov. 14, 2002); *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002); and *Management Reform: Elements of Successful Improvement Initiatives*, [GAO/T-GGD-00-26](#) (Washington, D.C.: Oct. 15, 1999).

procedures should be fair, shared with employees and their representatives in advance of an emergency, and able to be consistently applied to all employees. Experts and union leaders we met with agree that the cooperation and input from all components within the organization, including employees and their representatives, is important in developing these policies.

Following a disruption to normal operations, top leadership sets the direction and pace of organizational recovery. According to the experts, top leadership sets direction by providing the legitimate and identifiable voice of the organization for employees to rally around during tumultuous times. An expert from Marsh & McLennan Companies, Inc., a company that lost over 350 people in the World Trade Center on September 11, 2001, noted that in the aftermath of an emergency there is a fundamental need for a strong, visible leader to provide constant reassurance. The expert added that “employees need to know that someone is in control, even if the leaders do not know all the answers.” In addition, top leaders set the pace of organizational recovery by providing leadership to both the management team leading recovery of essential operations and the management team leading the resumption of all other operations.

Seek opportunities for synergy

- Integrate continuity efforts with broader decision making
- Consider how continuity investments benefit other program efforts

As we have previously reported, effective organizations integrate human capital approaches as strategies for accomplishing their mission and programmatic goals.⁸ According to the experts, strategic decisions made to improve day-to-day operations, including human capital approaches, and those made to build continuity readiness are not exclusive of one another and may have synergies. For example, early in 2001, GAO made the business decision to supply all of its analysts with laptop computers for financial reasons and to provide employees with flexibility in carrying out their work. That business decision, however, also contributed to our ability to quickly adapt to unforeseeable circumstances in October 2001. In response to the release of anthrax bacteria on Capitol Hill, we opened our doors to the 435 members of the House of Representatives and selected

⁸ See, for example, U.S. General Accounting Office, *High-Risk Series: Strategic Human Capital Management*, GAO-03-120 (Washington, D.C.: January 2003); GAO-03-669; GAO-03-293SP; and GAO-02-373SP.

members of their staffs. Over 1,000 GAO employees were immediately able to make use of their laptops to work from alternate locations. Consequently, we minimized the disruption to our operations and assisted the House of Representatives in continuing its operations. To take advantage of such synergies, the experts said that decisions regarding continuity efforts should be integrated with broader business decision making.

The integration of continuity planning with broader decision making helps to ensure that the direction of all efforts is consistent and provides mutual benefits. In a limited resource environment, consideration of how continuity investments benefit other program efforts also helps to strengthen the business case for human capital investments that are meant to improve continuity capabilities, day-to-day operations, or both.

- | |
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| <p>Maintain effective communication</p> <ul style="list-style-type: none">• Build relationships through two-way communication• Establish roles, responsibilities, and expectations• Develop redundant communication vehicles |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

The importance of communication cannot be overstated. According to the experts, two-way communication with employees, their representatives, and other stakeholders is key to building relationships and partnerships that can facilitate organizational recovery efforts. We have also previously reported that communication is most effective when done early, clearly, often, and is downward, upward, and lateral.⁹ According to a senior National Treasury Employees Union (NTEU) official, the union was able to capitalize on ongoing two-way communications with the Internal Revenue Service's (IRS) regional leadership to provide members with information following the September 11, 2001, attacks. For example, during the recovery efforts, the union provided supplementary channels for communicating with employees, including daily joint messages from the IRS Regional Director and the NTEU Chapter President. In addition, when the local New York office reopened on September 20, 2001, both the NTEU National President and the IRS Commissioner greeted employees at the door. From the union's perspective, communication efforts such as these helped to provide reassurance and support as well as to maintain employee trust.

⁹ [GAO-03-669](#) and [GAO-03-293SP](#).

According to experts, roles, responsibilities, and performance expectations must be communicated to all employees, and their representatives, prior to a disruption to promote the efficient and effective use of all of an organization's human capital assets. Early communication enables employees to assess and communicate to the organization any personal circumstances that may limit their ability to carry out those roles. The experts and union officials whom we spoke with agreed that in some cases, more formal communication vehicles, such as memorandums of understanding or addenda to collective bargaining agreements, may be necessary to negotiate changes or clarify roles and responsibilities in continuity plans.

Because effective emergency two-way communication depends greatly on technology, alternate and redundant communication infrastructures are necessary. In addition to technological vulnerabilities that can render different methods of communication useless, people frequently do not remain tied to the contact number or location listed in emergency records. To address these challenges, Macy's West, for example, has built an alternate emergency communication system that serves as an employee message retrieval system. The system, which is based outside of the region in case the local phone networks are overloaded, allows (1) the leadership of Macy's West to leave messages with instructions for employees, (2) family members to leave messages for employees, and (3) employees to leave messages for their loved ones.

Target investments in training and development

- Raise awareness of continuity efforts
- Build skills and competencies to increase flexibility
- Foster a culture that values flexible employees who are empowered to make effective decisions

Our past work has shown that organizations should consider making targeted investments in human capital approaches, such as training and development.¹⁰ According to the experts, training and development programs related to continuity efforts can help to raise awareness among all employees. The Social Security Administration (SSA), for example, has developed a video-training course to provide an overview of COOP, which includes an introduction from the Commissioner explaining why COOP is so important, a discussion of SSA's critical workloads and how they would

¹⁰ [GAO-02-373SP](#).

be processed during a disruption, and references to federal guides and information. The experts noted that less formal approaches, such as continuity planning awareness weeks, could also help to raise awareness.

Our recent work has indicated that training and development programs build skills and competencies that enable employees to fill new roles and work in different ways, which helps to build organizational flexibility.¹¹ According to experts, the training and development goals for employees assigned to the team that performs essential operations differ from those for the employees assigned to the team that is responsible for resuming all other organizational operations. The goal for the team that performs essential operations is to achieve “critical depth,” which occurs when an adequate number of employees are available to staff each critical function, in the event that a member of the team expected to perform that function is unavailable. Organizations can build critical depth in various ways, including using exercises that simulate an emergency to train backup employees alongside employees who have primary responsibility for an essential operation, or allowing backup employees to perform the operation while the primary employees oversee and critique their performance. In addition, critical depth can be built through succession planning. To be effective for this purpose, however, the scope of succession planning is extended to recognize that there is no time to develop successors in an emergency and incrementally increase levels of authority as an individual matures in a position. Therefore, organizations may have to plan to use predecessors to a position, including retirees, as successors.

With regard to the team that is responsible for resuming all other organizational operations, experts said that the training and development goal is to build sufficient breadth to enable members to contribute to resumption efforts in a variety of ways. For example, development programs requiring employees to rotate within an organization to learn a variety of positions, potentially at a variety of locations, contribute to

¹¹ We have identified eight core characteristics of a strategic training and development process that can help make a training and development program effective and strategically focused on achieving results. These characteristics are strategic alignment; leadership commitment and communication; stakeholder involvement; accountability and recognition; effective resource allocation; partnerships and learning from others; data quality assurance; and continuous performance improvement. For more information on these characteristics, see U.S. General Accounting Office, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2003).

critical breadth. We have previously reported that developmental assignments place employees in new roles or unfamiliar job environments in order to strengthen skills and competencies and broaden their experience.¹²

Effective training and development initiatives also help to foster a culture that is characterized by flexible employees who are empowered to make effective decisions independently. According to experts, such a culture is often critical to agency recovery and resumption efforts. Experts from Marsh & McLennan Companies, Inc., reported that effective decision-making abilities could be developed through formal training about the parameters in which employees are empowered to make decisions and on-the-job experiences demonstrating how employees can exercise authority in making decisions that manage, rather than avoid, risk and are focused on achieving results.

Leverage the flexibility of human capital

- Enable employees associated with resumption activities to contribute to mission results in alternate assignments
- Sustain the contribution of employees associated with essential operations
- Maintain organizational knowledge of staffing requirements and availability

The events of September 11, 2001, give ample evidence of the dedication and flexibility of federal, state, and local government employees in providing services to the American public. Disruption of normal operations challenges an organization to use this dedication and flexibility to its advantage, especially with regard to employees associated with the resumption of all operations that are not considered essential. According to the experts, organizations may use approaches such as telework and geographic dispersion, which includes regional structure, to increase the ways in which employees may contribute. As OPM guidance has underscored and presenters at a recent conference held by the International Telework Association and Council noted, telework is an important and viable option for federal agencies in COOP planning and implementation efforts, especially as the duration of the emergency event

¹² U.S. General Accounting Office, *Human Capital: Insights for U.S. Agencies from Other Countries' Succession Planning and Management Initiatives*, [GAO-03-914](#) (Washington, D.C.: Sept. 15, 2003).

is extended.¹³ However, to make effective use of telework, experts told us that organizations should identify those employees who are expected to telework during a disruption and communicate that expectation to them in advance. In addition, organizations should provide teleworkers with adequate support in terms of tools, training, and guidance.¹⁴ Geographic dispersion can also provide a way for employees associated with resumption activities to continue their normal functions albeit at or through other locations. For example, SSA recognizes that its field structure enables the agency to make use of both multiple locations and telework in providing its employees ways to contribute because most field functions can be transferred fairly easily from one location to another in the same region or performed remotely with laptop computers. Based on these efforts, SSA does not envision a scenario in which its field employees would not contribute to their normal functions for more than 72 hours.

Employees demonstrate their flexibility by a willingness to contribute to the organization in roles that may be unusual. According to the experts, flexible employees contribute as best they can usually in the following sequence: (1) providing support to the team performing essential operations, if needed; (2) continuing to contribute to their normal mission-related functions; (3) performing an alternate contribution for their organization; or if none of these can be accomplished, (4) volunteering in their communities as a direct form of public service. Federal employees may have additional opportunities to contribute to not only their own agencies' operations but also other agencies' operations in serving the American people. In addition, a recent memorandum from OPM recognizes the value of federal employees contributing to the general public through community volunteer service in the range of alternative contributions.¹⁵

¹³ See, for example, U.S. Office of Personnel Management, "Memorandum for Heads of Executive Departments and Agencies: Washington, DC, Area Dismissal or Closure Procedures," December 4, 2003, and "Memorandum for Heads of Executive Departments and Agencies: Level Orange Emergency Human Resources Management (HRM) Authorities," March 17, 2003.

¹⁴ Our previous work has also identified 25 key practices for implementation of successful federal telework programs. See U.S. General Accounting Office, *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts*, GAO-03-679 (Washington, D.C.: July 18, 2003).

¹⁵ U.S. Office of Personnel Management, "Memorandum for Heads of Executive Departments and Agencies: Subject: Widespread Power Outage," August 15, 2003.

Employees associated with providing essential operations may be working under unusual pressures for extended periods of time, and organizations need to consider ways to sustain these efforts. The experts recommend that if the circumstances of the emergency continue long enough to raise concerns about burnout, organizations consider providing opportunities for working in shifts; rotating assignments among team members; providing relief through the use of qualified employees associated with resumption activities; reemploying retirees; or utilizing employees from stakeholder or networked organizations, such as suppliers or contractors.

According to the experts, the ability of organizations to match staffing requirements with available skills and abilities could be enhanced through various initiatives, such as job banks, skill profile databases, and pre-arranged partnerships with other organizations or community service organizations. For example, job banks that detail additional jobs that may be required during an emergency but are not considered essential could allow employees to preselect alternate contributions that they would be able to perform. In the federal government, agencies could establish their own job banks; form interagency partnerships that link the potential needs of several agencies; and create a cache for volunteer opportunities, possibly tied to the Citizen Corps.¹⁶ Organizations with databases that collect employee knowledge, skills, and abilities (KSA)—even those KSAs outside the scope of an employee’s normal functions—may complement the job banks by allowing organizations to match available KSAs with the unmet needs of the organization.

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Build process to identify and share lessons</p> <ul style="list-style-type: none">• Create a learning environment• Make learning explicit and shared |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

An evaluation process that explicitly identifies and disseminates lessons learned during disruptions, or simulations of disruptions, promotes

¹⁶ President Bush created the Citizen Corps in January 2002, as a component of the USA Freedom Corps, to help coordinate volunteer activities that will make communities safer, stronger, and better prepared to respond to any emergency situation. This mission is carried out through a national network of Citizen Corps Councils that build on community strengths to implement the program and carry out a local strategy. FEMA coordinates the program nationally. In this capacity, FEMA works closely with key stakeholders, including other federal entities, state and local governments, first responders, emergency managers, and the volunteer community. More information can be found at www.citizencorps.gov or by calling 1-877-USA-CORPS.

learning among all of an organization's human capital assets and helps to improve organizational performance. An organization that is committed to learning has an inclusive and supportive process and a framework designed prior to a disruption to gather important data. According to experts, organizations committed to learning will ensure that those employees who are key to the recovery and resumption efforts are involved in the formal evaluation process in a timely manner and will seek the input from as many other employees as possible. Such an inclusive environment will enable the organization to discover valuable lessons learned by employees in unusual circumstances. In addition, conducting evaluations in a "no-blame," nonattribution atmosphere and taking organizational ownership of any problems that might be identified increases the openness with which participants are willing to share their experiences. To encourage such an environment, FEMA officials told us that the agency's Office of National Security Coordination has recently implemented a reporting system that allows any employee to identify lessons learned anonymously during an emergency, instead of waiting for the formal review process.

Our past work has shown that human capital approaches are best designed and implemented based on data-driven decisions.¹⁷ According to experts, having a framework prior to a disruption helps to gather data important to evaluating the effectiveness of human capital approaches during a disruption. Some measures that they suggested include number of employees contributing to mission-related outcomes each day; degree of contribution (e.g., part time or full time); location of employee when contributing (e.g., at alternate facility or home); type of contribution (e.g., performing same function, performing an alternate function within the department, working with another department, or volunteering); or obstacles to contribution (e.g., organizational or personal).

Once identified, it is important for the lessons learned during the evaluation to be made explicit and then widely disseminated. According to experts, the manner and formality of documentation and dissemination, however, depend on the situation or needs of the organization (e.g., after-action reports, detailed analyses, executive summaries, video tapes, CDs, or Web-based reports). There are unique opportunities in the federal government for agencies to share explicit lessons learned both internally and with other federal agencies and stakeholders. For example, following the September 11, 2001, attacks, senior Department of Housing and Urban

¹⁷ [GAO-02-373SP](#).

Development officials asked the New York Acting Regional Director to recount her experiences and lessons learned in front of a video camera. The accounts were edited down into a 30-minute video entitled *Thinking the Unthinkable: Preparing for Disaster*. That video has been used within the department as a training aid and has been shared with over 50 federal agencies with the help of the Washington, D.C.–based interagency COOP Working Group (CWG) and the FEBs in cities across the United States. In Canada, Emergency Management Alberta (EMA) employs a centralized Disruption Incident Reporting System for all government agencies, which is accessible via the Internet, to obtain timely and accurate reporting of all disruptions and “most importantly, ensure lessons learned can be documented for follow-up.”¹⁸ EMA has also created a Lessons Learned Warehouse Web site to share continuity lessons learned in all aspects of crisis management.¹⁹

FEMA and OPM Have Exhibited Leadership in Addressing Human Capital Considerations Relevant to COOP

As we stated earlier, the human capital considerations related to life safety and the needs of personnel performing essential operations have largely been addressed in continuity efforts. In the federal government, FEMA has issued guidance that has addressed these considerations and has recognized the opportunity to more fully address human capital considerations in its guidance. In addition, OPM has issued federal emergency preparedness guidance relevant to COOP that also addresses these considerations and is working with FEMA to more fully address human capital considerations in federal guidance.

FEMA Issued Guidance That Addresses Human Capital Considerations, but Recognizes Opportunity to Do More

As executive agent for federal COOP planning, FEMA issued FPC 65 in July 1999 as the primary guidance for agencies developing viable COOP plans. According to FPC 65, the purpose of COOP planning is to facilitate the performance of agency essential functions for up to 30 days during any emergency or situation that may disrupt normal operations. The five objectives of a viable COOP plan listed in FPC 65 are (1) ensuring the continuous performance of an agency’s essential functions during an emergency; (2) protecting essential facilities, equipment, records, and

¹⁸ Emergency Management Alberta, “Disruption Incident Reporting System,” www.municipalaffairs.gov.ab.ca/ema/BRP/DIRS.cfm (downloaded Feb. 19, 2004).

¹⁹ Emergency Management Alberta, “Welcome to the Lessons Learned Warehouse,” www.municipalaffairs.gov.ab.ca/ema/BRP/Welcome.cfm (downloaded Feb. 19, 2004).

other assets; (3) reducing or mitigating disruptions to operations; (4) reducing loss of life, minimizing damage and losses; and (5) achieving a timely and orderly recovery from an emergency and resumption of full service to customers.

The guidance subsequently limits a COOP event to one that significantly affects the facilities of an organization and requires the establishment of essential operations at an alternate location. Therefore, as FEMA recognizes, the guidance does not apply to significant disruptions that leave facilities intact, such as a severe acute respiratory syndrome (SARS) outbreak that could lead a large number of employees to avoid congested areas, including their workplaces. Although a people-only event such as SARS would significantly disrupt normal operations, the current COOP guidance would not apply because facilities would remain available. FPC 65 also indicates that the guidance is for use at all levels and locations of federal agencies. FEMA officials acknowledge, however, that the priority of COOP planning to date has been focused on agency headquarters located in the Washington, D.C., area.

Given the purpose of COOP and the nature of its objectives, the human capital considerations FEMA included in the guidance primarily relate to life safety for all employees and addressing the needs of employees performing essential operations. For example, the guidance states that one of the objectives of COOP is “reducing loss of life, minimizing damage and losses.” It also refers to the legal requirement that each agency develop a viable OEP, which is a short-term emergency response program that establishes procedures for safeguarding lives and property during emergencies in particular facilities.²⁰ FPC 65 more broadly defines life safety by including a statement related to the need to consider the health and emotional well-being of employees on the essential operations team. Also, with respect to employees who perform essential functions, the guidance directs agencies to designate an emergency team, delegate authority, establish orders of succession, develop communication plans, develop training programs, and provide for accountability.

FEMA officials we spoke with recognized that there is a need to go beyond the human capital considerations that have already been addressed within federal COOP guidance in order to achieve the full range of COOP

²⁰ 41 C.F.R. §§ 102-74.230 – 102-74.260 and U.S. General Services Administration, *Occupant Emergency Program Guide* (Washington, D.C.: March 2002).

objectives. Specifically, FEMA officials agreed that it was particularly important to deal with the human capital considerations inherent to the resumption activities needed to fully recover from an emergency. To that end, FEMA has taken several steps to more fully address these considerations. FEMA has worked with a subcommittee of the interagency CWG—a Washington, D.C.-based group that meets monthly to discuss issues related to COOP—to rewrite the federal COOP guidance. The agency has requested OPM’s assistance in incorporating these considerations into the new federal COOP guidance. FEMA has also worked in cooperation with us as we developed this report. As a result, FEMA officials told us that the draft guidance would include an augmented discussion of human capital considerations.

OPM Has Also Exhibited Leadership in Addressing Human Capital Considerations Related to Emergency Preparedness

OPM has also recognized the value of human capital in COOP and other emergency preparedness efforts. In a memorandum to the heads of executive departments and agencies, for example, the Director of OPM stated that “the American people expect us to continue essential government services without undue interruption, no matter the contingency, and Federal agencies must have the human resources to accomplish their missions, even under the most extreme of circumstances.”²¹ To this end, OPM has established the Emergency Preparedness subcommittee of the Chief Human Capital Officers Council that is tasked with recommending policy changes, legislative changes, or other strategies for moving the issue forward. In addition, OPM has initiated several efforts to help agencies address human capital considerations in emergency preparedness related to life safety and the needs of personnel performing essential operations, as well as to recognize the role that employee organizations and unions could play in supporting those efforts. These initiatives are important first steps; however, they do not fully address human capital considerations related to the resumption of all agency operations that are not considered essential.

With regard to providing for the safety of all employees, OPM has issued four preparedness guides to educate federal employees, managers, and their families on how to protect themselves from a potential biological,

²¹ U.S. Office of Personnel Management, “Memorandum to Heads of Executive Departments and Agencies: Level Orange Emergency Human Resources Management (HRM) Authorities,” March 17, 2003.

chemical, or radiological release, whether accidental or intentional.²² The guides also spell out the responsibilities of the federal government and individual agencies to protect employees in the event of an emergency. In addition to the guides, OPM has addressed safety issues by revising the Washington, D.C., area emergency dismissal protocols for federal employees and contractors, in conjunction with FEMA and GSA; issuing memorandums to all agency heads detailing the “minimum obligations” agencies have to secure the safety of federal workers; issuing two emergency preparedness surveys through which federal agencies could report on their progress in ensuring the safety of their employees; and highlighting the role that Employee Assistance Programs can play in responding to employee needs in emergency situations.

Related to providing for the needs of employees performing or supporting essential operations, OPM has led two forums focusing on emergency employee designations and the flexibilities that are available to agencies in emergency situations. OPM has also issued a series of memorandums outlining the existing human resource management flexibilities that agencies might employ in emergency situations.²³ Other human capital flexibilities that are available to agencies in nonemergency situations, such as telecommuting, job sharing, and flexible scheduling, might provide additional assistance during emergency situations and are detailed in OPM’s handbook, *Human Resources Flexibilities and Authorities in the Federal Government*. (See app. II for a list of human resource flexibilities that agencies may use to respond to emergency situations.)

In addition to initiating efforts to address several human capital considerations, OPM has highlighted the need to work with and through employee organizations and unions in developing and executing emergency management strategies. For example, OPM has held meetings with federal

²² The four guides are entitled *A Federal Employee’s Emergency Guide*, *Federal Manager’s/Decision Maker’s Emergency Guide*, *A Federal Employee’s Family Preparedness Guide*, and *A Federal Employee’s Family Preparedness Guide (For the Washington, D.C. Area)*.

²³ See U.S. Office of Personnel Management, “Memorandum for Heads of Departments and Agencies: Wildfires in California,” October 27, 2003; “Memorandum for Heads of Departments and Agencies: Hurricane Isabel,” September 19, 2003; and “Memorandum for Heads of Executive Departments and Agencies: Level Orange Emergency Human Resources Management (HRM) Authorities,” March 17, 2003. See also U.S. Office of Personnel Management, *Human Resources Flexibilities and Authorities in the Federal Government* (Washington, DC: July 25, 2001).

labor union leaders and employee associations to discuss relevant employee safety issues and has specifically encouraged agencies to work with and share information on preparedness efforts with applicable employee organizations and unions. Senior union officials whom we spoke with from the American Federation of Government Employees and NTEU agreed that it is important for unions to be involved throughout COOP planning and implementation efforts. These officials also stated that unions could be resources for agencies in communicating with employees, both before and during an emergency, as well as in engaging employees in recovery and resumption efforts.

FEBs Have Opportunities to Coordinate Regional Emergency Planning Efforts, Including COOP, in Major Metropolitan Areas

Although FEMA heads the interagency CWG to help coordinate COOP efforts in the Washington, D.C., area, the efforts of this group do not apply to the over 80 percent of federal employees who work outside of this area. While not specifically tasked with coordinating COOP efforts, FEBs are generally responsible for improving coordination among federal activities and programs in major metropolitan areas outside of Washington, D.C.²⁴ Under the direction of OPM, FEBs support and promote national initiatives of the President and the administration and respond to the local needs of federal agencies and the community. OPM officials have recognized that FEBs can add value to regional emergency preparedness efforts, including COOP, as vehicles for communication, coordination, and capacity building. To make use of these capabilities, OPM has provided FEBs with relevant emergency preparedness materials, encouraged FEBs to focus on preparedness issues in their regions, requested that FEBs test their emergency communication plans, and encouraged FEBs to inform OPM of any emergency-related events affecting federal employees in the regions.

The FEBs that we visited are already playing active roles in regional emergency preparedness and COOP efforts. For example, the Chicago FEB has established committees to deal with Disaster Recovery Planning and Emergency Release; surveyed its member agencies to determine the

²⁴ Although this section focuses on FEBs, much of the discussion could also apply to Federal Executive Associations (FEA) and Federal Executive Councils (FEC) that are located in cities where FEBS do not exist. FEAs and FECs have purposes and objectives similar to FEBS although they do not function within the same formal set of parameters as FEBS (e.g., they are not officially established by Presidential Memorandum, nor do they receive policy direction or guidance from OPM). FEAs and FECs also do not have permanent status and, according to OPM, often disband and regroup depending on the local commitment of agency members.

status of COOP planning in the region; sponsored a series of seminars, in conjunction with GSA and FEMA, on topics related to COOP, sheltering in place, and national security; participated in regional exercises, such as TOPOFF 2;²⁵ and sponsored a COOP exercise to provide agencies with a forum for validating their COOP plans, policies, and procedures. The Cleveland FEB has established an emergency preparedness committee to promote awareness and preparation, developed an *Employee Emergency Contingency Handbook* that provides basic actions to respond to emergencies that may be encountered by federal employees, and helped to make training available to all federal agencies. The Philadelphia FEB has held several COOP workshops for agencies and regularly shares relevant information with agency officials via e-mail. In addition, these FEBs play a role in developing and activating dismissal and closure procedures for federal agencies located in their particular regions.

Although both OPM officials and the FEB officials whom we spoke with recognized that FEBs can add value in coordinating emergency preparedness efforts, including COOP, and that such a role is a natural outgrowth of general FEB activities, a specific role and responsibilities have not been defined. In addition, the current structure in which FEBs operate results in differing capacities of FEBs across the nation. For example, each agency's participation in FEB activities is voluntary. Consequently, FEBs can only make recommendations to agencies, without the ability to require agency compliance. Also, FEBs rely on host agencies for funding, which results in variable funding and staffing from year to year and across FEBs. OPM has recognized that the roles and capacities of FEBs vary across the nation and has established an internal working group to study the strengths and weaknesses of FEBs and develop recommendations for improving their capacity to coordinate in regions outside of Washington, D.C. According to OPM, such efforts in regard to local emergency preparedness and response will include improving dissemination of information and facilitation of COOP training and tabletop exercises; addressing the implications for strategic human capital management in continuing the operations of the federal government (e.g., alternate work schedules, remote work sites, and telecommuting

²⁵ TOPOFF 2 was conducted from May 12 through May 16, 2003, and involved top government officials from federal, state, local, and Canadian participants in a full-scale exercise that assessed how responders, leaders, and other authorities would react to the simulated release of weapons of mass destruction in two U.S. cities, Seattle and Chicago.

capabilities); and developing strategies to better leverage the network of FEBs to help departments and agencies implement their initiatives.

Conclusions

More fully addressing human capital considerations in emergency preparedness guidance, including COOP, could improve agency response capabilities to large-scale COOP emergencies or situations; could help minimize the impact of more common, yet less catastrophic disruptions (e.g., snowstorms and short-term power outages); and is consistent with building a more flexible workforce, which would enhance ongoing efforts across the federal government to create more responsive human capital management systems. As FEMA works to update its federal COOP guidance and OPM continues to issue emergency preparedness guidance relevant to COOP, several areas require attention to more fully address human capital considerations relevant to COOP.

By limiting COOP to situations that necessitate moving to an alternate facility, agencies are left without guidance for situations in which an agency's physical infrastructure is unharmed, but its employees are unavailable or unable to come to work for an extended period of time. While facilities and technology would not be affected by such situations, the unavailability of people to contribute to mission-related outcomes could cause a significant disruption to normal operations.

Emergency guidance, including COOP, generally does not extend beyond consideration of life safety and the needs of employees performing essential operations. Therefore, the guidance excludes most agency employees—those who would be associated with resuming all other operations.

FEBs are uniquely situated to improve coordination of emergency preparedness efforts, including COOP, in areas outside of Washington, D.C. However, the context in which FEBs currently operate, including the lack of a clearly defined role in emergency preparedness efforts, including COOP, and varying capacities among FEBs, could lead to inconsistent levels of preparedness across the nation.

Recommendations for Executive Action

We recommend that the Secretary of Homeland Security direct the Under Secretary for Emergency Preparedness and Response to take the following two actions:

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- Expand the definition of a COOP event in federal guidance to recognize that severe emergencies requiring COOP implementation can include people-only events.
 - Complete efforts to revise federal COOP guidance to more fully address human capital considerations by incorporating the six organizational actions identified in this report.

We recommend that the Director of OPM take the following two actions:

- Develop and provide additional emergency preparedness guidance to more fully address human capital considerations by incorporating the six organizational actions identified in this report.
- Determine the desired role for FEBs to play in improving coordination of emergency preparedness efforts, including COOP, and identify and address FEB capacity issues to meet that role. It would be appropriate for FEBs to be formally incorporated into federal emergency preparedness guidance, including COOP guidance, for areas outside of Washington, D.C.

Agency Comments and Our Evaluation

We provided the Secretary of Homeland Security and the Director of OPM a draft of this report for review and comment. We received written comments from the Under Secretary of Emergency Preparedness and Response on behalf of FEMA and the Department of Homeland Security, which are reprinted in appendix III. In his comments, the Under Secretary stated that the draft accurately addressed human capital considerations relevant to COOP guidance and coordination and noted that DHS and FEMA will continue to work with OPM and other federal partners to improve the federal government's COOP plan by incorporating our recommendations in its federal COOP guidance. In addition, he stated that FEMA would expand its efforts with its regional offices and FEBs to improve coordination of COOP programs at the regional level.

The Director of OPM also provided written comments, which are reprinted in appendix IV. In her comments, the Director noted her appreciation for our acknowledgement of the agency's leadership role in addressing human capital considerations relevant to COOP planning. However, the Director of OPM stated that the agency has already carried out our recommendation to more fully address human capital considerations in emergency preparedness guidance, including COOP, by incorporating the key actions

identified in the report. The Director provided numerous examples of actions OPM has taken to support emergency preparedness efforts, all of which she noted were influenced by the agency's human capital framework. In addition, the Director also attached an enclosure to the agency comments that contain examples of OPM's internal COOP-related efforts that she believes would be helpful to federal agencies.

Most of the examples of emergency preparedness guidance that the Director of OPM provided were included in the draft report and deal largely with the human capital considerations related to life safety and the needs of personnel performing essential operations. While such initiatives are important first steps, there remain opportunities to improve OPM's emergency preparedness guidance to include a fuller range of human capital considerations, particularly related to the resumption of all agency operations that are not considered essential. As such, our assessment of OPM's guidance and our recommendation for the agency to develop and provide additional emergency preparedness guidance that incorporates the key actions identified in the report remain unchanged.

With regard to our second recommendation for OPM to determine the desired role of FEBs in improving coordination of emergency preparedness efforts, including COOP, and address any resulting capacity issues, the Director of OPM stated that the leadership role the agency plays with respect to FEBs was not sufficiently developed in the report and she provided examples of OPM's support for the FEB's efforts. Most of the supporting examples that the Director provided were included in the draft report. Moreover, the additional examples generally do not address our larger point that the role of FEBs in coordinating emergency preparedness efforts, including COOP, needs to be clearly defined. As such, we maintain our conclusion that the context in which FEBs currently operate, including the lack of a clearly defined role in emergency preparedness efforts and the varying capacities among FEBs, could lead to inconsistent levels of preparedness across the nation.

The Director of OPM suggested several clarifications to the report, which we considered and incorporated where appropriate. For example, she suggested both technical and substantive changes to a footnote describing Federal Executive Associations (FEA) and Federal Executive Councils (FEC). While we made technical changes in response to these comments, our work does not allow us to categorically exclude all FEAs and FECs as viable options for the coordination of emergency preparedness activities, as the Director suggested in her response. Instead, we recognize that any

guidance provided to FEBs would likely be beneficial to FEAs and FECs despite their differences. The Director also provided additional details describing OPM's internal working group that is studying the strengths and weaknesses of FEBs, and we have incorporated these details into the report.

We are sending copies of this report to the Ranking Minority Member, Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Senate Committee on Governmental Affairs; the Chairman and Ranking Minority Member, House Committee on Government Reform; the Chairman and Ranking Minority Member, Subcommittee on Homeland Security, House Committee on Appropriations; the Chairman and Ranking Minority Member, Subcommittee on National Security, Emerging Threats, and International Relations, House Committee on Government Reform; and other interested congressional parties. We will also send copies to the Secretary of Homeland Security, the Under Secretary of Emergency Preparedness and Response and the Director of OPM. This report will also be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me or William Doherty on (202) 512-6806. Key contributors to this report include Kevin J. Conway, Tiffany Tanner, Thomas Beall, Amy Choi, Amy Rosewarne, John Smale, and Michael Volpe.

Sincerely yours,

A handwritten signature in black ink that reads "J. Christopher Mihm". The signature is written in a cursive, flowing style.

J. Christopher Mihm
Managing Director, Strategic Issues

Objectives, Scope, and Methodology

The objectives of this report were to

- identify the human capital considerations that are relevant to federal agencies' continuity planning and implementation efforts;
- describe the continuity of operations (COOP) guidance provided by the Federal Emergency Management Agency (FEMA) and emergency preparedness guidance and activities of the Office of Personnel Management (OPM) to address human capital considerations relevant to COOP; and
- describe the role Federal Executive Boards (FEB) play, relevant to COOP, in coordinating efforts outside of the Washington, D.C., area.

To address human capital considerations that are relevant to continuity planning and implementation efforts, we reviewed relevant literature, such as industry journals, federal guidance, and codes of standards on disaster/emergency management and continuity programs. Because the available literature was limited in its attention to human capital, we based our work primarily on semistructured interviews with experts from private sector businesses, federal government agencies, and public institutions. We first reviewed industry journals, magazines, and Web sites; queried state and international auditors; attended a national business continuity conference; and sought input from the National Academy of Public Administration (NAPA), the Private Sector Council (PSC), and FEMA to identify individuals or organizations with the relevant knowledge needed to address our first objective. We selected individuals or organizations that had one or more of the following characteristics: (1) experience responding to, recovering from, and resuming business activities following an emergency, from which human capital lessons may have been drawn; (2) experience incorporating human capital considerations into their organization's continuity planning efforts; (3) specific human capital expertise that could be applied to continuity planning and implementation efforts; and (4) specific continuity expertise that is broad enough to identify those critical areas that require human capital attention. When an organization was selected, we then contacted the organization to identify the specific individuals who had the relevant expertise.

On the basis of these characteristics and the input from NAPA, PSC, and FEMA, we selected organizations or individuals within organizations to obtain a diversity of views from both the public and private sector. Individuals from a total of 15 organizations, in addition to FEMA, provided

their expertise in addressing our objective. The organizations include five federal agencies—the Centers for Disease Control and Prevention, the Department of Housing and Urban Development, the Department of Veterans Affairs, the General Services Administration, and the Social Security Administration; five private sector businesses—the Gillette Company, Lockheed Martin Corporation, Macy’s West, Marsh & McLennan Companies, Inc., and Science Applications International Corporation; and five public institutions—the Business Continuity Institute, the Disaster Recovery Institute International, Emergency Management Alberta (Canada), Clark-Atlanta University, and the University of Tasmania (Australia).

We then conducted three cycles of work to identify the human capital considerations that are relevant to continuity, with each subsequent cycle building upon the information gathered in previous cycles. We adopted this approach because our initial conversations with experts indicated that a common perspective of the continuity process could help structure and focus our subsequent interviews with experts about the relevant human capital considerations. Cycle one involved conducting semistructured interviews with experts from FEMA and 5 of the 15 organizations.¹ We asked each to describe a view of the entire continuity process from a human capital perspective. We used those descriptions to synthesize a framework that we then shared with each of the first cycle experts for comment. The experts generally agreed with the content of the framework and agreed that it would be useful in focusing subsequent interviews about human capital considerations. In the second cycle, we used this framework as a reference when conducting in-depth, semistructured interviews with experts from all 15 organizations and FEMA about the human capital considerations relevant to continuity. For the third cycle, we held a 1-day working group, in cooperation with FEMA, to more fully discuss the human capital considerations previously identified in cycles one and two. The interactive nature of the working group, which included a cross-section of the experts and additional representatives from GAO,²

¹ The cycle one participants were FEMA, the Department of Housing and Urban Development, the Gillette Company, Lockheed Martin Corporation, the Business Continuity Institute, and Clark-Atlanta University.

² The working group participants were from FEMA, the Department of Housing and Urban Development, the Social Security Administration, Lockheed Martin Corporation, Marsh & McLennan Companies, Inc., Science Applications International Corporation, and the Disaster Recovery Institute International, as well as representatives from GAO.

helped to ensure that we had adequately captured the key considerations relevant to continuity. As a final check, we provided all of the experts with a summary document that included the statements used throughout this report and attributed to the experts. We asked the experts to review the statements for fundamental disagreement or fatal flaws. Almost all experts responded and generally agreed with our treatment of these issues.

To supplement information we received in the three cycles, we held additional interviews with officials from OPM; representatives from the Chicago, Cleveland, and Philadelphia FEBs; and representatives from the National Treasury Employees Union (NTEU) and the American Federation of Government Employees (AFGE). We spoke with representatives of the FEBs because the FEBs' role as coordinative bodies in regions across the nation gives them a unique view of federal emergency preparedness efforts outside of the Washington, D.C., area. We spoke with representatives from NTEU and AFGE because unions can play a key role in addressing human capital considerations.

To describe the COOP guidance provided by FEMA and emergency preparedness guidance and activities of OPM to address human capital considerations relevant to COOP, we interviewed officials from both agencies. In addition, we reviewed and analyzed relevant documents. For example, we reviewed Federal Preparedness Circular 65, the primary guidance for federal executive branch COOP, to identify the human capital considerations that are included in federal COOP guidance. We also reviewed OPM publications, including four emergency preparedness guides and a series of memorandums that list available agency flexibilities in times of emergencies.

To describe the role FEBs play, relevant to COOP, in coordinating efforts outside of the Washington, D.C., area, we held interviews with officials from OPM with responsibility for FEBs nationwide and representatives from the three FEBs discussed above.

We conducted our work from February 2003 through December 2003 in accordance with generally accepted government auditing standards.

Emergency Human Capital Flexibilities Listed in OPM Emergency Memorandums

OPM has issued a series of memorandums outlining the existing human resources management flexibilities that executive departments and agencies might employ in emergency situations with and without OPM approval.¹ Other human capital flexibilities and programs, such as those detailed in OPM's handbook, *Human Resources Flexibilities and Authorities in the Federal Government*,² that are available to agencies in nonemergency situations may also provide additional assistance in responding to and recovering from COOP emergencies. For additional information on these flexibilities, OPM has advised that agency chief human capital officers, human resources (HR) directors, or both should contact their assigned OPM human capital officer. Employees are advised to contact their agency HR offices for assistance.

A compilation of the emergency flexibilities outlined by OPM in its emergency guidance memorandums appears below.

Leave

Excused Absence

Agencies have the discretion, without OPM approval, to grant excused absence to employees who are prevented from reporting to work because of an emergency. The authority to grant excused absence also applies to employees who are needed for emergency law enforcement, relief, or recovery efforts authorized by federal, state, or local officials having appropriate jurisdiction and whose participation in such activities has been approved by the employing agency. Military leave under 5 U.S.C. § 6323(b) is appropriate for federal employee members of the National Guard or Reserves who are called up to assist in an emergency.³

¹ See U.S. Office of Personnel Management, "Memorandum for Heads of Departments and Agencies: Wildfires in California," October 27, 2003; "Memorandum for Heads of Departments and Agencies: Hurricane Isabel," September 19, 2003; and "Memorandum for Heads of Executive Departments and Agencies: Level Orange Emergency Human Resources Management (HRM) Authorities," March 17, 2003.

² U.S. Office of Personnel Management, *Human Resources Flexibilities and Authorities in the Federal Government* (Washington, D.C.: July 25, 2001).

³ According to 5 U.S.C. § 6323(b), military leave is not to exceed 22 workdays.

Emergency Leave Transfer Program

Subject to approval by the President, OPM may establish an emergency leave transfer program, which is separate from the federal leave-sharing program, to assist employees affected by an emergency or major disaster. Under 5 U.S.C. § 6391, the emergency leave transfer program would permit employees in an executive agency to donate unused annual leave for transfer to employees of the same or other agencies who have been adversely affected by an emergency and who need additional time off work without having to use their own paid leave. If agencies believe there is a need to establish an emergency leave transfer program to assist employees affected by an emergency, they are to contact their OPM human capital officer.

Pay

Premium Pay for Employees Performing Emergency Overtime Work

In certain emergency or mission-critical situations, agencies have the discretion, without OPM approval, to apply an annual premium pay cap instead of a biweekly premium pay cap, subject to the conditions set forth in 5 U.S.C. § 5547(b) and 5 C.F.R. § 550.106. In this regard, the agency head, his or her designee, or OPM may determine that an emergency exists. Agencies have the discretion, without OPM approval, to apply an annual cap to certain types of premium pay for any pay period for (1) employees performing work in connection with an emergency, including work performed in the aftermath of such an emergency, or (2) employees performing work critical to the mission of the agency. Such employees may receive premium pay under these conditions only to the extent that the aggregate of basic pay and premium pay for the calendar year does not exceed the greater of the annual rate for (1) General Schedule (GS)–15 step 10 (including any applicable special salary rate or locality rate of pay, or (2) level V of the Executive Schedule.

Furlough

In some emergency situations, agencies have the discretion, without OPM approval, to furlough employees, that is, to place them in a temporary status without duties and pay for nondisciplinary reasons. Under 5 C.F.R. § 752.404(d)(2), agencies are relieved of the requirement to provide employees advanced notice and an opportunity to respond when the furlough is based on “unforeseeable circumstances,” such as a sudden

breakdown in equipment, an act of nature, or a sudden emergency requiring the agency to immediately curtail activities.

Benefits

Workers' Compensation Benefits

Workers' compensation benefits are available when federal employees are injured or killed while on duty. The Department of Labor may establish special procedures to provide direct assistance to affected employees and their families.

Expedited Processing of Retirement and Life Insurance Benefits

To assist agencies in responding to employee needs during and after an emergency situation, OPM may establish special expedited arrangements for processing disability retirement applications; survivor benefits; and payments under the Federal Employees Group Life Insurance Program, currently administered by the Metropolitan Life Insurance Company.

Death Gratuity

Under Section 651 of Pub. L. No. 104-208 (Omnibus Consolidated Appropriations Act, 1997), 5 U.S.C. § 8133 note, agencies have the authority, without OPM approval, to pay up to \$10,000 to the personal representative of a civilian employee who dies in the line of duty.

Telework

Agencies have the discretion, without OPM approval, to approve telecommuting arrangements and alternative work sites to accommodate emergency situations. According to OPM, one of the major benefits of the telework program is the ability of telework employees to continue working at their alternative work sites during a disruption to operations. In recognition of the growing importance of teleworkers in the continuity of agency operations, OPM states that agencies may wish to modify their current policies concerning teleworkers and emergency closures. Agencies may also wish to require that some or all of their teleworkers continue to work at their alternative work sites on their telework day during emergency situations when the agency is closed. Although agencies would not have to designate a teleworker as an emergency employee, OPM states that any requirement that a telework employee continue to work if

the agency closes on his or her telework day should be included in the employee's formal or informal telework agreement.

Emergency Hiring Flexibilities

Emergency Critical Hiring

Under 5 C.F.R. § 213.3102(i)(2), agencies have the discretion, without OPM approval, to fill positions for which an emergency or critical hiring need exists; however, initial excepted appointments under this authority may not exceed 30 days and may be extended only for an additional 30 days. Such an extension may be made only if the appointee's continued employment would be essential to the agency's operations.

Under 5 C.F.R. § 213.3102(i)(3), OPM may also grant agencies the authority to temporarily appoint individuals to the excepted service in positions for which OPM has determined that examination is impracticable (e.g., because of the time involved). For example, in the aftermath of the September 11, 2001, attacks, OPM granted agencies authority to fill positions affected by or that needed to deal with the attacks for up to 1 year, and later extended that authority.

When OPM grants agencies the authority to appoint individuals under 5 C.F.R. § 213.3102, agencies, not OPM, are responsible for establishing the qualifications that an individual must have to fill the position. In addition, in accordance with 5 C.F.R. pt. 330, agencies are not required to comply with the regulations regarding the Career Transition Assistance Plan (CTAP), Reemployment Priority List (RPL), and Interagency CTAP (ICTAP) because these regulations do not apply to excepted appointments.

Agencies have the discretion, without OPM approval, to use the authority granted by OPM under 5 C.F.R. § 213.3102 to fill senior-level positions, as well as positions at lower levels. Under appropriate circumstances, OPM may also authorize agencies to use a senior-level position allocation to appoint an individual under this section (5 C.F.R. § 319.104).

Direct-Hire Authority

Agencies have the authority to appoint candidates directly when OPM determines there is a critical hiring need, or a shortage of candidates, for

particular occupations, grades (or equivalent), geographic locations, or some combination of the three. This authority can be governmentwide or limited to one or more specific agencies depending on the circumstances.

OPM has granted governmentwide direct-hire authority for GS-0602 Medical Officers, GS-0610 and GS-0620 Nurses, GS-0647 Diagnostic Radiologic Technicians, and GS-0660 Pharmacists, at all grade levels and all locations, and for GS-2210 Information Technology Specialists (Information Security) positions at GS-9 and above, at all locations, in support of governmentwide efforts to carry out the requirements of the Government Information Security Reform Act and the Federal Information Security Management Act. OPM also approved a direct-hire authority that permits agencies to immediately appoint individuals with fluency in Arabic or other Middle Eastern languages to positions in support of the reconstruction efforts in Iraq.

Agencies have the discretion, without OPM approval, to give individuals in the categories, occupations and specialties, and grades listed above competitive service career, career-conditional, term, temporary, emergency indefinite, or overseas limited appointments, as appropriate. In all cases, agencies must adhere to public notice requirements in 5 U.S.C. §§ 3327 and 3330 and ICTAP requirements.

If agencies believe they have one or more occupations for which an agency-specific direct-hire authority may be appropriate in support of emergency relief and recovery efforts, they are to contact their OPM human capital officer.

**Senior Executive Service
Limited Emergency
Appointments**

To meet a bona fide, unanticipated, urgent need, agencies have the authority under 5 C.F.R. § 317.601 to make Senior Executive Service limited emergency appointments of career employees, without OPM approval. OPM approval is required to appoint individuals who are not current career employees and OPM cannot delegate this authority; however, OPM will process such requests on a priority basis and will also consider temporary position allocations for agencies that identify the need as essential to deal with the emergency.

Reemploying Retirees

Agencies have the discretion, without OPM approval, to employ retirees to deal with an emergency, to replace employees called to active duty military service, or both. Agencies may immediately offer reemployment to retirees

under any applicable appointing authority. However, generally, dual compensation restrictions (e.g., 5 U.S.C. §§ 8344 and 8468) require agencies to reduce the pay of a federal civil service retiree by the amount of his or her annuity. For details, see the *CSRS and FERS Handbook for Personnel and Payroll Offices*, Chapter 100 – Reemployed Annuitants.

OPM may waive these dual compensation restrictions and, upon request, may also delegate such authority to an agency head or designee to deal with emergency staffing requirements. See 5 C.F.R. pt. 553 for details. Dual compensation waivers cannot be approved retroactively. However, according to OPM guidance, annuitants who agree to work under salary offset pending a dual compensation waiver may be recognized for their special service by the agency through an individual cash award.

Reemploying Voluntary Separation Incentive Payment Recipients

Ordinarily, employees who resign or retire upon acceptance of a voluntary separation incentive payment (VSIP) (or buyout) can be reemployed only if they agree to repay the amount of that payment. However, upon agency's request, OPM may waive the repayment requirement if the individual's reemployment is necessary to deal with the emergency situation. (See 5 C.F.R. § 576.203(a)(1).) Persons being considered for VSIP repayment waivers must be the only qualified applicants available for the positions and possess expertise and special qualifications to replace persons lost or otherwise unavailable. Waivers may be limited by the agency's specific statutory VSIP authority.

Other Emergency Hiring Flexibilities

Under 5 C.F.R. pt. 300, subpart E, agencies have the discretion, without OPM approval, to contract with private sector temporary employment firms for services to meet their emergency staffing needs. These contracts may be for 120 days and may be extended for an additional 120 days, subject to displaced employee procedures.

Agencies have the discretion, without OPM approval, to make competitive service appointments of 120 days or less without regard to CTAP, ICTAP, or RPL eligibles. These programs do not apply to such appointments. See 5 C.F.R., pt. 330, Subparts F and G for CTAP/ICTAP conditions and 5 C.F.R. § 330.207(d) for RPL conditions.

Agencies have the discretion, without OPM approval, to appoint current and former employees from RPL to temporary, term, or permanent competitive service appointments. Conversely, agencies may make

Appendix II
Emergency Human Capital Flexibilities
Listed in OPM Emergency Memorandums

exceptions to the RPL provisions to appoint others under 5 C.F.R.
330.207(d).

Comments from the Federal Emergency Management Agency

Office of the Under Secretary
U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472



FEMA

April 1, 2004

Mr. J. Christopher Mihm
Managing Director
Strategic Issues, General Accounting Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Mihm:

We have reviewed the draft report number GAO-04-384 titled "Human Capital – Opportunities to Improve Federal Continuity and Planning Guidance." We appreciate the opportunity to work with the General Accounting Office (GAO) during the report's preparation and wish to thank them for their hard work. We believe that the final draft accurately addresses human capital considerations relevant to COOP guidance and coordination.

The Department of Homeland Security and Federal Emergency Management Agency will continue to work jointly with the Office of Personnel Management and our other Federal partners to improve the Federal Government's COOP program by incorporating GAO recommendations in our COOP guidance. Further, we will continue to expand our efforts with our Regional Offices and the Federal Executive Boards to improve coordination of COOP program efforts at the regional level.

If additional information is needed, please contact Mr. Reynold N. Hoover, Director, Office of National Security Coordination at 202-646-4145.

Sincerely,

Michael D. Brown
Under Secretary
Emergency Preparedness and Response

cc:

Tom Ridge, Secretary, DHS
Admiral James Loy, Deputy Secretary, DHS
Duncan Campbell, Chief of Staff, DHS

www.fema.gov

Comments from the Office of Personnel Management



OFFICE OF THE DIRECTOR

UNITED STATES
OFFICE OF PERSONNEL MANAGEMENT
WASHINGTON, DC 20415-0001

APR 01 2004

Mr. J. Christopher Mihm
Managing Director, Strategic Issues
United States General Accounting Office
441 G Street, NW.
Washington, DC 20548

Dear Mr. Mihm:

Thank you for the opportunity for the Office of Personnel Management (OPM) to review and comment on the General Accounting Office's (GAO) draft report, *HUMAN CAPITAL: Opportunities to Improve Federal Continuity Planning Guidance* (GAO-04-384). We appreciate GAO's continued support and this report's acknowledgement of our leadership role and our accomplishments in addressing human capital considerations relevant to planning for continuity of operations (COOP).

In the past several years, the necessity for the Federal Government to be prepared to operate during crisis situations has intensified. Agencies have dealt with emergencies ranging from bad weather, like hurricanes and snowstorms, to the tragic, unexpected terrorist attacks. OPM, in sharing a leadership role with the Federal Emergency Management Agency (FEMA) and the General Services Administration (GSA), has made it a priority to ensure agencies have the guidance and training necessary to plan for such situations.

While the report gives OPM high marks in the area of emergency preparedness education and issues directly related to COOP, it points out discrepancies and shortcomings in other areas. The primary criticism leveled at OPM (and FEMA) is that neither agency has issued guidance adequately addressing human capital considerations related to the resumption of broader agency operations after an emergency. We respectfully disagree and provide the following examples of what OPM has done to support this effort:

- We issued a series of Emergency Preparedness Guides for Federal managers, employees and their families. The guides are available on the OPM Web site.
- We issued memorandums at the time of emergencies, such as Hurricane Isabel and the California wildfires, to provide agencies with flexibilities available for managing their workforce during crisis situations.
- We approved the immediate use of additional flexibilities in response to the 9/11 national emergency, such as emergency temporary appointments under Schedule A, Senior Executive Service limited emergency appointments, salary offset waivers to reemploy annuitants, and Voluntary Separation Incentive Pay (buyout) repayment waivers.
- We issued two annual emergency preparedness surveys to agencies. OPM's Human Capital Officers then contacted agencies to discuss all items indicated as not yet completed.

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Appendix IV
Comments from the Office of Personnel
Management

Mr. J. Christopher Mihm

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- We established policy regarding teleworking opportunities and benefits for planned use during closures. OPM and GSA jointly established a telework website to provide access to guidance issued by both of our agencies.
- We hosted Emergency Planning and Preparedness Forums to address each agency's authorities upon closure of the Federal Government in emergency situations. The forums focused on available flexibilities, designating emergency personnel, transportation and communications issues, along with providing time for agencies to share their best practices. More than 250 employees from over 75 agencies attended the forums.
- We identified, in concert with the Chief Human Capital Officers Council, emergency preparedness as one of five key areas critical to the success of the strategic management of human capital and have established the Subcommittee on Emergency Preparedness. The subcommittee is tasked with recommending policy changes, needed legislation, and other strategies necessary to move issues forward.

One of the primary concerns noted in the GAO report is the resumption of all agency services, not just essential services, in the wake of an emergency. This year, OPM's annual survey for emergency preparedness included questions relating to telework employees. In addition, OPM issued memorandums to heads of departments and agencies strongly encouraging telework options as part of their emergency preparedness procedures. Planned use of telework during a crisis situation will help address this issue raised in the GAO report.

Two specific actions are recommended for the OPM Director (page 28). The first recommendation is to more fully address human capital considerations by incorporating the six key organizational actions identified in the report. OPM's framework for human capital, developed in collaboration with GAO, incorporates the six organizational actions to enhance continuity efforts. The framework provides the context for our discussions with agencies on human capital, which includes guidance on emergency preparedness. It is our contention that not only is this recommendation currently being carried out but has, in fact, been in place since September 11th. Provided as an enclosure is a point-by-point demonstration of measures OPM has taken internally under each of the six organizational actions. The enclosure will provide agencies with an example of how OPM has implemented certain COOP initiatives.

The second recommendation for the OPM Director is to determine the desired role for the Federal Executive Boards (FEBs) to play in improving coordination of emergency preparedness efforts, including COOP, and identify and address FEB capacity issues to meet that role. We note that overall the report has captured the essence of the activities undertaken by OPM. However, we believe the leadership role played by OPM, particularly with respect to the FEBs is not sufficiently developed in the report.

Mr. J. Christopher Mihm

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Specifically, on pages 23 and 24 of the draft report, the discussion of OPM's leadership role should be broadened to include what it has done to transform the role of the FEBs, particularly in the post-9/11 environment. For example, OPM has developed communications protocols for emergency preparedness operations for a variety of circumstances, such as natural disasters, national security operations, and other unforeseen events that may cause interruptions to the normal course of operations.

Additionally, on page 25 of the draft report, in discussing the role of the FEBs, it should be noted that OPM's leadership role has included expanding its annual FEB training program to cover emergency preparedness, employee security, and continuity of operations. OPM has facilitated teleconferences between FEMA and FEBs, and has worked to enhance the role of FEBs in the continuity of operations planning process.

Currently, OPM is working with FEMA to provide the FEBs the technical assistance and staffing they need to build full capacity in this area. A pilot project with key FEBs is slated to begin this summer.

We recommend the following changes to wording of the draft report:

1. Page 25, footnote - The footnote that references Federal Executive Associations/Councils (FEA/Cs) is poorly worded, and may create unrealistic expectations that FEA/Cs can assume the same role as FEBs in COOP/emergency situations. FEA/Cs are not officially established bodies. They rely on volunteer members. OPM maintains a listing of the FEA/Cs to have a point-of-contact for those Federal communities; however, we do not have official oversight responsibility for FEA/Cs. They do not have permanent status and often disband and regroup depending on the local commitment of agency members.

Recommendations:

- Strike the footnote; or
 - Reword the footnote to read: "While this section focuses on FEBs, we recognize the presence of Federal Executive Associations (FEAs) and Federal Executive Councils (FECs) in cities where FEBs do not exist. FEAs and FECs have purposes and objectives similar to FEBs although they do not function within the same formal set of parameters (e.g., officially established by Presidential Memorandum, policy direction and guidance from the Office of Personnel Management, etc.) as do the FEBs. FEAs and FECs do not have permanent status and, therefore, are not currently a viable option for a role in COOP."
2. Page 26, 2nd paragraph, last sentence – The report states that OPM "has established an internal working group to study the strengths and weaknesses of FEBs and develop recommendations for improving the FEBs' capacity to coordinate in regions outside Washington, D.C."

Appendix IV
Comments from the Office of Personnel
Management

Mr. J. Christopher Mihm

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Recommendation: Reword to “OPM has established an internal working group to improve the FEBs’ capacity to support local emergency preparedness and response. Such efforts include:

- Improving dissemination of information, facilitation of COOP training and tabletop exercises;
- Addressing the implications for strategic Human Capital management in the continuing the operations of the Federal Government (e.g., alternate work schedules, remote work sites, and telecommuting capabilities); and
- Developing strategies to better leverage the network of FEBs to help departments and agencies implement their initiatives.”

3. Page 38, Direct-Hire Authority – Missing from this section is the reference of two additional Governmentwide direct-hire authorities.

On June 20, 2003, OPM approved a direct-hire authority for Nurses in both the GS-0610 and GS-0620 series. The GS-0620 direct-hire authority was omitted from the report and should be added.

On July 01, 2003, OPM approved a direct-hire authority in support of the Administration’s critical reconstruction efforts in Iraq. This direct-hire authority permits agencies to immediately appoint individuals with fluency in Arabic or other related Middle Eastern languages to positions in support of those reconstruction efforts.

OPM looks forward to receiving GAO’s final report on improving Federal continuity planning guidance and we will continue with our commitment to assist agencies with emergency planning and preparedness.

Sincerely,



Kay Coles James
Director

Enclosure

The following is a point-by-point demonstration of what the Office of Personnel Management(OPM), through guidance from the Director, has accomplished under each of the six key organizational actions identified in the General Accounting Office's (GAO) draft report, *HUMAN CAPITAL: Opportunities to Improve Federal Continuity Planning Guidance* (GAO-04-384).

(A) DEMONSTRATE TOP LEADERSHIP COMMITMENT (P. 10 of Draft Rpt)

- ***Instill an approach to continuity planning that includes human capital considerations***

The paragraph explaining this bullet point reads in part, "...in providing leadership prior to an emergency, leaders demonstrate their commitment to human capital by establishing plans that value the organization's intention to manage employees with sensitivity to their individual circumstances..."

It is very clear that the OPM Director has incorporated this point in her overall management philosophy as it pertains to individual employees. There are several examples:

- 1) The following two paragraphs are lifted verbatim from OPM's report to the 9-11 Commission. The passage reflects what was utmost on the OPM Director's mind in the midst of horrific chaos on the morning of September 11, 2001:

"OPM Associate Directors and heads of offices began reporting their emergency contingencies to the Office of the Director as calls from other Departments across government began filtering in through an increasingly overloaded phone system. Within minutes of the Pentagon attacks, streets in downtown Washington, DC were becoming gridlocked. Multiple large agencies called OPM to either request or inform the Director of their decisions to let their workforce leave early. Looking down on the clogged streets from her 5th floor office, **the Director knew that with all the uncertainties of that fateful hour, staying inside might be the safest course of action for some Federal employees. She also recognized that thousands of workers in the Federal Government likely had children in day care facilities or had panicked children and loved ones in the surrounding suburbs and there was no way those individuals were going to remain at work.**

At 9:50 am, Director James huddled with her core senior staff and asked for recommendations and thoughts. Questions from representatives of the Washington, DC press corps were already streaming in and in fact, several reporters were in the OPM complex requesting interviews. **At 9:58 am...16 minutes after the attack on the Pentagon, Director James made the decision to close Federal offices in the Washington, DC area with the**

caveat that Federal employees *may* leave but no one was being forced out of their building into the growing gridlock and confusion in the DC streets.

2) When Hurricane Isabel was bearing down on the Washington, DC metropolitan area in mid September 2003, ominous weather reports and the subsequent closure of the regional subway system forced the OPM Director to close Federal offices. Here is a paragraph from the Director's official announcement that was disseminated to Federal employees and media outlets in the region,

"In an abundance of caution for the safety and security of Federal employees and in light of the disruptions of major transportation and power systems in the region, Federal agencies in the Washington DC area will remain closed on September 19th. The OPM Director realizes that there will be Federal employees who will not be impacted by the storm and she encourages these members of the Federal family to demonstrate the spirit of community that they have exhibited so many times in the past and assist their neighbors or others who might be in need."

3) During significant fires, flooding, hurricanes and earthquakes anywhere in the nation, the OPM Director issues guidance to Federal agencies as it pertains to leave and benefits to their Federal employees who have been adversely impacted by the event. OPM has also marshaled its resources to assist in transferring emergency responders from one Federal agency to another in order to meet developing crises. This authority was last used during the late summer of 2003, when 30 massive fires were blazing in 11 States.

4) The Director of OPM has maintained a consistent policy of ensuring open communication with the staff of this agency. It is her belief that in order to build trust with employees, they need to be kept fully aware of incidents that could adversely impact their safety and well being. Her belief is that the stronger the trust factor the better chance that employees will listen and cooperate if there is a potentially life threatening emergency where rapid response is needed. There are numerous instances where this has been carried out, notably in the time period between October 2001 – May 2002, during concerns of anthrax in Washington, DC mailrooms. **Appendix "A"** contains a sampling of agency wide memorandums from the Director, which kept employees aware of her efforts to ensure the protection of the OPM workforce. It should be noted that these memos are only from the Director. She directed many other "all employee" communications to be carried out by pertinent senior staff as well. The documents focus on three separate incidents:

1. The Director's response to anthrax concerns in general throughout Washington, DC area and the closure of Brentwood Postal Facility in late October, 2001.

2. Regular sampling tests taken in the OPM mailroom indicated the possibility of a trace amount of anthrax present. January 2002.
3. In May of 2002, regular mailroom testing turned up a **single** anthrax spore.

Similar communication efforts have been replicated during the recent risin scare and during an isolated asbestos concern in the OPM headquarters building. Keeping employees aware not only limits the spread of rumors and unreliable information but it demonstrates sensitivity to employee concerns at a time of elevated vigilance in our nation's capital. In all instances, immediate contact was also made with the employee unions. They have been very instrumental in helping make sure that employees are kept fully informed.

- **Allocate resources and set policies** (P. 11 of Draft Report)

This OPM Director has made a firm commitment to allocate the necessary resources to maintain a secure environment for the employees at OPM. While discussing the amount of monies appropriated and specific protective systems developed would be counter-productive in a public report, suffice to say advancements have been substantial. We would be happy to discuss this information privately with investigators from GAO at a place and time of your choosing. There are a number of steps taken that can be discussed. They include:

1. Mylar coating on all windows in the OPM headquarters facility aimed at cutting down on flying glass in the event of a nearby explosion.
2. Installation of a new PA and emergency alert system in the OPM headquarters. This system, complete with visual notification for the deaf and hard of hearing has been tested and is in operation.
3. Special training and accommodation has been made for those who are disabled and require special assistance in an emergency.
4. The Director ordered and received a completely updated Emergency Occupant Plan (EOP) for the OPM headquarters building.
5. Each employee was given emergency evacuation instructions on a laminated card, sized to fit alongside their agency ID badge on their lanyard. Examples of this have been shared on numerous occasions with security and communication specialists throughout the Government.
6. Teleconferencing capability has been readied between several locations in the OPM headquarters building and our COOP sites in Pennsylvania and Virginia.

In addition to allocating resources directly benefiting OPM, this Director used OPM funding to research, create and publish four Emergency Preparedness Guides, designed for Federal employees and their families both in the DC metro area and beyond. This fact is mentioned elsewhere in the draft GAO report. We are pleased to report that as of this date nearly 500,000 of the guides have been

distributed. OPM gathered emergency preparedness leaders from 16 governmental agencies to contribute their expertise to the development of the guides.

- **Set direction and pace of recovery** (Page 11 of Draft Report)

No event in recent memory has tested the resolve and actions of our nation's most senior leadership more so than 9-11. The OPM Director's major decision on that day was to set the direction for the operating status of the Federal Government for September 12th. Her unwavering belief was that the Nation's Government needed to demonstrate to our citizenry and governments world wide that America was "open for business" on 12 September and the United States would not cower at the hands of terrorists. Her recommendation was met with total support from the White House. She indeed demonstrated the ability to "set direction and pace of recovery," when America needed it most.

Among other emergency authorities the Director immediately delegated to agencies was the authority to approve dual compensation waivers to execute rapid pace emergency, cleanup, and security teams at the agency level.

(B) SEEK OPPORTUNITIES FOR SYNERGY (Page 12 of Draft Report)

- **Consider how continuity investments benefit other program efforts**

We will respond to this point by an answer based on the example you provided of how GAO addressed this bullet point by providing GAO employees with laptop computers which enabled them to work from alternate locations, consequently clearing space for some Congressional offices, displaced by anthrax concerns, to temporarily occupy. The Director of OPM exhibited foresight, in our particular building, by ordering a build-out of excess space in the subbasement of the OPM headquarters. This area can accommodate about 45-50 people. The work areas are complete with computers, phones and office supplies. This space has been made available to Congressional offices and even used recently by a Senatorial Committee that used the area and facilities to make final preparations for a Congressional hearing. Consequently, OPM has garnered its resources and made them available to teammates Governmentwide. The space can also be utilized by any office within OPM that is temporarily displaced for any reason (i.e., carpet replacement, electrical work, etc.).

(C) MAINTAIN EFFECTIVE COMMUNICATION (Page 13 of Draft Report)

- **Build relationships through 2-way communication**

This aspect of the OPM Director's philosophy of making sure employees remain aware of circumstances has been fully addressed in a previous answer. We want to take a moment here and comment on the way the OPM Director approached communicating and working with labor unions and other employee organizations

as it pertains to the development of the new personnel system at the Department of Homeland Security.

Working together, DHS and OPM developed and conducted a comprehensive and inclusive process for creating a new HR system for DHS. A key element of the process was the creation of a Design Team. This team, comprising of 80 DHS employees, supervisors, union representatives, and OPM staff, compiled an extensive collection of innovative and successful HR practices and developed a range of options for the new system. The options were developed after 64 nationwide Focus Groups and Town Hall meetings were conducted to gain input from employees in all major DHS components. Also during the options development stage, over 65 public and private sector organizations and HR experts were contacted. The options for the new system were then reviewed by a Senior Review Committee (SRC), made up of DHS and OPM officials and the presidents of DHS' three largest unions (AFGE, NTEU, NAAE).

Emergency protocols have been established to provide immediate contact within and between all levels of DHS/GSA/OPM/FEMA. Ongoing tests ensure seamless communications with White House leadership and OPM/DHS.

- ***Establish roles, responsibilities and expectations***

The OPM Director fully concurs with others who believe that communicating performance expectations to employees prior to disruption promotes a more efficient outcome and management of human capital assets. To that end, the Director of OPM has done the following:

1. Overseen and participated in a number of emergency tabletop exercises with her most senior staff. On one occasion, she has ordered herself "removed" and turned OPM's response over to the Deputy Director. In another instance both the Director and Deputy Director were taken out of the picture and the next person following in succession ran the operation.
2. Met with the nine people in the official line of succession to go over and discuss actions and responsibilities should she no longer be able to carry out the duties of OPM Director.
3. Ensured that each major program office in OPM provided in hard copy and backed up on CD-ROM (filed away in three separate locations across the nation) the actions that directorates would take in the event that the senior leadership of the directorate were incapacitated or unavailable for whatever reason. Information has been distributed to multiple remote OPM COOP locations that are maintained at near constant readiness levels. Contained in the material are draft policy statements, intergovernmental guidance and draft Executive Orders covering any eventuality ranging from emergency hiring authority to the

- maintenance of retirement and health benefits for Federal workers to continuation of the national security background investigation process.
4. Ordered and participated in tabletop exercises and educational sessions with the second and third tier leadership within OPM to familiarize them with the duties and responsibilities should the most senior leadership not be available.

- ***Develop redundant communication vehicles***

The OPM Director has provided the 100 highest ranking senior managers at OPM redundant means of emergency communication technology and each carries it 24/7. Those means of communication are NEXTEL phone, Blackberry and national pager. The 30 most senior advisors are also equipped with satellite phones and have access to the GETS (Government Emergency Telecommunications Service) system in the event of an emergency. Communication tests are administered frequently whereby each manager is required to phone into the OPM Situation Room upon receipt of request.

In regards to mainframe computer servers, again we do not want to provide any specifics in an open forum as to how the critical information on Federal employees is maintained by OPM but we can say that numerous safeguards and redundancies are built into the system and can be controlled from various locations across the United States (including one location that has been termed "one of the ten safest places in the world"). In addition, should OPM suffer a catastrophic loss of its mainframe, program managers have been instructed to physically transfer to an undisclosed location and, with redundant backups in different places nationwide, can reconstruct the data that has been compromised.

(D) TARGET INVESTMENTS IN TRAINING AND DEVELOPMENT

(Page 14 of Draft Report)

- ***Raise awareness of continuity efforts***

Over the past two and one half years, OPM has completely revamped its COOP process. Personnel who would be deployed have received significant information regarding their duties and responsibilities. Several meetings have included all those who would relocate and at these meetings COOP manuals were distributed that explains OPM's critical functions and the means that will be used to ensure that they are carried out in an emergency. A number of tests involving OPM's "Go-Teams" have been made. "Go-Teams" are comprised of 6-8 senior OPM officials, who at the first sign of trouble immediately exit the city before traffic becomes log-jammed. Their orders are to head immediately to the OPM COOP relocation site. These individuals have the experience and authority to make decisions relative to OPM's mission until the Director and her aides arrive. This concept has also been tested and fueled vehicles, cash, and packed suitcases are on the ready if needed.

- **Build skills and competencies to increase flexibility** (P. 14 of Draft Report)

OPM is unique in the sense that large numbers of our employees and the technology required to fulfill our critical missions are carried out away from Washington, DC and in intensely secure areas. For example, our COOP relocation site will have an additional 750-800 employees already there and that workforce can be tapped to cover any eventuality or need. Another facet of this flexibility is in the area of succession planning, and that has already been discussed previously.

(E) LEVERAGE THE FLEXIBILITY OF HUMAN CAPITAL

- **Enable employees associated with resumption activities to contribute to mission-results in alternate assignments**

The explanatory paragraph in the draft GAO report reads, "...organizations may use approaches such as telework and geographic dispersion, which includes regional structure, to increase the ways in which employees may contribute." The next line in the draft report points out OPM's guidance by way of symposiums and conferences held for Government officials which educate about and promote telework as a viable means of mission critical operations. The Director and her senior staff lead by example by teleworking at least one day per month.

OPM has sponsored an ongoing number of initiatives to promote telework to the agencies. Some of the more recent include the all-day November 4th Training Event in 2003, to which agency HR Directors and telework coordinators were invited, and given telework kits. Government telework coordinators heard some of the major pioneers and leaders in the field discuss the advantages of telework. One featured speaker was internationally known telework expert Gil Gordon. Since the training, we have distributed 250 telework kits to requesting agencies. We are currently making additional kits available to agencies as well as Capitol Hill offices through the Government Printing Office. In September of 2003, the ITAC (International Telework Association and Conference) conference in Baltimore for Federal Telework Coordinators was co-sponsored by OPM and GSA.

Following are the most recent major events in 2004 that OPM has spearheaded:

- Jan 04--Telework "WEB" inar featuring OPM and GSA speakers and Gil Gordon
- Feb 04--Quarterly Telework Coordinators Meeting
- Two Emergency Preparedness Meetings--OPM and GSA speakers on the importance of telework as a part of a COOP Plan
- March 11--OPM and GSA Speakers at DEA meeting of COOP planners

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- February 23 and 24--Alliance of Work/Life Progress (AWLP) conference in Phoenix--two special Federal Sessions featuring Telework presentations by OPM representative, Ms. Abby Block
- Quarterly senior-level telework meetings with GSA (November, February, May, etc.)

Planned upcoming near-term events pertaining to telework:

- Upcoming: Launch of two Telework e-training modules (Telework 101 for Managers, Telework 101 for Directors) for Federal employees on www.GoLearn
- May 5--Webinar to introduce two e-training modules (Telework 101 for Managers, Telework 101 for Directors) on OPM's GoLearn directed at agency telework coordinators so coordinators can have "hands-on" training in getting to and promoting the courses
- April 29--OPM coordinators will provide the keynote address on telework at the Mid Atlantic Intergovernmental Audit Forum for IGs (sponsored by GAO)
- Development of training modules for supervisors, managers and senior agency officials to be taught at OPM, GSA ,USDA and other courses

A second point was made in the draft report (p.17) suggesting the importance of geographically spreading out an agency's operations. OPM as an organization, already possesses wide geographic dispersion. Field offices and major facilities exist in Pennsylvania, Virginia, Georgia, Colorado and West Virginia. *OPM's critical missions can be carried out completely without a single person physically housed in Washington, DC.*

- ***Sustain the contribution of employees associated with essential operations***

This is an excellent point and one that should challenge every agency or department. "Safety and emergency planning" is an element in all of OPM's senior executive service members' performance plans. As previously stated, the OPM Director has identified the most senior 100 managers at OPM who will be called upon in the event of an emergency. This list of managers generally goes three or four deep in each of our seven major program offices. The Director has built enough redundancy in her agency planning to allow for rotation of duties in the event of an extended stay at the COOP relocation site. Keep in mind also, there are already 750-800 OPM employees at the COOP location and they can be utilized as needed.

- ***Maintain organizational knowledge of staffing requirements and availability***

This point made in the draft report (p.18) focuses on the need for agencies to establish some means of adding to its existing staff or replenishing staff in the

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event of a catastrophic incident. OPM, as the United States Government's human resources agency, already maintains vast up-to-date information on positions available, KSA criteria and interagency partnerships that could be utilized immediately. Please keep in mind also, that just after 9-11 it was OPM that devised and administered a program called Patriot, (not to be confused with the Patriot Act) that matched the talents of retired Federal employees who wanted to volunteer their abilities, to agencies that needed their particular skill.

(F) BUILD PROCESS TO IDENTIFY AND SHARE LESSONS

(p.19 of Draft Report)

- ***Create a learning environment***
- ***Make learning explicit and shared***

Like most agencies, OPM does conduct "hot wash" debriefings after each tabletop exercise and after each major event that causes disruption in the District of Columbia (Tractor Man, large weather events, World Bank and IMF demonstrations, etc.). In many instances, these debriefs are conducted with other agencies and officials from the District of Columbia and neighboring municipalities. It is our belief that more can be done in the area of sharing learning experiences. This is an area that we will study and will report back to you on advances made.

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