

GAO

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

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April 2005

# CONTINUITY OF OPERATIONS

## Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies



G A O

Accountability \* Integrity \* Reliability

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Highlights of [GAO-05-577](#), a report to the Chairman, Committee on Government Reform, House of Representatives

## Why GAO Did This Study

To ensure that essential government services are available in emergencies, federal agencies are required to develop continuity of operations plans. According to guidance from the Federal Emergency Management Agency (FEMA), which is responsible for providing guidance for and assessing agency continuity plan, a key element of a viable capability is the proper identification of essential functions. GAO previously reported on agency continuity plan compliance, and determined that a number of agencies and their components did not have continuity plans in place on October 1, 2002, and those that were in place did not generally comply with FEMA's guidance.

GAO was asked to determine, among other things, to what extent (1) major federal agencies used sound practices to identify and validate their essential functions and (2) agencies had made progress since 2002 in improving compliance with FEMA guidance.

## What GAO Recommends

To help ensure that agencies are adequately prepared to continue performing essential functions following an emergency, GAO is making recommendations aimed at improving the assessment and oversight of agency continuity plans. In commenting, FEMA agreed that there has been improvement in COOP plans and that additional oversight is needed.

[www.gao.gov/cgi-bin/getrpt?GAO-05-577](http://www.gao.gov/cgi-bin/getrpt?GAO-05-577).

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

# CONTINUITY OF OPERATIONS

## Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies

### What GAO Found

Many of the 23 agencies that GAO reviewed reported using sound practices for identifying and validating essential functions (see table), but few provided documentation sufficient for GAO to confirm their responses. This indicates that agencies—although aware of the practices—may not have followed them thoroughly or effectively. Further, the essential functions identified by agencies varied widely: the number of functions identified in each plan ranged from 3 to 538 and included ones that appeared to be of secondary importance. A major factor contributing to these shortcomings was that FEMA's guidance did not provide specific criteria for identifying essential functions. Subsequent guidance from FEMA and the White House significantly addresses the sound practices GAO identified. In addition, the White House plans further actions to improve continuity planning. If this guidance and these follow-up actions are implemented effectively, they could lead to improved identification of essential functions in the executive branch.

As of May 1, 2004, agencies had made progress in improving compliance with FEMA guidance, but significant weaknesses remained. Agencies that had plans in place in both years showed significant improvement in the area of tests, training, and exercises. However, although some improvement occurred for other planning areas, important weaknesses remained: for example, 31 of 45 plans did not fully identify mission-critical systems and data necessary to conduct essential functions. Inadequate oversight by FEMA contributed to the level of weaknesses in agency continuity plans. FEMA plans to improve oversight using an online readiness reporting system, which it plans to have fully operational later this year, and it has already taken other steps to help agencies improve their plans, such as conducting an interagency exercise. However, FEMA does not plan to verify the readiness information that agencies will report in the system.

### Sound Practices Identified by GAO for Determining Essential Functions

#### Practices

Establish a structured continuity project work group/committee that includes representatives of all agency components, legal advisers, and continuity experts and either includes a member of the agency's executive management or reports to a member of the agency's executive management. Such a committee should be involved in the initial selection of essential functions.

Determine the resources necessary to perform each function.

Determine the dependencies necessary to perform each function.

Develop a schedule or project plan for critical stages in the continuity program effort.

Identify and rank plausible threats, vulnerabilities, liabilities, and/or exposures through a risk assessment.

Perform a risk and impact analysis for each essential function—including prioritization of essential functions and determination of minimum acceptance level of output and recovery time objective for each function.

Develop and implement a strategy for validating the plan and underlying essential functions.

Change agency's essential functions as the result of the validation process.

Source: GAO.

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### Abbreviations

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

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

April 28, 2005

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

Dear Mr. Chairman:

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

In response, FEMA issued Federal Preparedness Circular (FPC) 65 in July 1999 as guidance to agencies. The circular states that, in order to have a viable COOP capability, agencies should identify their essential functions. These functions then provide the basis for subsequent planning steps. The circular also identified eight elements of a viable capability. In June 2004, FEMA released an updated version of FPC 65, providing additional guidance to agencies on each of the topics covered in the original guidance, including an annex on essential functions.

We previously reviewed agency COOP plan compliance with FEMA's guidance at your request. At that time, we reported that a number of agencies and their components did not have continuity plans in place on October 1, 2002, and those that were in place did not generally comply with FEMA's guidance.<sup>1</sup>

At your request, we subsequently assessed plans in place on May 1, 2004, both from the agencies that we previously reviewed that had plans in place in 2002 and from agencies that subsequently adopted plans. For the current

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<sup>1</sup>GAO, *Continuity of Operations: Improved Planning Needed to Ensure Delivery of Essential Government Services*, [GAO-04-160](#) (Washington, D.C.: Feb. 27, 2004) and *Continuity of Operations: Improved Planning Needed to Ensure Delivery of Essential Services*, [GAO-04-638T](#) (Washington, D.C.: Apr. 22, 2004).

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review, as agreed with the Committee, our objectives were to determine to what extent

- major federal agencies used sound practices to identify and validate their essential functions,
- agencies had made progress in improving compliance with the guidance outlined in the July 1999 version of FPC 65 since our 2002 review,<sup>2</sup> and
- agency continuity of operations plans addressed the use of telework arrangements (in which work is performed at an employee's home or at a work location other than a traditional office) during emergencies.

To achieve our first objective, we reviewed published literature on continuity planning; consulted with experts on continuity planning; surveyed agency officials responsible for COOP planning to determine which practices were used when agencies identified their essential functions; reviewed supporting documentation submitted by agency officials to support their responses; and conducted additional quantitative and qualitative analyses of the essential functions listed in agency plans.

For our second objective, we obtained and evaluated the headquarters continuity plans in place as of May 1, 2004, from 20 of the 23 largest civilian departments and agencies, as well as the headquarters plans for 25 components of departments. These agencies were selected because they were responsible for programs previously deemed high impact by the Office of Management and Budget (OMB).<sup>3</sup> We also interviewed the agency officials responsible for developing these plans, obtained and analyzed FEMA guidance and documents describing its efforts to provide oversight and assessments of the federal COOP planning efforts, and interviewed FEMA officials to clarify the activities described in these documents.

Finally, to accomplish our third objective, we reviewed our prior reports on telework to determine key practices for the development of an effective telework program; developed a series of questions regarding agency plans

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<sup>2</sup>Since the June 2004 version of FPC 65 was released after our cutoff date of May 1, 2004, we assessed plans against the July 1999 version of FPC 65.

<sup>3</sup>In addition to the 24 components selected for their high impact programs, we evaluated the plan from the Department of the Treasury's Financial Management Service because of its significant role in processing federal payments.

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to use telework during a COOP event; surveyed agency officials responsible for continuity planning to determine to what extent telework key practices were used in making continuity preparations; and reviewed supporting documentation submitted by agency officials to support their responses. We conducted our review between April 2004 and January 2005, in accordance with generally accepted government auditing standards.

On February 28, we provided your office with a classified briefing on the results of this review. The purpose of this letter is to provide you with the unclassified material from our briefing. (See app. I.)

In summary, many of the 23 agencies reported using the eight sound practices for identifying and validating essential functions that we identified (for example, performing a risk and impact analysis for each essential function), but few provided documentation sufficient for us to confirm their responses. This indicates that agencies—although aware of these practices—may not have followed them thoroughly or effectively. In addition, the number of functions identified in each agency plan ranged from 3 to 538 and included ones that appeared to be of secondary importance. Both FEMA's revision to its guidance and a recently initiated White House effort have the potential, if effectively implemented, to help agencies better identify their essential functions and thus develop better continuity plans. However, the lack of a schedule to complete the White House effort makes it unclear when these improvements might take place.

Furthermore, although agency COOP plans have shown improvement since our prior assessment of 2002 plans, most plans in place on May 1, 2004, continued to exhibit inconsistencies in the identification of essential functions and significant lack of compliance with FEMA's guidance. Inadequate oversight by FEMA contributed to the level of weaknesses in agency COOP plans. FEMA plans to improve oversight using an online readiness reporting system, which it plans to have fully operational later this year, and it has already taken other steps to help agencies improve their plans, such as conducting an interagency exercise. However, FEMA no longer plans to verify the readiness information that agencies will report in the system.

Finally, according to guidance from the Office of Personnel Management (OPM), one of the major benefits of a telework program is the ability of telework employees to continue working at their alternative work sites

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during a disruption to operations.<sup>4</sup> Even though FEMA's continuity planning guidance in place in May 2004 did not address telework, one agency's continuity plan in place at that time indicated that it was planning to use telework in response to an emergency. In addition, 10 agencies reported that they planned to use telework following a COOP event, but their plans were not clearly documented.

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## Recommendations

To ensure that agencies are adequately prepared to continue performing essential functions following an emergency, we are making four recommendations. We recommend that the Assistant to the President for Homeland Security establish a schedule for the completion of the recently initiated effort to validate agency essential functions and refine federal continuity of operations policy. We also recommend that the Secretary of Homeland Security direct the Under Secretary for Emergency Preparedness and Response to

- develop a strategy for short-term oversight that ensures that agencies are prepared for a disruption in essential functions while the current effort to identify essential functions and develop new guidance is ongoing;
- develop and implement procedures that verify the agency-reported data used in oversight of agency continuity of operations planning; and
- develop, in consultation with OPM, guidance on the steps that agencies should take to adequately prepare for the use of telework during a COOP event.

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## Agency Comments and Our Evaluation

We received written comments on a draft of our briefing from the Under Secretary for Emergency Preparedness and Response of the Department of Homeland Security (DHS). (These comments are reproduced in app. II.) In commenting on the briefing, the Under Secretary stated that DHS agreed that there has been improvement in COOP plans and attributed that improvement to a renewed emphasis by DHS and the White House. The department also agreed with the need for additional oversight and noted

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<sup>4</sup>U.S. Office of Personnel Management, *Washington, DC, Area Dismissal or Closure Procedures* (Washington, D.C.: Dec. 4, 2003).

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that FEMA had begun conducting COOP site assessments at departments and agencies to improve readiness.

The Under Secretary's letter drew attention to a number of actions taken after the May 1, 2004, cutoff date for our assessment. These actions include an interagency exercise conducted in May 2004, the June 2004 release of the revised FPC 65, FEMA's training for COOP managers, and initial planning for the next interagency exercise in 2006. These actions are described in our briefing. However, we did not use the June 2004 guidance in our assessments because it was released after we began our review.

The Under Secretary wrote that it was unclear whether we had considered classified information that DHS provided about interagency communications in our assessments. We considered this information in our assessments of individual agency plans, and the briefing reflects the results.

Finally, the Under Secretary pointed out that the readiness reporting system that FEMA is developing was not intended to be a COOP plan assessment tool, but that it instead provides key officials with the ability to determine plan status in near real time. We continue to believe that it is important for FEMA to assess agency plans as part of its oversight responsibilities. Regardless of the system's intended use, we believe its capabilities, as described by FEMA, make it a valuable tool that the agency should use when exercising these responsibilities.

We subsequently met with FEMA officials in April 2005 to receive an update on their oversight efforts. Officials stated that development of the readiness reporting system was completed in March 2005, and that the system is expected to be operational and certified by October 2005, at which time there will be seven locations (including two FEMA locations) using the system. In addition, FEMA reported that as of April 2005, it has trained 682 federal, state, and local officials representing 30 major federal departments and agencies and 209 smaller agencies.

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As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this report. At that time, we will send copies of this report to the Chairmen and Ranking Minority Members of the Subcommittee on Homeland Security, House Committee on Appropriations; Subcommittee on National Security, Emerging Threats, and International Relations, House



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Committee on Government Reform; and the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Senate Committee on Governmental Affairs. We are also sending copies to the Secretary of Homeland Security. We will make copies available on request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

Should you or your offices have any questions about matters discussed in this report, please contact me at (202) 512-6240 or by e-mail at [koontzl@gao.gov](mailto:koontzl@gao.gov). You may also contact James R. Sweetman, Jr., at (202) 512-3347 or by e-mail at [sweetmanj@gao.gov](mailto:sweetmanj@gao.gov). Major contributors to this report also included Barbara Collier, Mike Dolak, Nick Marinos, and Jessica Waselkow.

Sincerely yours,

A handwritten signature in black ink that reads "Linda D. Koontz". The signature is written in a cursive style with a large initial "L" and "K".

Linda D. Koontz  
Director, Information Management Issues

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# Unclassified Version of February 28, 2005, Briefing to the Committee on Government Reform, House of Representatives

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## Continuity of Operations: Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies

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



## Outline of Briefing

Introduction

Objectives, Scope, and Methodology

Results in Brief

Background

Results

- Identification of essential functions
- Compliance of federal agency continuity plans with guidance
- Telework

Conclusions

Recommendations

Agency Comments and Our Evaluation

Attachment 1: Continuity Planning Bibliography

Attachment 2: Major Agencies Reviewed

Attachment 3: Component Agencies Reviewed, with High-Impact Program Responsibilities

Attachment 4: 38 High-Impact Programs and Responsible Agencies



## Introduction

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

- the terrorist attacks on September 11, 2001, and at Oklahoma City;
- localized shutdowns due to severe weather conditions, such as the closure of federal offices in Washington, D.C., in September 2003 due to Hurricane Isabel; and
- building-level events, such as asbestos contamination at the Department of the Interior's headquarters.

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



## Introduction

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

FEMA's responsibilities include

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



## Introduction

In July 1999, FEMA first issued Federal Preparedness Circular (FPC) 65. FPC 65 is guidance to the federal executive branch for use in developing viable and executable contingency plans that facilitate the performance of essential functions during any emergency. Specifically, the guidance

- established the identification of essential functions as the basis for COOP planning;
- defined essential functions as those that enable agencies to provide vital services, exercise civil authority, maintain safety, and sustain the economy during an emergency;
- defined the elements of a viable continuity of operations capability according to eight topic areas: identification of essential functions; development of plans and procedures; identification of orders of succession; delegations of authority; provision for alternate facilities; provision of interoperable communications; availability of vital records; and conduct of regular tests, training, and exercises; and
- set up an interagency working group to coordinate continuity planning.



## Introduction

FPC 65 applies to all federal executive branch departments and agencies at all levels, including locations outside Washington, D.C. It directed the heads of each agency to assume responsibilities including

- developing, approving, and maintaining agency continuity plans and procedures;
- developing a COOP multiyear strategy and program management plan; and
- conducting tests and training of agency continuity plans, contingency staffs, and essential systems and equipment.



## Objectives, Scope, and Methodology

### Objectives

We previously reviewed agency COOP plan compliance with FEMA's guidance at the request of the Chairman, House Committee on Government Reform. At that time, we found that a number of agencies and their components did not have continuity plans in place on October 1, 2002, and those that were in place did not generally comply with FEMA's guidance.

At the Chairman's request, we subsequently assessed plans in place on May 1, 2004, both from the agencies that had plans in place in 2002 and from agencies that subsequently adopted plans. For the current review, as agreed with the Committee, our objectives were to determine to what extent

- major federal agencies used sound practices to identify and validate their essential functions,
- agencies had made progress in improving compliance with the guidance outlined in FPC 65 since our 2002 review, and
- agency continuity of operations plans addressed the use of telework arrangements (in which work is performed at an employee's home or at a work location other than a traditional office) during emergencies.





## Objectives, Scope, and Methodology

### Scope and Methodology

To accomplish our objective on sound practices, we

- reviewed published literature on continuity planning to identify sound practices in selecting and validating essential functions (a bibliography is included in attachment 1);
- consulted with experts on continuity planning to validate the resulting list of sound practices;<sup>1</sup>
- surveyed agency officials responsible for COOP planning to determine which practices were used when agencies identified their essential functions;
- reviewed supporting documentation submitted by agency officials to support their responses; and
- conducted additional quantitative and qualitative analyses of the essential functions listed in agency plans.

<sup>1</sup> We consulted with experts on continuity planning from the Business Continuity Institute and the Disaster Recovery Institute International, as well as from five private sector businesses—the Gillette Company, Lockheed Martin Corporation, Macy's West, Marsh & McLennan Companies, Inc., and Science Applications International Corporation. We selected the five businesses based on their experience and knowledge of human capital or emergency management as it relates to continuity, based in part on input from the National Academy of Public Administration, the Private Sector Council, and FEMA.



## Objectives, Scope, and Methodology

Based on an analysis of published literature and in consultation with experts on continuity planning, we identified eight sound practices related to essential functions that organizations should use when developing their continuity plans. These practices constitute an ongoing process that includes the selection and validation of essential functions.

We surveyed agency officials responsible for COOP planning to determine which of the eight practices were used when agencies developed their continuity plans. Agencies were asked whether they used each sound practice and to respond with “yes,” “no,” or “partial” (if they used some, but not all of the described practice). For “yes” and “partial” responses, agencies were requested to provide supporting documentation. We then analyzed the provided documentation to determine if the documents supported the related response. We tabulated the results of the survey, distinguishing responses that were supported with adequate documentation from those that were not.



## Objectives, Scope, and Methodology

To assess agency compliance with FPC 65 in May 2004, we

- obtained and evaluated headquarters contingency plans in place as of May 1, 2004, from 20 of the 23 largest civilian departments and agencies<sup>1</sup> (the 23 agencies are listed in attachment 2);
- obtained and evaluated plans from 24 components of departments, selected because they were responsible for a program previously deemed high-impact by the Office of Management and Budget (OMB),<sup>2</sup> as well as the Department of the Treasury's Financial Management Service, which we selected because of its significant role in processing federal payments (attachment 3 lists these 25 components and the high-impact programs for which they are responsible);
- interviewed agency officials responsible for developing each of the 45 continuity plans and reviewed other documentation provided by agencies to demonstrate compliance with the guidance;
- obtained and analyzed FEMA's COOP guidance and documents describing its efforts to provide oversight and assessments of federal planning efforts, and conducted interviews with FEMA officials to clarify the activities described in these documents.

<sup>1</sup>Two agencies had not yet developed plans, and one plan was not assessed against FPC 65 because the agency identified no essential functions.

<sup>2</sup>In March 1999, during its planning to address the Year 2000 computing issue, OMB identified a number of programs which it determined to have a high impact on the public. The agencies responsible for these programs are listed in attachment 4.



## Objectives, Scope, and Methodology

As we did in 2002, we assessed each agency plan using yes/no questions based on the guidance in FPC 65. These questions address each of the eight topic areas discussed in the guidance:

- essential functions,
- plans and procedures,
- orders of succession,
- delegations of authority,
- alternate facilities,
- redundant emergency communications,
- vital records, and
- tests, training, and exercises.

Each topic area included two to eight questions.



## Objectives, Scope, and Methodology

Based on the agency contingency plans and other related documents, we used content analysis to assign an answer of yes (compliant with all of the guidance related to that question), no (not compliant with any of the guidance related to that question), or partially (compliant with some, but not all of the guidance) to these 34 questions.

- Documents were reviewed and compared independently by two analysts.
- The analysts then met to compare their assessments and reach a consensus assessment. A third analyst reviewed plans where the initial two could not reach consensus.
- Initial assessments were shared with each agency during structured interviews.
- Agency officials had the opportunity to provide additional documentation to demonstrate compliance.
- Any supplemental information provided by the agencies was again reviewed by multiple analysts, first independently and then jointly.

Based on this analysis, we created summary tables that compared answers across agencies.



## Objectives, Scope, and Methodology

To accomplish our objective on the use of telework, we

- reviewed prior GAO work on telework<sup>1</sup> to determine key practices for the development of an effective telework program;
- developed a series of questions regarding agency plans to use telework during a COOP event;
- surveyed agency officials responsible for continuity planning to determine to what extent telework key practices were used in making continuity preparations;
- reviewed supporting documentation submitted by agency officials to support their responses.

We conducted our review between April 2004 and January 2005, in accordance with generally accepted government auditing standards.

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



**Results in Brief: Objective 1**  
Identification of Essential Functions

Many of the 23 agencies reported using the eight sound practices for identifying and validating essential functions that we identified (for example, performing a risk and impact analysis for each essential function), but few provided documentation sufficient for us to confirm their responses. This indicates that agencies—although aware of these practices—may not have followed them thoroughly or effectively. In any case, the essential functions identified by agencies varied widely. Specifically, of 45 plans in place on May 1, 2004, 43 identified at least one essential function. However, the number of functions identified in each plan ranged from 3 to 538 and included ones that appeared to be of secondary importance. For example, one agency included “champion decision-making decisions,” among its essential functions.

A major factor contributing to these shortcomings was that as of May 1, 2004, FEMA’s guidance did not provide specific criteria for identifying essential functions. Subsequent guidance from FEMA and the White House significantly addresses the best practices we identified. In addition, the White House plans further actions to improve continuity planning. If this guidance and follow-up actions are implemented effectively, they could lead to more consistent identification of essential functions across the executive branch.



**Results in Brief: Objective 2**  
COOP Plans' Compliance with FPC 65

Compared to our 2002 review, agencies had made progress in improving compliance with FPC 65 as of May 1, 2004, but significant weaknesses remained. Specifically, one of the three major agencies that did not have a plan in place in 2002 subsequently developed a plan, but the other two had no plans in place as of May 1. Plans were in place on May 1 for the other 20 major agencies, as well as for 25 of their components responsible for high-impact programs (9 more components than had plans in 2002). Agencies that had plans in place in both 2002 and 2004 showed significant improvement in the area of tests, training, and exercises. However, although some improvement occurred for the other seven designated planning areas, important weaknesses remained: for example, 31 of 45 plans did not fully identify mission-critical systems and data necessary to conduct essential functions, and 32 of 45 did not fully establish the staffing and resource requirements needed to perform the essential functions.

Inadequate oversight by FEMA contributed to the level of weaknesses in agency COOP plans. FEMA plans to improve oversight using an online readiness reporting system, which it plans to have fully operational later this year, and it has already taken other steps to help agencies improve their plans, such as conducting an interagency exercise. However, FEMA no longer plans to verify the readiness information that agencies will report in the system. Without more effective oversight, improvements in continuity plans could continue to proceed slowly, and the risk will remain significant that the public will not be able to rely upon the continued delivery of essential programs and services following an emergency.





**Results in Brief: Objective 3**  
Telework

Although not required to do so, one of the 21 agency continuity plans in place on May 1 documented plans to address some essential functions through telework. Two other agencies reported that they planned to use telework to fulfill their essential functions and eight agencies reported that they planned for nonessential staff to telework during a COOP event, but their continuity documents did not specifically document such plans. In addition, none of the agencies that were planning to use telework during a COOP event documented that they had followed the practices necessary for the development of an effective telework program.<sup>1</sup> In the subsequent revision to its guidance, FEMA suggested that agencies consider the use of telework, but neither this guidance nor telework guidance issued by OPM addresses the preparations necessary to ensure an effective telework program. As a result, agencies may not be able to use telework effectively to ensure the continuity of their essential functions in emergencies.

<sup>1</sup> We identified key practices for preparing an effective telework program from existing telework-related literature as well as other sources, such as our work on human capital. GAO, *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts*, GAO-03-679 (Washington, D.C.: July 18, 2003).



**Results in Brief**  
Recommendations and Agency Comments

To help improve the ability of the executive branch to continue to provide essential services during emergencies, we are making recommendations to the Assistant to the President for Homeland Security and the Secretary of Homeland Security.

In written comments on a draft of this briefing, the Department of Homeland Security's Under Secretary for Emergency Preparedness and Response stated that the department agreed that there has been improvement in agency plans. He also agreed with the need for increased oversight, and described actions FEMA is taking to assess agency COOP sites. The Under Secretary also called attention to actions that took place after the cutoff date of our assessment, and provided additional information on several other topics. We reviewed the briefing to ensure that the issues identified by the Under Secretary are adequately addressed.



## Background

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

In July 1999, FEMA issued FPC 65 to assist agencies in meeting the October 1999 deadline established by presidential directive. The guidance states that COOP planning should address any emergency or situation that could disrupt normal operations, including localized emergencies; thus, it extended the scope of the required planning beyond the national emergencies described in the Executive Order.

The guidance also states that essential functions form the basis of continuity planning—they establish the planning parameters that drive the agency's efforts in all other planning topics. For example, the guidance directs agencies to identify alternative facilities, staff, and resources necessary to support continuation of their essential functions. The effectiveness of the plan as a whole and the implementation of all other elements depend on the performance of this initial step.



## Background

Following the identification of essential functions, agencies are responsible for developing agency continuity plans and procedures, as well as a multiyear strategy and program management plan, which should address continuity planning goals and objectives, budgetary requirements, and planning milestones.

Finally, agencies are responsible for conducting training related to agency continuity plans, as well as tests to verify the adequacy of their plans and their ability to carry them out.



## Background

We previously reported on federal agency headquarters contingency plans in place in October 2002 at the request of the Chairman, House Committee on Government Reform.<sup>1</sup> At that time, we found that most agencies identified at least one function as essential, but the functions varied in number and apparent importance. We also found that while 20 of 23 agencies had documented COOP plans, none addressed all the guidance in FPC 65. We identified inadequate guidance and oversight as factors contributing to these weaknesses, and recommended that the Department of Homeland Security (DHS) (1) ensure that agencies without plans develop them, (2) ensure that agencies address weaknesses in their plans, and (3) conduct assessments of plans that included an independent verification of agency-provided data and an assessment of identified essential functions. In response to these recommendations, DHS reported in July 2004 that it (1) was developing an online system to collect data from agencies on the readiness of their continuity plans that would evaluate compliance with the guidance, (2) had conducted an interagency exercise, and (3) had developed a training program for agency continuity planning managers. DHS added that it planned to conduct an independent validation of each agency's self-assessment after deployment of the readiness system.<sup>2</sup>

<sup>1</sup>GAO, *Continuity of Operations: Improved Planning Needed to Ensure Delivery of Essential Government Services*, GAO-04-160 (Washington, D.C.: Feb. 27, 2004) and *Continuity of Operations: Improved Planning Needed to Ensure Delivery of Essential Services*, GAO-04-638T (Washington, D.C.: Apr. 22, 2004).

<sup>2</sup>GAO, *Status of Key Recommendations GAO Has Made to DHS and Its Legacy Agencies*, GAO-04-865R (Washington, D.C.: July 2, 2004).



**Objective 1: Essential Functions**  
Sound Practices

Based on an analysis of published literature and in consultation with experts on continuity planning, we identified eight sound practices related to essential functions that organizations should use when developing their COOP plans. These practices constitute an ongoing process that includes identifying and validating essential functions:

1. Establish a structured COOP project work group/committee that includes representatives of all agency components, legal advisors, and continuity experts and either includes a member of the agency's executive management or reports to a member of the agency's executive management. Such a committee should be involved in the initial selection of essential functions.
2. Determine the resources necessary to perform each function.
3. Determine the dependencies necessary to perform each function.
4. Develop a schedule or project plan for critical stages in the continuity of operations program effort.
5. Identify and rank plausible threats, vulnerabilities, liabilities, and/or exposures through a risk assessment.



**Objective 1: Essential Functions**  
Sound Practices

6. Perform a risk and impact analysis for each essential function—including prioritization of essential functions and determination of minimum acceptance level of output and recovery time objective for each function.
7. Develop and implement a strategy for validating the continuity plan and the underlying essential functions.
8. Change its essential functions as the result of the validation process.



**Objective 1: Essential Functions**  
 Agency Responses by Practice

**Agency Responses by Practice**

With regard to COOP plans in place on May 1, 2004, many of the 23 agencies reported using some of the sound practices in developing plans, included identifying and validating essential functions, but few provided documentation sufficient for us to validate their responses (see table).

Did your agency—	Yes		Partially		No
	with doc.	undoc. <sup>a</sup>	with doc.	undoc. <sup>a</sup>	
1. Establish a structured COOP project work group/committee that includes representatives of all agency components, legal advisors, and continuity experts?	8	12	0	1	2
1.A If yes, did the committee include or report to a member of the agency's executive management?	4	16	0	0	0
2. When determining the agency's essential functions, determine the resources necessary to perform each function?	2	14	1	3	3

<sup>a</sup>The agency provided either no documentation or documentation insufficient to support the response.





**Objective 1: Essential Functions**  
 Agency Responses by Practice

Did your agency—	Yes		Partially		No
	with doc.	undoc. <sup>a</sup>	with doc.	undoc. <sup>a</sup>	
3. When determining the agency's essential functions, determine the dependencies necessary to perform each function?	0	14	0	5	4
4. Develop a schedule or project plan for critical stages in the continuity of operations program effort?	5	11	0	2	5
5. Identify and rank plausible threats, vulnerabilities, liabilities, and/or exposures through a risk assessment?	4	11	0	2	6
6. Perform a risk and impact analysis for each essential function—including prioritization of essential functions and determination of minimum acceptance level of output and recovery time objective for each function?	2	9	0	4	8
7. Develop and/or implement a strategy for validating the continuity plan and the underlying essential functions?	1	16	0	3	3
8. Make any changes to its essential functions as a result of the validation process?	0	10	0	1	12

Source: GAO analysis of agency continuity planning documents.

<sup>a</sup>The agency provided either no documentation or documentation insufficient to support the response.



## Objective 1: Essential Functions Agency-Identified Essential Functions

Agencies' inability to provide documentation adequate to support their reported use of sound continuity planning practices raises concerns that the practices may not have been followed thoroughly or effectively. For example, it is unlikely that a thorough risk analysis of essential functions could be performed without being documented.

Whether or not these practices were followed, the results were inconsistent, and some of the functions identified were of questionable importance. For example, although 43 of the 45 COOP plans in our review identified at least one essential function, the number of functions in each plan varied widely—ranging from 3 to 538. In addition, the apparent importance of the functions was not consistent. For example, a number of essential functions were of clear importance, such as

- “conduct payments to security holders”;
- “provide emergency staffing and compensation policy advice”; and
- “carry out a rapid and effective response to all hazards, emergencies, and disasters.”

Other identified functions appeared vague or of questionable importance:

- “champion decision-making decisions”;
- “provide advice to the Under Secretary”; and
- “produce speeches and articles for the Secretary and Deputy Secretary.”



## Objective 1: Essential Functions Guidance

The high level of generality in FEMA's guidance on essential functions contributed to the inconsistencies in agencies' identification of these functions. As was the case during our 2002 review, the version of FPC 65 in place on May 1, 2004, defined essential functions as those that enable agencies to provide vital services, exercise civil authority, maintain safety, and sustain the economy during an emergency. The document did not, however, define a process that agencies could use to select their essential functions.

In June 2004, FEMA released an updated version of FPC 65, providing additional guidance to agencies on each of the topics covered in the original guidance, including an annex on essential functions. The annex lists several categories that agencies must consider when determining which functions are essential, including

- functions that must continue with minimal interruption or cannot be interrupted for more than 12 hours without compromising the organization's ability to perform its mission and
- functions assigned to the agency by federal law or by order of the President.

The new guidance goes on to outline steps addressing the prioritization of selected functions as well as the identification of resources necessary to accomplish them and of interdependencies with other agencies.



**Objective 1: Essential Functions**  
White House Effort

On January 10, 2005, the Assistant to the President for Homeland Security issued a memorandum outlining additional guidance on essential functions and initiated a process to identify and validate agency-level functions. The memorandum noted that in the past many departments and agencies had had difficulty clearly identifying and articulating their essential functions. It attributed this difficulty, in part, to the lack of a defined set of national-level essential functions to guide agency continuity planning, resulting in multiple efforts to develop agency essential functions for different specific purposes (e.g., planning for Year 2000 computer continuity, information technology planning, and critical infrastructure planning). Further, it noted that departments and agencies sometimes do not distinguish between a “function” and the specific activities necessary to perform the function.



**Objective 1: Essential Functions**  
White House Effort

To address these issues, the memorandum identified eight National Essential Functions that are necessary to lead and sustain the country during an emergency and, therefore, must be supported through continuity capabilities:

- Preserve our constitutional form of government.
- Provide leadership visible to the nation and the world; maintain the trust and confidence of the American people.
- Defend the country against all enemies, foreign or domestic, and prevent or interdict future attacks.
- Maintain and foster effective relationships with foreign nations.
- Protect against threats to the homeland and bring to justice perpetrators of crimes or attacks against the nation, its citizens, or its interests.
- Provide rapid and effective response to and recovery from the domestic consequences of an attack or other incident.
- Protect and stabilize the nation's economy; ensure confidence in financial systems.
- Provide for critical federal government services that address the national health, safety, and welfare needs of the nation.



**Objective 1: Essential Functions**  
White House Effort

Also, the memorandum asked major agencies to identify their Priority Mission Essential Functions—those functions that must be performed to support or implement the National Essential Functions before, during, and in the immediate aftermath of an emergency. The document states that generally priority functions must be uninterrupted or resumed during the first 24 to 48 hours after the occurrence of an emergency and continued through full resumption of all government functions.

When identifying their functions, agencies were asked to also identify the National Essential Function that each priority function supports, the time in which the priority function must be accomplished, and the partners necessary to perform the priority function. The memorandum asked agencies to reply by February 18, 2005.

The memorandum emphasized the need for the involvement of senior-level agency officials, calling for each agency's functions to be first approved by an official with agencywide responsibilities. The memorandum then laid out a process by which the functions would be validated by an interagency group within the Homeland Security Council.

The validated functions would then be used to support development of a new continuity policy and would be used to develop and implement improved requirements for capabilities, inform the annual budget process, establish program metrics, and guide training and exercises and other continuity program activities. The memorandum did not set any time frames for these later steps.



## Objective 1: Essential Functions Practices Addressed in New Guidance

Together, FEMA's revised guidance and the guidance from the White House significantly address the best practices that we identified. For example:

- Both documents call for agencies to identify dependencies necessary to perform the functions.
- FEMA's guidance calls for agencies to prioritize their essential functions and identify the resources necessary to perform them.
- The White House guidance calls on agencies to identify the recovery time necessary for each function and outlines a process to validate the initial list of functions.

If implemented effectively, the new guidance and the review process conducted by the White House could result in more consistent identification of essential functions across the executive branch. The functions could then form the basis for better plans for continuing the most critical functions following a disruption to normal operations. However, without time frames for completing the outlined process, it is unclear when the expected improvements will occur.



**Objective 2: Compliance with COOP Guidance**  
Plans in Place on May 1, 2004

When compared with our prior assessment, agency continuity plans in place on May 1, 2004, showed improved compliance with FEMA's guidance in two ways:

- One agency and 9 component agencies that did not have documented continuity plans in place at the time of our 2002 review had put such plans in place by May 1.
- For each of the topic areas outlined in the guidance, agencies generally made progress in increasing compliance.

However, two major agencies did not have plans in place on May 1, 2004. Neither agency had put a plan in place by December 2004—one planned to have a plan finalized in early 2005, and the other did not have an estimate of when its plan would be completed.

In addition, none of the plans that were in place on May 1 followed all of FEMA's guidance.





**Objective 2: Compliance with COOP Guidance**  
Plans in Place on May 1, 2004

The following sections describe agency compliance in each of the eight planning areas of FPC 65. For each area, our assessments of three sets of plans are listed for comparison purposes:

- the results from our review of plans in place in 2002, which included 34 plans covering 35 agencies and components;
- the results from our 2004 review for the 35 plans covering the agencies and components included in our 2002 review; and
- the results from all 45 agency and component plans in place on May 1, 2004.<sup>1</sup>

<sup>1</sup>This does not include the agency-level plan that identified no essential functions for COOP purposes.

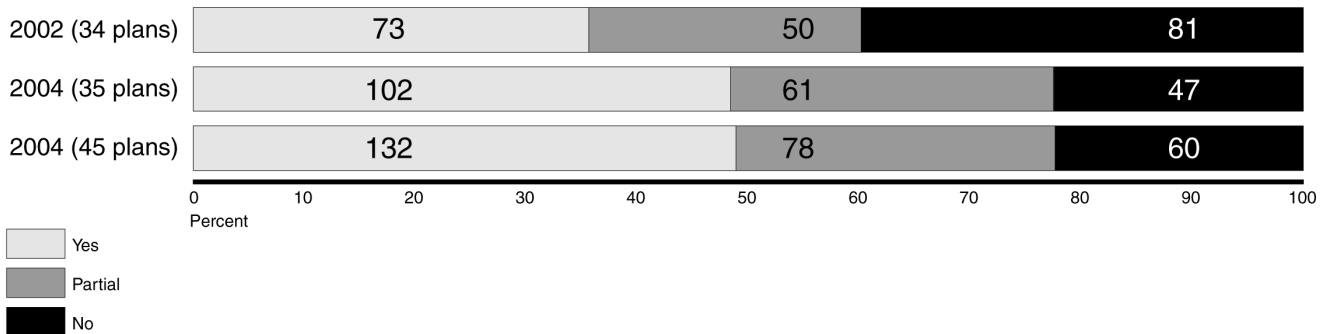


**Objective 2: Compliance with COOP Guidance**  
 Essential Functions

**Essential Functions**

Although most agency plans identified at least one essential function, many COOP plans did not fully address other aspects of the guidance related to essential functions, such as prioritizing the functions or identifying interdependencies among them. If agencies do not prioritize their essential functions and identify the resources necessary to accomplish them, their plans will not be effective, as the other seven topics of the continuity plan are designed around supporting these functions.

**Answers to All Essential Functions Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.

Note: During our 2002 review, one plan covered two components responsible for high-impact programs. The components responsible for those programs had separate plans in 2004.



**Objective 2: Compliance with COOP Guidance**  
 Essential Functions

**Essential Functions: Responses by Question**

The following table summarizes the results of our analysis of agency plans in place on May 1, 2004, according to the existing detailed guidance in FPC 65 on essential functions. It compares the results of our analysis of the 34 plans reviewed in 2002 to the 2004 results for the 35 agencies included in plans reviewed in 2002 as well as the total 45 agency plans reviewed in 2004.

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Identify the agency's essential functions? <sup>a</sup>	2002 (34)	25	4	5
	2004 (35)	31	2	2
	2004 (45)	40	3	2
Identify which essential functions must be continued under all circumstances?	2002 (34)	14	3	17
	2004 (35)	28	2	5
	2004 (45)	35	2	8
Prioritize essential functions?	2002 (34)	13	2	19
	2004 (35)	14	3	18
	2004 (45)	20	4	21
Establish staffing and resource requirements needed to perform the essential functions?	2002 (34)	8	20	6
	2004 (35)	10	23	2
	2004 (45)	13	30	2

<sup>a</sup> The analysis for this question addressed only whether essential functions were named; it did not evaluate the functions chosen.



**Objective 2: Compliance with COOP Guidance**  
 Essential Functions

Essential Functions: Responses by Question (cont'd)

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Identify mission-critical systems and data necessary to conduct essential functions?	2002 (34)	7	12	15
	2004 (35)	11	17	7
	2004 (45)	14	24	7
Integrate supporting activities/identify interdependencies among the essential functions and functions or resources controlled by others?	2002 (34)	6	9	19
	2004 (35)	8	14	13
	2004 (45)	10	15	20

Source: GAO analysis of agency continuity planning documents.



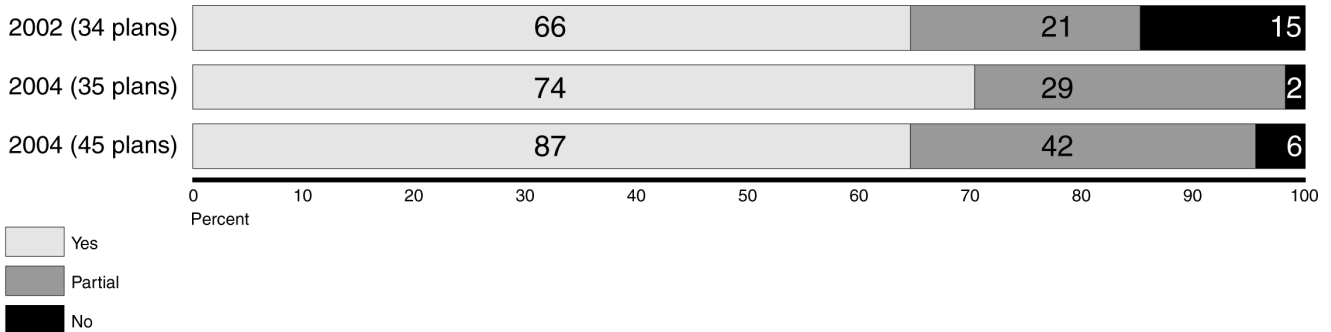
**Objective 2: Compliance with COOP Guidance**  
 Plans and Procedures

**Plans and Procedures**

FPC 65 calls for COOP plans to be developed and documented that provide for the performance of essential functions under all circumstances.

Most agency continuity documents included the plans and procedures outlined in FEMA's guidance. However, in those cases where plans and procedures are not adequately documented, agency personnel may not know what to do in an emergency.

**Answers to All Plans and Procedures Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.



**Objective 2: Compliance with COOP Guidance**  
 Plans and Procedures

**Plans and Procedures: Responses by Question**

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Identify a roster of personnel to perform essential functions?	2002 (34)	22	6	6
	2004 (35)	24	11	0
	2004 (45)	28	17	0
Identify procedures for employee advisories, alerts, notification, and relocation instructions to the alternate facilities?	2002 (34)	19	11	4
	2004 (35)	21	14	0
	2004 (45)	24	20	1
Establish a goal of becoming operational within 12 hours and maintaining that capability for 30 days?	2002 (34)	25	4	5
	2004 (35)	29	4	2
	2004 (45)	35	5	5

Source: GAO analysis of agency continuity planning documents.



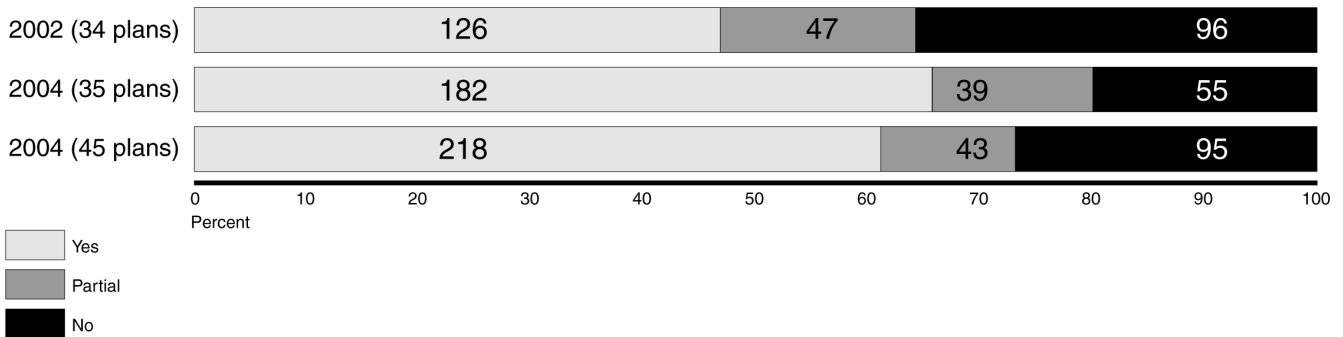
**Objective 2: Compliance with COOP Guidance**  
 Order of Succession

**Order of Succession**

Orders of succession ensure continuity by identifying individuals authorized to act for agency officials in case those officials are unavailable.

While most agency COOP documents adequately described the order of succession to the agency head, fewer addressed other succession planning procedures outlined in FPC 65. If orders of succession are not clearly established, agency personnel may not know who has authority and responsibility if agency leadership is incapacitated in an emergency.

**Answers to All Succession Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.



**Objective 2: Compliance with COOP Guidance**  
 Order of Succession

**Order of Succession: Responses by Question**

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Establish an order of succession to the agency head position?	2002 (34)	28	4	2
	2004 (35)	32	3	0
	2004 (45)	39	3	3
Establish orders of succession to other key leadership positions?	2002 (34)	19	6	9
	2004 (35)	24	6	5
	2004 (45)	28	6	11
Include officials outside Washington, D.C., in the order of succession? (Three agencies did not have senior officials outside the local area who could serve in the order of succession in 2002 and four did not in 2004.)	2002 (34)	19	1	11
	2004 (35)	27	0	4
	2004 (45)	31	1	9
Describe orders of succession by position or title?	2002 (34)	31	2	1
	2004 (35)	32	3	0
	2004 (45)	39	3	3
Include the orders of succession in the agency's emergency vital records?	2002 (34)	6	4	24
	2004 (35)	16	4	15
	2004 (45)	21	4	20





**Objective 2: Compliance with COOP Guidance**  
 Order of Succession

Order of Succession: Responses by Question (cont'd)

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Establish rules and procedures for resolving questions regarding succession in emergencies?	2002 (34)	14	3	17
	2004 (35)	28	0	7
	2004 (45)	33	0	12
Define the conditions under which succession takes place and how successors are to be relieved?	2002 (34)	9	20	5
	2004 (35)	18	14	3
	2004 (45)	20	17	8
Require orientation programs to prepare potential successors for their emergency duties?	2002 (34)	0	7	27
	2004 (35)	5	9	21
	2004 (45)	7	9	29

Source: GAO analysis of agency continuity planning documents.



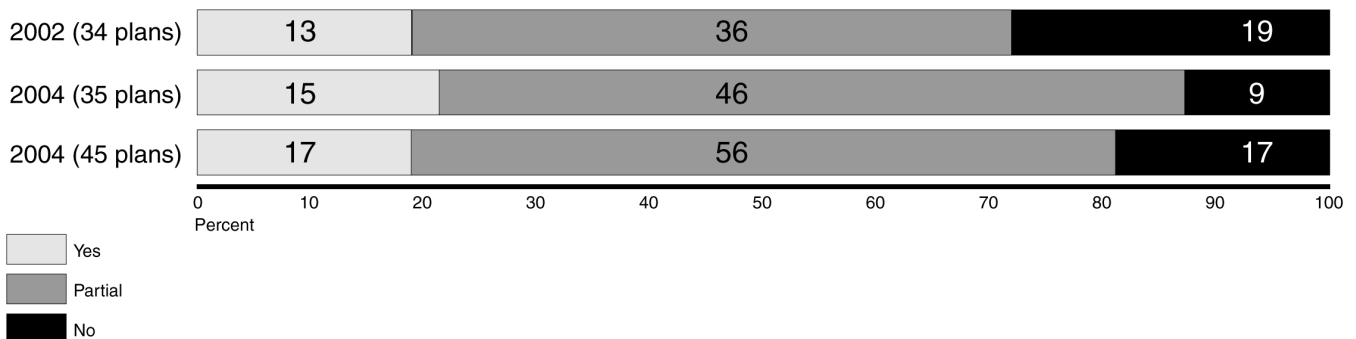
**Objective 2: Compliance with COOP Guidance**  
 Delegations of Authority

**Delegations of Authority**

To provide for rapid response to emergencies, FEMA's guidance calls for agencies to pre-delegate authorities for making policy determinations at all levels. Generally, these delegations define what actions those individuals identified in the orders of succession can take in emergencies.

We found that few agencies had fully documented delegations of authority. If delegations of authority are not clearly established, agency personnel may not know who has authority to make key decisions in an emergency.

**Answers to All Delegations of Authority Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.



**Objective 2: Compliance with COOP Guidance**  
 Delegations of Authority

**Delegations of Authority: Responses by Question**

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Document the legal authority for officials (including those below the agency head) to make policy decisions during an emergency?	2002 (34)	8	16	10
	2004 (35)	8	25	2
	2004 (45)	9	30	6
Identify when emergency legal authorities begin and when they terminate?	2002 (34)	5	20	9
	2004 (35)	7	21	7
	2004 (45)	8	26	11

Source: GAO analysis of agency continuity planning documents.



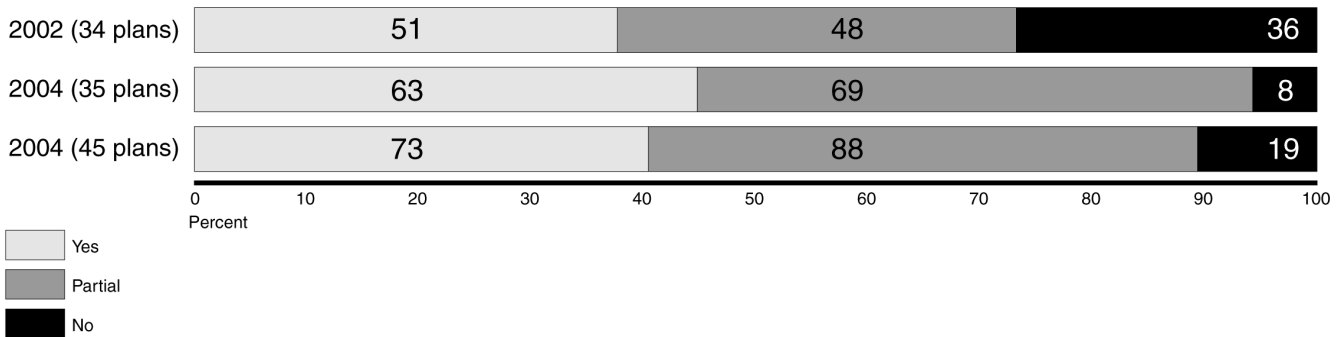
**Objective 2: Compliance with COOP Guidance**  
 Alternate Facilities

**Alternate Facilities**

Alternate facilities provide a physical location from which to conduct essential functions if the agency's usual facilities are unavailable.

Most agency COOP plans document the acquisition of at least one alternate facility for use in emergencies, but few of those plans demonstrate that the facilities are capable of meeting the agencies' emergency operating requirements. If alternate facilities are not provided or are inadequate, agency operations may not be able to continue in an emergency.

**Answers to All Alternate Facility Questions in 2002 and 2004 Assessment**



Source: GAO analysis of agency continuity planning documents.



**Objective 2: Compliance with COOP Guidance**  
 Alternate Facilities

**Alternate Facilities: Responses by Question**

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Document the acquisition of alternate facilities?	2002 (34)	24	6	4
	2004 (35)	28	7	0
	2004 (45)	31	12	2
Identify alternate facilities both within and outside of the local area?	2002 (34)	20	11	3
	2004 (35)	26	9	0
	2004 (45)	31	12	2
Document the facilities' capability to provide previously identified equipment and space for previously identified staff? (One agency transferred operations rather than relocating staff in 2002.)	2002 (34)	2	16	15
	2004 (35)	3	28	4
	2004 (45)	3	36	6
Document the capability to provide interoperable communications with internal and external organizations, critical customers, and the public?	2002 (34)	5	15	14
	2004 (35)	6	25	4
	2004 (45)	8	28	9

Source: GAO analysis of agency continuity planning documents.



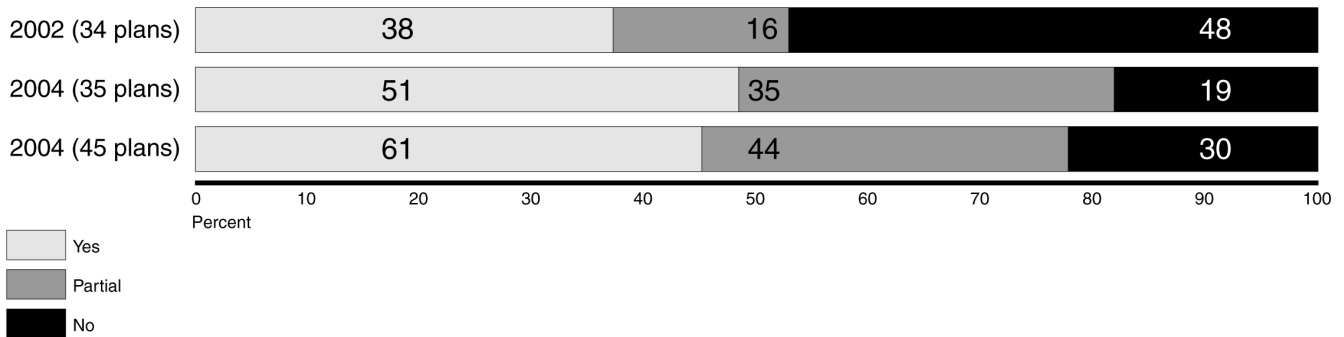
**Objective 2: Compliance with COOP Guidance**  
 Redundant Emergency Communications

**Redundant Emergency Communications**

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

Most COOP documents identified some redundant emergency communications capabilities, but few include emergency communications available for vital electronic systems. If communications fail in an emergency, essential agency operations may not be possible.

**Analysis of All Emergency Communications Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.



**Objective 2: Compliance with COOP Guidance**  
 Redundant Emergency Communications

**Redundant Emergency Communications: Responses by Question**

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Identify at least two independent channels for emergency communications?	2002 (34)	25	2	7
	2004 (35)	33	2	0
	2004 (45)	41	4	0
Identify key internal and external contacts and how to reach them?	2002 (34)	10	10	14
	2004 (35)	16	18	1
	2004 (45)	18	24	3
Identify how emergency communications channels will be used to access the agency's vital electronic systems?	2002 (34)	3	4	27
	2004 (35)	2	15	18
	2004 (45)	2	16	27

Source: GAO analysis of agency continuity planning documents.



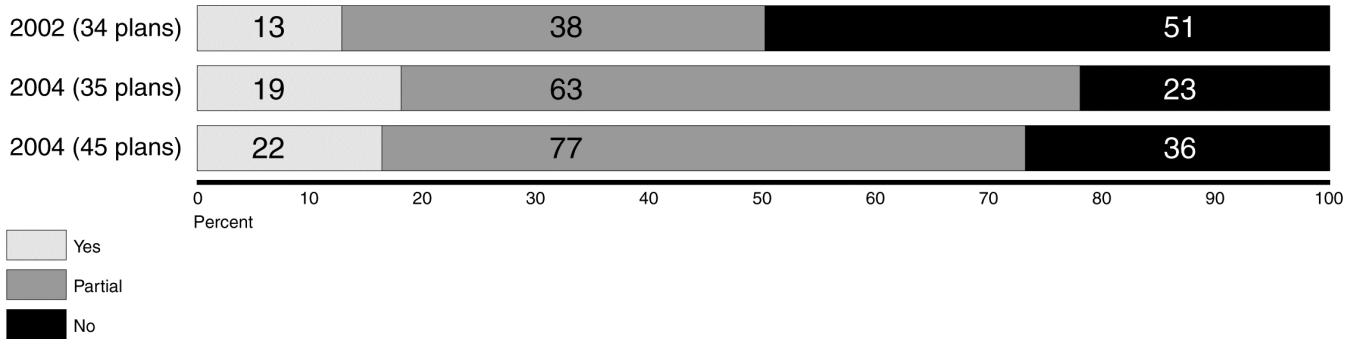
**Objective 2: Compliance with COOP Guidance**  
 Vital Records

**Vital Records**

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

About 38 percent of the continuity plans fully identified agencies' vital paper and electronic records, while fewer documented the procedures for protecting or updating them. If agency personnel cannot access and use up-to-date vital records, they may be unable to carry out essential functions.

**Analysis of All Vital Records Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.





**Objective 2: Compliance with COOP Guidance**  
 Vital Records

**Vital Records: Responses by Question**

Did the COOP documentation—	Year (plans)	Yes	Partially	No
Identify the vital records needed to support the identified essential functions?	2002 (34)	8	13	13
	2004 (35)	14	15	6
	2004 (45)	17	19	9
Identify where and how agency personnel are to access the vital records?	2002 (34)	2	10	22
	2004 (35)	3	21	11
	2004 (45)	3	26	16
Outline procedures for regularly pre-positioning and updating the identified vital records?	2002 (34)	3	15	16
	2004 (35)	2	27	6
	2004 (45)	2	32	11

Source: GAO analysis of agency continuity planning documents.



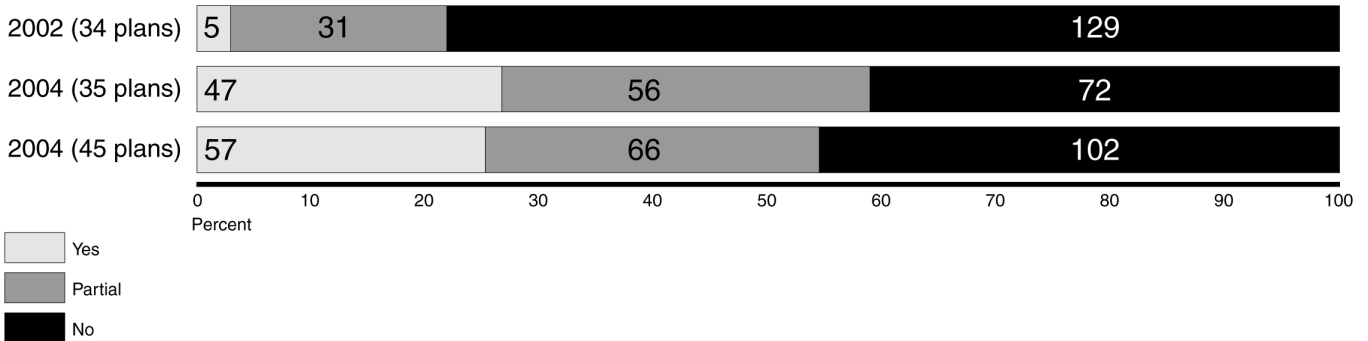
**Objective 2: Compliance with COOP Guidance**  
 Tests, Training, and Exercises

**Tests, Training, and Exercises**

Tests, training, and exercises of continuity of operations capabilities are essential to demonstrate and improve agencies' abilities to execute their plans.

The interagency COOP exercise conducted by FEMA in May 2004 helped improve compliance in this area. However, few agencies have documented that they conducted internal tests, training, and exercises at the recommended frequency before the FEMA exercise. If emergency procedures are not tested and staff is not trained in their use, planned responses to an emergency may not be adequate to continue essential functions.

**Analysis of All Test and Training Questions in 2002 and 2004 Assessments**



Source: GAO analysis of agency continuity planning documents.



**Objective 2: Compliance with COOP Guidance**  
 Tests, Training, and Exercises

**Tests, Training, and Exercises: Responses by Question**

Did the COOP documentation show that the agency—	Year (plans)	Yes	Partially	No
Conducted annual individual and team training for COOP staff?	2002 (34)	1	11	22
	2004 (35)	1	18	16
	2004 (45)	1	21	23
Conducted annual internal agency testing and exercising of COOP plans and procedures, including operations at the alternate facility(ies)?	2002 (34)	3	10	21
	2004 (35)	1	17	17
	2004 (45)	1	21	23
Conducted quarterly testing of alert and notification procedures?	2002 (34)	0	10	24
	2004 (35)	4	16	15
	2004 (45)	4	19	22
Conducted refresher orientations for staffs arriving at alternate facilities? (One agency transfers operations rather than relocating to an alternate facility.)	2002 (34)	0	0	33
	2004 (35)	16	4	15
	2004 (45)	18	4	23
Conducted joint agency exercises, where applicable and feasible?	2002 (34)	1	0	29
	2004 (35)	25	1	9
	2004 (45)	33	1	11

Source: GAO analysis of agency continuity planning documents.

Note: In 2002, four agencies determined that interagency exercises were not applicable. In 2004, all the agencies we reviewed and 13 of their components participated in an interagency exercise run by FEMA in mid-May 2004. Participation in this exercise was considered in our assessment of the question on joint agency exercises.



## Objective 2: Compliance with COOP Guidance Agency Responsibilities

FEMA's guidance also assigns agency heads several specific continuity of operations responsibilities, including developing, approving, and maintaining agency contingency plans and procedures, as well as developing plans to manage these activities. However, we found that agency heads were not consistently fulfilling these responsibilities.

Specifically, most of the agencies we reviewed could not document approval of their COOP plans by senior management. Of the 20 agency-level plans,

- 6 were approved by the agency head or deputy,
- 2 were approved by the next level of official (i.e., assistant secretary),
- 2 were approved by a lower-level official (i.e., director of security), and
- 10 were unsigned.

Of the 25 component plans,

- 12 were approved by the component head or deputy,
- 1 was approved by a lower-level official, and
- 12 were unsigned.



## Objective 2: Compliance with COOP Guidance Agency Responsibilities

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In addition, only 3 of the 21 major agencies had current COOP management plans in place on May 1, 2004. According to the guidance, agencies should use such plans to develop and maintain their contingency planning capabilities. The plans should outline the process agencies use to designate essential functions and resources, define short-term and long-term COOP goals and objectives, forecast budgetary requirements, and establish planning milestones. Without such plans, agencies will be hampered in their efforts to ensure that continuity planning efforts are timely and cost-effective.



**Objective 2: Compliance with COOP Guidance**  
Limited Oversight

During our prior review of 2002 plans, we found that insufficient oversight by FEMA contributed to agencies' lack of compliance with the guidance. Specifically, we noted that FEMA had not conducted an assessment of agency contingency plans since 1999. As a result, we recommended that FEMA conduct assessments of agency continuity plans that include independent verification of agency-reported information. In response DHS reported that it was developing a readiness reporting system to assist it in assessing agency plans and planned to verify the information reported by the agencies.

Although neither of these planned actions was completed by May 1, 2004, FEMA has made subsequent efforts to improve its oversight. According to FEMA officials, its readiness reporting system is due to be operational by January 31, 2005, and will be fully certified 20 weeks later. They added that once the system becomes fully operational, agencies will be required to periodically provide updated information on their compliance with FEMA's guidance. These officials also reported that the agency had taken additional steps to improve readiness. Specifically, they stated that the interagency exercise held in mid-May 2004 successfully activated and tested agency plans; they based this assessment on reports provided by the agencies. Furthermore, FEMA has begun planning for another interagency exercise in 2006. In addition, as of November 2004, FEMA had provided training to 372 federal COOP managers from 65 departments and agencies. FEMA officials stated that because of these additional successful efforts to improve readiness, they no longer planned to verify agency-reported readiness data.



**Objective 2: Compliance with COOP Guidance**  
Limited Oversight

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While the revised guidance, recent exercise, and ongoing training should help ensure that agency continuity plans follow FEMA's guidance, FEMA's ongoing ability to oversee agency continuity planning activities will be limited by its reliance on agency-provided data. Without verification of such data, FEMA lacks assurance that agency plans are compliant and that the procedures outlined in those plans will allow agencies to effectively continue to perform their essential functions following a disruption.



## Objective 3: Telework

Telework, also referred to as telecommuting or flexiplace, has gained widespread attention over the past decade in both the public and private sectors as a human capital flexibility that offers a variety of potential benefits to employers, employees, and society. In a 2003 report to Congress on the status of telework in the federal government, the Director of the Office of Personnel Management (OPM) described telework as “an invaluable management tool which not only allows employees greater flexibility to balance their personal and professional duties, but also allows both management and employees to cope with the uncertainties of potential disruptions in the workplace, including terrorist threats.”<sup>1</sup>

As we reported in an April 2004 report, telework is an important and viable option for federal agencies in COOP planning and implementation efforts, especially as the duration of an emergency event is extended.<sup>2</sup> In a July 2003 GAO report, we defined 25 key telework practices for implementation of successful federal telework programs.<sup>3</sup>

<sup>1</sup> U.S. Office of Personnel Management, *Report to the Congress: The Status of Telework in the Federal Government* (Washington, D.C.: January 2003).

<sup>2</sup> GAO, *Human Capital: Opportunities to Improve Federal Continuity Planning Guidance*, GAO-04-384 (Washington, D.C.: Apr. 20, 2004).

<sup>3</sup> GAO, *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts*, GAO-03-679 (Washington, D.C.: July 18, 2003).





### Objective 3: Telework

According to OPM's guidance on Washington, D.C., area closures, one of the major benefits of a telework program is the ability of telework employees to continue working at their alternative work sites during a disruption to operations.<sup>1</sup> In recognition of the growing importance of teleworkers to the continuity of agency operations, OPM states that agencies may wish to modify their current policies concerning teleworkers and emergency closures. OPM's guidance on emergency decision-making also notes that agency COOP facilities cannot accommodate enough key staff to facilitate maximum government operations, and that telework provides access to resources that may not be available otherwise.<sup>2</sup>

In addition, 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. Further, organizations should provide teleworkers with adequate support in terms of tools, training, and guidance.

<sup>1</sup>U.S. Office of Personnel Management, *Washington, DC, Area Dismissal or Closure Procedures* (Washington, D.C.: Dec. 4, 2003).

<sup>2</sup>U.S. Office of Personnel Management, *Federal Managers'/Decision-makers' Emergency Guide* (Washington, D.C.: Mar. 17, 2003).



### Objective 3: Telework Agency Responses

Although not required to do so, one of the 21 agency continuity plans in place on May 1, 2004, documented plans to address some essential functions through telework. Two other agencies reported that they planned to use telework to fulfill their essential functions, and eight agencies reported that they planned for nonessential staff to telework during a COOP event, but their continuity plans do not specifically mention telework.

In addition, none of the agencies that are planning to use telework during a COOP event documented that the necessary preparations had taken place (these preparations are derived from the practices for the development of an effective telework program that we identified earlier<sup>1</sup>). These preparations include informing and training the staff, ensuring that there is adequate technological capacity for telework, providing technological assistance, and testing the ability to telework.

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



**Objective 3: Telework**  
 Telework Practices

**Telework: Responses by Question**

The following tables summarize agency responses to our questions on the use of telework in responding to disruptions to operations and related preparations.

Question	Yes	Yes <sup>a</sup> (no doc.)	No	No response
Does your agency have a telework policy?	19	3	0	1
If yes, does the policy specifically address COOP events?	1	2	19	1
Does the COOP plan specifically address telework?	2	1	19	1
Does the agency coordinate its COOP and telework planning processes?	0	5	17	1
Was the agency's telework coordinator involved in COOP planning?	0	6	16	1

<sup>a</sup> Agencies provided a positive response but did not provide adequate documentation to support their response.



**Objective 3: Telework**  
 Telework Practices

Telework: Responses by Question (cont'd)

Question	Yes	Yes <sup>a</sup> (no doc.)	No	No response
Are any of the COOP essential team members expected to telework in a COOP event?	1	2	19	1
Were staff informed of their responsibility to telework during a COOP event?	1	3	18	1
Has the agency ensured that it has adequate technological capacity for staff to telework during a COOP event?	0	5	17	1
Will your agency provide technological assistance to staff during a COOP event?	0	5	17	1
Did your agency train staff how to telework during a COOP event?	0	3	19	1
Has your agency tested the ability of staff to telework during a COOP event?	0	2	20	1

<sup>a</sup> Agencies provided a positive response but did not provide adequate documentation to support their response.



**Objective 3: Telework**  
 Telework Practices

Telework: Responses by Question (cont'd)

Question	Yes	Yes <sup>a</sup> (no doc.)	No	No response
Are any personnel not designated essential for COOP purposes expected to telework during an emergency?	0	7	15	1
Was staff informed of their responsibility to telework during a COOP event?	0	3	19	1
Has the agency ensured that it has adequate technological capacity for staff to telework during a COOP event?	0	7	15	1
Will your agency provide technological assistance to staff during a COOP event?	0	5	17	1
Did your agency train staff how to telework during a COOP event?	0	1	21	1
Has your agency tested the ability of staff to telework during a COOP event?	0	3	19	1

Source: Analysis of agency responses to GAO questions.

<sup>a</sup> Agencies provided a positive response but did not provide adequate documentation to support their response.



**Objective 3: Telework**  
Telework Practices

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In May 2004, OPM's guidance on Washington, D.C., area closures and emergency planning (as mentioned earlier) were the only telework guidance available to agency emergency planners. Planners now have additional guidance from FEMA—the June 2004 version of its continuity planning guidance mentions telework as one option that agencies should consider when making plans for alternate facilities. However, neither agency's guidance addresses the steps that agencies who choose to use telework following a COOP event should take to ensure that they are fully prepared. If agencies are not informed of the need for such preparations, their future efforts to increase the use of telework may not effectively contribute to the continuity of the agencies' essential functions.



## Conclusions

Although agency COOP plans have shown improvement since our prior assessment of 2002 plans, most plans in place on May 1, 2004, continued to exhibit inconsistencies in the identification of essential functions and significant lack of compliance with FEMA's guidance. Both FEMA's revision to this guidance and a recently initiated White House effort have the potential, if effectively implemented, to help agencies better identify their essential functions and thus develop better continuity plans. However, the lack of a schedule to complete the White House effort makes it unclear when these improvements might take place. Agencies' efforts to develop continuity plans could also be aided by FEMA's efforts to develop a readiness reporting system, conduct a governmentwide exercise, and train agency COOP planners, as well as by any guidance or policies that result from the White House effort. At this time, we do not believe that agencies should begin extensive efforts to bring their plans into compliance with all of the current FEMA guidance because it appears likely to be revised. However, agencies that do not take some interim steps to address those weaknesses that directly affect their ability to perform their essential functions are placing their ability to perform those functions at risk. In addition, if FEMA continues to base its oversight activities on agency-reported data, its effectiveness will be limited. Without more effective oversight, improvements in continuity plans could continue to proceed slowly, and the risk will remain significant that the public will not be able to rely upon the continued delivery of essential programs and services following an emergency.



## Conclusions

Even though FEMA's continuity planning guidance in place in May 2004 did not address telework, one agency's continuity plan in place at that time indicated that it was planning to use telework in response to an emergency. In addition, 10 agencies reported that they planned to use telework following a COOP event, but their plans were not clearly documented. FEMA's inclusion of telework in its recently revised continuity planning guidance could encourage other agencies to add telework to their plans in the future. While some of the agencies that plan to use telework during an emergency reported making related preparations, the general lack of documentation to support their responses leads us to believe that few agencies are likely to have fully implemented the telework preparations we have previously found to be effective. Should agencies fail to support their plans with adequate preparations, the ability of their teleworking staff to contribute to the agency's essential functions during a COOP event could be hampered.





## Recommendations

To ensure that agencies are adequately prepared to continue performing essential functions following an emergency, we recommend that the Assistant to the President for Homeland Security establish a schedule for the completion of the recently initiated effort to validate agency essential functions and refine federal continuity of operations policy. We also recommend that the Secretary of Homeland Security direct the Under Secretary for Emergency Preparedness and Response to

- develop a strategy for short-term oversight that ensures that agencies are prepared for a disruption in essential functions while the current effort to identify essential functions and develop new guidance is ongoing;
- develop and implement procedures that verify the agency-reported data used in oversight of agency continuity of operations planning; and
- develop, in consultation with OPM, guidance on the steps that agencies should take to adequately prepare for the use of telework during a COOP event.



## Agency Comments and Our Assessment

In written comments on a draft of this briefing, the Department of Homeland Security's Under Secretary for Emergency Preparedness and Response replied that DHS agrees that there has been improvement in COOP plans, and attributed that improvement to a renewed emphasis by DHS and the White House. The department also agreed with the need for additional oversight, and noted that FEMA had begun conducting COOP site assessments at departments and agencies to improve readiness.

The Under Secretary's letter drew attention to a number of actions taken after the May 1, 2004, cutoff date for our assessment. These actions include the May 2004 interagency exercise, the June 2004 release of the revised FPC 65, FEMA's COOP manager's training, and initial planning for the next interagency exercise in 2006. These actions are described in our briefing. However, we did not use the June 2004 guidance in our assessments because it was released after we began our audit.

The Under Secretary wrote that it was unclear whether we had considered classified information DHS provided about interagency communications in our assessments. We considered this information in our assessments of individual agency plans, and the briefing reflects the results.



Agency Comments and Our Assessment

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Finally, the Under Secretary pointed out that the readiness reporting system FEMA is developing was not intended to be a COOP plan assessment tool, and instead provides key officials with the ability to determine plan status in near real time. We continue to believe that it is important for FEMA to assess agency plans as part of its oversight responsibilities. Regardless of the system's intended use, we believe its capabilities, as described by FEMA, make it a valuable tool the agency should use when exercising these responsibilities.



**Attachment 1: Bibliography**  
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- Hiles, Andrew FBCI. *Business Continuity: Best Practices*. June 2000.
- National Fire Protection Association. *NFPA 1600 Standard on Disaster/Emergency Management and Business Continuity Programs*. January 16, 2004.
- Office of Critical Infrastructure Protection and Emergency Preparedness. *Self-Help Advice for Businesses and Institutions: A Guide to Business Continuity Planning*.



## Attachment 2: Major Agencies Reviewed

Department of Agriculture	Agency for International Development
Department of Commerce	Environmental Protection Agency
Department of Education	General Services Administration
Department of Energy	National Aeronautics and Space Administration
Department of Health and Human Services	National Science Foundation
Department of Homeland Security <sup>1</sup>	Nuclear Regulatory Commission
Department of Housing and Urban Development	Office of Personnel Management
Department of Justice	Small Business Administration
Department of Labor	Social Security Administration
Department of State	
Department of the Interior	
Department of the Treasury	
Department of Transportation	
Department of Veterans Affairs	

<sup>1</sup> The Department of Homeland Security did not exist at the time of our 2002 review. We added it to the list of agencies we reviewed in 2004 because it encompasses FEMA, which was an independent agency in 2002, as well as several components responsible for high-impact programs, such as the Coast Guard.



**Attachment 3: Component Agencies Reviewed,  
 with High-Impact Program Responsibilities**

<b>Department</b>	<b>Component</b>	<b>High-impact programs</b>
Department of Agriculture	<i>Food and Nutrition Service</i>	Child nutrition programs; food stamps; and special supplemental nutrition program for women, infants, and children
	<i>Food Safety and Inspection Service</i>	Food safety inspection
Department of Commerce	National Oceanic and Atmospheric Administration	Weather service
	Patent and Trademark Office	Patent and trademark processing
Department of Education	<i>Office of Federal Student Aid</i>	Student aid
Department of Health and Human Services	Centers for Disease Control and Prevention	Disease control and monitoring
	Center for Medicare and Medicaid Services	Medicare and Medicaid
	<i>Health Resources and Services Administration<sup>a</sup></i>	Organ transplants
	Indian Health Service	Indian health services
Department of Homeland Security	<i>Citizenship and Immigration Service</i>	Immigration
	<i>Customs and Border Protection<sup>b</sup></i>	Immigration and cross-border inspections
	<i>Immigration and Customs Enforcement</i>	Immigration
	Federal Emergency Management Agency	Disaster relief
	U.S. Coast Guard	Maritime search and rescue

Note: Components listed in *italics* did not have documented COOP plans in place at the time of our 2002 review.  
<sup>a</sup> The component agency responsible for organ transplants was misidentified by agency officials during our 2002 review.  
<sup>b</sup> Customs and Border Protection assumed the responsibility for cross-border inspections from the U.S. Customs Service, which was included in our 2002 review.



**Attachment 3: Component Agencies Reviewed,  
 with High-Impact Program Responsibilities**

<b>Department</b>	<b>Component</b>	<b>High-impact programs</b>
Department of Housing and Urban Development	Government National Mortgage Association	Housing loans
	Office of Community Planning and Development	Community development block grants
	Office of Housing	Section 8 rental assistance and mortgage insurance
	Office of Public and Indian Housing	Public housing
Department of Labor	<i>Employment and Training Administration</i>	Unemployment insurance
Department of State	<i>Bureau of Consular Affairs</i>	Passports
Department of the Interior	Bureau of Indian Affairs	Indian affairs programs
Department of the Treasury	<i>Financial Management Service</i> <sup>°</sup>	Federal payments <sup>°</sup>
Department of Transportation	Federal Aviation Administration	Air traffic control system
Department of Veterans Affairs	<i>Veterans Benefits Administration</i>	Veterans' benefits
	<i>Veterans Health Administration</i>	Veterans' health care

Source: GAO.

<sup>°</sup> The Treasury Department's Financial Management Service was not identified as a high-impact program by OMB in 1999, but we included it in our 2004 assessment because of its significant role in the processing of federal payments.



**Attachment 4: 38 High-Impact Programs and Responsible Agencies**

<b>Agency</b>	<b>High-impact programs</b>
Agriculture	Food safety inspection
	Child nutrition programs
	Food stamps
	Special supplemental nutrition program for women, infants, and children
Commerce	Patent and trademark processing
	Weather service
Education	Student aid
Energy	Federal electric power generation and delivery
Health and Human Services	Disease monitoring and warnings
	Indian health services
	Medicaid
	Medicare
	Organ transplants
	Child care
	Child support enforcement
	Child welfare
	Low income home energy assistance
	Temporary assistance for needy families





**Attachment 4: 38 High-Impact Programs and Responsible Agencies**

<b>Agency</b>	<b>High-impact programs</b>
Homeland Security	Cross-border inspection services
	Disaster relief
	Immigration
	Maritime search and rescue
Housing and Urban Development	Community development block grants
	Housing loans
	Mortgage insurance
	Section 8 rental assistance
	Public housing
Interior	Bureau of Indian Affairs programs
Justice	Federal prisons
Labor	Unemployment insurance
Office of Personnel Management	Federal employee health benefits
	Federal employee life insurance
	Federal employee retirement benefits
Social Security Administration	Social security benefits
State	Passport applications and processing
Transportation	Air traffic control system
Veterans Affairs	Veterans' benefits
	Veterans' health care

Source: GAO.

# Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
500 C Street, SW  
Washington, DC 20472



**FEMA**

February 22, 2005

Ms. Linda Koontz  
Director, Information Management Issues  
U.S. Government Accountability Office  
Washington, DC 20548

Dear Ms. Koontz:

Thank you for the opportunity to review and comment on your draft briefing titled, *Continuity of Operations (COOP): Agency Plans Have Improved, but Better Oversight Could Assist Agencies in Preparing for Emergencies*, GAO-05-286C. The Department of Homeland Security (DHS) recognizes its role as the federal government's lead agency for COOP and has made significant strides toward ensuring the delivery of essential government services in an emergency.

In general, we agree that Federal Department and Agency COOP plans have significantly improved over the last two years. We believe this improvement is due, in part, to a renewed emphasis on COOP planning, training, and preparedness that has been led by the White House and DHS. Because the latest GAO report was cut - off on May 1, 2004, we would like to draw your attention to some significant COOP improvements that have occurred and are not fully covered in your findings. After a year long interagency training, planning and exercise development process, FEMA conducted the first ever government-wide COOP exercise from May 11 to 13, 2004, called Forward Challenge 04. This exercise event involved 45 Departments and Agencies and over 300 sub-entities mobilized to their alternate COOP locations, or other designated sites. Approximately 3,500 to 4,000 players from these Departments and Agencies participated deploying to more than 100 alternate site locations. As a result of this exercise, many Departments and Agencies have revised, updated, or finalized their COOP plans. Following closely behind Forward Challenge 04, FEMA released an updated Federal Preparedness Circular-65 (FPC-65), *Executive Branch COOP*, guidance document. The revised FPC-65, for the first time, provides alternate facility guidance prepared by the General Services Administration (GSA) and human capital management guidance prepared by the Office of Personnel Management (OPM). Unfortunately, your assessment did not take into account the new guidance provided by FPC-65. Beginning in July 2004 and continuing to date, FEMA, GSA and OPM have partnered to provide a COOP Manager's Training course to Departments and Agencies. This train-the-trainer course, which is being conducted nationwide, has provided training to more than 400 instructors from over 65 Departments and Agencies. Finally, planning has already started on Forward Challenge 06, another government-wide COOP exercise, which will build upon the lessons learned from and successes we experienced during Forward Challenge 04.

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**Appendix II**  
**Comments from the Department of Homeland**  
**Security**

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Your report suggests that increased oversight of Department and Agency COOP planning and capability may improve individual programs. We agree with that recommendation and have already begun COOP site assessments of Departments and Agencies. The information developed from these site visits will help us focus resources and preparedness initiatives to ensure Departments and Agencies have viable COOP plans. Moreover, we have used, and will continue to use, exercises such as the Forward Challenge series as our primary means of assessment of COOP readiness. Because Forward Challenge exercises are scheduled to occur biannually, FEMA and Department and Agencies are able to use the year between exercises to revise and update COOP procedures.

As you know, we facilitated a classified briefing for your staff on redundant emergency communications available to Departments and Agencies. This COOP communications plan is updated twice a year and distributed to the Federal Executive Branch to ensure that redundant and vital emergency communications are available. It is unclear whether or not your report reflects this important communication plan that is exercised and tested on a regular basis.

As a point of clarification, the Readiness Reporting System (RRS) that you reference in the report and is in the final stages of development, was never intended to serve as a Department and Agency COOP assessment tool. Nor is the system designed to verify or validate Department and Agency COOP plans. Rather, the RRS is designed and intended to be an automated reporting system that provides key officials with the ability to determine Department or Agency COOP status in near real time. This capability does not currently exist in the Federal government and will improve our ability to coordinate COOP activations and reporting requirements. Data input is the responsibility of individual Departments or Agencies and will be spot-checked by FEMA for accuracy.

We appreciate the GAO's recognition that the Federal government has made improvements in its COOP program and are committed to working with Departments and Agencies to ensure that viable COOP plans are in place and regularly exercised. In so doing, and by providing robust COOP training opportunities to Departments and Agencies, we are well positioned for further improvements in overall COOP preparedness.

Sincerely,



Michael D. Brown  
Under Secretary  
Emergency Preparedness and Response

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