

United States Government Accountability Office

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

November 2007

CONTINUITY OF OPERATIONS

Selected Agencies Tested Various Capabilities during 2006 Governmentwide Exercise





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

Why GAO Did This Study

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

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

What GAO Recommends

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

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

CONTINUITY OF OPERATIONS

Selected Agencies Tested Various Capabilities during 2006 Governmentwide Exercise

What GAO Found

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

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

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

Source: GAO.

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

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Abbreviations

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

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

November 19, 2007

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

Dear Mr. Davis,

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

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

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

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

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

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

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

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

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

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

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

	activities performed. However, in other cases, agencies reported conducting such activities but did not provide supporting documentation. Finally, agencies also reported not testing or exercising certain capabilities during the exercise. In these cases, participating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of our review.
	Agencies' inability to substantiate many of the test and exercise activities that they reported performing during Forward Challenge 06 was due in part to the absence of specific guidance on what should be documented in such exercises. While FEMA directed participating agencies to document issues and requirements for corrective action, significant findings, and important observations during the Forward Challenge 06 exercise, it did not require participating agencies to document the specific activities from their test and exercise programs that they conducted during the exercise. Without adequate records of what has been tested during a major governmentwide exercise, agencies lack assurance that they have adequately tested their continuity capabilities at the frequency outlined in FEMA guidance, which may limit their ability to fully evaluate their readiness to respond to a disruption. In addition, adequate records can reduce the potential negative impact of turnover in key personnel due to attrition or change in administration, and strengthen agency internal control capabilities.
Recommendation for Executive Action	To better assist agencies in assessing their readiness to respond to disruptions, we recommend that the Secretary of Homeland Security direct the FEMA Director to require agencies participating in future governmentwide exercises to document the specific test and exercise activities conducted.
Agency Comments and Our Evaluation	We received written comments on a draft of our report from the Director of the Department of Homeland Security's GAO/OIG Liaison office. (These comments are reproduced in app. II) In commenting on the report, the Director stated that the department agreed with our recommendation. In addition, the Director stated that the department had already complied with the recommendation during Forward Challenge 06, citing the general

guidance provided in Federal Preparedness Circular 65^4 as well as evaluations compiled by internal and external evaluators during the exercise. The Director stated further that the level of documentation was higher than we reported as demonstrated by external evaluations that he said did not meet GAO audit standards.

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

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

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

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

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

Sincerely yours,

Linda & Koontz

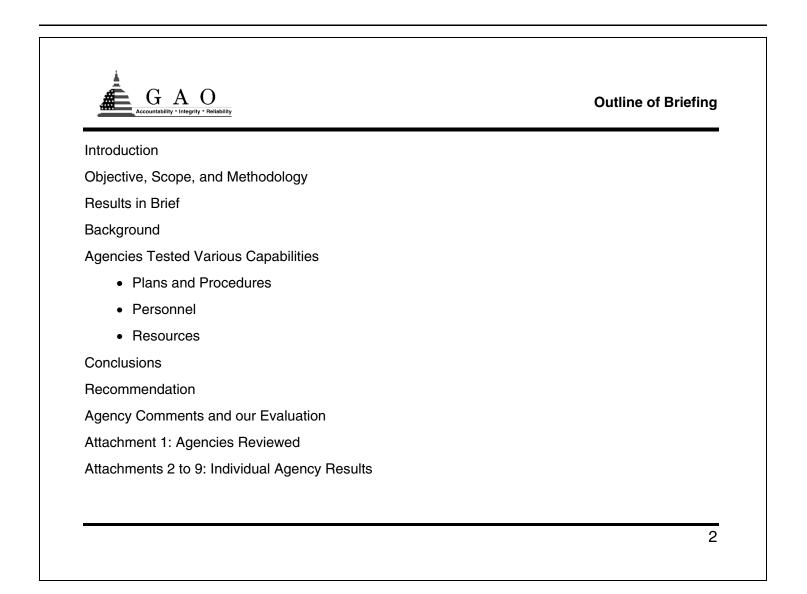
Linda D. Koontz Director, Information Management Issues

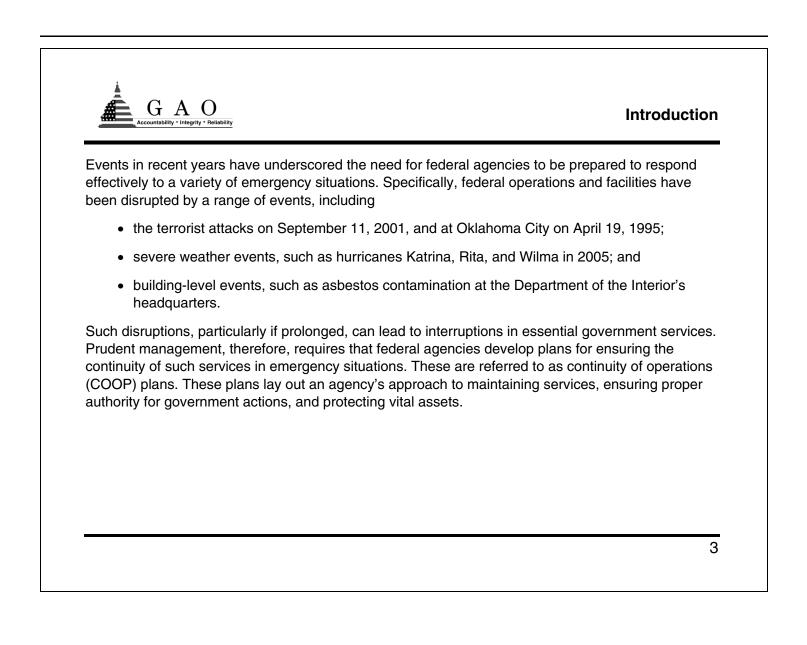


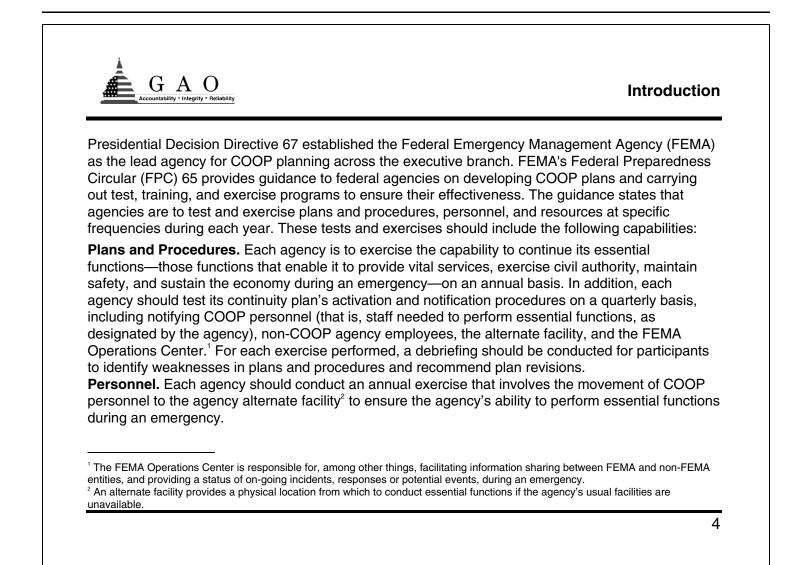
Continuity of Operations: Selected Agencies Tested Various Capabilities During 2006 Governmentwide Exercise

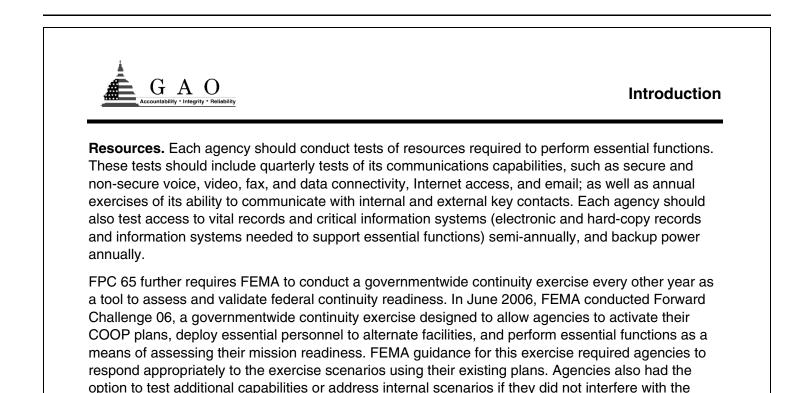
Briefing for the Staff of the Ranking Member Committee on Oversight and Government Reform House of Representatives

October 4, 2007



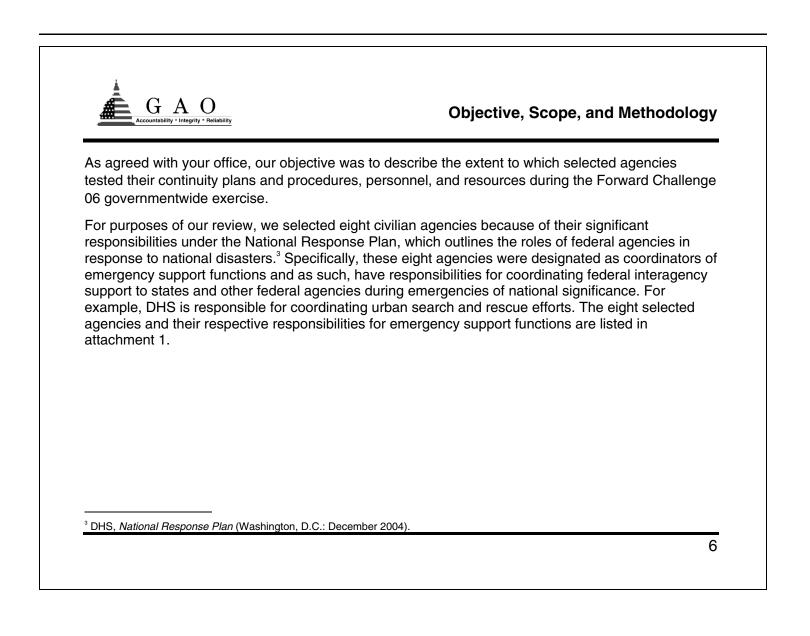


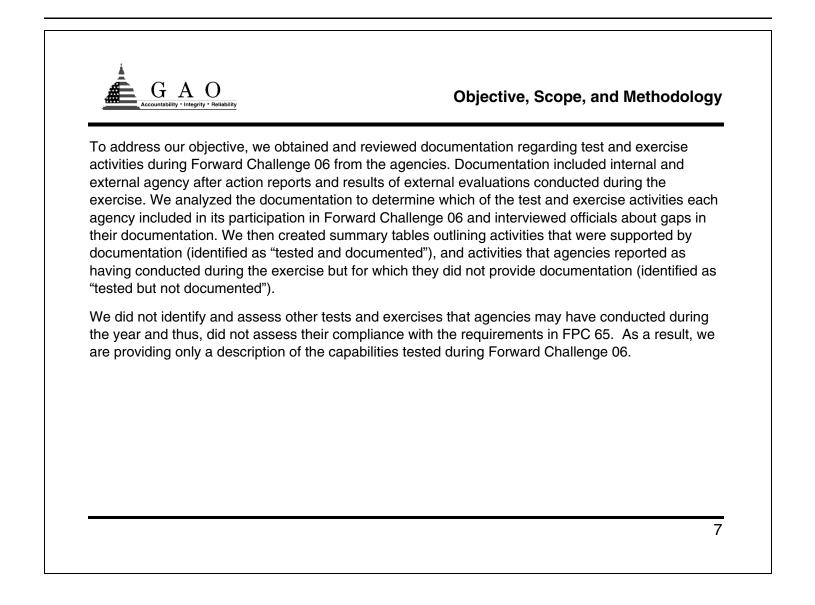


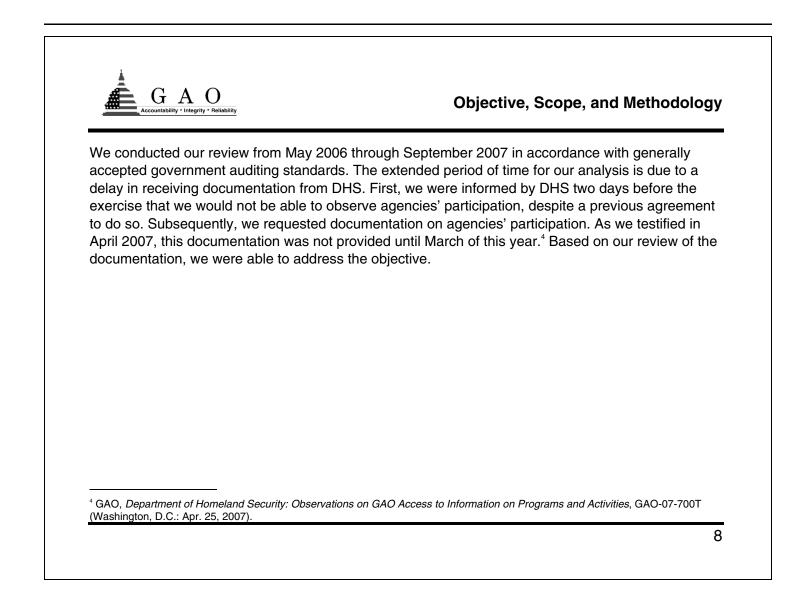


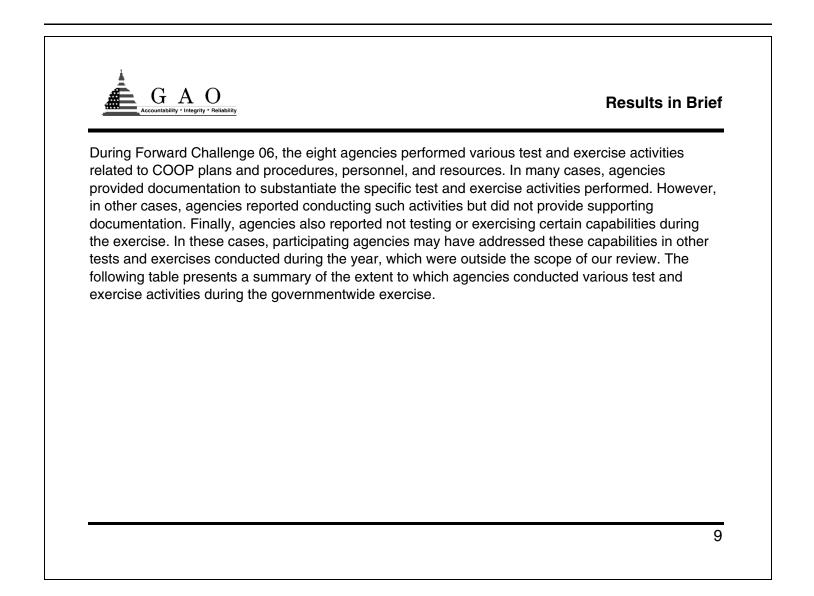
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overall exercise or the activities of other agencies.





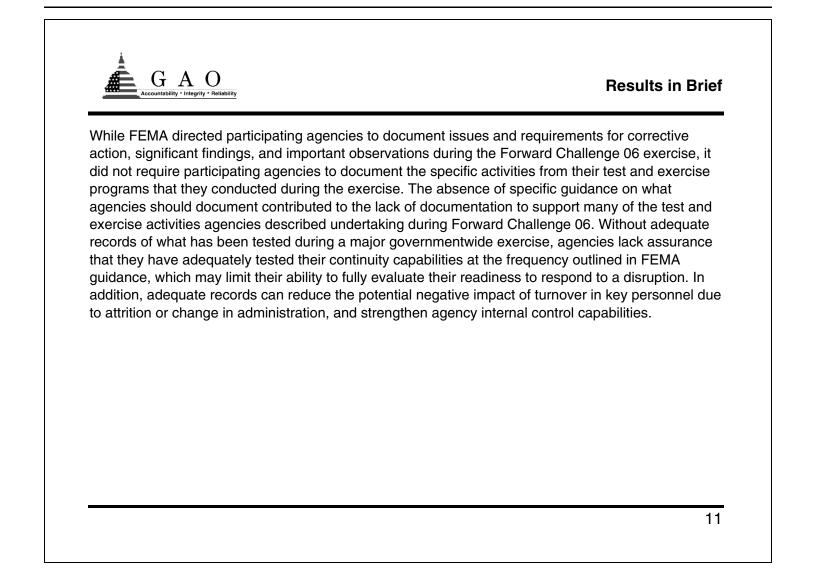


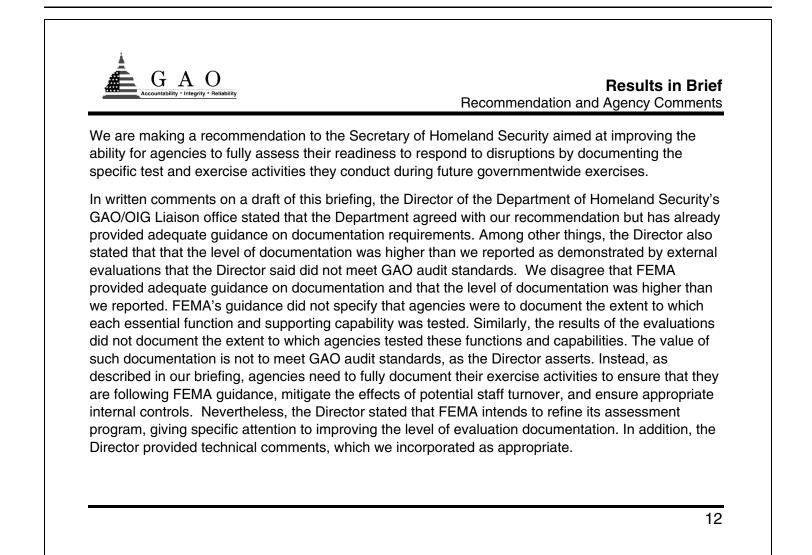


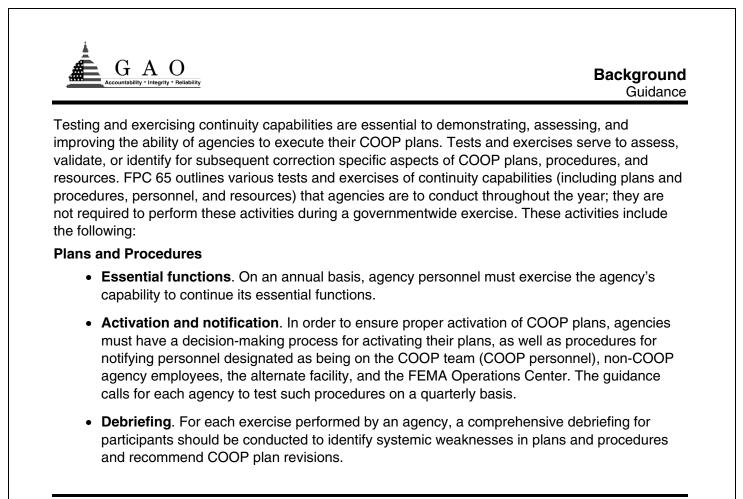
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Agency Testing and Exercising of COOP Plans and Procedures, Personnel, and Resources					
Category	Test and exercise activities	Tested and documented	Tested but not documented	Not tested during exercise	
Plans and	Essential Functions	4	4	0	
Procedures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

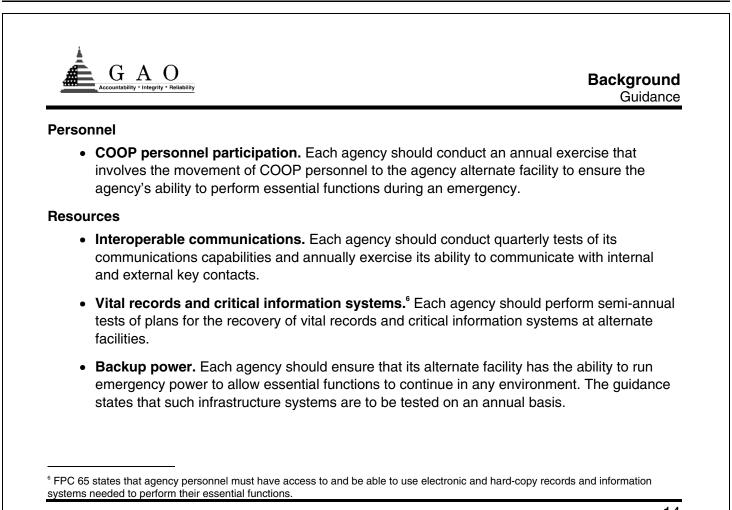
⁵ Participating agencies may have addressed these capabilities in other tests and exercises conducted during the year, which were outside the scope of our review.

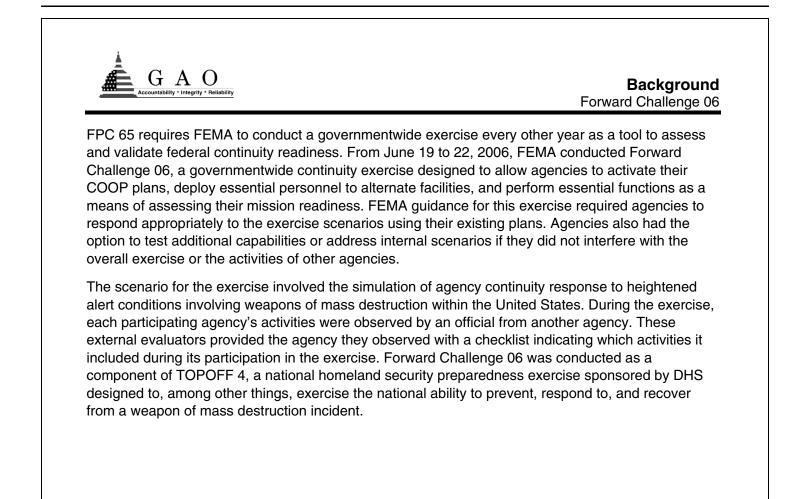
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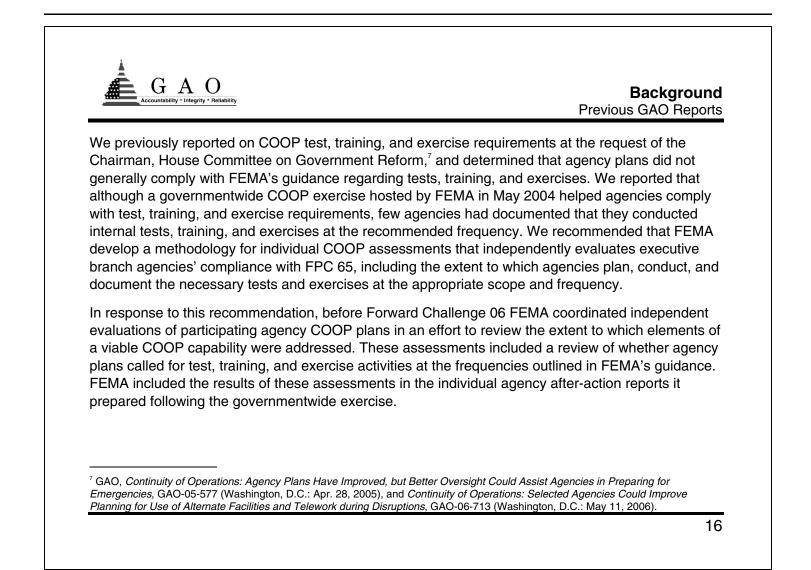


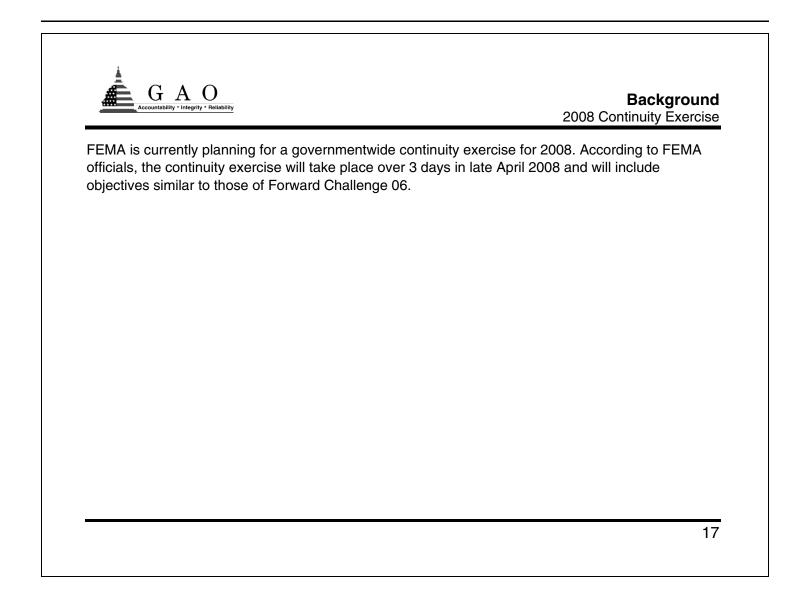


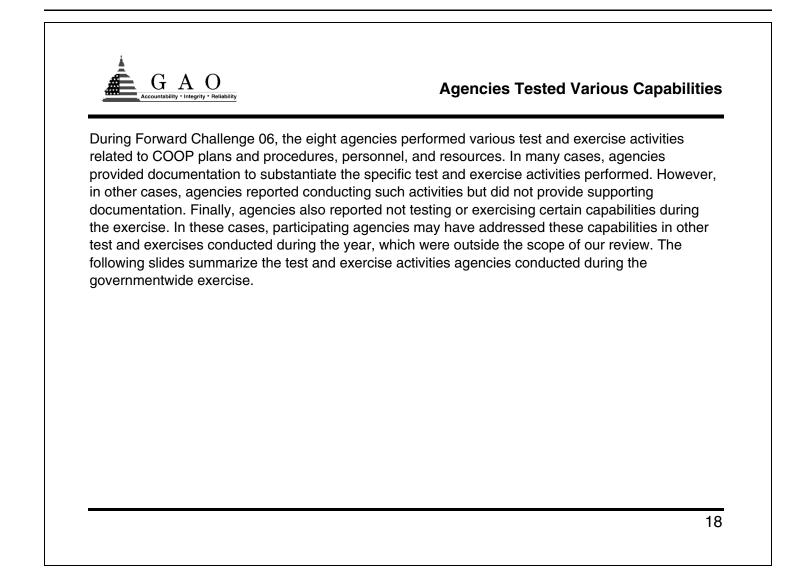


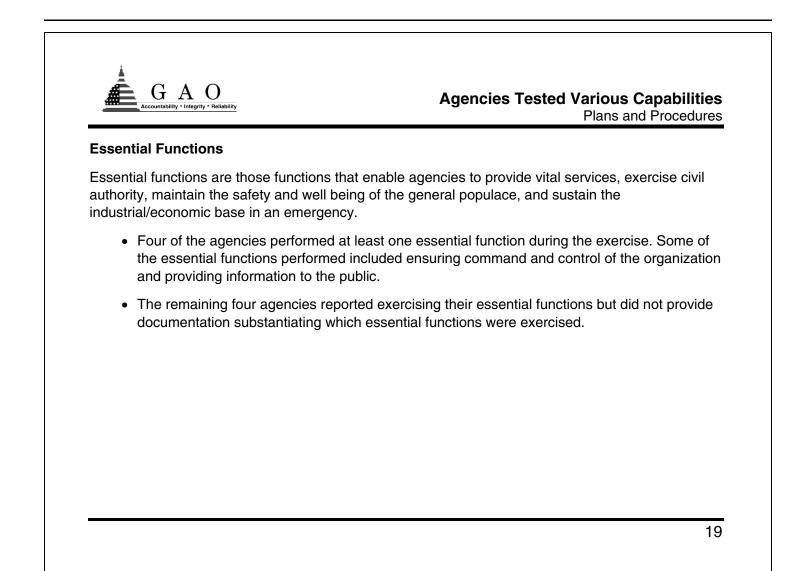


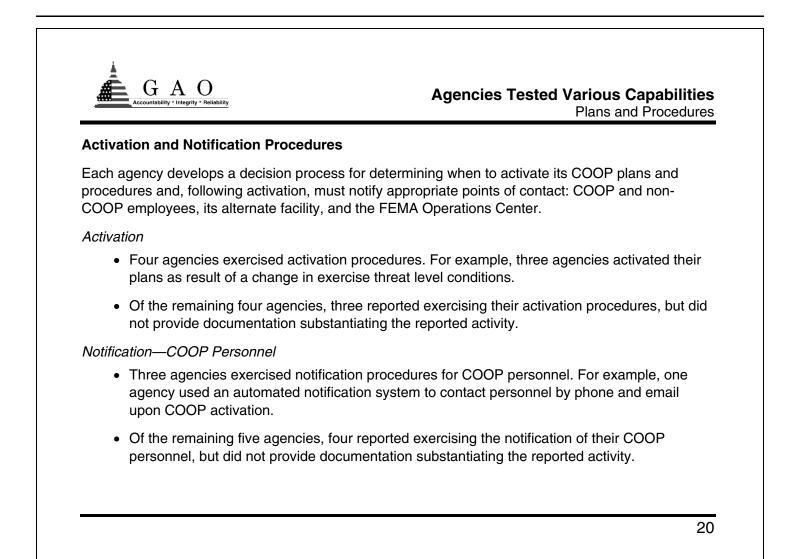
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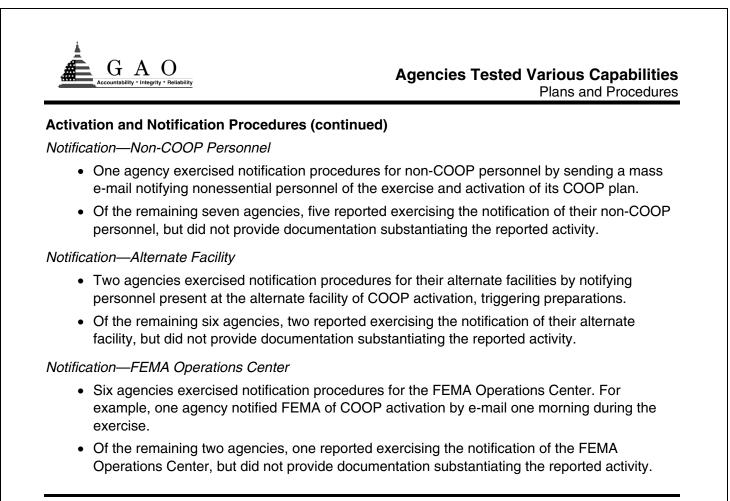




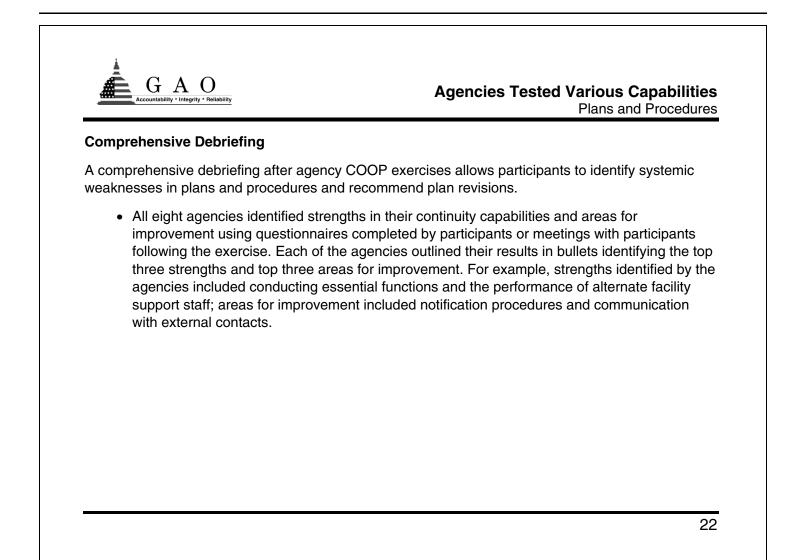


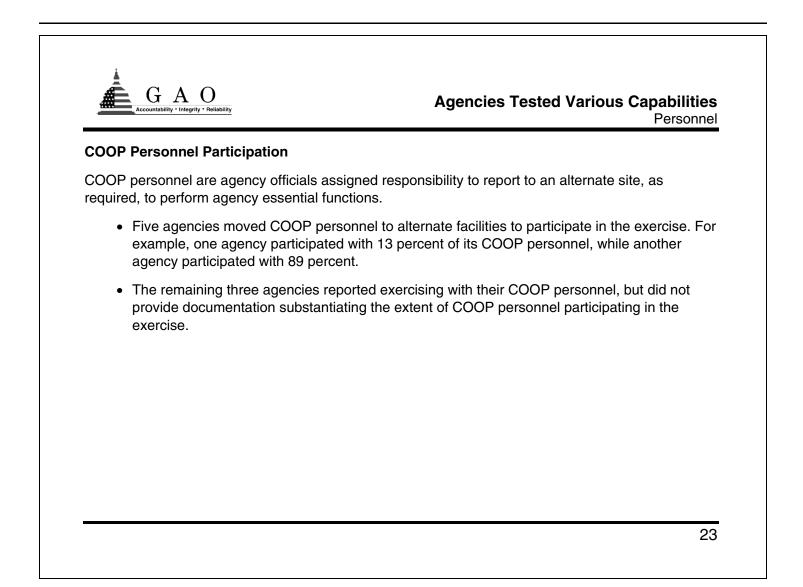


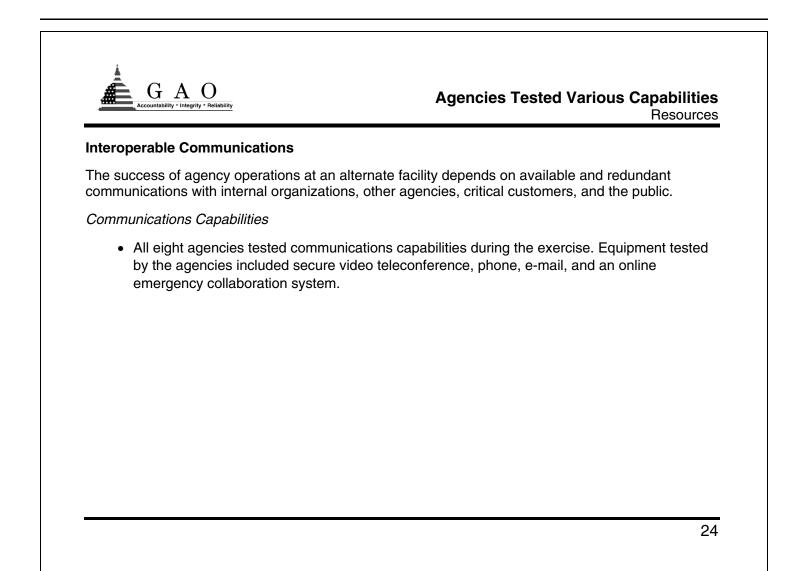


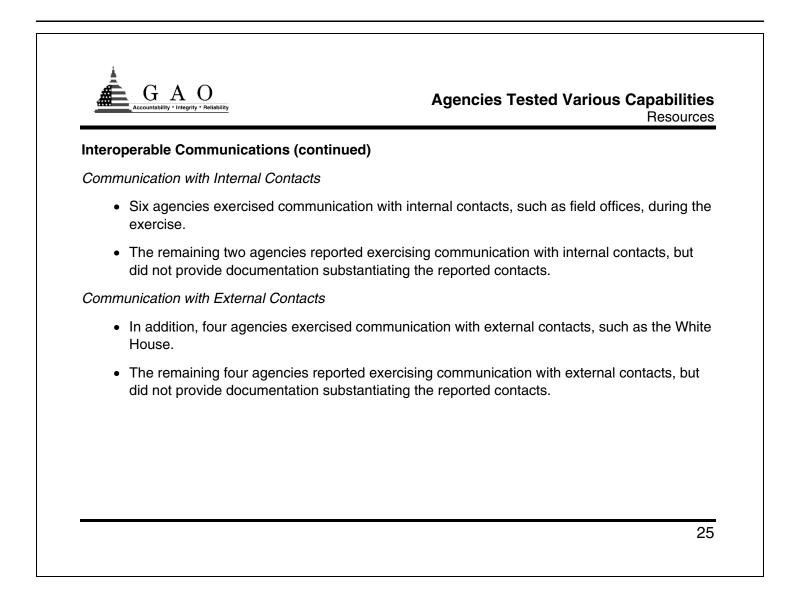


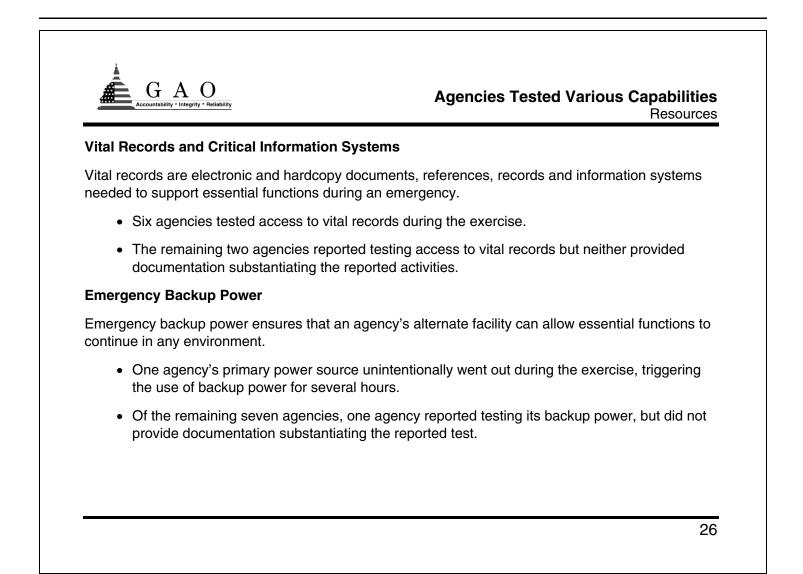
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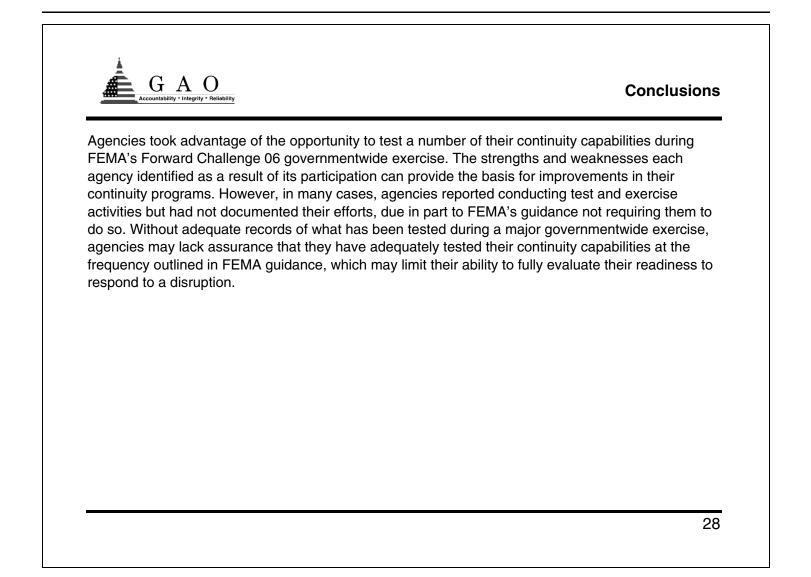


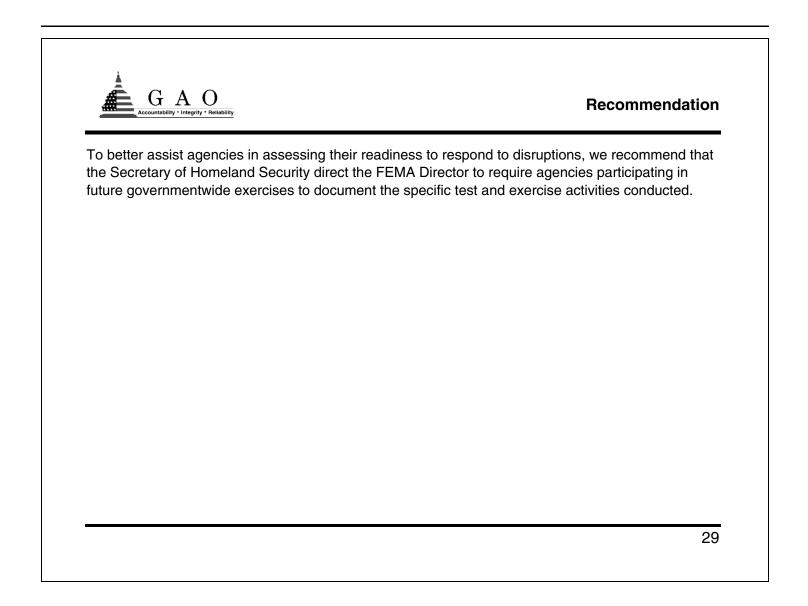


Agencies Tested Various Capabilities FEMA Provided Limited Guidance on Documentation

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

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





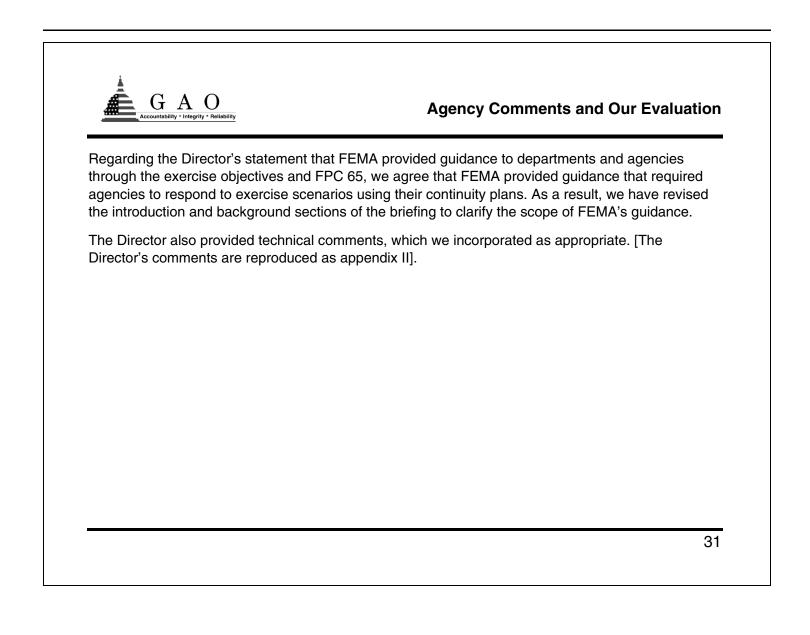


Agency Comments and Our Evaluation

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

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

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Accountability * Integrity * Reliability	Attachment 1 Agencies Reviewed
•	signates the following eight civilian agencies as coordinators of entified to provide support to states and other federal entities during
Agency/Coordinator	Emergency Support Function Responsibilities
Department of Agriculture	Firefighting; Agriculture and Natural Resources
Department of Energy	Energy
Department of Health and Human Services	Public Health and Medical Services
Department of Homeland Security	Communications; Emergency Management; Mass Care, Housing, and Human Services; Urban Search and Rescue; Public Safety and Security; Long-Term Community Recovery and Mitigation; and External Affairs
Department of Justice	Public Safety and Security
Department of Transportation	Transportation
Environmental Protection Agency	Oil and Hazardous Materials Response
General Services Administration	Resource Support
Source: DHS, National Response Plan (Washingtor	n, D.C.: December 2004).

				U. S. Department of Agriculture
.S. Department of A orward Challenge 06	-	•	-	ctivities
Fest and Exercise	Tested and Documented	Tested but Not Documented	Not Tested	USDA Action
Plans and Procedures				
I. Essential Functions	x			Exercised all 43 of its essential functions during the exercise.
2. Activation and Notific	ation Proc	edures		
a. Activation Procedures	x			Exercised its COOP activation procedures one morning during the exercise.
b. COOP Personnel Notification		x		Reported exercising the notification of its COOP personnel but did not provide documentation substantiating this activity.
c. Non-COOP Personnel Notification		x		Reported exercising the notification of its non-COOP personnel, but did not provide documentation substantiating this activity.

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

G A O	lity			Attachment U.S. Department of Agricultur
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	USDA Action
Resources		1 1		
5. Interoperable Commu	nications			
a. Communications Capabilities	x			Tested multiple forms of communication capabilities, including telephone, fax, and e-mail.
b. Communication with Internal Contacts	x			Exercised communication with internal entities, including the Animal and Plant Health Inspection Service.
c. Communication with External Contacts	x			Exercised communication with external contacts, including the White House.
6. Vital Records	x			Tested access to vital records pre-positioned at the alternate facility.
7. Backup Power		x		Reported that the backup power at its alternate facility was tested during the exercise by the facility's host, but did not provide documentation substantiating this testing.

Accountability * Integrity * Reliabili	ty			Attachment 3 Department of Energy
Department of Energy Forward Challenge 06			cise A	ctivities
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOE Action
Plans and Procedures				
1. Essential Functions		x		Reported exercising its essential functions but did not provide documentation substantiating which essential functions were performed during the exercise.
2. Activation and Notifica	tion Pro	cedures		
a. Activation Procedures	x			Exercised its COOP activation procedures one morning during the exercise.
b. COOP Personnel Notification		x		Reported exercising the notification of its COOP personnel but did not provide documentation substantiating this activity.
c. Non-COOP Personnel Notification		x		Reported exercising the notification of its non-COOP personnel but did not provide documentation substantiating this activity.

	1	1	1	Department of Energ
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOE Action
2. Activation and Notificat	ion Proc	edures	(contin	ued)
d. Alternate Facility Notification			х	Did not exercise the notification of its alternate facility.
e. FEMA Operations Center Notification	x			Exercised notification of the FEMA Operations Center one morning during the exercise.
3. Debriefing	x			Used questionnaires completed by exercise participants that identified main strengths and areas for improvement.
Personnel				
4. COOP Personnel Participation		x		Reported exercising with over 220 personnel during the course of the exercise, but did not provide documentation substantiating a level of participation by COOP personnel.

	ity			Attachment 3 Department of Energy
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOE Action
Resources				
5. Interoperable Commu	nications			1
a. Communications Capabilities	x			Tested communications capabilities, including satellite phones and secure video teleconferencing.
b. Communication with Internal Contacts	x			Exercised communication with internal contacts, including agency personnel using a web-based communication tool.
c. Communication with External Contacts	x			Exercised communication with external contacts, including other agencies such as the Nuclear Regulatory Commission.
6. Vital Records	x			Tested access to vital records during the exercise.
7. Backup Power			Х	Did not test backup power during the exercise.

Accountability * Integrity * Reliabil	ity			Attachment 4 Department of Health and Human Services
Department of Health Forward Challenge 06				
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	HHS Action
Plans and Procedures				
1. Essential Functions	X			Exercised one of its essential functions during the exercise.
2. Notification Procedure	s			·
a. Activation Procedures		x		Reported exercising activation procedures but did not provide documentation substantiating this activity.
b. COOP Personnel Notification		x		Reported exercising notification procedures for COOP personnel but did not provide documentation substantiating this activity.
c. Non-COOP Personnel Notification		x		Reported exercising non-COOP personnel notification procedures, but did not provide documentation substantiating this activity.

Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	HHS Action
2. Activation and Notifica	tion Proc	edures	(continu	
d. Alternate Facility Notification		x		Reported exercising notification procedures for the alternate facility but did not provide documentation substantiating this activity.
e. FEMA Operations Center	x			Exercised the notification of the FEMA Operations Center during the exercise.
3. Debriefing	x			Conducted a debriefing and provided a summary list of strengths and areas for improvement.
Personnel		1		1
4. COOP Personnel Participation	x			Deployed 105 COOP personnel for the exercise.

	ity			Attachment of Health and Human Service
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	HHS Action
Resources	1	. –		
5. Interoperable Commu	nications			
a. Communications Capabilities	x			Tested several communications capabilities, including telephone and fax.
b. Communication with Internal Contacts	x			Exercised communication with internal entities, such as the Centers for Disease Control and Prevention.
c. Communication with External Contacts	x			Exercised communication with external contacts, such as the Homeland Security Operations Center.
6. Vital Records	x			Tested access to vital records during the exercise.
7. Backup Power			x	Did not test backup power during the exercise. HHS reported that backup power is tested on a monthly basis at the alternate facility.

Accountability • Integrity • Reliabili	ty			5 Attachment Department of Homeland Security
Department of Homel Forward Challenge 06		-	• •	
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DHS Action
Plans and Procedures				
1. Essential Functions		x		Reported exercising its essential functions, but did not provide documentation substantiating this activity.
2. Activation and Notifica	tion Proc	cedures	L	·
a. Activation Procedures		х		Reported exercising its activation procedures, but did not provide documentation substantiating this activity.
b. COOP Personnel Notification	X			Exercised the notification of its COOP personnel.
c. Non-COOP Personnel Notification		x		Reported that DHS headquarters COOP team personnel provided notification and individual instructions to non-COOP personnel within their respective organizations. DHS did not provide documentation substantiating this activity.
	-	<u> </u>	<u> </u>	

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

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

Accountability * Integrity * Reliabili	ty			Attachment 6 Department of Justice
Department of Justic Forward Challenge 06	• •		cise Ad	ctivities
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOJ Action
Plans and Procedures				
1. Essential Functions		x		Reported exercising its essential functions as if conducting a usual work day but did not provide documentation substantiating which essential functions were performed.
2. Activation and Notification	tion Proc	edures	l	· · · · · · · · · · · · · · · · · · ·
a. Activation Procedures			Х	Reported that exercising activation procedures was not part of the agency's exercise plan.
b. COOP Personnel Notification			Х	Reported that exercising notification procedures was not part of the agency's exercise plan.
c. Non-COOP Personnel Notification			x	Reported that exercising notification procedures was not part of the agency's exercise plan.

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

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

Accountability * Integrity * Reliabili	ty			Attachment 7 Department of Transportatior
Department of Transp Forward Challenge 06				ctivities
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOT Action
Plans and Procedures				
1. Essential Functions		x		Reported exercising its essential functions, but did not provide documentation substantiating which functions were performed during the exercise.
2. Activation and Notification	tion Proc	edures		· · ·
a. Activation Procedures		X		Reported exercising its activation procedures, but did not provide documentation substantiating this activity.
b. COOP Personnel Notification		x		Reported notifying 90 percent of its COOP personnel through its alert system, but did not provide documentation substantiating the notification.
c. Non-COOP Personnel Notification			x	Did not test the notification of its non-COOP personnel during the exercise.

Accountability * Integrity * Reliabili	ty			Attachment 7 Department of Transportation
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	DOT Action
2. Activation and Notifica	tion Proc	cedures	(contin	ued)
d. Alternate Facility Notification			x	Did not exercise the notification of its alternate facility. DOT officials reported that the notification of the alternate facility was not applicable to the exercise because the facility managers were the leaders of the exercise.
e. FEMA Operations Center Notification	x			Exercised the notification of the FEMA Operations Center during the exercise.
3. Debriefing	x			Conducted a debriefing identifying strengths and areas of improvement from the exercise.
Personnel				
4. COOP Personnel Participation		x		Reported that it exercised with 90 percent of its COOP personnel, but did not provide documentation substantiating this level of participation.
		x		personnel, but did not provide documentation substantiating

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

				Attachment & Environmental Protection Agency
Environmental Protector			• •	ctivities
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Testec	EPA Action
Plans and Procedures			<u></u>	
1. Essential Functions	x			Exercised seven of its eight essential functions during the exercise.
2. Activation and Notifica	tion Proc	cedures		1
a. Activation Procedures	x			Exercised its COOP activation procedures.
b. COOP Personnel Notification	x			Exercised the notification of its COOP personnel by telephone and e-mail.
c. Non-COOP Personnel Notification	x			Exercised notification of its non-COOP personnel by sending an e-mail out to all EPA employees during the exercise.

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

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

	<u>_</u>			General Services Administration
eneral Services Ad orward Challenge 0				ctivities
Test and Exercise	Tested and Documented	Tested but Not Documented	Not Tested	GSA Action
Plans and Procedures			0	
. Essential Functions	x			Exercised all six of its essential functions.
2. Activation and Notific	cation Prod	cedures		
a. Activation Procedures	x			Exercised its activation procedures on one morning of the exercise.
b. COOP Personnel Notification	x			Exercised the notification of its COOP personnel through an email sent on one morning of the exercise.
c. Non-COOP Personnel Notification		x		Reported exercising the notification of its non-COOP personnel but did not provide documentation substantiating this activity.

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

G A Attachme Accountability - Integrity - Reliability General Services Administr					
Test and Exercise Activity	Tested and Documented	Tested but Not Documented	Not Tested	GSA Action	
Resources		1 1			
5. Interoperable Commu	nications				
a. Communications Capabilities	x			Tested multiple forms of communication capabilities, including cell phones and email.	
b. Communication with Internal Contacts	x			Exercised communication with internal contacts, including non-COOP personnel.	
c. Communication with External Contacts		x		Reported exercising communication with external contacts, but did not provide documentation substantiating this communication.	
6. Vital Records	x			Tested access to vital records during the exercise.	
7. Backup Power			х	Did not test its backup power during the exercise.	

Comments from the Department of Homeland Security

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 Ms. Linda D. Koontz Director, Information Management Issues U.S. Government Accountability Office 441 G Street, NW Washington, D.C. 20548 Dear Ms. Koontz: Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO's) draft report GAO 08-185SU entitled <i>Continuity of Operations: Selected Agencies Tested Various Capabilities During 2006 Governmentwide Exercise</i>. Technical comments have been provided under separate cover. We appreciate GAO's review of our previous comments on GAO's briefing slides and the changes made in this draft report in response to our comments. The Department of Homeland Security agrees with GAO's one recommendation "to require agencies participating in future government wide exercises to document the specific test and exercise activities conducted." Further, the Department believes that the Federal Emergency Management Agency (FEMA) has complied with this recommendation with respect to Forward Challenge 2006 (FC 06) and will continue to do so in future exercises. Federal Preparedness Circular 65 (FPC-65), dated June 15, 2004, is very specific on Federal Executive Branch Test, Training, and Exercise (TT&E) requirements. The FC 06 exercise was specifically designed to allow Departments and Agencies (D/As) to conduct their continuity of operations tests, training, and exercise activities in this internally and externally evaluated exercise. FPC 65 states on page 8 that, "<i>All agencies must plan, conduct, and document periodic tests, training, and COP test, training and exercise program for conducting and actions tests, training a COOP test, training and exercise program for conducting and documenting <i>TT&E</i>." FPC 65 provides an entire annex (Annex I) directing comprehensive</i>
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components of an agency Test, Training and Exercise programs. All agencies were provided FPC 65 prior to the exercise. The Evaluation Plan (EVALPLAN) provided guidance to organizations to test and evaluate FC 06 in accordance with the standardized published Exercise Evaluation Guides (EEG) and the self-assessment checklist. The Exercise Evaluation Guide/self-assessment checklist, included specific requirements for a department and agency's COOP program. This Guide/checklist is very specific and included Green, Yellow, and Red evaluation ratings for performance of these requirements. Exercise guidance was very clear that the checklist was to be used to assist the departments and agencies in their exercise planning/development to meet the continuity requirements, and that the assessment would document to the President

2 their ability to conduct these requirements. FPC 65 further requires all departments and agencies to document performance of continuity of operations exercise activities and include corrective actions in their Corrective Action Program (CAP). The FC 06 exercise was designed with the departments and agencies to facilitate the performance of their required essential functions and other supporting continuity of operations requirements. The eight departments/agencies reviewed by GAO for this exercise are all Level 1 and 2 organizations and all were required to participate in the exercise, participate in the required assessments, with reports on their capabilities to be submitted to the President. Again, FPC 65 requires all organizations that participate in COOP exercises to document their performance of exercise objectives in a Corrective Action Plan (CAP) and to develop and document corrective actions. Each agency evaluation team was made up of external and internal evaluators. The external evaluators were responsible for providing feedback to FEMA's National Continuity Programs (NCP) to develop the external After Action Reports (AARs); and the internal evaluators were provided the same forms/training to conduct their internal portion of the evaluation to include self-assessments on Primary Mission Essential Functions and internally developed Master Scenario Events Lists. They were also directed to prepare an internal AAR, which was to be provided to NCP. GAO indicated that D/As tested, but did not document, many components of their continuity exercises. GAO however, also acknowledged during their exit conference that many components were documented by external evaluators but not to GAO auditing standards. Thus, the level of documentation for Forward Challenge 06 was higher than reported by GAO, sufficient to evaluate performance and general lessons learned, but perhaps not uniformly at the level sufficient to meet GAO standards. FEMA intends to continue to refine upon its assessment program that was initiated during the Forward Challenge 2004 exercise, giving specific attention to improving the level of evaluation documentation. DHS welcomes the opportunity to provide GAO with appropriate and meaningful access so that GAO may effectively assess emergency preparedness and response activities. As an example, GAO observers were provided access to the recent TOPOFF 4 exercises which were held October 15-20, 2007. Thank you again for the opportunity to comment on this draft report and we look forward to working with you on future homeland security issues. Sincerely, Steven Hecmousty Steven J. Pecinovsky Director Departmental GAO/OIG Liaison Office

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