

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG Project No. 23-E-05-BN0

January 2024



Continuity of Operations (COOP) Planning Evaluation

GUIDING PRINCIPLES

ACCOUNTABILITY * INTEGRITY * PROFESSIONALISM

TRANSPARENCY * CONTINUOUS IMPROVEMENT * EXCELLENCE



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We independently audit, inspect, and investigate matters pertaining to the District of Columbia government to

- prevent and detect corruption, mismanagement, waste, fraud, and abuse.
- promote economy, efficiency, effectiveness, and accountability.
- inform stakeholders about issues relating to District programs and operations; and
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Executive Summary

EVALUATION OF THE DISTRICT OF COLUMBIA GOVERNMENT'S CONTINUITY OF OPERATIONS (COOP) PLANNING

WHY WE DID THIS EVALUATION

The District of Columbia (District) Homeland Security and Emergency Management Agency (HSEMA) is responsible for developing strategies that save lives, protect property, and stabilize the community following natural and man-made disasters and emergencies. Continuity of operations (COOP) planning is an entity-wide effort to ensure that key functions continue to be performed during times of emergency and disaster. DC Code § 7-2231.11(d) requires the Office of the Inspector General (OIG) to evaluate District-wide COOP Planning to ensure the District is prepared to prevent, protect against, respond to, mitigate, and recover from significant disruptions. COOP Planning is critical to ensuring that District agencies can continue to provide essential services to residents during disruptions such as natural disasters, security and cybersecurity attacks, and acts of terrorism. For this evaluation, the OIG assessed the extent to which HSEMA, which is responsible for coordinating District agencies' COOP Plans, ensured that agencies complied with COOP Planning requirements established in the District Government Continuity of Operations Plans Amendment Act of 2020 (COOP Act), which came into effect on March 16, 2021.

OBJECTIVES

The objectives of this evaluation were to assess whether District agencies were:

- (1) developing and submitting COOP Plans to HSEMA by the date required;
- (2) conducting the required COOP exercises and submitting reviews of the exercises by the required date;
- (3) updating and submitting their revised COOP Plans; and
- (4) fulfilling other legal requirements related to COOP Planning.

WHAT WE FOUND

Since our 2017 report on District COOP Planning, an increasing number of District agencies have exercised and submitted COOP Plans to HSEMA.

However, COOP Planning effectiveness remains limited. We found that HSEMA has not fully implemented all aspects of the COOP Act. Specifically, HSEMA has not:



Executive Summary

- identified and coordinated with all agencies required to submit COOP Plans;
- developed policies or procedures that establish the standards for the content of COOP Plans;
- specified how deficiencies with agency COOP Plans will be remediated; and
- developed policies about whether COOP Plans from agencies should include activities for their subordinate agencies.

Although HSEMA has taken positive steps toward executing the COOP requirements, HSEMA can improve COOP program management to ensure that the District is adequately prepared to continue operations and deliver essential services to residents through periods of significant disruption.

WHAT WE RECOMMEND

This report offers 11 recommendations to improve District-wide COOP compliance and preparedness.

MANAGEMENT RESPONSE

HSEMA concurred with all 11 recommendations and started taking action to address the report's findings.



January 16, 2024

Clint Osborn
Interim Director
Homeland Security and Emergency Management Agency
2720 Martin Luther King Jr. Avenue SE
Washington, DC 20032

Subject: Evaluation of the District of Columbia Government's Continuity of Operations (COOP) Planning | **OIG No. 23-E-05-BNO**

Dear Interim Director Osborn:

The Office of the Inspector General (OIG) Inspections and Evaluations Unit (I&E) has concluded its *Evaluation of the District of Columbia Government's Continuity of Operations (COOP) Planning*, which was included in our *Fiscal Year 2023 Audit and Inspection Plan*. The objectives for this evaluation were to assess whether District agencies are:

- (1) developing continuity of operations plans and submitting those plans to the DC Homeland Security and Emergency Management Agency (HSEMA) by the required date;
- (2) conducting the required exercises and submitting exercise reviews by the required date;
- (3) updating COOP Plans and submitting them to HSEMA; and
- (4) fulfilling other legal requirements related to COOP Planning.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Quality Standards for Inspection and Evaluation*¹ and gained an understanding of HSEMA's internal controls within the context of the evaluation objectives using the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, GAO-14-704G

¹ COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY, QUALITY STANDARDS FOR INSPECTION AND EVALUATION (Dec. 2020), <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf> (last visited Sep. 20, 2023) [hereinafter Blue Book].

(known as the Green Book). The Green Book sets the internal control standards for federal entities and may be adopted by state and local entities as a framework.²

Our draft report included four findings and 11 recommendations to HSEMA for actions our evaluation showed were necessary to improve COOP program management. HSEMA agreed with all recommendations.

We acknowledge that HSEMA has already begun addressing some of the findings in our draft report. The actions that HSEMA has taken or plans to take are responsive to our findings and meet the intent of the recommendations. Therefore, we consider these recommendations resolved but open, pending evidence of stated actions. HSEMA's response to the draft report is included in Appendix B.

If you have any questions, please get in touch with me or Yulanda Gaither, Assistant Inspector General for Inspections and Evaluations by e-mail at yulanda.gaither@dc.gov or by phone at 202-727-9029.

Sincerely,



Daniel W. Lucas
Inspector General

DWL/yg

cc: Mr. Kevin Donahue, City Administrator, District of Columbia

² U.S. GOV'T. ACCOUNTABILITY OFFIC., STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, GAO-14-704G (Sept. 2014), <https://www.gao.gov/products/GAO-14-704G> (last visited Sep. 20, 2023).

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BACKGROUND

A continuity of operations (COOP) plan helps to sustain essential services in the event of disruption to daily operations. Per DC Code § 7-2231.02(1C), a COOP Plan refers to the document containing specific policy and guidance for a District agency to ensure the agency “can continue to perform essential functions during short-term and long-term emergencies, including localized acts of nature, accidents, and technological or attack-related emergencies.” Disruptions include severe weather and other events that prevent safe travel to the workplace; cybersecurity events that impede access to data, devices, and networks; and power outages or fires that necessitate displacement of employees from facilities and destruction of equipment and files.

DC Mayor's Order 2012-61 (Order) requires cabinet-level agencies to coordinate with the District of Columbia Homeland Security and Emergency Management Agency (HSEMA) to create, exercise, and update COOP Plans annually. In 2017, the Office of the Inspector General (OIG) published its audit report titled *Homeland Security Management Agency: Continuity of Operations Planning Activities are Not Adequately Managed* (OIG No. 16-1-10BN),³ which reported the challenges HSEMA faced with District-wide COOP Planning efforts. In response to that report, HSEMA asserted that the Order contained unclear terminology and did not provide HSEMA with the authority to require some agencies to comply with the Order. In 2019, HSEMA's efforts to ensure all District Government agencies, including all subordinate and independent agencies (hereinafter District agencies), are prepared for emergencies resulted in proposed legislation to clarify and codify the agency's authority to coordinate COOP Planning for all District agencies.⁴ Legislative hearings regarding the District Government Continuity of Operations Plan Amendment Act of 2019 discussed the same challenges described in the OIG's 2017 audit report.

In response to these challenges, the DC Council enacted the District Government Continuity of Operations Plan Amendment Act of 2020 (COOP Act), codified as DC

³ Office of the Inspector General, Government of the District of Columbia, *Homeland Security Management Agency: Continuity of Operations Planning Activities are Not Adequately Managed*, OIG Project No. 16-1-10BN (June 2017), <https://oig.dc.gov/sites/default/files/Reports/DC%20OIG%20Report%20on%20HSEMA%20Continuity%20of%20Operations%20Planning%20Activities%20%28OIG%20No.%2016-1-10BN%29%20June%2015%202017.pdf> (last visited Oct. 19, 2023).

⁴ D.C. Code § 7-2231.02(2B) clarifies that, for purposes of this law, “District government agenc[ies] means subordinate or independent agenc[ies]” (internal quotations omitted). D.C. Code § 7-2231.02(4) states that “subordinate agenc[ies] shall have the same meaning as provided in D.C. Code § 1-603.01(17),” which defines them as “any agency under the direct administrative control of the Mayor” and includes a list of subordinate agencies but notes that the list is not all-inclusive. D.C. Code § 7-2231.02(2C) defines independent agencies as those “not under the direct administrative control of the Mayor.”

Code § 7-2231.11, effective March 16, 2021, which required HSEMA to take the following actions:

1. Designate a senior employee to serve as the District COOP Program Manager;⁵
2. Develop internal policies and procedures, including after-action reviews;
3. Maintain a complete and accurate list of COOP Coordinators and backup COOP Coordinators;⁶
4. Develop and distribute a COOP Plan template and guidance for each District agency;
5. Ensure each District agency develops, updates, and conducts exercises of its COOP Plan;
6. Consult with each District agency on after-action reviews of exercises of its COOP Plan;
7. Monitor the status of each District agency's COOP Plan and bring the District agency into compliance; and
8. Submit an annual report detailing HSEMA's implementation and each agency's COOP Planning efforts.⁷

DC Code § 7-2231.11(b) requires District agencies to take the following actions:

1. Designate COOP Coordinators and alternate coordinators by April 16, 2021;
2. Submit a conforming COOP Plan by October 1, 2021;
3. Exercise the COOP Plan and consult with HSEMA to conduct an after-action review describing any necessary improvements identified from the exercise by July 1, 2022; and
4. File an updated COOP Plan by October 1, 2022.

DC Code § 7-2231.11(b)(4) also requires agency COOP coordinators to work with HSEMA to develop, exercise, and update their agency's COOP Plans annually. Further, HSEMA is required to monitor the status of each agency's COOP Plan and bring the agency into compliance with the Code. The COOP Program Manager can assist agencies with developing exercise(s) that match the scenario most likely to disrupt their ability to provide essential services due to natural, technological, or man-made emergencies (e.g., flooding, power failure, hazardous materials,

⁵ HSEMA designates the COOP Program Manager to oversee and coordinate the District's COOP Planning.

⁶ Each agency designates a COOP Coordinator to work with HSEMA to develop and exercise the Subject Agency's COOP Plan to bring the Subject Agency's COOP Plan into compliance with D.C. Code § 7-2231.11 requirements.

⁷ D.C. Code § 7-2231.11(a).

pandemic); ensuring COOP Plans are updated properly; and analyzing the effects of the scenario and whether the appropriate agency personnel were involved.

DC Code § 7-2231.11(d) requires the Office of the Inspector General (OIG) to evaluate the District-wide COOP Planning to ensure the District is prepared to prevent, protect against, respond to, mitigate, and recover from threats and hazards. As such, we included this evaluation in our *Fiscal Year 2023 Audit and Inspection Plan* and conducted the evaluation from November 2022 to January 2023.

We conducted the evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Quality Standards for Inspection and Evaluation*⁸ and gained an understanding of HSEMA's internal controls within the context of the evaluation objectives using the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, GAO-14-704G (known as the Green Book). The Green Book sets the internal control standards for federal entities and may be adopted by state and local entities as a framework.

OBJECTIVES, SCOPE, AND METHODS

OBJECTIVES

The objectives for this evaluation were to assess whether agencies within the District of Columbia were:

1. developing COOP Plans and submitting those plans to HSEMA by the required date,
2. conducting required exercises and submitting reviews of said exercises by the required date,
3. updating their COOP Plans and submitting them to HSEMA, and
4. fulfilling other requirements related to COOP Planning as outlined in District Code.

SCOPE

The scope for this evaluation covered COOP Planning from November 2022 through January 2023.

⁸ COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY, QUALITY STANDARDS FOR INSPECTION AND EVALUATION (Dec. 2020), <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf> (last visited Sept. 20, 2023) [hereinafter Blue Book].

METHODOLOGIES

The OIG interviewed or corresponded with staff at 13 agencies to determine the reasons for their non-compliance with DC Code § 7-2231.11. We spoke with four HSEMA staff members who are in the chain of command to oversee the implementation of DC Code § 7-2231.11. We reviewed HSEMA's compliance tracking documents and compared those documents to the requirements of DC Code § 7-2231.11. We also examined the 2022 COOP Plans and After-Action Reviews (AAR), and the template and guidance HSEMA sent to District agencies.

To ensure HSEMA's list of agencies was complete, we attempted to determine which agencies might be required to submit plans and compared it to HSEMA's list of agencies. To create this list of agencies, we first used the Government of the District of Columbia FY 2023 Approved Budget and Financial Plan that lists every agency (independent and subordinate). We excluded all agencies that may be exempt from the requirements of DC Code § 7-2231.11 and excluded any entry listed to create a funding pass-through.⁹ We also compared the lists to the definitions and requirements outlined in DC Code §§ 1-603.01(13) & (17) & §§ 7-2231.02(2B) (2C), & (4). For FY 2024, the Fiscal Year 2024 Local Budget Act of 2023 (DC Law 25-0047) was effective from August 29, 2023. We relied on DC Law 25-0047 to identify current District government agencies.

To determine what percentage of agencies conducted exercises and submitted AARs by the deadline, we reviewed AARs, attendance logs from exercises, and submission dates. We also asked HSEMA and 12 non-compliant agencies how COVID-19 impacted COOP Planning. Finally, we briefly reviewed the available training related to COOP Planning, including Federal Emergency Management Agency (FEMA) IS1300 training.

FINDINGS AND RECOMMENDATIONS

FINDING 1 – HSEMA'S UNCERTAINTY REGARDING THE SCOPE OF THE COOP ACT LEAVES SOME AGENCIES UNPREPARED TO SUSTAIN OPERATIONS DURING TIMES OF MAJOR DISRUPTION OR EMERGENCY.

HSEMA's mission is to coordinate homeland security and emergency management activities to ensure the District's emergency operations can anticipate, respond to, and recover from hazardous and emergent situations.¹⁰ DC Code § 7-2231.11 assigns responsibility to HSEMA for coordinating COOP Planning with all District agencies. The Green Book offers that oversight bodies should “determine...an oversight

⁹ An example of a funding pass-through is the Metropolitan Washington Council of Governments (COG) in the FY 23 Budget. It was listed to allow the District a method to pay the District's annual payment to the COG.

¹⁰ HSEMA website, <https://hsema.dc.gov/page/who-we-are> (last visited Nov. 13, 2023).

structure to fulfill responsibilities set forth by applicable laws and regulations, relevant government guidance, and feedback from key stakeholders[.]” They must also understand the entity's objectives, related risks, and the expectations of its stakeholders.¹¹

In our 2017 report, the OIG found that “HSEMA did not ensure all District government agencies submitted a COOP Plan that identified each agency's essential functions during an unexpected emergency.”¹² This evaluation revealed that HSEMA has yet to coordinate with all District agencies. We note that HSEMA coordinated with 79 agencies, and the most recent HSEMA Annual Report stated that at least 34 agencies remained out of compliance at the end of FY 2022.

There are discrepancies within the DC Government regarding how many entities are classified as District government agencies. This lack of clarity remains a contributing factor to the reach of HSEMA's COOP Planning and compliance coordination efforts. For example, the DC Agency Directory lists 68 government agencies,¹³ while the District of Columbia organization chart in the *FY 2023 Approved Budget and Financial Plan* includes 130 District government agencies, such as departments, authorities, commissions, boards, and councils.¹⁴ During this evaluation, HSEMA staff revealed that coordination had not included all District agencies because HSEMA has yet to determine whether DC Code § 7-2231.11 applied to certain agencies, such as the Office of the District of Columbia Auditor and Office of Advisory Neighborhood Commissions, which are part of the District's legislative branch of government; and the Judicial Nomination Commission, which is part of the District's judicial branch of government.

In addition to the ambiguity surrounding which District agencies are mandated to comply with DC Code § 7-2231.11(b), HSEMA staff explained that its coordination efforts were further inhibited due to additional factors, including:

- Some agencies had not responded to HSEMA's correspondence attempting to engage or reengage them in the COOP process;
- HSEMA had considered some agencies too small to reasonably comply with the Code and believed they should not be mandated to coordinate COOP Planning (i.e., the Statehood Initiatives because it has only three full-time employees and its annual budget is less than \$250,000); and

¹¹ GREEN BOOK, *supra* note 2, at Principle 2.02.

¹² Offc. of the Inspector General, *supra* note 3.

¹³ WASHINGTON, DC AGENCY DIRECTORY, DC.gov, <https://dc.gov/directory?tid=All> (last visited November 2, 2023).

¹⁴ OFFC. OF THE CHIEF FINANCIAL OFFICER, GOV'T. OF THE DISTRICT OF COLUMBIA, FY2023 APPROVED BUDGET AND FINANCIAL PLAN (Aug. 2022), <https://app.box.com/s/fqjbsheieqj4im029sjbhv16h4yqgiue> (last visited October 19, 2023).

- HSEMA simply overlooked some agencies.

Because HSEMA did not have a policy that identified which agencies are subject to DC Code § 7-2231.11 requirements, some agencies lack a tailored, functional, and tested COOP Plan and may not be prepared to sustain essential services for the District government and residents during a short-term or long-term emergency. Furthermore, without adequately defining the list of participating agencies, HSEMA cannot know which agencies have yet to participate in COOP Planning. Not knowing which agencies remain out of compliance creates an incalculable risk to the District's disaster and emergency response planning efforts.

Recommendations

To ensure HSEMA fulfills its oversight responsibilities, and identifies and coordinates with all agencies required to develop, submit, and exercise COOP Plans, the OIG recommends the Director, HSEMA:

1. Consult with HSEMA General Counsel and, if necessary, the Mayor's Office of Legal Counsel or the Office of the Attorney General to identify all subordinate and independent District agencies subject to COOP Planning requirements under the jurisdiction of HSEMA.

Management's Response:

HSEMA agrees with OIG's recommendation and has consulted with the agency's General Counsel to assist with identifying all subordinate and independent District agencies subject to COOP planning requirements. An ongoing issue with identifying the applicable agencies is that HSEMA has not identified a single or centralized record of the applicable agencies. There are conflicting lists that HSEMA needs to reconcile.

HSEMA will continue to consult with legal partners to deconflict the lists and memorialize a comprehensive list of District agencies mandated to comply with DC Code § 7-2231.11(b). HSEMA will contact each non-compliant agency, notifying them of the Code, forthcoming HSEMA standard operations procedures (SOPs) on COOP compliance, and next steps to come into compliance.

In FY24, HSEMA will implement the use of digital communication strategies (e.g., subscription and distribution list management) to communicate COOP milestones and policies, and request updates to agency COOP points of contact.

Target completion on 9/30/2024.

2. Develop policies and procedures for identifying and maintaining a list of all agencies subject to COOP compliance and the criteria for adding or exempting agencies from COOP Planning activities.

Management's Response:

HSEMA agrees with OIG's recommendation to develop a policy or procedure on applicable agencies as determined in our findings in response to OIG's first recommendation above. In FY24, HSEMA will develop this policy.

Target completion on 9/30/2024.

FINDING 2 – HSEMA HAS NOT DEVELOPED POLICIES AND PROCEDURES TO ADEQUATELY COMPLY WITH COOP PLANNING LAWS.

DC Code § 7-2231.11(a)(2) requires HSEMA to develop “internal policies and procedures, including after-action reviews, to implement District-wide COOP Planning.” District law also requires HSEMA to work with agency-designated COOP Coordinators—who must be “senior employees” per DC Code § 7-2231.11(b)(1)—to develop, exercise, and update their COOP Plans. The Green Book recommends management to document and implement internal control responsibilities and activities through its policies and communicate this information internally and externally to achieve agency objectives.¹⁵ As stated in the Green Book:

Information requirements consider the expectations of both internal and external users. Management defines the identified information requirements at the relevant level and requisite specificity for appropriate personnel. Management identifies information requirements in an iterative and ongoing process that occurs throughout an effective internal control system.¹⁶

By the conclusion of this evaluation, HSEMA failed to develop two important processes that would allow it to effectively govern COOP Planning: (1) policies and procedures to govern COOP Planning; and (2) communication to agencies on the appointment of COOP Coordinators.

First, HSEMA had not developed policies or procedures to govern the implementation of COOP Planning as required—an issue also identified in the OIG's 2017 audit. The *District of Columbia Preparedness System Legal Handbook* (Handbook) describes the essential elements of the District's emergency authorities and the related legal authorities that support the District's emergency and disaster operations, including COOP, and could be used as reference or supplemental guidance; however, the Handbook has not been updated since it was published in

¹⁵ GREEN BOOK, *supra* note 2, Principles 12.01, 12.02, 14.01, and 15.01.

¹⁶ *Id.* Principles 13.02 and 13.03.

May 2014. And although HSEMA established a Policy, Performance, and Data Division, it was not yet fully functional as of this evaluation.

Further, some agencies were unable to designate effective COOP Coordinators as required due to a lack of communication from HSEMA on the requirements for this role. HSEMA internally identified two criteria for a senior employee: access to senior leadership at the agency and a complete understanding of the agency's functions. Notwithstanding its prioritization efforts, HSEMA had not communicated to agencies its definition of senior employee or any other criteria for COOP Coordinator designation. Because HSEMA had not codified or formally disseminated its definition of a "senior employee," agencies have named COOP Coordinators who do not understand their agency well enough to properly plan for emergencies or disruptions, according to HSEMA interviewees.

Based on our field work and interviews, we determined that HSEMA lacked internal policies for COOP Planning primarily because the agency had prioritized implementation of other aspects of the law, such as increasing participation in exercises and identifying COOP Coordinators.

The lack of policy may result in HSEMA's acceptance of COOP Plans that may not include required information. For example, the OIG learned from an HSEMA employee that DC Water has a COOP Plan, but does not share the plan with HSEMA, citing information security concerns. Despite not coordinating COOP Planning with DC Water, HSEMA considered DC Water as compliant with that aspect of the law.

Without policies and procedures that detail the responsibilities and required actions for COOP Planning, and without clear communication with agencies on the requirements for COOP Coordinators, HSEMA is not in full compliance with DC Code § 7-2231.11. The extent and quality of COOP Planning leaves the District vulnerable to poorly designed and potentially ineffective responses to emergency situations.

Recommendations

To ensure COOP activities and expectations are clearly defined, we recommend the Director, HSEMA:

3. Establish internal policies and procedures to govern the implementation of all aspects of DC Code § 7-2231.11, including establishing criteria for designating COOP Coordinators at District agencies and determining any parameters for confidential COOP Plans.

Management's Response:

HSEMA agrees with OIG's recommendation to establish internal policies or procedures to govern the implementation of all aspects of the applicable DC Code, including establishing criteria for designating

COOP Coordinators and determining parameters for confidential COOP plans. HSEMA's policy will recommend that District agencies that are mandated to comply with the Code designate their Chief of Operations (COO) or a Senior Emergency Manager (SEM) to serve as the agency COOP Coordinator and identify another senior level alternate or deputy to serve in that capacity in case the designee is away on leave at the time of a disaster.

HSEMA believes that more senior level engagement from the agencies' COO/SEM representatives will result in higher COOP planning performance, including COOP plans submitted and exercised. Additionally, designating COO/SEM representatives as COOP Coordinators helps to streamline communication with agencies for all matters emergency preparedness and response.

Pending approval from the City Administrator and Deputy Mayor for Public Safety and Justice (DMPSJ), HSEMA will establish this policy in FY24.

Target completion on 9/30/2024.

FINDING 3 – HSEMA DID NOT EFFECTIVELY COMMUNICATE EXPECTATIONS FOR COOP PLANNING TO AGENCIES.

The Green Book provides that management should communicate information vertically and horizontally across reporting lines to enable personnel to achieve objectives, address risks, and support the internal control system.¹⁷ With these communications, management assigns internal control responsibilities for key roles:

Management communicates with, and obtains quality information from, external parties using established reporting lines. Open two-way external reporting lines allow for this communication. External parties include suppliers, contractors, service organizations, regulators, external auditors, government entities, and the general public.¹⁸

Exercising COOP Plans

DC Code §§ 7-2231.11(b)(2)-(4) require each District agency to annually develop, update, and exercise its COOP Plan, then to complete an after-action review (AAR) of the exercise.¹⁹ To confirm completion of an exercise, an agency must submit to HSEMA an AAR responding to questions about the exercise. The AAR solicits details about which of the agency's essential functions were affected by the scenario, whether the specific scenario would have activated the COOP Plan, and whether the exercise identified issues or missing actions in the agency's plan. HSEMA's COOP

¹⁷ *Id.* Principle 14.03.

¹⁸ *Id.* Principle 14.03.

¹⁹ See *also* D.C. Code § 7-2231.11(a)(5).

Program Manager reviews the AAR and provides the agency with comments about the exercise's effectiveness. The AAR helps an agency fully understand the information it should have discovered from the exercise and to use that information to update its COOP Plan, as necessary.

Figure 1 details agency COOP Planning performance in 2021 and 2022. The figure illustrates the number of agencies that HSEMA tracked for COOP Planning activities, noted an assigned COOP Coordinator, and observed exercised and submitted COOP Plans.

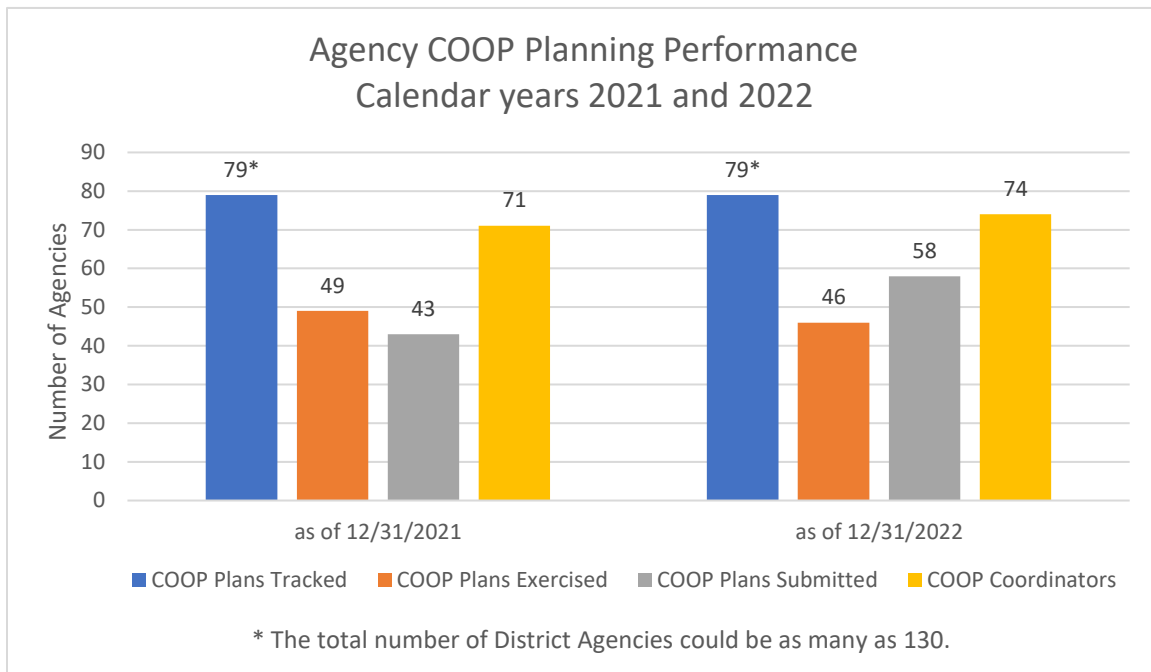


Figure 1: Agency COOP Planning performance 2021 and 2022

Due to the broad impact of the COVID-19 pandemic, HSEMA used the emergency as a real-life disruption exercise that involved all District agencies. HSEMA allowed agencies the flexibility to conduct COOP exercises virtually and to update their COOP Plans to correct any apparent weaknesses while concurrently responding to the pandemic. During 2022, 46 agencies completed at least one COOP exercise, compared to 2015 when only two agencies exercised COOP Plans. The flexibility of virtual exercises likely contributed to the rise in the number of agencies that conducted an exercise and complied with the AAR requirement.

HSEMA's efforts may have contributed to the increased compliance for some aspects of COOP Planning, but better communication with District agencies could have improved overall compliance with the Code. For example, staff of one agency revealed that the agency was unaware of the option to conduct COOP exercises virtually during the COVID-19 pandemic. Further, interviewees suggested that some

of HSEMA's outreach efforts were directed at the wrong agency personnel. Follow-up communication from the COOP Program Manager could have identified the appropriate agency contacts and resolved misunderstandings or misconceptions about any obstacles to completing exercises.

Exercising an agency's COOP Plan helps the agency's COOP Coordinator to familiarize employees with example scenarios and details regarding the roles, tasks, responsibilities, and potential issues that may arise during a short-term or long-term emergency or disruption. Agencies that have not exercised their COOP Plan lack the awareness and understanding of their plan's effectiveness and whether the agency is prepared for the next emergency or disruption.

Recommendations

To ensure agencies coordinate with HSEMA to develop and exercise COOP Plans, and update plans with information learned from AARs, the OIG recommends the Director, HSEMA:

4. Develop and maintain a listing of District-wide agency COOP Coordinators and backup COOP Coordinators.

Management's Response:

HSEMA agrees with OIG's recommendation to develop and maintain a listing of COOP Coordinators and backup Coordinators. In FY24, HSEMA will implement the use of digital communication strategies (e.g., subscription and distribution list management) to communicate COOP milestones and policies, and request updates to agency COOP points of contact. HSEMA's new policy (per recommendation #2), will include guidance on designating primary and alternate COOP Coordinators as well as processes for reviewing and updating agency point of contact information.

Target completion on 9/30/2024.

5. Ensure regular and recurring communications between the COOP Program Manager and agency COOP Coordinators.

Management's Response:

The incumbent Program Manager already sends bi-monthly email communications to COOP Coordinators, offering assistance with COOP plans and exercises.

During the Emergency Preparedness Council meetings chaired by the DMPSJ and HSEMA, the COOP Program Manager will (1) provide updates to Cabinet members and other participants on the COOP program and agency compliance data; (2) request Cabinet members to review or update COOP Program Coordinator point of contact

information; and (3) solicit feedback and provide information on individual agency COOP planning and exercises.

6. Draft or update a policy that would allow using relevant real-life occurrences as exercises.

Management's Response:

HSEMA agrees with OIG's recommendation to draft or update policy to use real-world events as exercises. HSEMA will include guidance in the new policy on the use of real-world events as well as after-action reporting of the COOP activation to count towards the agency's exercise requirement.

7. Communicate to all District agencies all available options for conducting COOP exercises.

Management's Response:

HSEMA agrees with OIG's recommendation to communicate with all applicable agencies on options for conducting COOP exercises. The incumbent COOP Program Manager routinely communicates with COOP Coordinators on guidance and opportunities (e.g., training events) for meeting the COOP exercise requirement. HSEMA will continue to offer resources and "exercises in a box" that District agencies may use to plan their own exercises.

Tracking Completion of Agency COOP Exercises and After-Action Reviews

DC Code § 7-2231.11(a)(5) requires HSEMA to work with District agencies to update their respective COOP Plans. After an agency exercises its COOP Plan, HSEMA is required to ensure that agency's COOP Plan complies with all aspects of DC Code § 7-2231.11. The Green Book Principles 16.04 and 16.05 direct management to evaluate and document the results of ongoing monitoring and evaluations to identify internal control weaknesses and determine the effectiveness of the internal control system.

Updated COOP Plans should incorporate corrections to weaknesses identified during an agency's exercise and as documented in the AAR. They should also account for any loss or gain of key personnel and record any changes to how the agency provides services.

HSEMA acknowledged agencies as compliant upon receipt of updated COOP Plans, though they are not sufficiently reviewed. HSEMA has not employed methods to determine whether agency COOP Plans have been updated to address deficiencies identified during exercises and AARs, or whether the plans ensure the District agency can continue to provide essential services when disruptions occur. HSEMA employees indicated they knew some COOP Plans were missing essential items but

accepted them anyway. Interviews indicate that HSEMA's current staffing, prioritization, and lack of policies regarding the content of COOP Plans did not allow for adequate analysis and feedback to the agency.

Because HSEMA has not developed systems to monitor and evaluate the content of agency submissions, it cannot determine whether agencies have resolved previously identified deficiencies and cannot ensure agencies are prepared to respond to emergency situations. Consequently, if an agency omits required information or has not corrected known errors, the purpose of conducting exercises to identify and correct weaknesses remains unrealized. Therefore, though agencies' exercise participation increased, those increases may not lead to improvements in the quality and effectiveness of the updated COOP Plans.

In addition, allowing agencies to combine multiple divisions into one COOP Plan may create confusion when a disruption occurs. In one case, two entities had two applicable COOP Plans; both the Mayor's Office on Returning Citizen Affairs (MORCA) and the Office of the Secretary (OS) submitted COOP Plans. During the same cycle, the Executive Office of the Mayor (EOM) submitted a different COOP Plan that applied to both MORCA and OS. In an emergency requiring OS to activate a COOP Plan, it is unclear which COOP Plan would take precedence.

HSEMA's lack of procedures delineating how to track whether updated plans incorporate issues revealed in the AARs and its lack of a policy delineating what a report must contain to comply with DC Code § 7-2231.11(b)(3) has contributed to them accepting whatever agencies submit.

Recommendations

To ensure HSEMA adequately scrutinizes all COOP Plans, including updated plans, for compliance and suitability to address short-term and long-term emergency situations, the OIG recommends the Director, HSEMA:

8. Develop and implement policies and procedures to determine whether an agency has fulfilled its requirement to update its COOP Plan.

Management's Response:

HSEMA agrees with OIG's recommendation to develop policies or procedures to determine agency fulfillment of the requirement to update its COOP Plan. The policy and procedures will detail the requirements and steps for agencies to submit, manage, review, and update their plans in CORE DC (the District's WebEOC Crisis Information Management Software).

9. Develop and implement policies and procedures to monitor the status of agency COOP Plans and ensure each plan complies with requirements and meets the agency's needs to provide essential programs and services during times of emergency or disruption.

Management's Response:

HSEMA agrees with OIG's recommendation to develop policies or procedures which will detail the requirements and steps for agencies to submit, manage, review, and update their plans in CORE DC. The COOP Program Manager will provide guidance, checklists, and a review of agency plans to ensure that plans address each agency's ability to fulfill its mission and deliver services.

10. Ensure alignment between COOP Plans submitted by EOM and subordinate entities and establish a policy related to the submission of joint COOP Plans.

Management's Response:

HSEMA agrees with OIG's recommendation and has consulted with the agency's General Counsel to assist with identifying all subordinate and independent District agencies subject to COOP planning requirements—including EOM and subordinate entities. In FY24, HSEMA will develop a policy on applicable agencies as determined in our findings in response to OIG's first recommendation. The policy will include guidance on the submission of joint COOP Plans, as applicable.

Target completion on 9/30/2024.

11. Ensure HSEMA provides consulting and advisory services to District agencies on their AARs.

Management's Response:

The COOP Program Manager will continue to collaborate with HSEMA's AAR team members to assist agencies with updating their COOP Plans with information learned from AARs.

CONCLUSIONS

HSEMA has increased District agencies' compliance with the requirements of the COOP Planning requirements. However, HSEMA can improve COOP program management by implementing the remaining elements of the law so that the District is prepared to respond effectively to potential threats to District-wide operations.

For this evaluation, we asked four questions:

(1) Are District agencies developing and submitting COOP Plans to HSEMA by the date required?

We found that many agencies did submit COOP Plans on time. However, without a policy listing all the agencies that are required to submit COOP Plans, the OIG could not determine which, or how many, agencies must still submit a COOP Plan.

(2) Were District agencies conducting the required COOP exercises and submitting reviews of the exercises by the required date?

The OIG found that many agencies conducted the required COOP exercises and submitted reviews. However, more agencies could have participated with a clear policy and effective communication regarding using real-life events as exercises.

(3) Were District agencies updating and submitting their revised COOP Plans?

The OIG found that many agencies updated and submitted revised COOP Plans. However, some of these documents were accepted without HSEMA's review. Without a policy ensuring the review of updated plans, the OIG could not determine how many agencies have appropriately revised their COOP Plans after exercising them.

(4) Were District agencies fulfilling other requirements related to COOP Planning as outlined in DC Code?

The OIG found that many agencies submitted COOP Plans that had been drafted, exercised, and revised. However, without a policy related to HSEMA monitoring each COOP Plan's content, the OIG could not determine if the COOP Plans will be effective should a disruption occur.

The OIG's recommendations are intended to prompt constructive dialogue around defining the objectives and policies that will enable HSEMA to better support District agencies in creating, exercising, and updating effective COOP Plans. This includes identifying the full scope of which agencies fall under HSEMA's purview and drafting and communicating policies necessary to clarify confusion and achieve compliance from all District agencies. Otherwise, District government services and the welfare of District residents may be at risk during the next emergency or disruption.

APPENDIX A: TABLE OF RECOMMENDATIONS

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response	Agreement
HSEMA	<ol style="list-style-type: none"> 1. Consult with HSEMA General Counsel and, if necessary, the Mayor's Office of Legal Counsel or the Office of the Attorney General to identify all subordinate and independent District agencies subject to COOP Planning requirements under the jurisdiction of HSEMA. 		<p>HSEMA agrees with OIG's recommendation and has consulted with the agency's General Counsel to assist with identifying all subordinate and independent District agencies subject to COOP planning requirements. An ongoing issue with identifying the applicable agencies is that HSEMA has not identified a single or centralized record of the applicable agencies. There are conflicting lists that HSEMA needs to reconcile.</p> <p>HSEMA will continue to consult with legal partners to deconflict the lists and memorialize a comprehensive list of District agencies mandated to comply with DC Code § 7-2231.11(b). HSEMA will contact each non-compliant agency, notifying them of the Code, forthcoming HSEMA standard operations procedures (SOPs) on COOP compliance, and next steps to come into compliance.</p> <p>In FY24, HSEMA will implement the use of digital communication strategies (e.g., subscription and distribution list management) to communicate COOP milestones and policies, and request updates to agency COOP points of contact.</p>	Agree
HSEMA	<ol style="list-style-type: none"> 2. Develop a policy to ensure the HSEMA COOP Program Manager identifies, and maintains a list of, all agencies subject to COOP compliance and the criteria for adding or exempting agencies from COOP Planning activities. 		<p>HSEMA agrees with OIG's recommendation to develop a policy or procedure on applicable agencies as determined in our findings in response to OIG's first recommendation above. In FY24, HSEMA will develop this policy.</p>	Agree

<p>HSEMA</p>	<p>3. Establish internal policies and procedures to govern the implementation of all aspects of DC Code § 7-2231.11, including establishing criteria for designating COOP Coordinators and determining any parameters for confidential COOP Plans.</p>		<p>HSEMA agrees with OIG’s recommendation to establish internal policies or procedures to govern the implementation of all aspects of the applicable DC Code, including establishing criteria for designating COOP Coordinators and determining parameters for confidential COOP plans. HSEMA’s policy will recommend that District agencies that are mandated to comply with the Code designate their Chief of Operations (COO) or a Senior Emergency Manager (SEM) to serve as the agency COOP Coordinator, and identify another senior level alternate or deputy to serve in that capacity in case the designee is away on leave at the time of a disaster.</p> <p>HSEMA believes that more senior level engagement from the agencies’ COO/SEM representatives will result in higher COOP planning performance, including COOP plans submitted and exercised. Additionally, designating COO/SEM representatives as COOP Coordinators helps to streamline communication with agencies for all matters emergency preparedness and response.</p> <p>Pending approval from the City Administrator and Deputy Mayor for Public Safety and Justice (DMPSJ), HSEMA will establish this policy in FY24.</p>	<p>Agree</p>
<p>HSEMA</p>	<p>4. Develop and maintain a listing of District-wide agency COOP Coordinators and backup COOP Coordinators.</p>		<p>HSEMA agrees with OIG’s recommendation to develop and maintain a listing of COOP Coordinators and backup Coordinators. In FY24, HSEMA will implement the use of digital communication strategies (e.g., subscription and distribution list management) to communicate COOP milestones and policies, and request updates to agency COOP points of contact. HSEMA’s new policy (per recommendation #2), will include guidance on designating primary and alternate COOP Coordinators as well as processes for reviewing and updating agency point of contact information.</p>	<p>Agree</p>

<p>HSEMA</p>	<p>5. Ensure regular and recurring communications between the COOP Program Manager and agency COOP coordinators.</p>		<p>The incumbent Program Manager already sends bi-monthly email communications to COOP Coordinators, offering assistance with COOP plans and exercises.</p> <p>During the Emergency Preparedness Council meetings chaired by the DMPSJ and HSEMA, the COOP Program Manager will (1) provide updates to Cabinet members and other participants on the COOP program and agency compliance data; (2) request Cabinet members to review or update COOP Program Coordinator point of contact information; and (3) solicit feedback and provide information on individual agency COOP planning and exercises.</p>	<p>Agree; work is underway</p>
<p>HSEMA</p>	<p>6. Draft or update a policy that would allow using relevant real-life occurrences as exercises.</p>		<p>HSEMA agrees with OIG's recommendation to draft or update policy to use real-world events as exercises. HSEMA will include guidance in the new policy on the use of real-world events as well as after-action reporting of the COOP activation to count towards the agency's exercise requirement.</p>	<p>Agree</p>
<p>HSEMA</p>	<p>7. Communicate to all District agencies all available options for conducting COOP exercises.</p>		<p>HSEMA agrees with OIG's recommendation to communicate with all applicable agencies on options for conducting COOP exercises. The incumbent COOP Program Manager routinely communicates with COOP Coordinators on guidance and opportunities (e.g., training events) for meeting the COOP exercise requirement. HSEMA will continue to offer resources and "exercises in a box" that District agencies may use to plan their own exercises.</p>	<p>Agree</p>
<p>HSEMA</p>	<p>8. Develop and implement policies and procedures to determine whether an agency has fulfilled its requirement to update its COOP Plan.</p>		<p>HSEMA agrees with OIG's recommendation to develop policies or procedures to determine agency fulfillment of the requirement to update its COOP Plan. The policy and procedures will detail the requirements and steps for agencies to submit, manage, review, and update their plans in CORE DC (the District's WebEOC Crisis Information Management Software).</p>	<p>Agree</p>

HSEMA	9. Develop and implement policies and procedures to monitor the status of agency COOP Plans and ensure each plan complies with requirements and meets the agency's needs to provide essential programs and services during times of emergency or disruption.		HSEMA agrees with OIG's recommendation to develop policies or procedures which will detail the requirements and steps for agencies to submit, manage, review, and update their plans in CORE DC. The COOP Program Manager will provide guidance, checklists, and a review of agency plans to ensure that plans address each agency's ability to fulfill its mission and deliver services.	Agree
HSEMA	10. Ensure alignment between COOP Plans submitted by EOM and subordinate entities and establish a policy related to the submission of joint COOP Plans.		HSEMA agrees with OIG's recommendation and has consulted with the agency's General Counsel to assist with identifying all subordinate and independent District agencies subject to COOP planning requirements—including EOM and subordinate entities. In FY24, HSEMA will develop a policy on applicable agencies as determined in our findings in response to OIG's first recommendation. The policy will include guidance on the submission of joint COOP Plans, as applicable.	Agree
HSEMA	11. Ensure HSEMA provides consulting and advisory services to District agencies on their AARs.		The COOP Program Manager will continue to collaborate with HSEMA's AAR team members to assist agencies with updating their COOP Plans with information learned from AARs.	Agree; work is underway

APPENDIX B: HSEMA RESPONSE TO THE DRAFT REPORT



DC HOMELAND SECURITY AND EMERGENCY MANAGEMENT AGENCY

December 29, 2023

Daniel Lucas
Inspector General
Office of the Inspector General
Government of the District of Columbia
100 M Street SE, Suite 1000
Washington, DC 20003

Subject: Homeland Security and Emergency Management Agency (HSEMA) Response to the Evaluation of the District of Columbia Government's Continuity of Operations (COOP) Planning | OIG No. 23-E-05-BN0

Dear Mr. Lucas,

On behalf of Interim Director Clint Osborn, I would like to thank the Office of the Inspector General (OIG) for the thoughtful, comprehensive evaluation of the District's COOP Planning. Inherent to HSEMA's responsibility to ensure that the District is prepared to prevent, protect against, respond to, mitigate, and recover from all threats and hazards, we acknowledge that COOP Planning is critical to ensuring that District agencies can continue to provide essential services and perform key functions during and after times of emergency and disaster. HSEMA submits the attached responses to OIG's findings, and we look forward to continuing to work with OIG to improve the COOP program.

HSEMA continues to introduce efficiencies to improve overall compliance via (1) online repository and collaboration tools; (2) increased training and exercises; and (3) new COOP Planning initiatives. Please note the following calendar year 2023 key highlights of HSEMA's planning process and the District's overall performance:

- 74 agencies have designated a COOP Coordinator and identified a backup coordinator.
- 60 agencies completed a COOP exercise (up from 46 agencies in 2022).
- In April 2023, HSEMA hosted an online "Risk Assessment Workshop" which assisted agencies with performing a business impact analysis and aligning their COOP Plans to the District's Community Risk Assessment.
- HSEMA—in partnership with the Department of Homeland Security's Cybersecurity & Infrastructure Security Agency—hosted three "P.A.C.E Planning for the Emergency Communications Ecosystem" courses for District agencies. PACE (Primary, Alternate, Contingency, and Emergency) is a method used to build a communication plan and a tool for helping organizations prepare for backup communications capabilities during and after times of emergency and disaster.
- In June 2023, HSEMA hosted FEMA course "L1301: Continuity Planning" which assists continuity practitioners with understanding their continuity roles and responsibilities, and



DC HOMELAND SECURITY AND EMERGENCY MANAGEMENT AGENCY

provides them with the knowledge, skills, and tools necessary to help develop and maintain viable continuity plans for their agency.

Thank you again for OIG's thorough review, and feel free to direct any questions or concerns to me at danielj.mccoy@dc.gov or (202) 374-2357.

Signed,

A handwritten signature in black ink, appearing to read 'D McCoy'.

Daniel J. McCoy
Associate Director
Division of Operations and Intelligence
Homeland Security and Emergency Management Agency

January 16, 2024



DC HOMELAND SECURITY AND EMERGENCY MANAGEMENT AGENCY

Responsible Agency	Recommendations	Agency Response
HSEMA	1. Consult with HSEMA General Counsel and, if necessary, the Mayor's Office of Legal Counsel or the Office of the Attorney General to identify all subordinate and independent District agencies subject to COOP Planning requirements under the jurisdiction of HSEMA.	<p>HSEMA agrees with OIG's recommendation and has consulted with the agency's General Counsel to assist with identifying all subordinate and independent District agencies subject to COOP planning requirements. An ongoing issue with identifying the applicable agencies is that HSEMA has not identified a single or centralized record of the applicable agencies. There are conflicting lists that HSEMA needs to reconcile.</p> <p>HSEMA will continue to consult with legal partners to deconflict the lists and memorialize a comprehensive list of District agencies mandated to comply with DC Code § 7-2231.11(b). HSEMA will contact each non-compliant agency, notifying them of the Code, forthcoming HSEMA standard operations procedures (SOPs) on COOP compliance, and next steps to come into compliance.</p> <p>In FY24, HSEMA will implement the use of digital communication strategies (e.g., subscription and distribution list management) to communicate COOP milestones and policies, and request updates to agency COOP points of contact.</p>
HSEMA	2. Develop a policy to ensure the HSEMA COOP Program Manager identifies, and maintains a list of, all agencies subject to COOP compliance and the criteria for adding or exempting agencies from COOP Planning activities.	<p>HSEMA agrees with OIG's recommendation to develop a policy or procedure on applicable agencies as determined in our findings in response to OIG's first recommendation above. In FY24, HSEMA will develop this policy.</p>



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Responsible Agency	Recommendations	Agency Response
HSEMA	3. Establish internal policies and procedures to govern the implementation of all aspects of DC Code § 7-2231.11, including establishing criteria for designating COOP Coordinators and determining any parameters for confidential COOP Plans.	<p>HSEMA agrees with OIG's recommendation to establish internal policies or procedures to govern the implementation of all aspects of the applicable DC Code, including establishing criteria for designating COOP Coordinators and determining parameters for confidential COOP plans. HSEMA's policy will recommend that District agencies that are mandated to comply with the Code designate their Chief of Operations (COO) or a Senior Emergency Manager (SEM) to serve as the agency COOP Coordinator, and identify another senior level alternate or deputy to serve in that capacity in case the designee is away on leave at the time of a disaster.</p> <p>HSEMA believes that more senior level engagement from the agencies' COO/SEM representatives will result in higher COOP planning performance, including COOP plans submitted and exercised. Additionally, designating COO/SEM representatives as COOP Coordinators helps to streamline communication with agencies for all matters emergency preparedness and response.</p> <p>Pending approval from the City Administrator and Deputy Mayor for Public Safety and Justice (DMPSJ), HSEMA will establish this policy in FY24.</p>
HSEMA	4. Develop and maintain a listing of District-wide agency COOP Coordinators and backup COOP Coordinators.	<p>HSEMA agrees with OIG's recommendation to develop and maintain a listing of COOP Coordinators and backup Coordinators. In FY24, HSEMA will implement the use of digital communication strategies (e.g., subscription and distribution list management) to communicate COOP milestones and policies, and request updates to agency COOP points of contact. HSEMA's new policy (per recommendation #2), will include guidance on designating primary and alternate COOP Coordinators as well as processes for reviewing and updating agency point of contact information.</p>
HSEMA	5. Ensure regular and recurring communications between the COOP Program Manager and agency COOP coordinators.	<p>The incumbent Program Manager already sends bi-monthly email communications to COOP Coordinators, offering assistance with COOP plans and exercises.</p> <p>During the Emergency Preparedness Council meetings chaired by the DMPSJ and HSEMA, the COOP Program Manager will (1) provide updates to Cabinet members and other participants on the COOP program and agency compliance data; (2) request Cabinet members to review or update COOP Program Coordinator point of contact information; and (3) solicit feedback and provide information on individual agency COOP planning and exercises.</p>



**DC HOMELAND SECURITY AND
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Responsible Agency	Recommendations	Agency Response
HSEMA	6. Draft or update a policy that would allow using relevant real-life occurrences as exercises.	HSEMA agrees with OIG's recommendation to draft or update policy to use real-world events as exercises. HSEMA will include guidance in the new policy on the use of real-world events as well as after-action reporting of the COOP activation to count towards the agency's exercise requirement.
HSEMA	7. Communicate to all District agencies all available options for conducting COOP exercises.	HSEMA agrees with OIG's recommendation to communicate with all applicable agencies on options for conducting COOP exercises. The incumbent COOP Program Manager routinely communicates with COOP Coordinators on guidance and opportunities (e.g., training events) for meeting the COOP exercise requirement. HSEMA will continue to offer resources and "exercises in a box" that District agencies may use to plan their own exercises.
HSEMA	8. Develop and implement policies and procedures to determine whether an agency has fulfilled its requirement to update its COOP Plan.	HSEMA agrees with OIG's recommendation to develop policies or procedures to determine agency fulfillment of the requirement to update its COOP Plan. The policy and procedures will detail the requirements and steps for agencies to submit, manage, review, and update their plans in CORE DC (the District's WebEOC Crisis Information Management Software).
HSEMA	9. Develop and implement policies and procedures to monitor the status of agency COOP Plans and ensure each plan complies with requirements and meets the agency's needs to provide essential programs and services during times of emergency or disruption.	HSEMA agrees with OIG's recommendation to develop policies or procedures which will detail the requirements and steps for agencies to submit, manage, review, and update their plans in CORE DC. The COOP Program Manager will provide guidance, checklists, and a review of agency plans to ensure that plans address each agency's ability to fulfill its mission and deliver services.
HSEMA	10. Ensure alignment between COOP Plans submitted by EOM and subordinate entities and establish a policy related to the submission of joint COOP Plans.	HSEMA agrees with OIG's recommendation and has consulted with the agency's General Counsel to assist with identifying all subordinate and independent District agencies subject to COOP planning requirements—including EOM and subordinate entities. In FY24, HSEMA will develop a policy on applicable agencies as determined in our findings in response to OIG's first recommendation. The policy will include guidance on the submission of joint COOP Plans, as applicable.



**DC HOMELAND SECURITY AND
 EMERGENCY MANAGEMENT AGENCY**

Responsible Agency	Recommendations	Agency Response
HSEMA	11. Ensure HSEMA provides consulting and advisory services to District agencies on their AARs.	The COOP Program Manager will continue to collaborate with HSEMA's AAR team members to assist agencies with updating their COOP Plans with information learned from AARs.

REPORT WASTE, FRAUD, ABUSE, AND MISMANAGEMENT.

 (202) 724-TIPS (8477) and (800) 521-1639

 <https://oig.dc.gov>

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