



OFFICE OF THE INSPECTOR GENERAL MONTGOMERY COUNTY MARYLAND

MEGAN DAVEY LIMARZI, ESQ
INSPECTOR GENERAL

Continuity of Operations Planning

Office of Emergency Management and Homeland Security

OIG Publication # 24-01

JULY 17, 2023

EXECUTIVE SUMMARY

The disruptions caused by the COVID-19 pandemic required the county to quickly make significant revisions to its daily operations and highlighted the importance of having detailed plans to ensure the county can maintain the essential functions residents rely upon. The Montgomery County Office of the Inspector General (OIG) initiated this review to evaluate Continuity of Operations (COOP) planning throughout county government.

The county's COOP program is overseen by the Office of Emergency Management and Homeland Security (OEMHS). They are tasked with providing guidance and training to county offices and administering an on-line system to manage the county's COOP plans. Each county department and office is responsible for developing a COOP plan and selecting a program manager that serves as the point of contact with OEMHS on issues related to COOP planning. A COOP plan must identify and prioritize an office's essential functions as well as the employees and resources needed to sustain these functions throughout any emergency or disruptive event. Some departments maintain a single COOP plan while others have multiple plans specific to individual offices or programs.

OBJECTIVES

Through this review, we sought to (1) determine whether each executive branch and legislative branch office has a COOP plan; (2) assess whether COOP plans align with county guidelines; and (3) assess OEMHS's oversight of the county's COOP planning.

SCOPE & STANDARDS

Our review was conducted between January and June 2023, in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspectors General, Quality Standards for Inspections, Evaluations, and Reviews* (May

RESULTS

- Policy does not require all county offices to have a COOP plan.
- Not all offices have a COOP plan.
- OEMHS needs to improve COOP program oversight.
- Most COOP plans do not align with guidance and are not regularly updated.

RECOMMENDATIONS

- Implement formal policy requiring all offices to maintain a COOP plan and conduct periodic COOP training.
- Ensure all COOP plans are kept in the county's emergency management system, WebEOC.
- Update COOP guidance materials, develop criteria for evaluating plans, ensure quality of plans, and regularly update COOP program manager contact lists.
- Ensure all COOP plans contain current information and comply with guidance.

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The Covid-19 pandemic resulted in the loss of countless lives, school and business closures, significant travel restrictions, and supply chain disruptions which led to widespread shortages of critical medicines, food, and household staples. The severity, duration, and global impact of the pandemic was unexpected and forced the county and many other government entities to quickly make modifications to daily operations. Reflecting on this historic event highlights the importance of having comprehensive and flexible plans to ensure the continuity of critical operations throughout any disruptive event.

In the event of an emergency, residents rely on the county to not only take steps to mitigate the emergency but also to maintain the vital government services that address their daily needs. The Federal Emergency Management Agency's (FEMA) Continuity Guidance Circular¹ states that Continuity of Operations (COOP) "ensures that an individual organization can continue to perform its essential functions, provide essential services, and deliver core capabilities during a disruption to normal operations." Further, Presidential Policy Directive-21, *Critical Infrastructure Security and Resilience*, defines resilience as "the ability to prepare for and adapt to changing conditions and recover rapidly from operational disruptions. Resilience includes the ability to withstand and recover from deliberate attacks, accidents, or naturally occurring threats or incidents."

The mission of the county's Office of Emergency Management and Homeland Security (OEMHS) is to "plan, coordinate, prevent, prepare for, and protect against major threats that may harm, disrupt, or destroy our communities, commerce, and institutions; and to effectively manage and coordinate the County's unified response, mitigation, and recovery from the consequences of such disasters."² The County Code requires that OEMHS "undertake emergency management and disaster preparedness planning, and coordinate response and recovery operations to a disaster."³

The county established a COOP program overseen by OEMHS to help ensure that the county remains resilient and can sustain identified essential functions⁴ under all conditions. Each county office selects a COOP program manager to serve as the primary point of contact with OEMHS on COOP matters. OEMHS provides guidance to assist offices with the development of their individual COOP plan. COOP plans are maintained in WebEOC, the county's emergency management system. OEMHS reviews plans for completeness and compliance with recommended content guidelines, identifies deficiencies and shares its overall assessment with each office.

¹ FEMA's Continuity Guidance Circular provides guidance to organizations in developing and maintaining the capability to ensure continuity of operations.

² <https://www.montgomerycountymd.gov/OMB/Resources/Files/omb/pdfs/FY24/psprec/48-EmergencyManagementandHomelandSecurity-FY2024-REC-Publication-Report.pdf>

³ Chapter 2, Administration, Sec. 2-640, of the Montgomery County Code.

⁴ Operations or activities that cannot be deferred for an extended period of time.

COOP plans should identify and prioritize a department or office’s essential functions and the employees and resources necessary to perform them. Departments are responsible for determining the number of plans needed within their organization to maintain essential services. Some departments maintain a single COOP plan while others have multiple plans specific to individual offices or programs. Without a comprehensive and up-to-date plan, a disruptive event may prevent county offices from providing the essential services that residents rely upon.

In 2014, the Montgomery County Office of Internal Audit (MCIA) published Report No. 15-2 detailing its findings from a review of the county’s COOP planning efforts. Notably, MCIA found that OEMHS provided limited oversight of the COOP program and that office COOP plans were not regularly updated.

Objectives, Scope, and Methodology

Through this review we sought to (1) determine whether each executive branch and legislative branch department or office⁵ has a COOP plan; (2) assess whether COOP plans comply with county COOP guidelines; and (3) assess OEMHS’s oversight of the county’s COOP planning.

For the first objective, we verified the existence of COOP plans maintained in WebEOC as of February 2023 for all executive and legislative branch offices. For any department or office that did not have a plan in WebEOC, we made further inquiries and requested any active plan.

For the second objective, we divided the population of all COOP plans maintained in WebEOC (92 plans representing 32 departments and offices) by executive and legislative branches.⁶ We further divided the population of the executive branch plans into two categories; those that are signatories to the county’s Emergency Operations Plan (EOP) and those that are not. We used random sampling to select 40% of the total population in each of the two executive branch categories for review. There were only three legislative branch office plans in WebEOC and therefore we reviewed each one.⁷ See *Table 1*.

Table 1. COOP Plans Sample Size for Review

	Total # of WebEOC COOP Plans	Sample Size
Executive Branch EOP Signatories	63	24
Executive Branch – Non EOP Signatories	26	10
Legislative Branch Offices	3	3
Total # of Plans	92	37

⁵ Executive and legislative branch offices identified on the county’s website as of February 2023 at <https://www2.montgomerycountymd.gov/mcgportalapps/departments.aspx>. In this report, executive and legislative branch offices will be referred to interchangeably as offices or departments.

⁶ The 92 plans do not include four that were maintained outside of WebEOC.

⁷ Two Legislative Branch Offices did not have a COOP plan and one had a plan outside of WebEOC.

We tested the eight most measurable requirements⁸ outlined in OEMHS's COOP Guide. We reviewed the 37 COOP plans, interviewed the COOP program manager(s) and reviewed OEMHS guidance materials to determine if the plans aligned with OEMHS COOP guidelines.

To evaluate our third objective, we interviewed OEMHS staff, reviewed OEMHS COOP guidance materials, examined OEMHS records related to training county employees on COOP planning and OEMHS's review of COOP plans during the period from January 1, 2019, through December 31, 2022. We also assessed individual COOP plans, interviewed COOP program managers, and reviewed relevant laws and COOP guidance prepared by FEMA.

This review was conducted between January and June 2023, in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspector General, Quality Standards for Inspections, Evaluations, and Reviews* (May 2014).

⁸ The eight measurable requirements reviewed include: (1) Inclusion of all employees in plan, (2) identification of essential employees in plan, (3) identification of 2 alternate facilities in plan, (4) pre-approval of alternate facilities, (5) plan is kept in multiple locations, (6) plan is kept in multiple formats, (7) plan is distributed to management and essential employees, and (8) employees are trained on their office's COOP plan.

FINDINGS AND RECOMMENDATIONS

Although continuity of operations planning is a recognized best practice and has been embraced by many county departments and offices, there is currently no county-wide policy or local law that requires all departments and offices to maintain an updated COOP plan or train staff on how to implement the plan. OEMHS created a COOP Guide (Guide) that provides general instructions on developing a plan, but it carries limited authoritative weight. During our review we noted that the county has placed value in COOP planning and leadership expects all county departments and offices to have COOP plans. Our work therefore focused on strengthening those efforts.

Similar to MCIA's 2014 report, we identified issues with OEMHS's oversight of the COOP program as well as deficiencies with individual office COOP plans. These weaknesses could impact the county's ability to efficiently provide critical services when residents need them most.

Finding 1: County policy does not require all county departments and offices to have COOP plans.

There is currently no county-wide policy that requires all departments and offices to maintain an updated COOP plan or provide COOP training to staff. Maryland law requires each county to establish an agency for emergency management.⁹ This same law requires all principal executive branch departments of State government to develop a COOP plan and update the plan annually; however, this requirement does not extend to county or local governing bodies. While there is no federal, state, or local legal requirement that the county develop and maintain department or office COOP plans, COOP planning is considered a best practice by OEMHS, FEMA, and the Emergency Management Accreditation Program.¹⁰ Furthermore, the recent pandemic has provided a real-world example and opportunity for county government to develop and improve the most efficient and effective preparedness models.

Maryland law specifically requires that each county's emergency management agency develop plans to address a radiological or hazardous materials incident. Led by OEMHS, the county developed an Emergency Operations Plan (EOP) that establishes a single, comprehensive framework for the management of major emergencies and disasters within the county. Although language within the EOP states that all county agencies are required to "[d]evelop and maintain a department-specific continuity of operations plan [COOP] in accordance with County guidelines and standards", only 10 county departments are signatories to the EOP. We found no evidence that this requirement is regularly communicated to departments and offices that are not part of the EOP. Without express policy and training requirements, it is conceivable that new department directors are unaware of the obligation to maintain an updated COOP plan or that they must regularly train their employees on the implementation of the plan.

⁹ Md. Public Safety Code Ann. § 14-101 et seq.

¹⁰ The EOP has been accredited by the Emergency Management Accreditation Program.

Formal policy would underscore the county's commitment to COOP planning and better enable the county to maintain essential functions during an emergency or major event that disrupts normal operations. The lack of a county policy requiring all departments and offices to have formal COOP plans and associated training may result in COOP planning taking a back seat to other office priorities and duties. Additionally, the lack of formal policy hamper OEMHS's ability to enforce compliance with their COOP guidance.

Recommendation 1

We recommend the county draft and implement formal policy requiring all departments and offices to:

- (a) maintain an updated COOP plan that adheres to OEMHS guidance;**
- (b) conduct periodic COOP training for staff; and**
- (c) require designated staff including senior leadership and COOP program managers to participate in OEMHS COOP exercises.**

Finding 2: Not all executive and legislative branch departments and offices have a COOP plan.

Our review of all executive and legislative branch departments and offices found that 14% and 33%, respectively, had no COOP plan. Without a COOP plan, an office may need to develop ad hoc processes quickly and potentially under extreme circumstances, inhibiting or delaying their ability to perform essential functions during or after an emergency. *See Table 2.*

Table 2. Total Number of COOP Plans

	Total # of Departments/Offices	# Departments/ Offices with COOP Plans	# Departments/ Offices without a COOP Plan
Executive Branch	37	32 (86%)	5 (14%)
Legislative Branch	6	4 (67%)	2 (33%)
Totals	43	36 (84%)	7 (16%)

We also found that of the offices with COOP plans, three (8%) executive branch offices and one (17%) legislative branch office did not maintain their COOP plan in WebEOC. OEMHS requires that all county offices maintain their COOP plans in WebEOC as it makes it easier to update plans and ensures offices can access COOP plans during an emergency. Not maintaining a plan in WebEOC prevents OEMHS from evaluating and providing instructive guidance to offices. It also impedes the county's ability to assess its overall readiness to maintain operations throughout a disruptive event. Without the information, county leadership cannot effectively meet the needs of residents.

Recommendation 2

We recommend OEMHS develop a process to ensure that all executive and legislative branch departments and offices maintain a COOP plan in WebEOC.

Finding 3: OEMHS oversight of the COOP program needs improvement.

OEMHS's oversight of the county's COOP program includes monitoring COOP plans and providing training to ensure that all departments and offices have current, accessible, and viable COOP plans. We noted, however, that OEMHS's limited oversight has resulted in knowledge gaps, minimal participation in training, and incomplete and deficient COOP plans.

Monitoring COOP Plan Compliance

Once a year, OEMHS staff reviews all WebEOC COOP plans and records related to COOP program manager participation in monthly drills. Each department or office receives a score from zero-to-three based on the completeness of their plan(s) and the number of monthly drills completed by program manager(s). If a department has multiple plans, they receive an overall score based on the average scores for all its COOP plans. A score of 2.5 or greater is considered passing. OEMHS communicates the results of their reviews to individual offices and to CountyStat annually.

During this review, we observed that OEMHS did not perform annual COOP plan reviews from 2019 through 2021. In OEMHS's 2022 review of COOP plans, 11 departments/offices received a failing score and 21 received a passing score. Seven departments/offices did not have a COOP plan, and four had COOP plans that were not reviewed because they were not maintained in WebEOC. While the 2022 results were shared with CountyStat, they were not shared with the departments and offices. We also learned that in prior years when results were shared, OEMHS did not proactively provide guidance to departments and offices that received a "failing" score, rather OEMHS advised that departments could contact them with questions. Because scores were not shared with departments and offices after the completion of the 2022 review, those with failing scores were not provided guidance to help strengthen their planning. Proactive intervention by OEMHS could help improve scores, participation in training activities, and overall readiness.

We observed that OEMHS does not have formal written procedures for evaluating COOP plans and detailing their role in addressing noted deficiencies. In practice, OEMHS's passive approach does little to help remediate noted deficiencies. Additionally, although they provided us with a general description of the considerations that go into awarding a numeric score for the plans, much of the effort is subjective. A lack of formal criteria also produces incongruent results. For example, we observed one instance in which an office received a passing score even though they had not participated in training and much of their plan was outdated. In comparison, we noted

other offices that had similar deficiencies received failing scores. Formalizing procedures and consistently applying criteria will allow for more uniform scoring and ensure offices receive needed guidance.

COOP Training

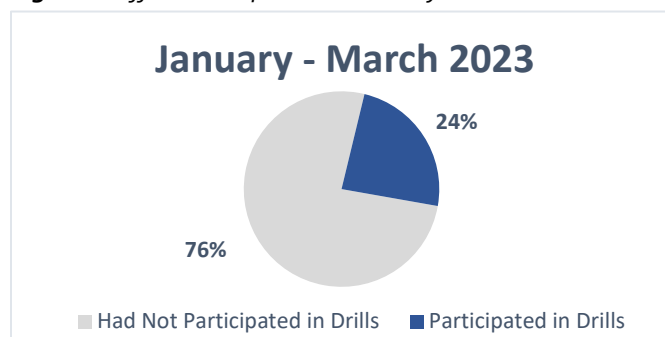
The Guide explains that to maintain a viable COOP plan “it is vital to train and educate employees about COOP and COOP plan activation.” The Guide goes on to note that “in order for employees to understand their responsibilities during a COOP plan activation, it is necessary to conduct formal training on a regular basis.” In the past, OEMHS has led half day COOP activation training exercises. During these exercises, staff presents different scenarios and participants discuss how their COOP plans address the scenario presented. The last county-wide COOP exercise was held on March 5, 2020, in anticipation of the Covid-19 pandemic. It was attended by 101 employees from 33 offices.

OEMHS reported that, if requested, they can facilitate department-specific COOP training which would allow managers and their employees to practice how specific scenarios would impact their day-to-day operations. However, OEMHS staff has not provided a department-specific COOP training since prior to 2018.

The cornerstone of OEMHS’s efforts to continually educate offices on COOP is a through a monthly “drill”. These drills are emails OEMHS sends to COOP program managers and other select staff with instructions on completing a specific component of a COOP plan. Recipients are instructed to review the material and make any necessary changes to their COOP plans in WebEOC. They are further asked to inform OEMHS that they have reviewed the material, i.e., completed the drill. There is no interactive element to the drills and none of the drills we reviewed provided opportunities to practice responsibilities during plan activation.

In evaluating records related to COOP drills for the months of January through March 2023, we observed that department and office participation was overwhelmingly low. *See Figure 1.* The low participation rate likely means most COOP plans are not being regularly updated or reviewed and most COOP managers are not well versed in how to respond to an event that requires activation of their plan.

Figure 1. Office Participation in Monthly COOP drills



While reviewing the COOP drill records for January of 2023, we observed that 12 of the 37 plans we evaluated (32%) did not have a COOP program manager included on the distribution list used to disseminate the monthly drill emails. We also noticed that the distribution list contained former employees and staff that were no longer affiliated with the department or office for which they previously served as a COOP program manager. OEMHS's failure to maintain an accurate distribution list resulted in program managers not receiving the drills which diminishes OEMHS's efforts to provide information about COOP. This also may contribute to plan deficiencies going unaddressed.

Program managers are provided little training that would equip them with the necessary skills to adequately develop and train their staff on COOP contingencies. OEMHS guidance is limited and, in some instances, refers the program managers to FEMA materials that are written for experienced emergency operations practitioners and are not always applicable. Sporadic training and insufficient guidance may limit the opportunity for offices to test their COOP plans, potentially constraining their ability to provide essential services in an emergency and leaving county employees unprepared and residents without services.

Recommendation 3

We recommend OEMHS:

- (a) update their guidance materials to provide clear, consistent, and comprehensive information relating to COOP plans and associated training;**
- (b) develop clear and consistent criteria for evaluating the completeness and quality of COOP plans;**
- (c) conduct and document reviews of COOP plans on an established schedule;**
- (d) work with offices to ensure completeness and quality of COOP plans; and**
- (e) regularly update the COOP program manager contact list and ensure materials and communications are distributed to appropriate, current personnel.**

Finding 4: Most COOP plans do not align with OEMHS guidance and are not regularly updated.

We reviewed 37 out of 92¹¹ plans in the WebEOC COOP module and interviewed associated COOP program managers to assess whether department and office COOP planning complied with OEMHS guidelines. Our assessment of compliance was designed around the eight most measurable requirements outlined in the Guide.¹² Of the 37 plans we reviewed, only 3% met all eight OEMHS requirements we evaluated.

¹¹ The 92 plans do not include four that were maintained outside of WebEOC.

¹² Although the Guide provided direction, it is difficult to decipher exactly what is required versus a suggestion or best practice. Thus, it was not feasible to measure compliance against all the guidelines.

We aggregated the requirements into four categories: plan content, accessibility of the plan, employee training, and plan updates. The plan content category includes requirements related to employees and alternate work locations. Accessibility includes how and where the plan is maintained and to whom it is distributed. The third and fourth categories include compliance with requirements regarding COOP training of employees and maintenance of COOP plans.

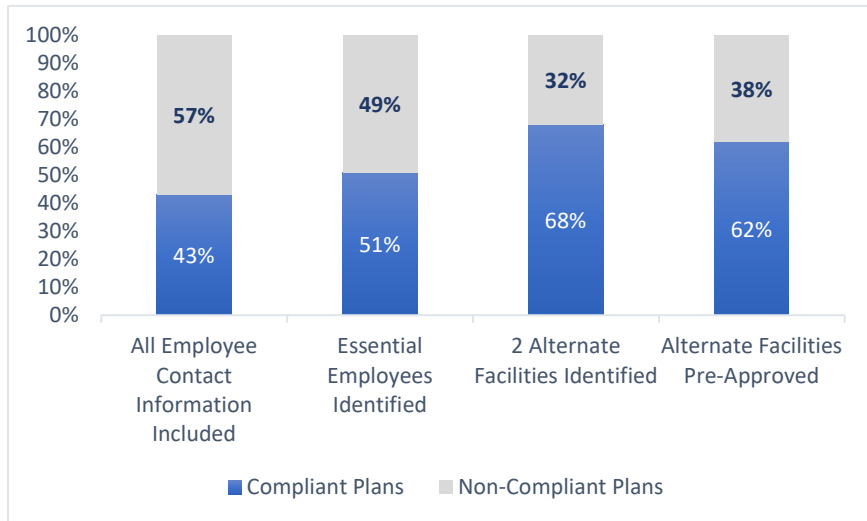
Plan Content

The Guide requires a COOP plan to include contact information for all department or office employees, with multiple methods of contact, to ensure that they can be reached in an emergency. The plan must also identify those employees necessary to perform the department’s essential functions. We found that 57% of the plans in our sample failed to include contact information for all employees and 49% failed to designate essential employees. *See Figure 2.*

Per OEMHS guidance, plans should identify at least two pre-approved alternate facilities to be used if the primary facility is unavailable. We interviewed COOP program managers to ascertain whether they coordinated with the primary occupants of the alternate facility in advance as required by the Guide to ensure there is ample space and resources to support additional staff in that location should a plan be activated. Our review revealed that 32% of the plans in our sample failed to identify more than one alternate facility and 38% of the plans included an alternate facility that was not pre-approved. *See Figure 2.*

Failure to include contact information for all staff could impact a department’s ability to communicate with staff during an emergency and limit the ability for managers to account for the wellbeing of all staff. Not identifying employees who are responsible for a department’s essential functions may hinder its ability to quickly provide critical services when normal operations are disrupted. Likewise, not identifying sufficient pre-approved alternate locations could hamper a department’s ability to carry out critical operations when the primary location is not available.

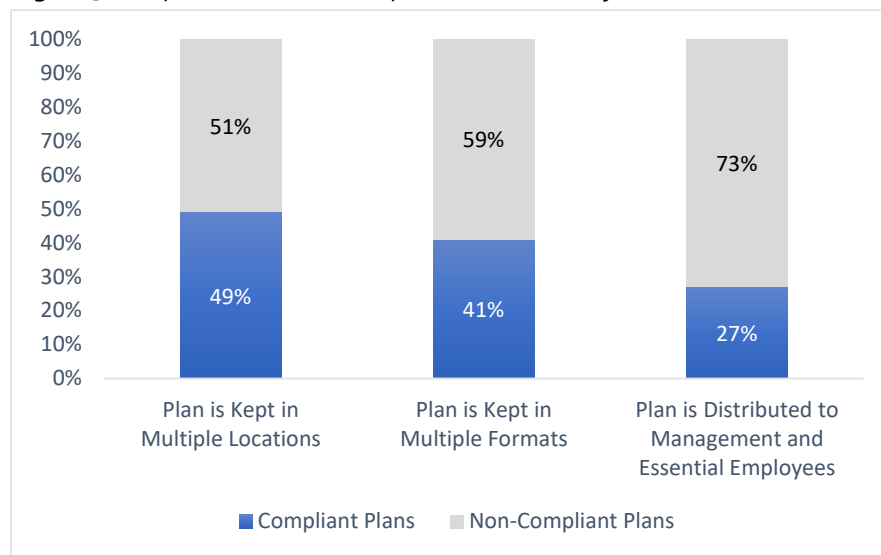
Figure 2. Sampled COOP Plan Compliance – Plan Content



Plan Accessibility

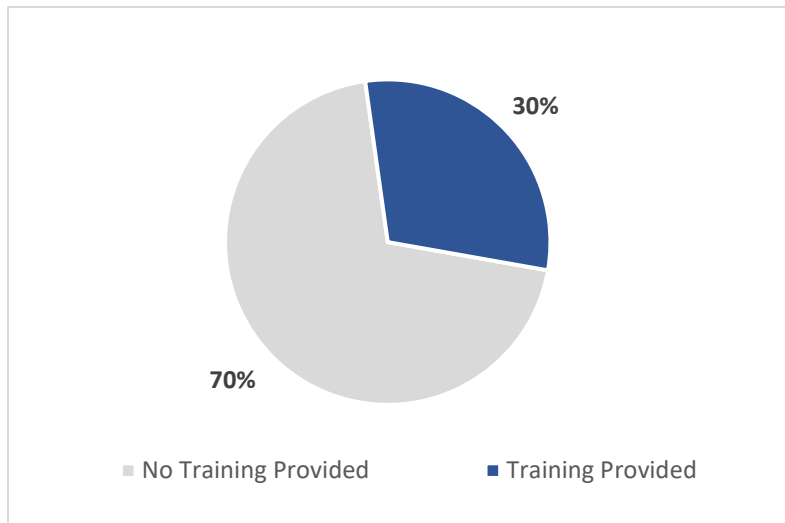
We also evaluated plan compliance with OEMHS COOP guidelines related to the accessibility of the plan in an emergency. The Guide requires that a plan be kept in multiple formats and in multiple locations. It also requires that the plan be distributed to management and essential personnel so they are aware of their roles and responsibilities. Our assessment revealed that most plans were not stored in multiple locations or in multiple formats as required by the Guide. Similarly, we found that 73% of COOP plans were not shared with office management or the employees designated as essential. See *Figure 3*. Failure to distribute the COOP plan to the appropriate staff and to store the plan in multiple formats and locations increases the risk that the plan will not be readily accessible in an emergency.

Figure 3. *Sampled COOP Plan Compliance - Accessibility*



Employee Training

The Guide requires that employees be trained on their office's COOP plan on a regular basis. Comprehensive training enables departments and offices to ensure the viability of the plan and that employees are prepared. Additionally, it assists employees in understanding their responsibilities and improves their ability to execute the plan in an emergency. We found that 70% of the program managers we spoke to did not provide such training to staff. See *Figure 4*. Without training, staff may be unprepared to fulfill their responsibilities in circumstances where the COOP plan must be activated.

Figure 4. *Sampled COOP Employee Training Provided*

Plan Maintenance

OEMHS requires a COOP plan to be “updated based on monthly WebEOC COOP drills, exercises, and personnel, procedural, or operational changes.” Program managers for 49% of the COOP plans we reviewed stated that they either did not know when their plan was last updated, or that it had not been updated within the past three years. Unsurprisingly, we found that 57% of the COOP plans in our sample contained outdated information in two or more components of the plan. Accurate and current information in a COOP plan is necessary to ensure a plan’s viability.

The requirements we evaluated are all critical components of COOP plans. The fact that only 3% of plans met all eight requirements we evaluated points to much needed improvements to policy, planning, training, and oversight. Plans are of limited value if they do not contain current information, are not distributed, practiced, and accessible to those that will need them in emergency situations.

Recommendation 4

We recommend OEMHS develop a process to ensure that office COOP plans comply with all OEMHS guidance and contain current information.

OIG COMMENTS TO THE CAO'S RESPONSE

The County Chief Administrative Officer's response to our report is included in its entirety in Appendix A. The response notes concurrence with the OIG's recommendation.

We ask the administration to provide us copies of noted Administrative Procedure when it is finalized.

APPENDIX A: THE CAO'S RESPONSE

The Chief Administrative Officer provided the following response to our report:



OFFICE OF THE COUNTY EXECUTIVE


Marc Elrich
County Executive

Richard S. Madaleno
Chief Administrative Officer

MEMORANDUM

July 12, 2023

TO: Megan Davey Limarzi, Inspector General

FROM: Richard S. Madaleno, Chief Administrative Officer 

SUBJECT: Inspector General Confidential Draft Report: Continuity of Operations Planning – Office of Emergency Management and Homeland Security (OIG Publication #OIG-24-001)

Thank you for the opportunity to respond to the issues identified in the confidential draft report. As noted in the report, the disruptions caused by the COVID-19 pandemic required Montgomery County Government to quickly make significant revisions to its daily operations to ensure County government could maintain the essential functions County residents and businesses rely upon. The success of the County's ability to continue its delivery of essential services during this unprecedented challenge is a testament to both the resiliency of County government and the commitment of its employees.

We conduct periodic Continuity of Operations Planning (COOP) drills and exercises, in which senior leadership, managers, and COOP program managers participate to ensure that the County is prepared to address a variety of event-driven scenarios. We also conduct "hotwashes" following these drills to identify lessons learned and opportunities for improvement. We recognize that additional actions, as identified in the draft report, are warranted to ensure appropriate policies, processes, and training are in place to better document departmental COOP plans and to enhance oversight and compliance by the Office of Emergency Management and Homeland Security (OEMHS). We are committed to making these enhancements in a timely manner.

Recommendation 1: We recommend the County draft and implement formal policy requiring all departments and offices to:

- a) maintain an updated COOP plan that adheres to OEMHS guidance;
- b) conduct periodic training for staff; and
- c) require designated staff, including senior leadership and COOP program managers, to participate in OEMHS COOP exercises.

CAO Response: We concur. We have directed OEMHS to formalize their existing informal policies and procedures into an Administrative Procedure to address this recommendation.

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CAO Response Inspector General Confidential Draft Report: Continuity of Operations Planning
- Office of Emergency Management and Homeland Security (OIG Publication #OIG-24-001)
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Recommendation 2: We recommend OEMHS develop a process to ensure that all executive and legislative branch departments and offices maintain a COOP plan in WebEOC.

CAO Response: We concur. The Administrative Procedure discussed above will include a requirement that all executive and legislative branch departments and offices maintain a COOP plan in WebEOC. In addition, OEMHS will establish and implement a process to monitor and report on compliance with this requirement.

Recommendation 3: We recommend OEMHS:

- a) update their guidance materials to provide clear, consistent, and comprehensive information relating to COOP plans and associated training;
- b) develop clear and consistent criteria for evaluating the completeness and quality of COOP plans;
- c) conduct and document reviews of COOP plans on an established schedule;
- d) work with offices to ensure completeness and quality of COOP plans; and
- e) regularly update the COOP program manager contact list and ensure materials and communications are distributed to appropriate, current personnel.

CAO Response: We concur and will ensure that OEMHS takes appropriate and timely steps to implement these enhancements.

Recommendation 4: We recommend OEMHS develop a process to ensure that office COOP plans comply with all OEMHS guidance and contain current information.

CAO Response: We concur. As part of the internal processes and policies to be developed pursuant to the other recommendations noted above, OEMHS will develop a process to ensure that department and office COOP plans comply with requirements in the Administrative Procedure and are kept current. As noted above, OEMHS will establish and implement a process to monitor and report on compliance with this requirement.

We appreciate the recommendations reflected in the report and will take appropriate actions to further strengthen the processes as noted in the report.

Thank you for bringing these matters to our attention.

cc: Fariba Kassiri, Deputy Chief Administrative Officer, Office of the County Executive
Earl Stoddard, Assistant Chief Administrative Officer, Office of the County Executive
Luke Hodgson, Director, Office of Emergency Management and Homeland Security
Bill Broglie, Internal Audit Manager, Office of the County Executive