California Public Utilities Commission

Internal Audit Unit Report on

Emergency Preparedness

January 27, 2016

Contents

Executive Summary

This audit reviewed the California Public Utilities Commission's (CPUC) emergency preparedness. In this regard, the CPUC has two responsibilities.

First, the CPUC is responsible to the people of the California for assuring safe, reliable, affordable, and environmentally-sound services from the utilities it regulates. In an emergency, action from the CPUC may be required to assist utilities, emergency authorities and others respond, restore service, and aid in recovery.

Second, the CPUC is responsible to its employees and can help protect them under the same circumstances.

To these ends, this audit focused on the safety of the agency as a regulator and an employer – primarily, to determine whether the CPUC is prepared to operate effectively during or after a large-scale disaster (such as a major earthquake or fire).

Our findings address several aspects of preparedness. We found that:

- The CPUC is reasonably well prepared to protect its employees during and immediately after the occurrence of a critical emergency.

- The CPUC needs to improve its preparedness to function effectively during the days and weeks immediately following the occurrence of a critical emergency.

- The CPUC has developed plans that are likely to be of some benefit in attempting to reconstitute its operations subsequent to a critical emergency, although those can be improved in significant ways.

- Operational decisions have been made by the CPUC's Information Technology (IT) management that have major implications for the ability of mission-critical functions to operate on a continuing basis (i.e. continuity); however, the implications of these decisions may not be understood across the agency's leadership and senior management.

- Some new risks and a need for improved communication have resulted from the recent transfer of operational responsibility for the San Francisco building safety— from the CPUC to the Department of General Services (DGS).

In what follows we describe our audit objectives and methodology, and describe the data and analysis that support our conclusions and recommendations. We also acknowledge the assistance of agency management in the conduct of this audit, and wish to credit their full cooperation as well as that of relevant officials from the Department of General Services.

Key Supporting Findings

Safety of CPUC Employees: Overall, the CPUC is reasonably well prepared to ensure the safety of the employees during or after a disaster. More specifically, the audit made the following findings regarding this responsibility toward CPUC employees:

- The CPUC is reasonably well prepared to ensure the physical safety of the employees during or after a disaster. Most employees knew when to evacuate and the identified staging areas following a disaster. Many employees possessed a copy of the Emergency Guide, which allows quick and easy access to necessary information. All employees interviewed had possession of the red Emergency Phone List that is inserted into the same pouch as their CPUC identification badges. Some useful emergency provisions, including a substantial water supply, were identified in the San Francisco headquarters building.

- The CPUC is somewhat prepared with information intended to assist staff in the case of a disaster.   The key concern is that the essential elements that could guide employees during or after an emergency situation are divided among three documents. In an emergency, staff may need to hunt around to try to locate critical information when time may be of the essence. The three documents include the following: [1]

    a. Emergency Guide: A multi-tabbed guide for quick access, and appears to be a useful document to aid staff during an emergency.

    b. The Facility Emergency Plan Guidelines: A compilation of the Emergency Guide information, Emergency Team Rosters, and information about the San Francisco office building. This document may not be useful to staff during an emergency because critical information is unclear and it is located on the intranet.[2]

    c. The Technology Recovery Plan: The State Administrative Manual Section 5325.1 requires a Technology Recovery Plan; however, SAM requires the Technology Recovery Plan to be part of a larger Continuity Plan, required by State Administrative Manual (SAM) Section 5325. This CPUC Technology Recovery Plan document states that it is designed for long-term disasters that affect the building and systems for a period longer than two weeks. This document may be useful to staff because it identifies the IT infrastructure as well as some alternate cellular phone numbers for the executive and management staff.

- In one significant regard, the CPUC is not prepared to ensure the building will be safe in the case of an earthquake. Many shelves and bookcases in the CPUC's San Francisco headquarters are laden with heavy objects, and are not adequately braced to avoid toppling over.

Agency Functions: The audit found that CPUC is not fully prepared to meet its regulatory responsibilities during and after an emergency. The primary concern is that the emergency documents intended to be used during or immediately following a disaster do not include sufficient communications alternatives if the building is uninhabitable or its telephone and IT capabilities are unavailable. Another concern is that the CPUC has not identified or prioritized critical functions that should be restored following a disaster. We made the following findings regarding the agency:

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[1] We note that the "CPUC Internal Emergency Response Plan and Protocols, Roles and Responsibilities" document was recently published in October 2015 and is outside the timing of our audit. It may relate to management's response and efforts going forward.

[2] The "Purpose of Plan Statement" states, "As required by Title 19, California Code of Regulations; California Fire Code; California Health and Safety Code; and the San Francisco Fire Code, an emergency plan shall be prepared, implemented, maintained and annually reviewed for this building."

- The CPUC is well-prepared to facilitate the recovery of service by utilities immediately following a disaster. The CPUC has established memorandum accounts to allow utilities to track disaster-recovery expenditures for potential recovery in rates at a later date. Key agency personnel have been identified to maintain communication with the utilities during or immediately following a disaster. Most importantly, the California Utilities Emergency Association (CUEA), under an MOU with the Office of Emergency Services (OES), has been established to coordinate the repair of power, water and other utilities via its affiliated businesses.

- The CPUC is marginally prepared to communicate following a disaster. If the San Francisco building and its functionality are lost, agency leadership and key subject matter experts are not systematically ready to communicate using alternative means. The Technology Recovery Plan, intended to be used for long-term disasters that affect the building and systems for a period longer than two weeks,[3] includes alternate cell phone numbers for the management team; however, it includes only landline phone numbers for the Security Station, the Emergency Team, and the division contacts. The landline phone numbers may not be useful if the electricity is disrupted or the building is uninhabitable. Another emergency plan, The Facility Emergency Plan Guidelines, does not include alternate cellular phone numbers for the executive and management staff nor the Emergency Team members. There are no backup email addresses or other contact methods (e.g. conference call lines) catalogued and distributed, and a full complement of CPUC staff subject matter experts have not been identified and included in these emergency contact lists.

- The CPUC is marginally prepared for continuity of its agency functions following a disaster. The agency's information technology infrastructure will provide for the ultimate recovery of electronic information that has been archived prior to the disaster, but not for continuous operations (continuity) during the period of reconstitution. The CPUC is somewhat prepared to reconstitute operations following a disaster lasting two weeks or longer. In a prior external audit, the State Auditor made a number of related recommendations, including a recommendation to develop, implement, and maintain an entity-wide information security program.[4]

- Regarding whether the CPUC is prepared to be responsive to the Governor and the public during or immediately following a disaster, the findings indicate that CPUC employees generally understand their responsibility to the Governor in the event of a nationally declared emergency. The CPUC is not adequately prepared, however, to be fully responsive to the Governor and the public because the CPUC has not identified essential functions that would need to perpetuate during a disaster, and has not prioritized operations to reconstitute critical services following the disaster. Although the Technology Recovery Plan identifies activities and equipment needed to restore the operations of each division, there is no Continuity Plan that includes emergency/disaster management and business resumption or any documents that provide a prioritized roadmap for meeting key needs first. Here again, some of these areas parallel similar prior findings from the State Auditor.

Marginal concerns include the following:

- Some employees lack the Emergency Guide or easy access to the Emergency Guide, which is intended to provide immediate instruction and reference in the event of an emergency.

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[3] 2015 Technology Recovery Plan. Page 3.

[4] California State Auditor. "California Public Utilities Commission—It Needs to Improve the Quality of Its Consumer Complaint Data and the Controls Over Its Information Systems." Report 2014-120. April 2015.

- Emergency Team member meetings are not as frequent as the Emergency Coordinator would like, although there are no identified standards for the frequency of the meetings and the content of the meetings.

Recommendations

Based on our findings, Internal Audit offers a number of recommendations intended to provide a greater level of safety to the CPUC's employees, and to improve the CPUC's readiness to perform its essential functions during and after a disaster:

- Streamline the Facility Emergency Plan to include only relevant information that is identified only once. Include key elements that will be important to emergency coordinators during and immediately following a disaster, and to employees who may find themselves confined to the building. Ensure the plan aligns with the National Incident Management System (NIMS) and Incident Command System (ICS), and coordinate with OES. [5] The CPUC emergency operation plan(s) should include the elements identified in the OES Crosswalk (Appendix A). Provide two to four hard copies of the Facility Emergency Plan in a conspicuous location on each floor in the San Francisco office.

- Develop a Continuity Plan that includes the Technology Recovery Plan and include information necessary for long-term disasters and business resumption.   Use the Cal OES Continuity Plan Checklist[6], and/or Federal Emergency Management Agency (FEMA) Continuity Plan Template[7] to ensure all elements of continuity planning are included. Maintain a hard-copy of the Continuity Plan at the Security Station in the San Francisco office, as well as in a conspicuous location on each floor.[8]

- Complete the agency's planned managerial response to the State Auditor's findings regarding information security, and prioritization of critical agency functions for emergency responsiveness and recovery.

- Identify an Emergency Coordinator and an Alternate Emergency Coordinator at each of the satellite CPUC offices. Conspicuously locate the rosters at every egress. To the extent this is not already done, consider whether floor warden duties should be specified in duty statements for participating employees, including appropriate weight in annual performance reviews.

- Identify a manager at the San Francisco building to be the contact person for the Emergency Coordinators at each of the satellite offices. Have that manager be responsible for working with each location to ensure there is always an Emergency Coordinator identified in the office.

- Request the IT Chief to provide an overview to the Commission's Finance and Administration Committee on the security, redundancies, and continuity capabilities of the CPUC's IT processes.

- The DGS Building and Property Manager and CPUC management should institute semi-annual emergency preparedness meetings designed to ensure that all associated responsibilities are clearly assigned and fulfilled as between the two parties. Among other topics, these might include updating the Emergency Team rosters, holding the

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[5] OES recommends using an Emergency Plan Crosswalk to ensure all essential elements are included in the department's Emergency Operation Plan (or Facility Emergency Plan and Continuity/Technology Recovery Plan), which is included in Appendix A.

[6] Included in Appendix B.

[7] http://www.ready.gov/sites/default/files/documents/files/BusinessContinuityPlan.pdf

[8] Technology Recovery Plan should use the "Technology Recovery Plan Instructions—SIMM 5325-A".
   http://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/rev427sept14/chap5300/5325.pdf

quarterly meetings with the Emergency Team, ensuring adequate training for Emergency Team members, maintaining emergency supplies, conducting fire drills, and writing and updating the Facility Emergency Plan.

- Ensure that building engineers secure cabinets, shelves and other tall and heavy objects pursuant to FEMA recommendations and the California Seismic Safety Commission checklist.

- Create, distribute and keep current an Emergency Contacts and Operations directory containing alternative telephone numbers and email addresses for Commissioners, executive management and key CPUC staff subject matter experts, along with key external contacts such as utility executives, Governor's Office and OES, and the media.

Introduction and Scope

This audit focused on the safety of the CPUC as an employer and as a regulator. Primarily, this audit determined whether the CPUC is prepared to operate effectively during or after a natural disaster. The CPUC has a responsibility to the utilities it regulates, and to its employees and dedicated staff. To expeditiously restore critical utility infrastructure and service, the CPUC-regulated utilities will need the CPUC to be responsive, reliable, and able to effectively communicate with key utility personnel, other governmental decision-makers, and the public through the media and other channels.

Following the Pacific Gas and Electric (PG&E) pipeline rupture in San Bruno in 2010, the CPUC embarked upon a strategic initiative to change the safety culture of the agency and the industries it regulates. A critical criticism was that PG&E was deficient in its emergency-response actions after the incident.

To assist in ensuring the CPUC is responsive in an emergency or disaster, and to further our goal to be a model of a safety culture for the utilities we regulate, the scope of this audit is to determine whether the CPUC is poised to respond to an emergency, both internally for the employees and externally for the public and the state's regulated industries.

One aspect of this audit is to determine whether the CPUC is prepared for the safety of the employees during an emergency. The auditors interviewed staff and reviewed emergency preparedness documents to determine whether:

- The CPUC has developed emergency preparedness and response plans for the safety of the staff.

- There is adequate ongoing training for floor wardens on emergency-response actions depending on the emergency, whether the CPUC has identified the appropriate role of floor wardens, whether the staff knows who the floor wardens are, as well as the floor wardens' roles and authority in an emergency situation.

The other aspect of this audit is to determine whether the CPUC is prepared to be responsive to the Governor, the public, and the utilities it regulates. The auditor conducted interviews and reviewed documents to determine whether:

- Key personnel have been identified and trained in a state-wide or national framework to coordinate the CPUC's role in prevention, preparedness, response, and reconstruction, in the case of an emergency or disaster.

- The CPUC has prioritized functions that:
    - Need to continue or intensify during a natural or man-made disaster.
    - Could be suspended while the disaster is being addressed and prioritized for reconstitution of service.
    - Necessitate back-up operations to provide continuity of the essential CPUC functions during a catastrophic emergency.

- Clear lines of authority have been established through which the Commission as a whole, the Commission President, the Commissioners, Executive Director, and/or other or staff may take expeditious actions needed to permit utilities, public agencies or other entities to cope with emergency circumstances.

- There is a plan to convey information to the CPUC Public Information Officer (PIO), and if so, whether the plan identifies how the PIO will disseminate information to CPUC staff and the public, and identifies a back-up in case the PIO is unavailable.

- There is a plan to reconstitute normal CPUC operations after an emergency or disaster.

- CPUC managers and staff are aware of their responsibility to render all possible assistance to the Governor and to the Director of OES during an emergency, and whether that information is disseminated to CPUC staff.

Background and Risk Justification

On August 8, 2014, the Internal Audit Unit offered the division directors the opportunity to identify risks of greatest concern. The directors placed the risks onto a "dashboard" that included a symbol that identified whether each risk was high (red hexagon), medium (orange square), or low (yellow triangle). Of the eight risks identified as the "high," five included risks that would necessitate emergency-response plans:

- Natural disasters
- Adverse weather
- Terrorism/utility facilities
- 9-1-1 service
- Contact with energized electric transmission lines (due to wildfires, adverse weather, etc.)

In 2010, the California Emergency Management Agency (presently OES), formulated the State's 2010-2015 Strategic Plan to coordinate emergency response efforts consistent with federally standardized models. OES is responsible for the coordination of overall state agency responses to major disasters in support of local government. In this role, OES coordinates the Statewide Emergency Planning Committee (SWEPC), an informal organization comprised primarily of state agency emergency liaison personnel.

During major emergencies, Government Code section 8595 permits the Governor to call upon state and local government agencies, based on their specialized capabilities and expertise, to help provide support. If or when called upon, the CPUC will need to have confidence in an

emergency preparedness and response plan in order to effectively coordinate emergency-response efforts with OES and federal relief efforts.

The entity responsible for security at the San Francisco office has recently changed. Over the past 30 years, the CPUC has been retiring the bond debt associated with the San Francisco building through a separate appropriation in the annual budget act. As long as the bond debt was paid through the CPUC budget-act appropriation, the CPUC was responsible for security services. To fulfill this responsibility, the CPUC contracted with Veritas, who provided the CPUC with an Emergency Coordinator as well as general building security personnel and services.

As of July 1, 2015, DGS is responsible for emergency preparedness at the San Francisco building. The State Administrative Manual Section 1330 states that the mission of DGS Building and Property Management Branch is to manage, maintain, and operate state buildings and grounds in order to provide tenants and the public with a safe and healthy environment in which to conduct business. Section 1330 specifically states that DGS is to provide, "Emergency Preparedness and Response," in addition to 14 other items of responsibility.

The DGS Building and Property Manager is currently responsible for the emergency preparedness at the CPUC's San Francisco building, as well as for ten other buildings in the San Francisco Bay Area.

Methodology

There were two primary sources of information for this audit. The first was our review of a series of plans, handbooks, documents, and like materials that are intended to satisfy a variety of emergency planning requirements, or to inform CPUC management and employees about emergency procedures. The second consisted of interviews, surveys, physical inspections and further document reviews we undertook to investigate particular concerns, clarify organizational roles, and verify the understanding of certain information on the part of agency management and staff. We also researched FEMA and OES requirements, and used checklists and templates provided by FEMA and OES to aid in evaluating the information.

Our interviews involved CPUC executive management and selected staff. Our six interviews with executive management addressed the extent of their knowledge regarding:

- Emergency-response planning at the agency-wide (conducted at the executive level), division, or branch level.

- Emergency preparedness and response plans, in accordance with the federally standardized models and the State Emergency Plan for highest risk incidents, and whether the plan(s) identify key personnel with clear lines of authority.

- Established back-up operations for essential functions that will need to continue or intensify during an emergency situation.

- Designated key personnel, including decision-makers, those with delegated authority, and those responsible for utility-CPUC communications to maintain contact with the utilities.

- Subject-matter experts who would be accessible to key decision-makers in the case of an emergency situation.

- A PIO, as well as a succession of officers to be responsible for public communication during an emergency situation.
- A plan for disseminating information to CPUC staff in case the building is uninhabitable and the IT and communications capabilities within it are disrupted.
- A continuity plan for resuming normal operations after the disaster has subsided.

We interviewed 28 staff at random among the four CPUC offices (San Francisco, Sacramento-Downtown, Sacramento-Natomas, and Los Angeles) and reviewed related documents to determine whether CPUC staff:

- Have been informed of appropriate emergency-response actions under different emergency scenarios.
- Know the identity of, and are aware of the roles and authority of floor wardens.
- Know how they will be provided information from the CPUC if the information technology network is down.
- Are prepared with emergency provisions in case they are confined in the building for a period of time.
- Are aware of how to assist in an emergency situation under Article 7 of the California Emergency Services Act, pursuant to Government Code Section 8596.

We also surveyed nine floor wardens to determine whether they understood their roles in the case of an emergency, and whether they were receiving ongoing training and performing periodic drills.

We reviewed the State Administrative Manual Section 1330 that identifies DGS responsibilities for Building and Property Management of state-owned offices, and local emergency-response and fire codes for privately owned offices buildings.

Finally, we conducted this audit independently of the CPUC staff. The Internal Audit Unit reports directly to the Finance and Administration Committee, a subcommittee of the full Commission, and performs internal audits they authorize. We planned and performed this audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives specified in the Introduction and Scope section of the report. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Findings

When conducting this audit, we asked Executive Management and other CPUC staff a series of uniform questions to help determine whether the CPUC is prepared in the case of an emergency. In addition, we made some other findings that may be of interest to the CPUC Executive Management team due to their relevance to employee safety and the role of the CPUC during or following a disaster.

Response to Audit Questions

The findings indicate that the CPUC is reasonably well prepared to ensure the physical safety of the employees during or after a disaster; however, it is not well prepared to recover from a disaster. The documents intended to be used during or immediately following a disaster do not include sufficient communications alternatives if the building is uninhabitable or its telephone and IT capabilities are unavailable. In addition, the CPUC lacks a continuity plan and as such, has not identified critical functions that would need to perpetuate during a disaster and has developed a road map for reconstitution of services. The following are responses to the specific audit questions:

Review and Discussion of Written Documents and Plans

The CPUC has developed emergency-preparedness and response plans for the safety of the staff. The written plans appear somewhat sufficient; however, (1) there are gaps identified with responsibilities associated with the Safety Coordinators, and (2) the plans are not clearly distinct and it is not evident which plan to use, by whom, and in which situation.

We performed a review of emergency preparedness documents. The CPUC has developed four different documents for the safety of the staff: Emergency Guide, Facility Emergency Plan Guideline, Technology Recovery Plan, and the red Emergency Phone List that is included in the same pouch as the CPUC employee identification badge. According to the Technology Recovery Plan document, it is designed for long-term disasters that affect the building and systems for a period longer than two weeks.   The other documents are intended to be used during or immediately after an emergency.

The Sacramento-Downtown office developed a procedures manual. It is a universal manual and includes non-emergency information as well as emergency evacuation procedures. The (non-CPUC) building management has provided an emergency plan, which provides emergency evacuation instructions to facilitate a safe escape from the building.

To be operationally prepared, OES publishes an Emergency Plan Crosswalk to assist planners and state agencies with emergency preparedness. The Crosswalk is used to ensure that the fundamental Standardized Emergency Management System (SEMS)[9] and NIMS[10] content are included in emergency operations plans. These systems provide common language and common protocols to ensure a base understanding in the case of an emergency. When OES reviews departments' emergency plans, it uses the Emergency Plan Crosswalk to determine whether the plans include the SEMS and NIMS content.

Of the 52 elements in the OES Emergency Plan Crosswalk, 10 elements address employee safety during an emergency. Twenty-seven elements address the CPUC's responsibilities to the

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[9] SEMS identifies an organizational structure for emergency-response agencies. SEMS facilitates priority setting, interagency cooperation, and the efficient flow of resources and information in order to respond to frequent and multiple disasters occurring anytime and anywhere in the state. SEMS identifies a clear and consistent organizational structure for emergency-response agencies.

[10] NIMS is the foundation to the FEMA National Preparedness System (NPS) and provides the template for the management of incidents and operations in support of all five national planning frameworks. NIMS provides a systematic, proactive approach to guide departments and agencies at all levels of government, nongovernmental organizations, and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life and property and harm to the environment. Executive Order S-2-05 formally adopted NIMS on February 8, 2005. https://www.fema.gov/national-incident-management-system.

Governor, the public, and the utilities it regulates. The remaining 15 elements address both levels of responsibility.

Of the ten elements that exclusively address employee safety, the CPUC includes seven in its documents. The following three elements are described only partially, or not included in the CPUC documents:

1. "SEMS-based Emergency Organization," which identifies agency roles and responsibilities during disaster situation, includes an emergency organization chart, and indicates how the CPUC fulfills the five SEMS sections: management, plans/intelligence, operations, logistics, and finance/administration. The CPUC's Technology Recovery Plan identifies roles of a Management Team and an Evaluation Team. The Facilities Emergency Plan Guidelines document identifies the roles of the Emergency Team; however, it does not clearly identify the plans/intelligence and the logistics.

2. "Recovery Disaster Assistance," which describes the different programs, their purpose, restrictions, and application process for public assistance, individual assistance, and hazard-mitigation grant programs.

3. "Dams," which identifies dams in the area, inundation maps, evacuation plans, shelter locations, and other facilities for people with disabilities, persons who lack their own transportation, or persons requiring special assistance.

The CPUC "Implementation of the Safety Policy Statement" points out that several individuals in the Safety and Enforcement Division management as well as staff in the News and Public Information Office are certified in NIMS and ICS. The policy statement reports, "The Commission shall develop and adopt an emergency response plan that aligns with NIMS and ICS," and to closely coordinate with the OES.[11]

Emergency Guide

Intended Audience: All staff.

Point in time: During and immediately following a disaster.

This multi-colored and tabbed guide allows employees to quickly flip to the page that pertains to a specific situation. For example, there are separate tabs for Civil Disturbances/Medical Emergencies, Evacuations, Fires, Hazardous Materials/Explosions/Weapons, Hostage/Assault/Flood, Power Outage, Earthquakes, and Bomb Threats. The Emergency Guide also includes office evacuation sites for each of the CPUC offices. This is a useful document for emergency preparedness.

Key concerns:

- For the Los Angeles and both Sacramento offices, there is no floor map with the exits identified.

- Just 8 out of 27 staff surveyed were able to immediately access their Emergency Guide.

The following are suggestions to improve or facilitate the use of the Emergency Guide to provide the CPUC employees additional security and safety during or immediately following a disaster:

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[11] CPUC. "Implementation of the Safety Policy Statement." February 2015. Page 8.

- Add a notification on the front page of the Emergency Guide that states that all employees must evacuate when directed, and evacuate to the appropriate Evacuation Site/Staging Area. Suggest that Emergency Coordinators in satellite offices and primary floor wardens in the San Francisco office submit a roll-call sheet after the emergency has subsided.

- Have managers and supervisors provide the Emergency Guide to all new employees on their first day of work with the CPUC and recommend that they keep it clearly visible from their workstation. Add the provision of the Emergency Guide to the onboarding checklist.

- Add building floor maps that designate the exit routes at the Sacramento-Downtown, Sacramento-Natomas, and the Los Angeles offices at all points of egress.

- Within the San Francisco headquarters building, consider ways to label locations in the building with designations that employees can see, and emergency responders can understand (e.g., "fourth floor, northeast corner of the building"). In an emergency, employees may not be able to describe their locations very well in a call, text or email, especially if they have moved around and there are compelling distractions.

Facility Emergency Plan Guidelines

Intended Audience: Unidentified.

Point in time: Immediately during or following a disaster.

This 50-page document is located on the CPUC Intranet under *Employee Resources.* It does not seem to provide easily accessible information for the general staff; however, it may be useful to the Emergency Response Team because it addresses issues associated with the San Francisco headquarters building. Specifically, it includes information such as the building's safety features, emergency duties of the emergency coordinator and Emergency Team members, plans for evacuation, and instructions to follow in situations such as fire or bomb threat. Although this guide may not assist the general staff in such situations, our assessment is that they may still be able to evacuate safely.

Previously, the CPUC Administrative Services Division, Business Services Branch was responsible for creating and updating the Facility Emergency Plan Guidelines. With the change in building security responsibilities from the CPUC to DGS, the DGS Building and Property Manager is currently responsible for this document. On August 28, 2015, the DGS Building and Property Manager informed the internal auditor that he is expecting to drop the term "Guidelines" and revise the Facility Emergency Plan by the end of September.

The Facility Emergency Plan Guidelines, Section III, Authority for the Emergency Preparedness Program, states that it is the responsibility of management to ensure that all employees possess a general knowledge of emergency procedures. It is assumed that employees possessed a general knowledge of emergency procedures due to the Emergency Guide and not the Facility Emergency Plan Guidelines.[12]

Communication among the Emergency Coordinator and the Emergency Team is critical during and immediately following a disaster. The Facility Emergency Plan Guidelines document does not include alternate communications information for the Emergency Team members, front

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[12] This audit did not ask management or staff whether they knew of or where to find the Facility Emergency Plan Guidelines.

desk/security station, the DGS Building and Property Manager, and the building engineer. It includes the office landline phone numbers, which may not work in the case of a disaster; thus, this document might not help employees and staff with critical roles to contact each other, unless they may have exchanged personal cell phone numbers and/or personal email accounts independently.

Government Code section 8585 requires OES to be responsible for the state's emergency and disaster-response services for natural, technological, or manmade disasters and emergencies, including responsibility for activities necessary to prevent, respond to, recover from, and mitigate the effects of emergencies and disasters to people and property. OES uses the California Fire Code[13] which establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises. Although state law requires OES to be responsible for the state's emergency-response efforts, the CPUC guide does not follow the OES template or use the OES recommended categories.

For other locations, the Sacramento-Downtown office includes emergency-response instructions in its procedures manual. In addition, the Director of the Office of Governmental Affairs, the temporary emergency coordinator until the Associate Governmental Program Analyst position is filled, stated that the Sacramento-Downtown office engages in at least two fire drills per year and frequently corresponds with building management with regard to any safety issues. While present, the auditor noticed a document that the building management provided that clearly and concisely identifies exits and emergency-response information.

The staff at the Sacramento-Natomas office and the Los Angeles office seem to be prepared in the case of an emergency, even though neither office provides an emergency-response manual to the staff. Interviews with both office emergency coordinators revealed that the staff participate in at least two fire drills annually and often engage with building management for emergency coordination.

Key concerns:

- The Facility Emergency Plan Guidelines document is not as useful as the Emergency Guide for all staff during and immediately following a disaster. Instant emergency information is more easily found using the Emergency Guide.

- The Facility Emergency Plan Guidelines is located on the Intranet. Under many emergency situations, the Intranet may not be accessible.

- There are many sections of the Facility Emergency Plan Guidelines that address evacuations and potential actions during an emergency; it would be difficult to determine which directions to follow.[14] This document should be straightforward and

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[13] California building codes are codified in the California Code of Regulations, Title 24. Title 24 includes 13 parts.; The California Fire Code is Part 9. The California Fire Code is developed by the California Building Standards Commission, as authorized by the California Health and Safety Code sections 18901-18949.31. The California Fire Code incorporates by adoption the 2012 International Fire Code of the International Code Council with necessary California amendments.

[14] For example: Page 9, "Exiting" identifies the exits available. Page 17, "Evacuation Plan" describes the types of evacuations, provides a procedure for the floor warden and Emergency Team members, and identifies the relocation meeting point. Page 29, "Exiting the Movement of People in a Fire Emergency" provides a narrative about the importance of leaving a burning building and identifies the difference between evacuation and relocation. It also states that the San Francisco fire code allows the Emergency Team four minutes to move occupants down from the top floors. Page 30, "Evacuation" per the San Francisco fire codes, discusses the difference in evacuation plans for high-rise buildings that are less than 150 feet in height, and evacuation plans in buildings that exceed 150 feet. It

relevant; however, due to the numerous references, it is unclear and could cause confusion.

- According to the DGS Building and Property Manager, the Facility Emergency Plan Guidelines are merely guidelines and not intended to be the emergency plan to direct the staff to safety.

Recommendations:

- Streamline the Facility Emergency Plan to include only relevant information that is identified only once. Include key elements that will be important to emergency coordinators during and immediately following a disaster, and to employees who may find themselves confined to the building. Ensure the plan aligns with the NIMS and ICS, and coordinate with OES. [15] The CPUC emergency operation plan(s) should include the elements identified in the OES Crosswalk (Appendix A). Provide two to four hard copies of the Facility Emergency Plan in a conspicuous location on each floor in the San Francisco office.

Technology Recovery Plan

Intended Audience: Unsure whether all management, all staff, or IT staff.

Point in time: Long-term disasters that affect the building and systems for a period longer than two weeks.

According to the California Information Security Office, the Technology Recovery Plan is just one portion of contingency planning and business continuity. A full business continuity plan includes emergency/disaster management, business resumption, and technology recovery plans. [16]

For the safety of the staff, the Technology Recovery plan includes an older version of the Facility Emergency Plan Guidelines, Emergency Team rosters, lists of fire stations, hospitals, and other information that may be intended to assist staff during an actual emergency. Although this may be good information to have, it is unlikely that the staff will use this document in an emergency. They are more likely to use the Emergency Guide.

Operationally, the Technology Recovery Plan provides a portion of what is entirely needed for full continuity planning. The Technology Recovery Plan describes steps to follow if a disaster causes all or part of the worksite to be unavailable to the point where normal operations are significantly reduced. Although the Technology Recovery Plan states that it is mainly designed for long-term disasters that affect the building and systems for period longer than two weeks, it includes some short-term emergency-related information, such as emergency staging areas, immediate communications, and action plans where normal operations are interrupted and can be resolved in two weeks or less. Additional short-term information includes a "CPUC Emergency Plan" for emergency-response procedures; floor rosters that identify the floor wardens and other Emergency Team members; lists of hospitals, police, and fire stations; and

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does not state the height of the San Francisco building, and as such, it is unclear which directions the tenants should follow. In addition, it includes superfluous and irrelevant information that could detract staff in an emergency situation. Some superfluous information includes the estimated time to evacuate a 50-story building and different evacuation plans associated with hotel high-rise buildings due to the different languages and cultures of most tenants.

[15] OES recommends using an Emergency Plan Crosswalk to ensure all essential elements are included in the department's Emergency Operation Plan (or Facility Emergency Plan and Continuity/Technology Recovery Plan), which is included in Appendix A.

[16] Technology Recovery Plan Instructions. SIMM 5325-A, (Formerly SIMM 65A). September 2013.
http://www.cio.ca.gov/Government/IT_Policy/SIMM/SIMM5325_A.PDF

floor maps with evacuation routes. Some of this information would be beneficial to the staff during a disaster; however, the Technology Recovery Plan is voluminous—about 200 pages— and not as easily accessible as the Emergency Guide.

The Technology Recovery Plan also identifies "Technology Recovery Team" members for each division, including required activities, primary persons responsible, telephone numbers for each team member, and a list of current servers and printers that are located at varied locations that may be affected in the event of a disaster.

According to the previous Executive Director, the two copies of the Technology Recovery Plan were provided to the executive director, deputy executive director, division directors, and the Chief Information Officer. They were directed to keep one copy in the employee's office; the other copy in their private residences.

A recent audit by the State Auditor revealed the following with regard to the Technology Recovery Plan:[17]

- The CPUC's inventory of its information assets is incomplete.
- It has not assessed the risks to its assets.
- It has not developed an information security plan or an incident response plan.
- The CPUC's technology recovery plan lacks key elements.

A major recommendation from this audit was to develop, implement, and maintain an entity-wide information security program, including these steps:

- Complete and maintain an inventory of all its information assets, specifically categorizing the level of required security of the information assets based on the potential impact that a loss of confidentiality, integrity, or availability of such information would have on its operations and assets.
- Develop a risk-management and privacy plan and conduct an assessment of the risks facing its information assets.
- Develop, implement, and maintain an information security plan.

CPUC management agreed with and committed to comply with the State Auditor's recommendations regarding the CPUC IT plans.

Key Concerns:

- Although the Technology Recovery Plan is very thorough, it may not be useful to employees during an emergency. The Emergency Guide will likely be the first document employees use, and the Facility Emergency Plan Guidelines provide additional short-term emergency information for the Emergency Team during or immediately following a disaster. The Technology Recovery Plan discloses that it is intended for technology recovery and long-term operations. As such, it may be more useful as part of a larger Continuity Plan, which is required by the State Administrative Manual, and recommended by OES and FEMA.

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[17] California State Auditor. "California Public Utilities Commission—It Needs to Improve the Quality of Its Consumer Complaint Data and the Controls Over Its Information Systems." Report 2014-120. April 2015.

- State Administrative Manual Section 5325 requires all departments to create a Continuity Plan, and Executive Order S-04-06 requires each agency to annually update their Continuity Plan. The Evaluation Checklist (Appendix B) is a tool used by OES to ensure that the continuous performance of the state essential functions is maintained during an emergency. The CPUC was required to submit a Continuity Plan to OES by January 2015.[18]

The following are suggestions to improve access to the important information included in the Continuity Plan:

- Provide a hard-copy of the Continuity Plan to each of the floor wardens in San Francisco.

- Provide a hard-copy of the Continuity Plan to each of the Emergency Coordinators in the satellite offices.

Recommendations:

- Develop a Continuity Plan that includes the Technology Recovery Plan and include information necessary for long-term disasters and business resumption.   Use the Cal OES Continuity Plan Checklist[19], and/or FEMA Continuity Plan Template[20] to ensure all elements of continuity planning are included. Maintain a hard-copy of the Continuity Plan at the Security Station in the San Francisco office, as well as in a conspicuous location on each floor.[21]

- Complete the agency's planned managerial response to the State Auditor's findings regarding information security, and prioritization of critical agency functions for emergency responsiveness and recovery.

CPUC Emergency Team Rosters

Intended Audience: All staff.

Point in time: During and immediately following a disaster.

The Emergency Team rosters are posted at each stairwell in the San Francisco building and provide information on persons responsible for specified tasks during emergencies. The floor wardens are responsible for the safety of the staff and assist with evacuation when appropriate, and ensure that staff shelter-in-place when appropriate.

The auditor surveyed nine persons identified as floor wardens and alternate floor wardens on the Emergency Team rosters.[22] Named floor wardens responded inconsistently and some appeared hesitant or uncertain about their responsibilities during an emergency. When asked whether they were assigned or volunteered (with the assumption that volunteers would exhibit more commitment), the survey revealed the following results:

- One was assigned to be a floor warden.

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[18] http://www.caloes.ca.gov/PlanningPreparednessSite/Documents/Schedule%20for%20Submission%20of%20Continuity%20Plans.2015.pdf

[19] Included in Appendix B.

[20] http://www.ready.gov/sites/default/files/documents/files/BusinessContinuityPlan.pdf

[21] Technology Recovery Plan should use the "Technology Recovery Plan Instructions—SIMM 5325-A".
http://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/rev427sept14/chap5300/5325.pdf

[22] The second floor roster identified a DGS employee as the Floor Warden due to construction on the re-stacking project. The DGS employee was not surveyed. As of this date, the second floor tenants have returned and are in the process of identifying the Emergency Team for the second floor.

- One did not believe that he was still an alternate floor warden.

- Two were asked to be floor wardens.

- One said that he was not an alternate floor warden.

- Four volunteered, and of the four, one asked if she could resign.

Five floor wardens and alternate floor wardens provided the following responses:

- All knew their respective roles during an emergency. One responded that his responsibility is to clear the floor; however, according to the building manager, this is not the appropriate procedure in every situation.[23]

- When questioned how floor tenants know the identities of the floor wardens, two stated that they introduce themselves to new floor tenants, two rely on the Emergency Team rosters, and one did not know.

- When asked if they were required to introduce themselves to new floor tenants, the five who responded said that they were not required.

- None of the five responders inform the Emergency Coordinator when they are on leave or are not in the building.

- Two of the five said that they know of provisions that would be made available to employees and others who may be confined inside the building during a disaster.

- One has been trained to use protective equipment.

- One conducts periodic safety inspections.

Key Concerns:

- Of the nine initial survey notices, just five responded to the complete questionnaire, which should have taken less than two to three minutes. Some never responded even though a second solicitation was sent to the non-responders. The floor warden's job is critical during a disaster. The employees may or may not know their respective floor wardens whose responsibility it is to ensure all employees safely and appropriately respond to an emergency situation.

- No rosters that identify Emergency Team members are posted in any of the satellite offices. In addition, there is no single person responsible for ensuring the satellite offices have a dedicated Safety Officer. The role of the Safety Officer in the satellite offices is important in the following ways:

    o Coordinates emergency-response drills with the building management.

    o Is the primary liaison with the Safety Coordinator in the San Francisco office.

    o Ensures all CPUC employees, regardless of location, participate in the building management fire drills and are well-versed in safe evacuation procedures.

    o Ensures employees possess the Emergency Guide.

- There are no alternate cellular phone numbers for the Emergency Team. All phone numbers on the roster are the landline phone numbers, which may not work during a disaster.

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[23] CPUC Emergency Team March 4, 2014 Meeting Minutes. Topic 3: Emergency Plan Presentation by David Omosheyin on the purpose of "Shelter in Place."

Recommendation:

- Identify an Emergency Coordinator and an Alternate Emergency Coordinator at each of the satellite CPUC offices. Conspicuously locate the rosters at every egress. To the extent this is not already done, consider whether floor warden duties should be specified in duty statements for participating employees, including appropriate weight in annual performance reviews.

Emergency Phone List

Intended Audience: All staff.

Point in time: During and immediately following a disaster.

Each employee is provided a bright red Emergency Phone List that is placed in the same pouch as their CPUC badge. The Emergency Phone List includes phone numbers for an employee hotline, the California Highway Patrol, and contact phone numbers for the San Francisco, Los Angeles, and both Sacramento offices. The phone numbers for the San Francisco and Los Angeles offices were current and appropriate.

Key Concerns:

- The phone number for the Sacramento-Natomas office is the direct line to a specific employee. Because this employee is on periodic leave, the phone may not be answered. (It should be noted that the property manager provided an extensive Emergency Procedures Manual after the Emergency Coordinator requested it.)
- The phone number to the Sacramento-Downtown office left an outgoing message that if the caller needs immediate assistance, to dial a recently retired employee on her direct line. The office response was adequate. The auditor left a message and received a call back the same day. The phone messages are being monitored. A new replacement was recently hired, as such, this may not be an issue.

Recommendations:

- Identify a manager at the San Francisco building to be the contact person for the Emergency Coordinators at each of the satellite offices. Have that manager be responsible for working with the office to ensure there is always an Emergency Coordinator in the office.

Review and Discussion of Other Emergency Procedures (beyond the indicated documents)

Sacramento-Downtown Office Procedures Manual

The Sacramento-Downtown Office Procedures Manual includes a section on Emergency Information. The manual contains extensive non-emergency information, and the section on emergency response is not prominent. As such, it may not be a sufficient emergency preparedness and response plan.

We also intended to interview the Emergency Coordinator at the Sacramento-Downtown office. In the Sacramento-Downtown office, the employee identified as the Emergency Coordinator in the Emergency Guide is retired. There is a temporary Emergency Coordinator who is aware of her responsibilities. In addition, when the auditor called the emergency phone number, an

outgoing recording directed the caller to leave a message. At the end of the day, a staff member returned the call. It is understood that as soon as a replacement is hired, he or she will be assigned the role as the Emergency Coordinator and directly answer the emergency phone line. As of this publication date, a replacement has been hired.

During a recent visit, the auditor noticed that the building management provided an emergency-response document that identified emergency exits and stairwell information. This information was well presented and appears to be sufficient to help ensure the safe evacuation of CPUC employees during or immediately following a disaster.

Key concern:

- Just one copy of building management's Emergency and Evacuation Plan was located in the conference room. The Emergency Coordinator may consider providing each employee with a hard copy of this plan.

Although the CPUC has identified the appropriate roles of floor wardens, there may not be adequate ongoing training for floor wardens on needed response actions depending on the emergency. Staff do not know who the floor wardens are, or wardens' roles and authority in an emergency situation.

The Facility Emergency Plan Guidelines states that the Safety Office and the CPUC Training Office will provide training based on the Emergency Preparedness Guidelines. It goes on to state that training may be required by the CHP annually in major state buildings and for other state facilities upon request.

The State Administrative Manual Section 1330 provides that the DGS Building and Property Management Branch services include, "Emergency Preparedness and Response." To fulfill that role, the DGS Building and Property Manager's duty statement includes the following responsibilities:

- Conducts ongoing emergency-response training for building tenants and DGS staff using training manuals and interactive discussion to ensure emergency preparedness for the facility.
- Provides safety training.
- Leads the team and acts as the Safety Coordinator in developing, executing and training the tenants in the plans for Emergency Response; Disaster Recovery; Continuity of Business Plan; and Hazardous Materials and Waste Manifest by creating and/or conducting regularly scheduled emergency-response team meetings in accordance with published guidelines and CHP and DGS guidelines.

The Internal Audit team was unable to access a DGS procedures manual that should identify the duties of the Building and Property Manager with regard to emergency preparedness and response. According to the DGS Building and Property Manager, DGS does not provide a procedures manual for property managers. In addition, the nature of the CPUC building is dissimilar to most other State buildings. In most State buildings, there are many tenants from different state agencies. The CPUC is the only tenant in the San Francisco building, and it is managed differently.

On March 18, 2015, the audit team interviewed the DGS Building and Property Manager. He informed the audit team that he holds quarterly emergency-response meetings to train the CPUC Emergency Team members (floor wardens and other staff identified as Emergency Team members). The DGS Building and Property Manager stated that last year, all four quarterly meetings were held. He also stated that due to the transition from CPUC-administered security services to DGS-administered security services, one meeting in 2015 had been missed.

When asked to provide the meeting agendas and/or meeting minutes, the DGS Building and Property Manager provided agendas from three meetings over the past two years: November 20, 2013, March 4, 2014, and September 16, 2014. Since the interview, he held another Emergency Team meeting on July 15, 2015. The auditor was unable to locate any DGS or State standards that require or recommend a specific number of meetings per year. As such, the DGS Building and Property Manager's goal is meritorious and would appear to be adequate ongoing training for the floor wardens if four meetings per year are held.

The CPUC seems to have adequately identified the appropriate roles of Emergency Team members, although the auditor could not identify definitive standards for comparison. The Emergency Team rosters identify staff on each floor with the following responsibilities:

Title per DGS	CPUC Designate (yes/no)	Number of CPUC Staff
Floor Warden	Yes	2 on floors 1, 4, 5 3 on floors 2, 3
Zone/stairwell monitors	Yes	5 on floor 1 (3 plus 2 garage) 5 on floor 2 (3 plus 2 alternates) 3 on floors 3, 4 5 on floor 5 (2, plus 1 temporary, plus 2 vacant alternates)
Exit monitors	Yes	2 on floor 1 only
Elevator and restroom monitors	Yes	1 on floor 1 (plus Mocha's personnel) 2 on floor 2 2 on floors 3 and 5 (1 plus 1 vacant) 1 on floor 4
First aid and CPR Personnel	Yes	2 on floor 1 1 on floors 2 - 4
Search Personnel	Yes	Unidentified on floor 1 (Security team and Mochas personnel) 3 on floor 2 2 on floors 3 - 5
Messengers	Yes	1 on floors 1 - 5

Staff in each of the offices, including the satellite offices, do not sufficiently know the identity of their floor wardens. The results seemed to be proportionally spread between the San Francisco, Los Angeles, and Sacramento-Downtown offices.[24] Of the 18 staff who could not identify any floor wardens, 13 were in the San Francisco office, 3 were stationed in Los Angeles, and 2 were stationed in the Sacramento-Downtown office. In offices where there was one floor warden, of the four staff interviewed, two could identify the warden and two could not. In the offices or floors where there were 2 floor wardens, 9 of the 14 staff could not identify either of the floor wardens. In the offices or floors where there were 3 floor wardens, 7 of the 10 staff could not identify any of the floor wardens.

One Floor Warden	Two Floor Wardens	Three Floor Wardens
2 staff could not identify the warden	9 staff could not identify a warden	7 staff could not identify a warden
2 staff identified the warden	3 staff identified 1 warden	2 staff identified 1 of the 3 wardens
	1 staff identified both wardens	1 staff identified 2 of the 3 wardens
		0 staff identified all 3 wardens

Perpetuation of Needed Agency Functions in an Emergency

The audit made findings that CPUC is not prepared to meet its regulatory responsibilities during and after an emergency. The primary concern is that the emergency documents intended to be used during or immediately following a disaster do not include sufficient communications alternatives if the building is uninhabitable or its telephone and IT capabilities unavailable.

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[24] The auditor did not interview staff from the Sacramento-Natomas office because most staff are field-based inspectors.

Another concern is that the CPUC has not identified or prioritized critical functions that should be restored following a disaster. The following audit questions addressed whether the CPUC is operationally prepared in the case of an emergency or disaster.

Key personnel have not been identified and trained in a state-wide or national framework to coordinate the CPUC's role in prevention, preparedness, response, and reconstruction, in the case of an emergency or disaster.

On January 7, 2015, the auditors interviewed the CPUC-contracted Security Office. When asked whether key CPUC personnel have been identified and trained in a state-wide or national framework, the Security Officer responded that he was not sure if the CPUC Deputy Executive Director had been trained. According to the Deputy Executive Director, she has not been trained in a state-wide or national framework to coordinate the CPUC's role in the case of an emergency or disaster.

On March 18, 2015 when the auditors interviewed the DGS Building and Property Manager, he responded that DGS will have a liaison to work with OES. The DGS Building and Property Manager did not identify a date that a liaison would be appointed and trained. During a follow-up phone call on August 28, 2015, the DGS Building and Property Manager stated that DGS has a designated person required to be trained in a state-wide framework. The DGS-designated person will disseminate information to the Regional Building and Property Managers, who will convey the information to the Building and Property Managers. Although the DGS Building and Property Manager believes that no CPUC coordinators will be necessary to directly coordinate with OES, management may consider designating a CPUC coordinator in case the DGS Building and Property Manager is unavailable.

The CPUC has not prioritized functions that would need to continue or intensify during a natural or man-made disaster, and other functions that could be suspended while the disaster is being addressed; and, the CPUC is somewhat prepared with back-up operations or a plan to ensure continuity of the essential CPUC functions during a catastrophic emergency.

The State Administrative Manual requires state entities to create a Continuity Plan that: (1) identifies and documents all business functions; (2) conducts a business-impact assessment that identifies critical functions and systems and prioritizes them based on necessity, threats, and vulnerabilities; and, preventive controls and countermeasures to reduce the state entity's risk level; (3) develops recovery strategies to ensure systems and functions can be brought online quickly; and, (4) includes procedures for how the state entity will stay functional in a disastrous state. In addition, the Technology Recovery Plan section of the Continuity Plan is required to categorize the required security of their information assets based on the potential impact that a loss of confidentiality, integrity, or availability of such information would have on their operations and assets. According to a State Auditor report[25] the CPUC was unable to identify all of the information systems that contain information assets that are critical to its ability to carry out its mission because the CPUC had not yet inventoried all of the information assets. As such, it has not identified the information systems that are most critical to its business functions.

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[25] California State Auditor. "California Public Utilities Commission—It Needs to Improve the Quality of Its Consumer Complaint Data and the Controls Over Its Information Systems." Report 2014-120. Page 37.

According to the interviews with the previous Executive Director, the Deputy Executive Director, and the IT Acting Chief, the CPUC has not prioritized functions that would need to continue or intensify during a natural or man-made disaster. It has also not identified responsibilities or programs that could be temporarily suspended while the disaster is being addressed.

The Technology Recover Plan states that each division will refer to its own technology recovery plan chapter detailed in this plan for guidance, once management has determined what work can be safely continued and in what priority.[26] In addition, it requires the Executive Director and/or the Deputy Executive Director to prioritize workload. It clarifies that for long-term emergencies, the Executive Director and/or the Deputy Executive Director are to prioritize work/cases and assign to available staff.[27]

The CPUC is somewhat prepared with back-up operations or a plan to ensure continuity of the essential CPUC IT functions during a catastrophic emergency, even though it has not prioritized critical functions. One member of the executive management team said that the CPUC email has continuity but Content Server does not."[28] The IT Acting Chief stated that if the San Francisco office is damaged and the IT services fail, everyone loses internet access; however, email access would be available because the email operation is located in Sacramento. The Technology Recovery Plan states that IT staff performs daily back-ups of all files on all systems. A set of weekly full back-up tapes is stored off-site in Sacramento and stored for 45 days. Off-site back-up tapes are delivered and picked up every other Friday. This system appears to be adequate so far as it goes, although we were not clear on the extent to which backup might occur between the time when the system might go down or be impaired, and the subsequent time when the (prior) backed-up information is recovered and the system restored to full operation. Information about these backup capabilities or scenarios would be an apt subject for discussion with agency management, including to provide staff with information they can use to help safeguard their work in such instances.

During our interviews with agency IT management and staff, it became apparent that considerable thought has gone into many aspects of emergency preparedness and capabilities that can help sustain continuity and recovery of vital communications and IT functions. In many instances, we also heard evidence that tradeoffs have been made in these capabilities due to resource limitations, and in particular a perceived shortage of IT budget and staff. We do not offer an opinion about the wisdom of these particular tradeoffs given the CPUC's resource constraints, but through other interviews we observed that agency leadership is not very aware of the extent of these capabilities and the reasons for which associated choices have been made – with important implications for preparedness, continuity and recovery. In our view, this is a communication gap that should be bridged.

Recommendations:

- Develop a Continuity Plan that includes the Technology Recovery Plan and include information necessary for long-term disasters and business resumption.   Use the Cal OES

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[26] 2015 Technology Recovery Plan. Page 8.

[27] 2015 Technology Recovery Plan. Page 17.

[28] IT Acting Chief. March 5, 2015.

Continuity Plan Checklist[29], and/or FEMA Continuity Plan Template[30] to ensure all elements of continuity planning are included. Maintain a hard-copy of the Continuity Plan at the Security Station in the San Francisco office, as well as in a conspicuous location on each floor.[31]

- Request the IT Chief to provide an overview to the Commission's Finance and Administration Committee addressing the security, redundancy, and continuity aspects of the CPUC's IT processes.

- Complete the agency's response to the related findings made by the State Auditor.

Clear lines of authority have been established through which the Commission as a whole, the Commission President, the Executive Director and/or other Commissioners or staff may take expeditious actions needed to permit utilities, public agencies or other entities to cope with emergency circumstances.

Public Utilities Code Section 325 provides the CPUC with the authority to adopt expedited procedures for recovery in parts of the state which have been declared national disaster areas and in which severe damage to or destruction of existing utility facilities has occurred. To comply, the CPUC has allowed utilities to fund catastrophic memorandum accounts for carriers to seek later recovery of costs. The catastrophic memorandum accounts allow the utilities to address a disaster immediately without concern that it may not recover unanticipated and reasonably incurred costs.

In addition, OES engages in a Memorandum of Understanding with CUEA, which coordinates the repair of power, water and other utilities via its affiliate businesses.[32] As an agent of the State of California through a memorandum of understanding with OES, CUEA provides emergency operations support for gas, electric, water, wastewater, telecommunications (including wireless) and petroleum pipeline utilities. The State Emergency Plan designates the California Natural Resources Agency as the Lead Agency for the utilities' emergency function that addresses how CUEA, OES, California Natural Resources Agency, and other governmental agencies work before, during and after an event to:

- Facilitate communications and cooperation between member utilities and public agencies, and with non-member utilities (where resources and priorities allow).

- Provide emergency response support wherever practical for electric, petroleum pipeline, telecommunications, gas, water and wastewater utilities.

- Support utility emergency planning, mitigation, training, exercises and education among utilities stakeholders.

CUEA serves as a point-of-contact for critical infrastructure utilities to OES and other governmental agencies before, during and after an event. CUEA, via the Executive Director, actively participates in senior leadership and executive-level planning sessions and working groups. The Executive Director serves as the OES Utilities Branch Liaison at the State Operations Center or one of the Regional Operations Centers.

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[29] Included in Appendix B.

[30] http://www.ready.gov/sites/default/files/documents/files/BusinessContinuityPlan.pdf

[31] Technology Recovery Plan should use the "Technology Recovery Plan Instructions—SIMM 5325-A".
  http://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/rev427sept14/chap5300/5325.pdf

[32] Governor's Office of Emergency Services, "State Emergency Plan, EF 12 Executive Summary." October 2013.

The following table identifies each CUEA committee and their respective responsibilities:

CUEA Committees

Committee	Activities
Energy and Pipeline	- Develop protocols for emergency response activities. - Develop and maintain mutual assistance agreements among partner stakeholders. - Conduct after-action reports and share lessons learned. - Develop and maintain emergency response personnel identification. - Educate stakeholders on potential emergency management situations and contingencies.
Telecommunications	- Conduct discussions of current and potential issues relating to emergency Telecommunications. - Conduct after-action analysis of emergency response telecommunication issues.
Training	- Coordinate stakeholder participation in state-wide emergency exercises. - Review after-action reports and develop improvements for future emergency-response training among stakeholders. - Create training web-based courses for access by stakeholders. - Conduct and participate in emergency-response exercises.
Water/Waste Water	- Conduct coordination among stakeholders on water security, preparedness, and response activities. - Provide education on stakeholder issues dealing with theft, protection of sensitive information and upgrades to security policies and technology

There is a plan to convey information to the CPUC PIO and identify how the PIO will disseminate information to CPUC staff and the public. There is a plan to identify a back-up in case the PIO is affected by the disaster.

The Technology Recovery Plan includes a section on "Communications" that identifies the responsibilities for communication to the employees, the media, and the public.[33] If the disaster occurs during normal working hours, the public-address system will be used.

Immediate and long-term communications are also identified. For immediate communications, the Technology Recovery Plan states that all managers have been issued cellular telephones to be used as a backup. If the cellular phones fail to function, the Emergency Team messengers along with on-the-spot recruits will carry messages to key stations in the building, which will be determined at the time of the disaster by the Technology Recovery Coordinator. For employee communications during and immediately following a disaster until full operations are reconstituted, the News and Public Information Office maintains an "Employee Hotline" to provide instructions to employees following a disaster. The Employee Hotline is identified on the red emergency card that is issued with each employees' CPUC identification.

[33] 2015 Technology Recovery Plan. Page 6.

The Technology Recovery Plan directs the News and Public Information Office under the direction of the Executive Director to handle communications with the media and the public. Specific instructions are provided that further specify that the Information Officer III, CEA is responsible for maintaining communication with media outlets, utility companies, and disaster centers.[34]

According to a member of executive management team, the Administrative Services Division is researching costs and procedures to initiate "push notifications." Push notification capability allows a smartphone to receive and display text message alerts even when the device's screen is locked and the CPUC office is closed. It also allows the sender, the CPUC Executive Director and/or Deputy Executive Director, to include targeted information blasts to subject-matter experts during an emergency. The Deputy Executive Director noted that one of the impediments to deploying an effective push notification system is some employees are resistant to giving their contact information, even though it would be to their potential benefit.

There is a not a plan to reconstitute normal CPUC operations after an emergency or disaster; however, there is a plan to reconstitute IT operations that includes necessary furniture and electronics. The plan is difficult to follow and replete with unnecessary or irrelevant information.

The 2015 Technology Recovery Plan includes much of the information that FEMA recommends for a continuity plan; however, the Technology Recovery Plan, according to the State Information Security Office, should be part of a larger Continuity Plan. In addition, the Technology Recovery Plan includes additional information that may not be necessary for a long-term disaster.

FEMA provides a template to assist businesses and government agencies with completing a Continuity Plan, called a Continuity Assistance Tool (CAT).[35] The CAT provides guidance and assistance for States, and other entities to identify continuity program strengths and areas for improvement.[36] The template prompts managers to provide specific information. Of the ten elements that FEMA describes as necessary to establish and maintain a comprehensive and effective continuity capability, the CPUC includes seven in the Technology Recovery Plan.

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[34] 2015 Technology Recovery Plan. Page 18.

[35] http://www.fema.gov/pdf/about/org/ncp/cat.pdf

[36] http://www.fema.gov/media-library-data/1389019980859-b64364cba1442b96dc4f4ad675f552e4/Business_ContinuityPlan_2014.pdf and http://www.fema.gov/pdf/about/org/ncp/coop/continuity_plan_non_federal.pdf.

Specific elements recommended by FEMA include:

	FEMA Elements	CPUC Includes	Comments
1.	Essential Functions	No	The Technology Recovery Plan (TRP) directs each division director to prioritize workload. With regard to IT projects, the Plan states that data communications will be established as quickly as possible, and that highest priority will be given to those applications with Commission-wide usage such as the email system, document management, and web-based systems.
2.	Orders of Succession	Yes	The TRP identifies the lines of authority, succession of management, and delegation of authority.
3.	Delegations of Authority	Yes	The TRP includes the roles and responsibilities for team members.
4.	Continuity Facilities	Yes for Fiscal Office, No for all other functions.	The TRP provides for short-term meeting places for Commissioners and management; however, for long-term alternate facilities, the TRP states that the Management Services Branch will be responsible for identifying any usable locations and arranging for their use. It does not include logistics for relocation to alternate worksites.
5.	Continuity Communications	Yes	The TRP identifies continuity communications; however, some cell phone numbers are not included in the Plan. The TRP includes information on the interaction with external organizations including contractors and vendors.
6.	Vital Records Management	Yes for Contracts Office, No for all other functions.	
7.	Human Capital	Yes	The TRP identifies continuity personnel and all other special categories of employees who have not been designated as continuity personnel.
8.	Test, Training, and Exercise Business Continuity Program	No	
9.	Devolution of Control and Direction	No	The TRP does not address the full spectrum of all-hazard/threat emergency events that may render an organization's leadership or staff unavailable to support, or incapable of supporting the execution of the organization's essential functions from either its primary operating facility or continuity facility. The TRP does not identify prioritized essential functions, defines tasks that support those essential functions, and determines the necessary resources to facilitate those functions.

		The TRP includes:
10. Reconstitution Operations	Somewhat	• Resource requirements for "Back to Normal" operation for each division.
		• Resource requirements and data restoration plan for the recovery of IT (networks and required connectivity, servers, desktop/laptops, wireless devices, applications, and data)
		The TRP does not include recovery time objectives for business processes, IT, and data restoration.

FEMA recommends that the continuity plan be distributed to members of the business continuity team and management. It recommends that the business continuity team leader maintain a master copy of the document, and printed copies should reside in the room designated as the emergency operations center. FEMA also recommends that multiple copies should be stored within the emergency operations center to ensure that team members can quickly review roles, responsibilities, tasks, and reference information when the team is activated.

OES also provides continuity guidance and provides a Continuity Plan Evaluation Checklist.[37] The Continuity Plan Evaluation Checklist is a self-certification that an agency has developed and is maintaining a continuity plan that reflects the most current state and federal continuity planning standards and best practices. The Checklist documents the organization's Continuity Program and Plan status.

Beginning in 2010, the Continuity Plan Evaluation Checklist is to be completed by the agency's continuity planning team and signed by the secretary or director. The Continuity Plan Approvals page is used to indicate that the organization's senior level officials have read the Continuity Plan and understand their roles and responsibilities should the organization's business essential functions be disrupted. The Checklist should then be mailed to OES according to the Continuity Planning Guidance Document.

The Technology Recovery Plan also includes information for a short-term disaster, which may distract from the primary function of the document. With regard to short-term disasters, other documents such as the Emergency Guide might be more helpful and expeditious during an emergency.

The following are suggestions to focus the Technology Recovery Plan on long-term disasters:

- Include the Technology Recovery Plan as a part of a larger Continuity Plan as described in "Recommendations."
- Include alternate cellular telephone numbers or other contact information for all emergency and recovery team personnel.

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[37] Appendix B.
http://www.caloes.ca.gov/PlanningPreparednessSite/Documents/Continuity%20Plan%20Evaluation%20Checklist_2014.pdf#search=Continuity%2520checklist.

Recommendation

- As recommended above, develop a Continuity Plan that includes the Technology Recovery Plan and include information necessary for long-term disasters and business resumption. Use the Cal OES Continuity Plan Checklist[38], and/or FEMA Continuity Plan Template[39] to ensure all elements of continuity planning are included. Maintain a hard-copy of the Continuity Plan at the Security Station in the San Francisco office, as well as in a conspicuous location on each floor.

CPUC managers and staff are aware of their responsibility to render all possible assistance to the Governor and to the Director of Emergency Services during an emergency.

Most CPUC managers and staff are aware of their responsibility to render all possible assistance to the Governor and to the Director of OES during an emergency. Of the six managers interviewed, four were aware and two were not. Although the specific responses were not documented, almost all staff were aware of their responsibility as state employees. It is noted, however, that the safety and security of family is a primary priority, and responsibility to the Governor is a secondary priority.

Additional Concerns

Transfer of Authority for Security, from CPUC to DGS

As of July 1, 2015, DGS is responsible for emergency preparedness at the San Francisco building, and the CPUC no longer has its own Security Officer on site full-time. Over the past 30 years, the CPUC has been retiring the bond debt associated with the San Francisco building through a separate appropriation in the annual budget acts. As long as the bond debt was paid through the CPUC budget-act appropriation, the CPUC was responsible for security services. To fulfill this responsibility, the CPUC contracted with Veritas, who provided the CPUC with an Emergency Coordinator as well as general building security personnel and services.

The State Administrative Manual Section 1330 states that the mission of DGS Building and Property Management Branch is to manage, maintain, and operate state buildings and grounds in order to provide tenants and the public with a safe and healthy environment in which to conduct business. Section 1330 specifically states that DGS is to provide, "Emergency Preparedness and Response," in addition to 14 other items of responsibility.

The DGS Building and Property Manager may be too oversubscribed to serve the CPUC San Francisco building with the same level of service that Veritas provided. The audit revealed that the DGS Building and Property Manager is responsible for management of 11 state buildings throughout the San Francisco Bay Area, including the CPUC's San Francisco building. Five of the buildings are located in San Jose.

There may exist some level of uncertainty with regard to who backs up the DGS Building and Property Manager. The DGS Building and Property Manager explained that when he is absent, the Chief Engineer is the alternate Emergency Coordinator; however, if the DGS Building and Property Manager is not present for a fire drill or other emergency, the CPUC Manager of

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[38] Included in Appendix B.

[39] http://www.ready.gov/sites/default/files/documents/files/BusinessContinuityPlan.pdf

Business Services is the alternate. The State Fire Marshall requires at least one fire drill per year. Last year, the CPUC conducted one formal drill.[40] According to the DGS Building and Property Manager, to conduct a fire drill, all building manager staff must be present (or designated an alternate).

A recent interview with the DGS Building and Property Manager revealed that the Facility Emergency Plan Guidelines were only intended to be "guidelines" and not the entire Facility Emergency Plan. The DGS Building and Property Manager had previously created a Facility Emergency Plan, in compliance with the City and County of San Francisco and the California State Fire Marshal requirements. He had provided an initial Facility Emergency Plan to the CPUC Safety Office. He said that he will provide an updated Facility Emergency Plan by the end of September 2015.

Recommendation:

- The DGS Building and Property Manager and CPUC management should institute semi-annual emergency preparedness meetings designed to ensure that all associated responsibilities are clearly assigned and fulfilled as between the two parties. Among other topics, these might include updating the Emergency Team rosters, holding the quarterly meetings with the Emergency Team, ensuring adequate training for Emergency Team members, maintaining emergency supplies, conducting fire drills, and writing and updating the Facility Emergency Plan.

Earthquake Safety: Unattached or Unbraced Building Contents

The audit revealed a widespread problem associated with unsecured shelves and file cabinets. In the case of an earthquake, unsecured furniture and bookcases pose a safety risk to those in the building or trying to evacuate. Shelving units may slide or overturn and the contents may become dislodged or fall. Where there are rows of freestanding or poorly anchored shelves, the failure of a few may result in progressive collapse of many.

The large storage areas in the basement (which contain furniture, bulk paper and the like) contain a number of heavy steel storage shelves along the walls. The storage shelves appear to be secured by a steel cable that runs through the shelves and attaches to the wallboard with a molly bolt on either end. The steel cable may not be sufficient to hold up what could be several hundred pounds. In one instance, one end of the cable was not secured to the wall. As such, there is a row of shelves that lacks any earthquake protection.

In the case of an earthquake, unsecured bookshelves could compromise employee safety. The audit team examined all large bookcases, filing cabinets, and shelves throughout the San Francisco building.[41] The criterion was any storage system over five feet in height.

We inspected all open offices, break rooms, storage rooms, conference rooms, and common areas on each of the other floors. A few offices were closed and were not inspected. Units examined included wall shelves, cabinets, book cases, and refrigerators.

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[40] The CPUC experienced two additional evacuations when the fire alarms sounded after detecting smoke from burned popcorn.

[41] The team examined storage racks and shelves on floors one, three, four, and five. The second floor was not inspected due to the restacking project.

With regard to applicable standards, FEMA references American Society of Civil Engineers (ASCE); however, that source does not provide clear guidelines for securing cabinets and shelves. FEMA states, "Permanent floor-supported shelving or storage cabinets over 6 feet tall must be designed as architectural components per ASCE 7-10 *Minimum Design Loads for Buildings* (ASCE 2010). Bracing and anchorage for these units should be designed considering the weight of the unit and weight of shelved contents." It goes on to state, "For sheet metal cabinets or shelving, anchor units to floor, tie back-to-back units together, strap rows of units together across the top, or anchor units to an adjacent wall. Light duty steel storage racks may additionally require cross bracing…. Any connections to stud walls must engage the structural studs." FEMA also advises, "Do not locate cabinets or racks adjacent to doors or exits if their failure would block the exit.[42]   Under Seismic Mitigation Considerations, FEMA states, "Bookcases and shelving should be anchored to an adjacent stud wall or concrete masonry wall…. Any connections to stud walls must engage the structural studs; do not rely on gypsum or plaster to support shelving."[43]

The California Seismic Safety Commission recommends that commercial property owners fasten heavy equipment and furniture to the floor or to the studs in the walls, and store heavy objects on low shelves or in areas that pose fewer hazards. It also states, "Make sure your employees or tenants secure items such as tall furniture or equipment when it is installed or moved." The Seismic Safety Commission also provides a diagram that shows how to bolt bookcases and file cabinets to each other and to the studs. [44]

From these sources we took the point of view that taller, substantial objects should be secured so they won't fall over in an earthquake.

Key Concerns:

- Of the 507 units inspected, just 101 were secured and 406 were not adequately secured. Of those secured, 7 stored large computer equipment. All 39 units in the storage room were unsecured.

- It appeared as if some units were detached during the construction work for the restack project on that floor; however, they were not subsequently reattached to the wall when the units were moved back in. In other instances, such as copy rooms where the units were not affected by the restack project, tall shelves with heavy contents were not adequately secured.

- New large filing cabinets throughout the CPUC were procured as part of the restack project. Most of the cabinets are located in open common areas. It is not clear whether the new cabinets are adequately secured to withstand a moderate earthquake.

Recommendation:

- Ensure building engineers secure the cabinets, shelves, and other tall and heavy objects pursuant to FEMA recommendations and California Seismic Safety Commission checklist.[45]

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[42] http://www/fema/gov/plan/prevent/earthquake/fema74/ Chapter 6.5 Furniture, Fixtures, Equipment and Contents, 6.5.1 Storage Racks, 6.5.1.1 Light Duty Shelving. Pages 6-437 and 6-438.

[43] Ibid. Page 6-455.

[44] California Seismic Safety Commission. "Commercial Property Owner's Guide to Earthquake Safety." Page 27.

[45] California Seismic Safety Commission. "Commercial Property Owner's Guide to Earthquake Safety." Page 35.

Emergency Communication

If the building is uninhabitable, the electricity service is disrupted, cellular telephone service is down, or the email servers are down, the CPUC commissioners, executive team, and management would not have a way to communicate with each other using the facilities the building supports – such as the CPUC phone system, and email and website. Alternatives should be provided for in advance, and tested periodically.

The following are suggestions that may assist CPUC management and staff during and/or following a disaster:

- Provide all Commissioners, management staff and key subject matter experts (SMEs) an alternate emergency email account that is hosted on a non-CPUC server, such as gmail, yahoo, etc.

- Establish several conference call lines for use during emergencies (e.g. using free or low-cost web-based solutions).

- Create an emergency contact directory containing the following information; update it regularly, and distribute two current copies (for home and office) to relevant personnel:
  - o Wireless and home telephone numbers, and backup email addresses for Commissioners and their principal advisors, and CPUC executive and management staff.
  - o Wireless and home telephone numbers, and backup email addresses for CPUC SMEs on matters that might require emergency attention or decision making.
  - o Key agency contacts with whom the CPUC might interface (e.g. OES, Governor's Office staff, Cal EPA, ARB, etc.).
  - o Selected media and press contact information.
  - o Selected utility executive and emergency contact information.
  - o Emergency conference call phone numbers and access codes.

- As part of the continuity discussion we recommend take place between IT management and the agency's leadership and senior management, consider the establishment of an alternative or "mirror" website or other redundancy approach that would permit the CPUC to maintain a continuous web presence in any emergency.

- Periodically test and verify the functionality of alternative emergency contact methods, including the ability of agency staff and leadership to use them (e.g. respond to a test email sent to an emergency alternate address).

- As part of these arrangements, provide guidance to agency staff and leadership as to the appropriate use of State communications services and facilities, and the need to preserve public records should such be created on alternatives that are used in an emergency.

Recommendation:

- Create, distribute and keep current an Emergency Contacts and Operations directory containing alternative telephone numbers and email addresses for Commissioners, executive management and key CPUC staff subject matter experts, along with key external contacts such as utility executives, Governor's Office and OES, and the media.

CPUC Management Response

Memorandum

Date: November 25, 2015

To: Carl Danner, Chief
California Public Utilities Commission
Internal Audit Unit

From: Michelle Cooke
Deputy Executive Director
Administrative Services

Subject: Response to Emergency Preparedness Audit Recommendation

Administrative Services has reviewed the findings and recommendations from the CPUC Emergency Preparedness Audit, and we agree with the overall findings. Administrative Services is working on an action plan that will incorporate the recommendations provided for each of the audit findings

Recommendation

☐ Streamline the Facility Emergency Plan to include only relevant information that is identified only once. Include key elements that will be important to emergency coordinators during and immediately following a disaster, and to employees who may find themselves confined to the building. Ensure the plan aligns with the National Incident Management System (NIMS) and Incident Command System (ICS), and coordinate with OES. [1] The CPUC emergency operation plan(s) should include the elements identified in the OES Crosswalk (Appendix A). Provide two to four hard copies of the Facility Emergency Plan in a conspicuous location on each floor in the San Francisco office.

> Response: Administrative Services agrees with the findings related to this recommendation. Since the buildings that CPUC occupies are either DGS owed or are leased property, our plans are not an independent product and we must reach out to these key resources to obtain their approval of all emergency/evacuation plans.

☐ Develop a Continuity Plan that includes the Technology Recovery Plan and include information necessary for long-term disasters and business resumption. Use the Cal OES Continuity Plan Checklist[2], and/or Federal Emergency Management Agency (FEMA) Continuity Plan Template[3] to ensure all elements of continuity planning are included. Maintain a hard-copy of the Continuity Plan at the Security Station in the San Francisco office, as well as in a conspicuous location on each floor.[4]

> Response: CPUC Information technology staff has been working with Dell Secure Works consultants to update Technology Recovery Plan and Business Continuity Plan. The Business Continuity Plan will also receive input from CPUC management before it is finalized.

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[1] OES recommends using an Emergency Plan Crosswalk to ensure all essential elements are included in the department's Emergency Operation Plan (or Facility Emergency Plan and Continuity/Technology Recovery Plan), which is included in Appendix A.
[2] Included in Appendix B.
[3] http://www.ready.gov/sites/default/files/documents/files/BusinessContinuityPlan.pdf
[4] Technology Recovery Plan should use the "Technology Recovery Plan Instructions—SIMM 5325-A".
http://www.documents.dgs.ca.gov/sam/SamPrint/new/sam_master/rev427sept14/chap5300/5325.pdf

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☐ Complete the agency's planned managerial response to the State Auditor's findings regarding information security, and prioritization of critical agency functions for emergency responsiveness and recovery.

Response: CPUC Information Technology staff has contracted the services of Dell Secure Works to assist CPUC staff to complete the following tasks:
- Information Assess Risk Report
- Vulnerability scanning
- Penetration testing
- Information Security Assessment report
- Information security Plan
- Business continuity
- Risk management and Privacy Plan

☐ Identify an Emergency Coordinator and an Alternate Emergency Coordinator at each of the satellite CPUC offices. Conspicuously locate the rosters at every egress. To the extent this is not already done, consider whether floor warden duties should be specified in duty statements for participating employees, including appropriate weight in annual performance reviews.

Response: There is an Emergency Coordinator and Alternate Coordinators at each CPUC satellite office. For DGS Owned buildings the Building Manager is the primary Emergency Coordinator and the Alternate Emergency Coordinator is the Security Manager. SF and all satellite offices have a CPUC Coordinator and Alternative. Posting rosters at every egress locations has been done since at least the early 2000s. Since DGS's took over the 505 building CPUC Business Services role has been to provide DGS Building Manager with monthly roster updates. Administrative Services will continue maintain a cooperative and informative relationship with the DGS on this matter.

☐ Identify a manager at the San Francisco building to be the contact person for the Emergency Coordinators at each of the satellite offices. Have that manager be responsible for working with the office to ensure there is always an Emergency Coordinator in the office.

Response: CPUC Business Services Manager has always been the Primary contact for all satellite office coordinators to report emergency incidents and to update the CPUC rosters. These areas are checked periodically by the Business Services Manager via its Facilities Office for current updates.

☐ Request the IT Chief to provide an overview to the Commission's Finance and Administration Committee on the security, redundancies, and continuity capabilities of the CPUC's IT processes.

Response: We will work with the Committee to schedule the requested overview.

☐ The DGS Building and Property Manager and CPUC management should institute semi-annual emergency preparedness meetings designed to ensure that all associated responsibilities are clearly assigned and fulfilled as between the two parties. Among other topics, these might include updating the Emergency Team rosters, holding the quarterly meetings with the Emergency Team, ensuring

adequate training for Emergency Team members, maintaining emergency supplies, conducting fire drills, and writing and updating the Facility Emergency Plan.

Response: Administrative Services agrees to the Audit recommendations as it pertain to leased satellite offices and will strive to work with the property management for semi-annual emergency preparedness meetings. For State owed buildings, bi-annual emergency meetings are scheduled and facilitated by DGS Building Managers and emergency matters are also covered in monthly tenant meetings.

☐ Ensure that building engineers secure cabinets, shelves and other tall and heavy objects pursuant to FEMA recommendations and the California Seismic Safety Commission checklist.

Response: Administrative Services agrees that cabinets, shelves, and other tall and heavy items should be secured. If an item is found not to be secured then it is immediately reported to the DGS Building Manager, whose responsibility it is to secure items to walls.

☐ Create, distribute and keep current an Emergency Contacts and Operations directory containing alternative telephone numbers and email addresses for Commissioners, executive management and skey CPUC staff subject matter experts, along with key external contacts such as utility executives, Governor's Office and OES, and the media.

Response: The CPUC is in the process of acquiring an emergency notification system. This system will have capability to build hierarchy of contacts in case of emergency and is independent of the telecom and IT resources on site.

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Internal Audit Response to Management Response

The Internal Audit Unit appreciates the response of management to our audit recommendations, and would offer only a few additional observations.

With regard to streamlining the Facility Emergency Plan, developing a Continuity Plan, and responding to the State Auditor, we appreciate management's response while recommending that a target date of completion be set for each of the items.

We note management's response that there currently exist designated Emergency Coordinators and Alternate Emergency Coordinator at each of the satellite offices. We note that the latter had not been identified at the time of the audit for both of the Sacramento-based satellite offices, but appreciate that this has since occurred.

We note that Administrative Services agrees that cabinets, shelves, and other tall heavy objects should be adequately secured, and management identified a policy for securing these items. Notwithstanding this policy at the time of the audit, 80 percent of bookcases and shelves that could cause harm to employees and facilities in the case of an earthquake were not secured. It is unknown whether this has been rectified. We would suggest that CPUC management provide the DGS Building Manager the list of unsecured items provided by Internal Audit, in addition to directives to proactively identify other items that may pose a safety risk in the case of a fire or earthquake, and ask the DGS Building Manager to secure those items by a specified date.

With regard to the recommendation to create, distribute, and keep current an Emergency Contacts and Operations directory containing alternative telephone numbers and email addresses for CPUC commissioners and key staff, it is unclear whether management concurs or differs with this recommendation. Management responded that it is in the process of acquiring an emergency notification system. Although an emergency notification system may be helpful with proactively notifying CPUC commissioners and staff in an emergency, it would serve a different purpose than the recommendation – which identifies a resource that would help staff and Commissioners target and proactively communicate with key employees in the case where in the case where the email servers and phone system may be down. In addition, it is unclear what alternative approach management will have in place until the emergency notification system is fully implemented.

Appendix

A. California Office of Emergency Services— Emergency Operations Plan "Crosswalk"

OES recommends using an Emergency Plan Crosswalk to ensure all essential elements are included in the department's Emergency Operation Plan (or Facility Emergency Plan and Continuity/Technology Recovery Plan). As part of our audit analysis, we used this document to help reconcile the CPUC's available information to the OES protocol. This appendix presents that reconciliation, for readers who have an interest in these specifics.

According to OES, the emergency operation plan facilitates response and short-term recovery activities, which set the stage for successful long-term recovery. It should drive decisions on long-term prevention and mitigation efforts or risk-based preparedness measures directed at specific hazards. A Plan should be flexible enough for use in all emergencies. A complete Emergency Operation Plan should describe the purpose of the plan, situation and assumptions, concept of operations, organization and assignment of responsibilities, administration and logistics, plan development and maintenance, and authorities and references. It should also contain functional annexes, hazard-specific appendices, and a glossary. Emergency Operation Plans should predesignate jurisdictional and/or functional area representatives to the IC or UC whenever possible to facilitate responsive and collaborative incident management. While the preparedness of the public is generally beyond the scope of the NIMS, EOPs should also include pre-incident and post-incident public awareness, education, and communications plans and protocols. (http://www.fema.gov/nimcast)

OES developed this checklist of emergency plan elements, known as a "crosswalk" to assist planners to ensure that the fundamental SEMS and NIMS content is included in emergency operations plans. The current version of the crosswalk can be found on the OES website. For each element, OES requests that the department describe the location in the plan(s) where the element is described (page number, chapter, section, paragraph, etc.). If this element is not applicable to the plan, list it as such. A completed copy of this crosswalk should accompany each local emergency operation plan (or combination of Facility Emergency Plan and Technology Recovery Plan) submitted to OES office for review.

We reviewed each CPUC document to determine whether the CPUC plans include the essential elements. We did not specify the level of detail required by OES. This exercise was intended to generally determine whether the CPUC documents include the elements, and if so, which document.

The table below uses the following legend:
Int   Internal—safety of CPUC employees
Ext   External—statewide or federal Emergency Planning, or Regulated Utilities
TRP   Technology Review Plan
FEPG   Facility Emergency Plan Guidelines
EG   Emergency Guide
All 3   All of the above three documents

Emergency Operations Plan Crosswalk Element	Int/ Ext	Doc. Where Located	Comments
FOREWORD SECTION			
1. Foreword/Preface/Introduction: Provides a foreword, preface or introduction that explains why the plan was developed and how the plan is to be used (SEMS EOP Element). This section should describe that the plan is flexible enough to use in all emergencies and will facilitate response and short-term recovery activities (NIMS EOP Element).	Int	TRP	
2. Plan Concurrence: Provides evidence that the assigned emergency agencies are in agreement with how the plan describes their tasks. This may be in the form of a letter of concurrence or a sign-off sheet (SEMS EOP Element).	Ext	No	
3. Letter of Approval: Provides evidence of a dated letter of promulgation or resolution from the governing board (SEMS EOP Element).	Ext	No	
PART I: BASIC PLAN			
4. Table of Contents: Listing of where significant parts of the plan are located by page number and subsection of the plan (SEMS EOP Element).	Both	TRP FEPG	
5. Purpose: Describes the EOP purpose (NIMS EOP Element).	Both	All 3	
6. Scope: Defines the scope of preparedness and incident management activities necessary for the jurisdiction (NIMS EOP Element).	Both	All 3	
7. Authorities and References: Describes the EOP authorities and references (NIMS EOP Element). Provides authorities for the plan and its development. Identifies the references used in developing the plan (SEMS EOP Elements).	Ext	FEPG	Not clear
8. Situation and Assumptions: Describes the EOP situation and assumptions (NIMS EOP Element). Summarizes the Jurisdictional Hazard Analysis. Includes a description of potential hazards. This could be in a narrative with maps, schematic, or matrix indicating severity potential, affected population estimates, frequency and geographical characteristics of the jurisdiction. This and other relevant information should be included to provide a rationale for prioritizing emergency preparedness actions for specific hazards (SEMS EOP Element).	Both	TRP EG	
9. Organization, Roles and Responsibilities: Describes organizational structures, roles and responsibilities, policies and protocols for providing emergency support (NIMS EOP Element).	Int	All 3	
10. Standardized Emergency Management System (SEMS) based Emergency Organization: Identifies agency roles and responsibilities during disaster situation, include an emergency organization chart. Indicate how the jurisdiction fulfills the five SEMS sections (Management, Plans/Intelligence, Operations, Logistics, Finance/Administration) (SEMS EOP Element).	Int	No	

Emergency Operations Plan Crosswalk Element	Int/ Ext	Doc. Where Located	Comments
11. Emergency Operations Center Organization: Describes the roles and responsibilities of agencies and departments in the EOC, including who is responsible for ensuring the readiness of the EOC (SEMS EOP Element).	**Ext**	**No**	
12. Involvement of special districts, private and non-profit agencies: Identifies emergency responsibilities of special districts, private and volunteer agencies and their roles in the EOC, REOC, Incident Command Post, or other emergency facility (SEMS EOP Element).	**Ext**	**No**	
13. Essential Facilities-Primary and Alternate EOC: Indicates the location of both the primary and alternate EOC and what conditions would cause the alternate EOC to be activated (SEMS EOP Element).	**Ext**	**TRP**	
14. Essential Facilities-Activation/Deactivation of EOC: Indicates how, when and by whom, the Emergency Operations Center will be activated and deactivated (SEMS EOP Element).	**Int**	**FEPG**	**Somewhat**
15. Essential Facilities-Alternate Government Facilities: Indicates an alternate seat of government to serve as government offices for performing day-to-day functions and a facility that could serve as an alternate emergency operations center (EOC) (SEMS EOP Element).	**Ext**	**TRP**	
16. Essential Facilities-Americans with Disabilities Act: Identifies how shelter facilities, evacuation/movement, warning, etc. procedures accommodate the provisions of the Americans with Disabilities Act (SEMS EOP Element).	**Int**	**FEPG**	
17. Continuity of Government: Provides persons by position to succeed key government officials and members of the emergency management organization. Also indicates the level and duration of authority these individuals would assume (Gov. Code Sec. 8560) (SEMS EOP Element).	**Ext**	**TRP**	
18. Vital Record Retention: Indicates how vital records are to be protected in the event of a disaster. Most data storage systems have a back-up system. Identify the system, archiving schedules and who has responsibility for its maintenance (SEMS EOP Element).	**Ext**	**TRP**	
19. Concept of Operations: Describes the EOP concept of operations (NIMS EOP Element). Includes the principles and methods used to carry out emergency operations, including the provision of emergency services by government agencies (Gov. Code Sec. 8560).	**Ext**	**FEPG**	
20. Notification and Mobilization: Describes how resources are mobilized and managed (Gov. Code Sec. 8560). Includes methods to contact emergency response personnel during normal and after-hours. This may be in the form of an alert list (SEMS EOP Format).	**Both**	**FEPG**	
21. SEMS Coordination Levels: Indicates how the jurisdiction coordinates between the different SEMS levels (field, local, operational areas, region, state), how information is exchanged, how and when multi/inter-agency coordination and unified	**Ext**	**No**	

Emergency Operations Plan Crosswalk Element	Int/ Ext	Doc. Where Located	Comments
command are used. The Operational Area agreement should also be referenced; and the plan should indicate who performs the Operational Area responsibilities (SEMS EOP Element).			
22. Incident Command System (ICS): Indicates how ICS will be used in the field. This should include the interface between the field Incident Command Post and the EOC. It should also indicate methods of integrating state and federal field activities into local emergency management operations (SEMS EOP Element). Pre-designates jurisdictional and/or functional area representatives to the IC or UC whenever possible (NIMS EOP Element).	Ext	No	
23. Field/EOC Communications and Coordination: Indicates how the EOC will coordinate and communicate with field units, operational areas, regions and other entities, including the use of the Response Information Management System (SEMS EOP Element).	Ext	No	
24. Field/EOC Direction and Control Interface: Describes the direction and control relationship between the field responders (ICS) and the EOC. This should include the reporting of pertinent information (SEMS EOP Element).	Ext	No	
25. Field Coordination with Department Operations Centers (DOCs) and EOCs: Includes the use and coordination of DOCs and how they fit into the emergency management organization (SEMS EOP Element).	Ext	No	
26. Mutual Aid: Includes a general description of mutual aid system and processes (Gov. Code Sec. 8560) (SEMS EOP Element).	Ext	No	
27. Emergency Proclamations: Indicates the purpose and process of emergency declarations (include samples) (SEMS EOP Element).	Ext	No	
28. Public Information: Includes pre-incident and post-incident public awareness, education and communications plans and protocols (NIMS EOP Element). (Gov. Code Sec. 8560)	Ext	TRP	
29. Recovery Overview: Includes a general recovery concept of operations (SEMS EOP Element).	Ext	TRP	
30. Recovery Organization: Provides a description of the recovery organization along with a diagram (SEMS EOP Element).	Ext	TRP	
31. Recovery Damage Assessment: Describes the damage assessment organization and responsibilities (SEMS EOP Element).	Ext	TRP	
32. Recovery Documentation: Describes the documentation process (SEMS EOP Element).	Ext	No	
33. Recovery After-action Reports: Includes the CalEMA After-Action Questionnaire (SEMS EOP Element).	Ext	No	
34. Recovery Disaster Assistance: Describes the different programs, their purpose, restrictions and application process. Include Public Assistance, Individual Assistance and Hazard	Int	No	

Emergency Operations Plan Crosswalk Element	Int/ Ext	Doc. Where Located	Comments
Mitigation Grant programs (SEMS EOP Element).			
35. Administration and Logistics: Describes the administration and logistics of the EOP (NIMS EOP Element).	**Ext**	**TRP**	
36. Emergency Plan Maintenance and Distribution: Describes EOP development and maintenance (NIMS EOP Element). Who maintains the emergency plan? What is the process? Details schedules for modifications, revision list, distribution list and who has responsibility for ensuring the plan is kept up-to-date (SEMS EOP Element).	**Both**	**FEPG**	
37. Standard Operating Procedures (SOP) Development: Ensures emergency response agencies develop and maintain SOPs. Indicate in the plan the relationship and purpose of SOPs to the plan (SEMS EOP Element).	**Both**	**FEPG**	
38. Training and Exercises: Describes the training and exercise programs for the jurisdiction, including who has personal responsibility for the programs. Training should include EOP orientation, SEMS training, a full-scale exercise and other training as deemed necessary (SEMS EOP Element).	**Ext**	**No**	
PART II: FUNCTIONAL ANNEXES			
39. Functional Annexes: Contains functional annexes (NIMS EOP Element). Suggested annexes should address the five emergency management functions. They may be as simple as a checklist or as complex as to include function-based concepts of operation.	**Ext**	**No**	
40. Management Section: Should include the following activities and responsibilities (SEMS EOP Element): • Overall EOC management • Public Information assignment • Identification of a media center • Rumor control • Public inquires • Provision for public safety communications and policy • Identification of a Safety Officer • Facility security • Agency liaison • State/federal field activity coordination	**Ext**	**TRP** **All except State/federal field activity coordination.**	
41. Operations Section: Should include the following activities and responsibilities (SEMS EOP Element): • General warning • Special population warning • Authority to activate Emergency Alert System • Inmate evacuation • Traffic direction and control • Debris removal • Evacuation • Evacuation and care for pets and livestock • Access control • Hazardous materials management	**Both**	**FEPG**	**Only some of the elements.**

Emergency Operations Plan Crosswalk Element	Int/ Ext	Doc. Where Located	Comments
• Coroner operations • Emergency medical care • Transportation management • Crisis counseling for emergency responders • Urban search and rescue • Disease prevention and control • Utility restoration • Flood operations • Initial damage assessments • Safety assessments • Shelter and feeding operations • Emergency food and water distribution			
42. Planning/Intelligence Section: Should include the following activities and responsibilities (SEMS EOP Element): • Situation status • Situation analysis • Information display • Documentation • Advance planning • Technical services • Action planning • Demobilization	**Both**	**No**	
43. Logistics Section: Should include the following activities and responsibilities (SEMS EOP Element): • Field incident support • Communications support • Transportation support • Personnel • Supply and procurement • Resource tracking • Sanitation services • Computer support	**Both**	**TRP** **Only Communications support and Computer Support**	
44. Finance/Administration Section: Should include the following activities and responsibilities (SEMS EOP Element): • Fiscal management • Time-keeping • Purchasing • Compensation and claims • Cost recovery • Travel request, forms, claims	**Both**	**TRP**	
PART III: APPENDICES			
45. Appendices: Contains hazard-specific appendices (NIMS EOP Element).	**Int**	**FEPG EG**	
46. Hazardous Materials: Incorporates or references the Hazardous Materials Area Plan requirements into the emergency plan. (SEMS EOP Element).	**Int**	**FEPG**	
47. Dams: If there are dams in the area, the plan should have, or reference inundation maps that indicate what areas could	**Int**	**No**	

Emergency Operations Plan Crosswalk Element	Int/ Ext	Doc. Where Located	Comments
flood, the time the flood wave arrives at specific locations and when the water will recede. Operational information necessary to carry-out an evacuation of all potentially flooded areas should be indicated for each dam. The information required for each dam should include shelter locations, location of critical facilities such as government center hospitals, nursing homes, schools, day care centers, etc. Each dam evacuation plan should also indicate other facilities with large concentrations of people with disabilities or persons that lack their own transportation, or requiring special assistance (SEMS EOP Element).			
48. Other Hazards Specific to the Jurisdiction: The threat of domestic terrorism has gained the interest of emergency managers in recent years. Most of the state is prone to damages from earthquakes. Some coastal jurisdictions could be affected by tsunamis. Some alpine areas of the state are prone to avalanches and some to volcanic activity. The EOP should address response activities that are specific to all-hazards that pose a threat to the jurisdiction (SEMS EOP Element).	**Both**	**No**	
49. Glossary of Terms: Contains a glossary of terms (NIMS EOP Element). Provide a glossary that includes all the terms used throughout the plan (SEMS EOP Element).	**Both**	**No**	
50. Resources: Identifies sources for materials and supplies internally and externally (SEMS EOP Element).	**Both**	**No**	
51. Contact List: Includes a list of agencies and personnel not internal to the organization but critical to emergency operations (SEMS EOP Element).	**Int**	**EG**	
52. Supporting Documentation: Includes material necessary to self-certify compliance with SEMS. This should include evidence of training, planning, exercises and performance (SEMS EOP Element).	**Both**	**No**	

Emergency Operations Plan Crosswalk Totals

	Tech. Rec. Plan	Fac. Emerg. Plan Gdlns.	Emerg. Guide	> 1	None	Total
Internal	1	3	1	2	3	**10**
External	10	2	0	0	15	**27**
Both	2	3	0	5	5	**15**
Total	**13**	**8**	**1**	**7**	**23**	**52**

B. Continuity Plan Evaluation Checklist

Executive Order S-04-06 requires each agency to annually update their Continuity Plan. OES provides the Evaluation Checklist as a tool to ensure that the continuous performance of the state essential functions is maintained during an emergency. According to OES, by using this process, California is able to continue vital governmental services and general operations in an all hazard environment.

As a reference, we include a copy of the OES Evaluation Checklist in this appendix. Unlike Appendix A and the Crosswalk, in this instance we did not perform an analysis or reconciliation of these requirements as against the CPUC's documentation.

The Continuity Plan evaluation checklist allows organizations to self-assess their Continuity Plan and Program to ensure preparedness levels are being maintained or identify where improvements are needed. This document may be used in conjunction with the FEMA Continuity Plan Template for Non-Federal Entities.[46]

OES Instructions: This evaluation checklist should be used to determine whether all the continuity program elements are addressed in the departmental Continuity Plan (or other related planning documents). Review the planning elements on the left and record in the right column the plan name (if content is addressed in another plan), date of plan, and page references for where the information can be found. Both the Director and Continuity Planning Coordinator will then certify with their signatures at the end of the checklist that the organization has completed an evaluation of their Continuity Plan and documented its status as it relates to the requirements of the program.

Planning Element			
Program Plans and Procedures (Program Management) [Capability Description: An effective continuity program is implemented through its related continuity plans and procedures and an operational capability to support those plans and procedures. Continuity planning is an effort to document the existence of, and ensure the capability to continue essential functions during a wide range of potential emergencies.]	**Yes – Element is Addressed in Plan** [Reference page number and name of plan where the info can be found]	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

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[46] http://www.fema.gov/pdf/about/org/ncp/coop/continuity_plan_non_federal.pdf

1. Procedures for employee advisories, alerts and Continuity Plan activation are included.

Comments:

2. Provisions for personnel accountability throughout the duration of the emergency are included.

Comments:

3. Procedures exist for an annual review of this agency Continuity Plan and the ability to make any needed revisions.

Comments:

4. Includes a risk or hazard analysis to identify threats to facilities and operations.

Comments:

5. Includes an adopted operational plan that identified activation criteria, responsibilities, and command and control during a Continuity Plan activation.

Comments:

6. Established readiness levels in order to provide a flexible and coordinated response to escalating threat levels or actual emergencies. <Example: the federal Continuity of Government Readiness Conditions system (COGCON)>

Comments:

Essential Functions [Capability Description: Essential Functions are those organizational functions that must be continued under any and all circumstances. These functions are derived from the organizations overall functions and missions and, when identified, should be prioritized to ensure the most critical functions are appropriately	**Yes – Element is Addressed in Plan** [Reference page number and name of plan where the info can	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

emphasized. Essential Functions are those functions that enable organizations to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial/economic base in an emergency.]

be found]

1. Essential functions are listed, prioritized and document in the Plan.

Comments:

2. Staffing requirements for each essential function are identified.

Comments:

3. Resource requirements for each essential function are identified.

Comments:

4. Critical data and data systems for each essential function are identified.

Comments:

5. Support activities are addressed as part of essential functions.

Comments:

6. Resumption or Recovery plans exist for essential functions to ensure operational capability within 12 hours.

Comments:

7. Processes and procedures exist to acquire resources necessary to continue essential functions and sustain operations for up to 30 days.

Comments:

8. Considered and identified the department's role in supporting the State Emergency Functions.

Comments:

Lines of Succession/Delegation of Authority [Capability Description: Each organizational element is required to establish, promulgate, and maintain lines of succession to key positions. These lines of succession should be of sufficient depth to ensure the organization's ability to manage and direct its essential functions and operations. Delegations of authority specify who is authorized to act on behalf of the Agency head or other officials for specified purposes. Generally, pre-determined delegations of authority will take effect when normal channels of direction are disrupted and terminate when those channels have been re-established. Delegations of authority at the headquarters, regional, field, satellite, and other levels and agency locations, as appropriate, are included in the applicable continuity implementation plans.]	Yes – Element is Addressed in Plan [Reference page number and name of plan where the info can be found]	No – Element Not Completely Addressed in Plan	Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps

1. Line of Succession is established for the agency's highest position of authority.

Comments:

2. Line of succession is established for the other leadership positions.

Comments:

3. Policy for the delegation of emergency authorities is established and described. (Limitations for delegated authorities are listed.)

Comments:

4. Lines of succession are included in continuity plans.

Comments:

5. Rosters of trained personnel with the authority to perform essential functions

and activities are maintained.

Comments:

6.   Rules and procedures for implementing order of succession are established.

Comments:

7.   Rules and procedures for order of succession include initiating conditions, notification methods and terminating conditions.

Comments:

Continuity Facilities

[Capability Description: Continuity Facilities are locations where leadership and staff may operate during a continuity event. Leadership and staff may be co-located in one facility or dispersed through many locations, connected virtually through communications systems. Facilities must be able to provide survivable protection and enable continued, endurable operations. Physical dispersion should allow for easy transfer of function responsibility in the event of a problem in one location.]

	Yes – Element is Addressed in Plan [Reference page number and name of plan where the info can be found]	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

1.   Immediate capability exists to operate under potential threat conditions including WMD threats.

Comments:

2.   Sufficient space and equipment to sustain the relocating organization are identified and included in relocation planning.

Comments:

3.   Pre-positioned resources are identified and where possible contingency contracts are established or prepared with appropriate resource providers.

Comments:

4. Plan includes provisions for establishing interoperable communications with all identified essential internal and external organizations, critical customers and the public.

Comments:

5. Alternate facilities provide for logistical support, services and infrastructure systems (e.g., water, electrical power, heating and air conditioning.)

Comments:

6. Plan contains provisions to sustain operations for a period of up to 30 days.

Comments:

7. Plan addresses considerations for the health and safety of relocated employees.

Comments:

8. Plan addresses physical security and access controls.

Comments:

Continuity Communications

[Capability Description: The success of continuity programs is dependent on the availability to provide intra- and interagency connectivity. An agency's ability to execute its essential functions at its HQ and at its alternate or other continuity facilities depends upon the availability of effective communications systems. If this section is already addressed in the organization's Disaster Recovery Plan (formerly known as Operational Recovery Plan), indicate this in the column on the right.]

Yes – Element is Addressed in Plan

[Reference page number and name of plan where the info can be found]

No – Element Not Completely Addressed in Plan

Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps

1. Procedures or plans exist for communications with Continuity contingency staff, management and other organizational components.

Comments:

2. Procedures or plans exist for communications with other agencies and emergency personnel.

Comments:

3. Procedures or plans exist for access to data and systems necessary to conduct essential activities and functions.

Comments:

Human Capital [Capability Description: In a continuity event, continuity personnel and other special categories of employees will be activated by an agency to perform their assigned response duties. An agency must ensure that its human capital strategies for all personnel are adaptable to changing circumstances and a variety of emergencies, and that these strategies and procedures are regularly reviewed and updated, as appropriate.]	**Yes – Element is Addressed in Plan** [Reference page number and name of plan where the info can be found]	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

1. Includes procedures for the dismissal of employees and/or closure of the facility following an emergency impacting the facility.

Comments:

2. Designates Continuity staff and other special categories of employees and their roles and responsibilities.

Comments:

3. Includes procedures for non-Continuity staff and non-special categories of employees are identified (pay flexibilities,

benefit issues).

Comments:

4. Includes agency guidelines for communicating to/with employees following an emergency.

Comments:

Vital Records Management

[Capability Description: Each department and agency continuity program, plan, and procedures should account for the identification and protection of those vital records and mission critical systems and databases that are necessary to perform essential functions and reconstitute normal operations after the emergency ceases. Agencies should pre-position, and update on a regular basis, duplicate records and databases or back-up electronic media. The agency's Vital Records Management Program must be reviewed periodically and updated accordingly. If this section is already addressed in the organization's Disaster Recovery Plan (formerly known as Operational Recovery Plan), indicate this in the column on the right.]

Yes – Element is Addressed in Plan

[Reference page number and name of plan where the info can be found]

No – Element Not Completely Addressed in Plan

Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps

1. Essential emergency operating plans, including line of succession; delegations of emergency authorities; staffing assignments; policy or procedural records, are identified and protected.

Comments:

2. Essential legal/financial records, such as accounts receivable; contracting and acquisition files; official personnel files; Social Security, payroll, retirement, insurance records and property management and inventory records, are identified and protected.

Comments:

    3. Provisions for classified or sensitive data are included.

Comments:

    4. Procedures for data backup and restoration are included.

Comments:

    5. Location and accessibility to vital records are identified.

Comments:

Tests, Training, and Exercises [Capability Description: An effective Test, Training and Exercise Program is necessary to assist agencies to prepare and validate their organization's continuity capabilities and program. Training familiarizes continuity personnel with their roles and responsibilities in support of the performance of an agency's essential functions during a continuity event. Tests and exercises serve to assess, validate, or identify for subsequent correction, all components of continuity plans, policies, procedures, systems and facilities used in response to a continuity event. Periodic testing also ensures that equipment and procedures are kept in a constant state of readiness.]	**Yes – Element is Addressed in Plan** [Reference page number and name of plan where the info can be found]	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

    1. Plans include annual individual and team training of agency Continuity emergency personnel.

Comments:

    2. Plans include annual agency testing and exercising of Continuity plans and procedures.

Comments:

    3. Plans include quarterly testing of emergency alert and notification

procedures.

Comments:

4. Plans include refresher orientation for
    Continuity staff.

Comments:

5. Plans include inter-agency exercising of
    Continuity plans where applicable and
    feasible.

Comments:

Devolution

[Capability Description: Devolution planning supports overall continuity planning and addresses catastrophes and other all-hazards emergencies that render an agency's leadership and key staff unavailable to or incapable of performing its essential functions from either the agency's primary or alternate facilities. Devolution planning also addresses notice and no notice events. A continuity plan's devolution option should be developed so that it addresses how an agency will identify and transfer its essential functions and/or leadership authorities away from the primary facility or facilities, and to a location that offers a safe and secure environment in which essential functions can continue to be performed. The devolution option may be used when the agency's alternate facility is not available.]

	Yes – Element is Addressed in Plan [Reference page number and name of plan where the info can be found]	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

1. Identifies the likely triggers that would
    initiate or activate the devolution option.

Comments:

2. Specifies how and when direction and
    control of agency operations will be
    transferred to the devolution site.

Comments:

3. Lists necessary resources (people,
    equipment, and materials) to facilitate

the ability to perform essential functions at the devolution site.

Comments:

4. Establishes capabilities to restore or reconstitute agency authorities to their pre-event status upon termination of devolution.

Comments:

Reconstitution Operations [Capability Description: Agencies must identify and outline a plan to return to normal operations once agency heads or their successors determine that reconstitution operations for resuming normal business operations can be initiated.]	**Yes – Element is Addressed in Plan** [Reference page number and name of plan where the info can be found]	**No – Element Not Completely Addressed in Plan**	**Corrective Actions (If Answered No) – Strategy for Addressing Planning Gaps**

1. Provides an operational plan to transition from Continuity status to an efficient normal operations status once a threat or disruption has passed.

Comments:

2. Includes coordinated and pre-planned options for reconstitution of the agency regardless of the level of disruption causing implementation of the Continuity Plan. (Options to include movement from the devolution location back to headquarters or a new operating site if necessary.)

Comments:

3. Outlines procedures necessary to affect a smooth transition from the relocation site, whether standard Continuity or devolution scenario, to a new or restored headquarters.

Comments:

I hereby certify that:

1. A Continuity Planning Program exists (which includes all the department's continuity planning documents, processes, and procedures) and that this program contains the key elements as listed in the checklist above;

2. A program is in place to ensure the confidentiality of the sensitive material in the documents and only persons authorized because of their operational functions will have access to sensitive portions of the document; and,

3. A maintenance cycle and protocol has been established to address any gaps identified on the checklist above and, per Executive Order S-04-06, to ensure the regular update of the Continuity Plan and related documents.

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