

EXECUTIVE SUMMARY

Planning for recovery from a disaster is commonly recognized as an essential component in the management of risk. Continuity of operations (COOP) planning refers to the efforts of an organization, such as a branch of government, department, or office, to ensure that the capability exists to continue essential operations in the aftermath of a comprehensive array of potential operational interruptions. We define a COOP event as a weather, geological, or other type of event that keeps employees away from the central office for an extended period of time.

The Equal Employment Opportunity Commission (EEOC) experienced major events disrupting continuity of operations at two of its field offices (New York after September 11, 2001, and New Orleans after Hurricane Katrina in 2005). The recovery and reconstitution of these two field offices occurred thanks to the tireless efforts of a number of headquarters and field office staff, rather than to prudent strategy and planning.

Currently, the development of COOP plans and strategy is the responsibility of each Agency field office director. The Office of Inspector General (OIG) finds that the lack of headquarters oversight, as well as the lack of an Agency executive identified as a senior accountable official, as required by the National Continuity Policy, prevents EEOC from assisting in field office COOP planning and testing.

The current field office plans address only 4 COOP plan elements (essential functions, order of succession, delegations of authority, and alternate facilities) of the 11 recommended by the Federal Emergency Management Agency (FEMA).

We also conclude the following:

1. Without complete and viable COOP plans for each field office, EEOC's ability to provide continuity of operations and continued mission-critical services (receiving new discrimination complaints, investigating previously submitted discrimination complaints, providing mediation services, etc.) to its stakeholders is seriously jeopardized.
2. In the case of a COOP event, if access to paper case-file documentation is restricted, the Agency's ability to maintain productivity is greatly hindered.
3. In the case of a COOP event, mission-critical information that is not backed up onto a network drive may not be accessible or may be lost permanently.

Therefore, OIG recommends to the Chief Operating Officer the following actions:

1. Appoint a senior accountable officer for COOP, whose primary responsibility is to assist field offices with the development, implementation, and updating of COOP plans to ensure the adequacy of the plans.

The newly appointed senior accountable officer should also:

2. Direct field office directors to prepare COOP plans and activities to ensure that field offices are adequately prepared for a COOP event. The preparation of the plans must meet the requirements defined in the National Continuity Policy, as well as other FEMA requirements.
3. Ensure that all field office staff take the Continuity of Operations (COOP) Awareness Course offered by FEMA. This free online course will provide staff basic COOP information.
4. Develop and implement policy and procedures instructing field office staff to store all mission-critical electronic files on Agency-managed network drives.

OIG also suggests that the Office of Field Programs, Office of Federal Operations, and Office of Information Technology develop an Agencywide strategy to save critical documents in an electronic format so that field offices can access or restore information from alternate locations in case of a COOP event.

Agency comments on the draft report are included in their entirety as Appendix B. Generally, management agreed with the facts in the report and OIG's findings, conclusions, and recommendations. In addition some suggestions were offered to further improve the COOP process. We acknowledge minor changes to the final report for clarification purposes.

1.0 INTRODUCTION

1.1 Background

Planning for recovery from a disaster is commonly recognized as an essential component in the management of risk. Annually, nearly one in five businesses suffers a major disruption of operations or services. A disruption of service can be caused by a weather, geological, or other type of event that results in employees not having access to the central office for an extended period of time. Because continuity planning is a means of ensuring that essential functions of business survive such disruptions, it is crucial for any business or organization to plan for loss or denial of access to key assets or resources.

Continuity of operations (COOP) planning refers to the efforts of an organization, such as a branch of government, department, or office, to ensure that the capability exists to continue essential operations in the aftermath of a comprehensive array of potential operational interruptions. COOP plans are *not* the same as Occupant Emergency Plans.¹

On May 9, 2007, President George W. Bush issued National Security Presidential Directive (NSPD) 51, which is also identified as Homeland Security Presidential Directive (HSPD) 20, National Continuity Policy.² The directive updates longstanding continuity directives designed to ensure that governing entities are able to recover from a wide range of potential operational interruptions. The National Continuity Policy states that heads of executive departments and agencies shall execute their respective department or agency COOP plans in response to a localized emergency and shall plan, program, conduct, and support annual tests for continuity capabilities.

According to interviews with senior officials in the Office of Field Programs and the Chief Financial Officer, each field office director is required to annually update his or her office's COOP plan. Field office COOP plans include the following:

- Leadership contact names and numbers
- Emergency directory and calling tree
- Alternate sites
- Essential functions
- Resources needed
- Reference to documents concerning order of succession and delegation of authority
- External directory
- Specialized telephone/fax/e-mail directory

¹ The Occupant Emergency Plan (OEP) is a set of procedures to protect life and property under defined emergency conditions.

² NSPD 51/HSPD 20 revokes Presidential Decision Directive (PDD) 67, Enduring Constitutional Government and Continuity of Government Operations, which was issued by the Clinton Administration on October 21, 1998.

Each district office is required to update the COOP appendices for its district, including area and local offices. District offices are responsible for maintaining the accuracy of the plans. Subsequent updates should be submitted to the inSite (EEOC's intranet) coordinators in the Office of Field Programs.

1.2 Objective, Scope, and Methodology

1.2.1 *Objective*

The primary objective of this review is to determine whether EEOC's 51 field offices have developed, implemented, and tested their individual COOP plans in accordance with the National Continuity Policy. Addressing this objective will enable OIG to determine whether all field offices have adequately developed COOP plans that will enable them to reconstitute and resume customer service in a timely, efficient, and effective manner.

The COOP plan designed and developed by each field office should address the measures by which Agency field offices can ensure that they are able to provide effective mission-essential functions after an unexpected emergency or disaster.

1.2.2 *Scope and Methodology*

The scope of this review focuses on activities relating to EEOC's field office COOP planning and execution, including the following:

- Field office COOP strategy, planning, and execution
- EEOC strategy for, and management of, field office COOP planning

In order to assess the viability of the Agency's field office COOP plans, we used the following approaches:

- Held discussions with COOP experts to gain perspective on evaluating COOP strategy, planning, and activities
- Reviewed copies of EEOC's field office COOP plans to establish a baseline regarding the field office COOP strategy and planning
- Surveyed field office directors regarding COOP plans and management
- Interviewed individuals in headquarters responsible for Agency COOP policies and field office COOP oversight
- Visited the New York and New Orleans field offices to evaluate the viability of their COOP plans and to obtain input (interviews, focus groups, and data) from managers and staff

This assessment was conducted in accordance with generally accepted government auditing standards, as published in the Comptroller General's Government Auditing Standards of July 2007. The fieldwork took place from June 2007 through October 2007.

2.0 FINDINGS AND CONCLUSIONS

2.1 COOP Management – Structure, Functions, and Perspective

2.1.1 *Structure*

The recovery and reconstitution of the New York and New Orleans field offices occurred through the tireless efforts of a number of headquarters and field office staff, rather than through the execution of prudent strategy and planning.

Our review of headquarters' COOP-related policies and procedures determined that EEOC has no centralized managerial structure regarding Agency COOP coordination and oversight. According to the National Continuity Policy, heads of executive departments and agencies must appoint a senior accountable official, at the assistant secretary level, as the continuity coordinator for the department or agency.

2.1.2 *Functions*

The Office of Field Programs (OFP) coordinates operational planning support services for field offices and provides advice and assistance to support OFP managers in the development and implementation of effective planning activities. The Office of the Chief Financial Officer (OCFO), Central Services Division, plans, establishes, directs, controls, and implements Agency policies, procedures, and standards governing all aspects of the following functional areas: real and personal property management; transportation, travel, and fleet management; mail management; records management; printing and reproduction services; space design; and physical security, safety, and emergency planning.

2.1.3 *Perspective*

Currently, the development of COOP plans and strategy is the responsibility of each Agency field office director. However, both the EEOC's OFP and the OCFO state that it is not their responsibility to provide oversight or guidance to field offices concerning COOP planning. A senior official in OFP stated that it does not conduct a formal review of field office COOP plans that are submitted for posting on the Agency's intranet, inSite.

OFP, the Office of the Chair, and other headquarters offices aided in the reconstitution efforts of the New York and New Orleans field offices after the September 11, 2001, attack and Hurricane Katrina in 2005. According to OFP officials, these reconstitutions were engineered without thought of using any type of COOP plan and occurred through the use of ad hoc committees convened to assist in specific reconstitution areas. OFP officials also stated that the Agency learned valuable lessons regarding office recovery and reconstitution; however, this information was never captured into any one informational document (such as a COOP plan or standard operational procedures) that could be used as a guide by other field offices during a COOP event.

2.1.4 ***Conclusions***

- a. The lack of headquarters oversight prevents EEOC from adequately supporting field office COOP planning and testing.
- b. There is no senior Agency official responsible for COOP planning. A senior accountable official, at a level equivalent to an assistant secretary, reports to the National Continuity Coordinator.³ While field office directors should be involved in the development and execution of COOP plans for their respective offices, the Agency is required by the National Continuity Policy to identify an individual to serve as a senior accountable official for the Agency regarding COOP planning.

2.2 Comparison and Analysis of Existing Plans to Applicable Standards

2.2.1 *FEMA Standards*

According to FEMA, a viable COOP plan should contain the below-mentioned 11 elements. The current field office COOP plans addressed only 4 of the FEMA-recommended elements (essential functions, order of succession, delegations of authority, and alternate facilities) and failed to address the other 7 recommended elements. We identified three documents on the Agency's intranet that related to COOP. The first document, Continuity of Operations Plan, contained no practical instructions regarding what actions field offices should perform during a COOP event. The second document, entitled Continuity of Operations Plan: Appendices A–E and Emergency Directories, contains few details regarding COOP planning or specific plans regarding COOP (weather, geological, or other) events. The third document, which is entitled Continuity of Operations Plan: Appendices – EEOC Headquarters, Appendices A–E and Emergency Directories, contains information regarding headquarters COOP.

FEMA states that an effective COOP plan should include 11 elements. The table below shows that EEOC adheres to 4 elements.

³ A National Continuity Coordinator is a federal official who reports directly to the president and establishes a continuity policy coordination committee to develop policies, a continuity advisory group to implement programs and an interagency board to validate primary mission-essential functions) on all continuity matters.

EEOC Adherence to COOP Plan Elements

COOP Element	Description	EEOC Adherence
Essential Functions	Functions that enable the Federal government to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial and economic base in an emergency situation	Yes
Alternate Facilities	Facilities used to carry out mission-essential functions in a COOP situation if the agency's primary facility is unavailable	Yes
Order of Succession	Provisions for the assumption of senior agency offices during an emergency in the event that any of those officials are unavailable to execute their legal duties	Yes
Delegations of Authority	Predetermined statements that specify who is authorized to act on behalf of agency leadership for specific purposes	Yes
Devolution	Capability to transfer statutory authority and responsibility for mission-essential functions from an agency's primary operating staff and facilities to other employees and facilities, and to sustain operational capability for an extended period	No
Vital Records	Electronic and hard-copy records needed to support mission-essential functions during a COOP situation	No
Interoperable Communications	Alternate communications that provide the capability to perform essential functions until normal operations can be resumed	No
Test, Training, and Exercises	Measures to ensure that an agency's COOP program can implement the COOP plan and support mission-essential functions during an emergency situation	No
Reconstitution	Process by which an agency transitions from COOP implementation to resumption of normal operations	No
Human Capital	Plans and actions to respond to threats that employees are most likely to face during COOP activation, such as dismissal procedures, agency guidelines for communicating to employees, and staffing flexibilities, such as telework	No
Plans and Procedures	Plans and procedures to be developed and documented so that agency personnel will know what to do in an emergency situation (Plans and procedures are required for the three phases of COOP implementation: activation, relocation, and reconstitution.)	No

2.2.2 Pandemic Influenza

Our review of the field office COOP plans determined that the current plans do not address pandemic influenza as required by the Implementation Plan for the National Strategy for Pandemic Influenza. Pandemic influenza is a global outbreak of disease that occurs when a new influenza virus appears or “emerges” in the human population, causes serious illness, and spreads easily from person to person worldwide.

The Implementation Plan for the National Strategy for Pandemic Influenza requires Federal departments and agencies to develop operational plans addressing: (1) protection of employees, (2) maintenance of essential functions and services, (3) support for the Federal response, and (4) communication with stakeholders about pandemic planning and response.

In fiscal year 2007, EEOC hired Excalibur Associates, Inc., to provide expertise and technical editing of content to update the Agency's COOP plan and create a COOP pandemic template for EEOC headquarters and field offices. The primary goal of the draft document developed by Excalibur Associates, Inc., entitled EEOC COOP Pandemic Template, dated December 18, 2007, is to facilitate COOP preparedness, activation, implementation, and reconstitution following a pandemic influenza outbreak.

The template provides the framework for EEOC district and other offices to further develop comprehensive pandemic annexes to the existing EEOC COOP plans. According to Excalibur Associates, Inc., Federal interagency planning guidance requires the development of a COOP pandemic annex and states that the annex neither replaces nor supersedes the current approved EEOC headquarters COOP plan; rather, it supplements it, bridging the gap in the traditional all-hazards COOP planning of Federal Preparedness Circular (FPC) 65.

Our review did not cover in detail pandemic influenza or assess the template completed by Excalibur Associates, Inc., for accuracy or completeness as it relates to policy described in FPC 65, or the Implementation Plan for the National Strategy for Pandemic Influenza. However, we note that the template and annex discuss pandemic influenza for both headquarters and field offices, and discuss pandemic influenza planning in terms of the 11 elements of a viable COOP plan as described by FEMA.

2.2.3 *Conclusions*

Overall, current field office COOP plans do not discuss pandemic influenza planning. However, once the EEOC COOP pandemic template is finalized and incorporated into the field office COOP plans, the template should provide the Agency with an appropriate level of assurance regarding: (1) the protection of employees, (2) maintenance of essential functions and services, (3) support for the Federal response, and (4) communication with stakeholders about pandemic planning and response.

2.3 Field Office Experience – Survey Results

Our survey of EEOC field offices (92 percent response rate) shows that while COOP planning is widely regarded as important, most offices have not taken the necessary steps to produce a detailed COOP plan or to systematically test COOP plans. For a statistical summary of the responses to each survey question, see Appendix A.

Some offices do not have any staff with COOP training, making adequate COOP preparation problematic. Several survey responses suggested that more headquarters attention to COOP would be helpful. Many offices improve their COOP efforts by working with other entities. Field offices reported working with Federal, state, and other entities, such as the U.S. Corps of Engineers. For example, one office will participate with its local Federal Executive Board in a pandemic influenza exercise, and another office participated in a government regional COOP exercise.

2.3.1 COOP Events and Understanding of COOP Planning

Twenty-three percent of field offices reported experiencing a COOP event in the last six years. Most of the events were weather related. Los Angeles reported one COOP event in each of the three categories, weather, geological, and other. COOP awareness and concern among office directors is strong, with virtually all office directors reporting that COOP planning is very important or important.

Only 42 percent of office directors reported receiving basic COOP training. Some directors who had not taken COOP training reported taking COOP-related training, such as emergency management (18 percent). Several office directors reported taking multiple training courses. Most offices reported that additional staff had received training. Forty-four percent of the training was COOP awareness.

Survey results show that some offices do not understand or distinguish between emergencies and COOP events. Twenty-six percent of respondents stated that their offices tested COOP plans. However, some of the examples cited were for emergencies, not COOP events. Waiting until an event occurs is insufficient as a testing mechanism. One survey respondent stated, “It would be better to discover discrepancies in our plan during a non-emergency scenario than in an actual crisis situation.”

2.3.2 Conclusions

Without complete and viable COOP plans for each field office, EEOC’s ability to provide continuity of operations and continued mission-critical services (receiving new discrimination complaints, investigating previously submitted discrimination complaints, providing mediation services, etc.) to its stakeholders is seriously jeopardized.

2.4 Field Office Results – New York and New Orleans

The New York and New Orleans offices experienced severe COOP events in 2001 and 2005, respectively. Each office recovered essential operations and reconstituted full operations due to strong individual and group efforts by field and headquarters staff.

COOP plans were not used during the COOP events in New York and New Orleans. Given the overall lack of Federal experience and activity regarding COOP in 2001, this was an understandable shortcoming for EEOC. By 2005 (Hurricane Katrina/Rita), however, adequate time had passed for EEOC to prepare and position itself to implement a field office COOP plan. The lack of attention to COOP resulted in inadequate planning. For example, critical human resource decisions were made in an ad hoc manner because guidance and procedures were not in place.

OIG staff visited New Orleans and New York to determine how the experiences of these field offices could assist EEOC in improving field office COOP planning and related

activities. We found that both offices have made significant strides in preparing for another COOP event. However, much remains to be accomplished in the following areas:

- COOP communication, training, and testing
- COOP planning
- Information technology
- The written COOP plan

2.4.1 New York

2.4.1.1 Recovery and reconstitution

On September 11, 2001, the New York District Office (NYDO) was completely destroyed, including all paper files and all electronic data that had not been saved and stored at a remote location. NYDO management made great efforts to contact and communicate with staff in the days following the attack. Because planning for such an event had not taken place, there was not an effective method to quickly contact staff.

NYDO managers worked closely with headquarters to meet the social needs of the NYDO staff. For example, close coordination ensured that paychecks were not interrupted and that counseling (short and long term) and information on a variety of issues were provided. NYDO staff believe, overall, that headquarters responded quickly and responsibly to the COOP event.

Headquarters and NYDO staff then worked in a dedicated manner to resume essential NYDO operations, such as intake and internal and external communication. Initially, a small number of staff worked in the EEOC's Newark office and others teleworked, while New York and headquarters management promptly began searching for and then securing temporary workspace in New York City.

2.4.1.2 Status of COOP efforts

Since reconstitution and recovery, NYDO has made significant efforts to improve its COOP program, but much work remains to be done in the following areas:

- COOP communication, training, and testing
- COOP planning

COOP communication, training, and testing: NYDO staff believe that getting in touch with staff and meeting other communication needs are critical after COOP events, and need improvement. After the September 11 disaster, contact information for all staff has been updated, but management stated that access to updated information needs improvement.

Staff, including some managers, do not distinguish between COOP and other emergency situations (such as shelter in place) and do not know very much about COOP. Staff and management agree that testing of COOP/emergency procedures would be useful.

Most managers and staff have had no formal COOP training. Managers and staff believe training to be important. For example, one manager believes most investigators do not have basic COOP knowledge and recommends that all employees receive COOP training. Basic CCOP training is available free of charge at www.fema.gov.

COOP planning: NYDO is working with the local Federal Executive Board⁴ (FEB) on COOP issues, and at least two managers appear knowledgeable in this area. The NYDO Director reports that the FEB is aggressive in New York, thereby helping COOP planning efforts. The Director believes it is important to be fully involved with FEB COOP efforts.

After the September 11 event, NYDO provided all staff with emergency kits. However, not all staff were kept current with supplies and information related to COOP (e.g., new staff are not provided with emergency kits).

2.4.1.3 Conclusions

According to interview and focus group results, most staff and managers believe that COOP preparation is very important and want better-informed and trained staff.

2.4.2 New Orleans

2.4.2.1 Recovery and reconstitution

On August 29, 2005, Hurricane Katrina struck New Orleans, forcing EEOC to abandon its New Orleans office. The building in which the office was housed sustained damage that made it necessary to obtain temporary space. Many paper files were left in the office and were recovered later. Many EEOC staff lost their homes or had to leave their homes for an extended period of time. Twelve of the 53 staff did not return to New Orleans. At the time of OIG's interview, the office had 35 staff.

Prior to Hurricane Katrina, the New Orleans office maintained a COOP Plan on file with the Agency. However, because of lessons learned from Hurricane Katrina, New Orleans is developing a new COOP plan. While, the official COOP plan does not include many of the elements of a viable COOP plan, including Pandemic Influenza planning, the new draft plan (which as of this report is still under review by New Orleans staff) does address the following:

- Types of events: hurricane, pandemic influenza, catastrophic occurrence
- How to secure information and information systems
- Alternate worksites
- Continuing operations

⁴ Located outside Washington, D.C., in 28 cities with a large Federal presence, the Federal Executive Boards (FEBs) are interagency coordinating groups designed to strengthen Federal management practices, improve intergovernmental relations, and participate as a unified Federal force in local civic affairs.

- Communications
- Office devolution

The draft plan does not, however, fully address all elements of a viable COOP plan as prescribed by FEMA.

As with the NYDO September 11, 2001, disaster, headquarters and field staff, without adequate preparation, worked diligently to recover. New Orleans and headquarters staff obtained temporary workspace and later obtained permanent space. Until conditions in and around New Orleans improved, many New Orleans staff, including the Director, worked at other field offices but were unable to work on New Orleans cases. Much of the New Orleans casework could not be performed because staff were unable to access paper files.

Using the experience from the NYDO COOP event, though not having translated it into formal COOP plans, headquarters staff worked with New Orleans management to ensure that the social needs of New Orleans staff were met. For example, paychecks and payment for other expenses were sent to employees, even those who moved out of the area. Overall, New Orleans management and staff believe that headquarters and New Orleans office management responded well to the event. For example, headquarters personnel were helpful in locating New Orleans Field Office (NOFO) staff and in establishing the EEOC CARES (Co-workers Aiding Recovery through Encouragement and Support) program.

However, staff reported that some parts of the recovery process did not work well. For example, staff stated that there appeared to be pressure to get staff back behind desks, even if there was no work for them or conditions greatly hampered operations. Staff reported problems with the temporary space and initially with the new permanent space. For example, the size of the room and the technology at the temporary workspace prevented efficient operations.

Staff cited the following efforts as successful immediately following Katrina:

- The community Web site
- The Katrina phone tree
- Per diem and travel claim processes
- Communication with headquarters and New Orleans Director K. Hill

2.4.2.2 Status of COOP efforts

Our analysis, as well as the ideas of New Orleans management and staff, identified the following areas that need work:

- COOP communication, training, and testing
- COOP planning

COOP communication, training, and testing: The consensus of the New Orleans staff we met with was that they were *not* well informed on the NOFO COOP plans. They agreed that it is important to be informed. Similarly, they agreed that testing is important. Examples cited during the focus group include evaluation plans, how to manage laptops, securing files, and backing up information.

COOP planning: Staff and management agreed on the vital nature of having updated contact information for all staff. NOFO has an emergency contact sheet with information for all employees. Before Katrina, some staff were reluctant to provide that information. Since Katrina, the Director reports 100 percent cooperation.

The NOFO Director sits on the Federal Executive Board (FEB) in New Orleans. He stated that the FEB is tasking agencies to perform COOP planning (post Katrina). The NOFO Director also stated that the FEB has also been good at coordinating Federal efforts in the aftermath of Katrina.

2.4.2.3 *Conclusions*

OIG agrees with the management and staff of New Orleans that the COOP plan needs to be more detailed, tailored to the office, and made available to all the staff.

2.5 Technology

2.5.1 *Field Office Discussion*

New York and New Orleans managers and staff informed us of issues relating to technology.⁵ These include how field offices strive to access and recover the information necessary to perform mission-critical functions while located in an alternate facility.

According to staff in both New Orleans and New York, a major issue continues to be the inability to access paper documents in order to perform critical Agency mission-related functions. In New York, all work files were destroyed. In New Orleans, access to files was not possible for an extended period of time.

Also, according to focus group participants and supervisors, many individuals maintain most of their work files on their computers' hard drives. Events in both New York and New Orleans showed the importance of employees being able to access Agency resources in order to maintain productivity.

⁵ This review did *not* include an analysis of the Agency's information technology (IT) COOP plan in accordance with *National Institute of Standards and Technology Special Publication 800-34, Contingency Planning Guide for Information Technology Systems*. We interviewed the Agency's Acting Chief Information Officer, and she informed us that the Agency's IT COOP plan focuses on the Agency's six major information and general support systems.

2.5.2 *Conclusions*

- a. In the case of a COOP event, if access to paper case-file documentation is prevented or otherwise restricted, the Agency's ability to maintain productivity is greatly hindered.
- b. In the case of a COOP event, mission-critical information that is not backed up onto a network drive may not be accessible or may be lost permanently.

3.0 RECOMMENDATIONS

The following recommendations are offered to improve COOP planning in EEOC field offices.

OIG recommends that the Agency's Chief Operating Officer take the following actions:

1. Appoint a senior accountable officer for COOP, whose primary responsibility is to assist field offices with the development, implementation, and updating of COOP plans to ensure the adequacy of the plans.

The newly appointed senior accountable officer should also:

2. Direct field office directors to prepare COOP plans and activities to ensure that field offices are adequately prepared for a COOP event. The preparation of the plans must meet the requirements defined in the National Continuity Policy, as well as other FEMA requirements.
3. Ensure that all field office staff take the Continuity of Operations (COOP) Awareness Course offered by FEMA. This free online course will provide staff basic COOP information.
4. Develop and implement policy and procedures instructing field office staff to store all mission-critical electronic files on Agency-managed network drives.

OIG also suggests that the Office of Field Programs, Office of Federal Operations, and Office of Information Technology develop an Agencywide strategy to save critical documents in an electronic format so that field offices can access or restore information from alternate locations in case of a COOP event.

3.1 Management Comments

Agency comments on the draft report are included in their entirety as Appendix B. Generally, management agreed with the facts in the report and OIG's findings, conclusions, and recommendations. In addition some suggestions were offered to further improve the COOP process. We acknowledge minor changes to the final report for clarification purposes.

Audit Follow-Up

The Office of Management and Budget issued Circular Number A-50, Audit Follow-Up, to ensure that corrective action on audit findings and recommendations proceed as rapidly as possible. EEOC Order 192.002, Audit Follow-Up Program, implements Circular Number A-50 and requires that for resolved recommendations, a corrective action work plan should be submitted within 30 days of the final evaluation report date describing specific tasks and indicating the completion dates necessary to implement audit recommendations. Circular Number A-50 requires prompt resolution and corrective action on audit recommendations. Resolutions should be made within six months of final report issuance.