



# Review of TVA's Continuity of Operations Plan

2006-5071

June 1, 2006



# Objective, Scope, & Methodology

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## **Objective:**

To determine whether TVA's Continuity of Operations Plan (COOP) (1) complies with laws, regulations, and/or Executive Orders and (2) was adequately implemented and assessed for effectiveness.

## **Scope:**

TVA's overall COOP plan as compared to the requirements of a viable COOP plan as described by Federal Preparedness Circular (FPC) 65. The specific provisions in Presidential Decision Directive (PDD) 67 remains classified.



# Objective, Scope, & Methodology (cont'd)

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## Methodology:

To assess TVA's COOP plan, we:

- ◆ Reviewed PDD 67 and FPC 65 to determine provisions required by law.
- ◆ Reviewed TVA's draft COOP plan as of June 2002 to determine if requirements of FPC 65 have been met.
- ◆ Interviewed TVA management personnel to assess compliance with requirements and assess understanding and communication of the TVA COOP plan.
- ◆ Reviewed GAO reports and other outside information to identify best practice provisions/elements of a COOP plan.

This inspection was conducted in accordance with the "Quality Standards for Inspections."



# Background

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- ◆ Presidential Decision Directive (PDD) 67 issued October 1998 relates to Continuity of Operations Planning. While the text of PDD 67 remains classified and there is no White House Factsheet summarizing its provisions, the website for the Federation of American Scientists states PDD 67 contains the following:
  - Federal agencies are required to develop Continuity of Operations Plans for Essential Operations.
  - Federal Preparedness Circular 65, issued by the Federal Emergency Management Agency (FEMA), provides guidance to Federal Executive Branch departments and agencies for use in developing viable and executable COOP plans.
- ◆ Federal Preparedness Circular 65, issued July 1999 and revised in June 2004, outlines specific COOP requirements.
- ◆ TVA, as a Federal agency, falls under the provisions of PDD 67 and FPC 65.



# Background (cont'd)

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- ◆ TVA's June 2002 proposed COOP plan:
  - Still remains in draft form.
  - Appears to address major COOP requirements as stated in FPC 65.
  - Provides guidance for preparation of site, activity, or business unit specific COOP plans.
- ◆ In 1999, FEMA reviewed TVA's COOP program and found it to be acceptable.



# Summary of Observations

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While TVA's overall draft COOP plan addresses the requirements of a viable plan, we found that it lacks proper implementation and has not been assessed for effectiveness.



# Observation 1: Compliance with FPC 65 Requirements

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- ◆ We found TVA's overall COOP plan, as drafted, addresses the major requirements as stated in FPC 65, including:
  - Establish a plan and design procedures.
  - Identify and prioritize essential functions.
  - Predelegate decision-making authorities.
  - Establish orders of succession.
  - Identify alternate operating facilities.
  - Develop interoperable communications.
  - Protect vital records and databases.
  - Establish procedures to manage human capital.
  - Conduct testing, training, and exercises.
  - Plan for devolution of control and direction.
  - Address reconstitution.



# Observation 2: Implementation

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We found that while the draft COOP plan addresses FPC 65 requirements, the plan lacks proper implementation and support.

- ◆ The 2002 plan is still in draft form.
- ◆ TVA's overall plan is not being assessed for viability.
- ◆ There is not a complete communication of duties, as outlined in the COOP plan to the responsible parties.
- ◆ A central point of contact does not exist for overall and business unit specific COOP planning. Consequently:
  - There is no coordination of TVA business unit specific plans.
  - A regular viability review is not done on business unit specific COOP plans.
- ◆ The plan is not regularly tested and training is not being provided.
- ◆ Unclear responsibility exists for interagency communications.
- ◆ Concerns exist about interoperable communications.



# Recommendations

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The Executive Vice President, Administration, should:

- ◆ Assign responsibility to ensure ongoing COOP plan development and implementation.
- ◆ Review and approve TVA's draft COOP plan.
- ◆ Take steps to ensure TVA's overall plan and business unit specific plans are viable. Specifically:
  - Communicate responsibilities and duties to all responsible parties and organizations.
  - Coordinate business unit specific plans throughout TVA.
  - Assess plans regularly to identify and correct deficiencies.
  - Conduct tests, training, and exercises to ensure effective coordination, communication, and support.

