TO: The Honorable Chairman and Members of the Board of County Commissioners

FROM: Ken Burke, CPA
Clerk of the Circuit Court
Ex Officio County Auditor

SUBJECT: Audit of Continuity of Operations Plan (CEMP, COOP/COG)

DATE: May 17, 2012

For your review and filing in the Official Records, I am enclosing a copy of the report dated May 17, 2012 on the above-referenced audit.

I hope you find this report helpful in ensuring Pinellas County government provides the best possible service to our citizens.

cc: Robert S. LaSala, County Administrator
Carl Harness, Assistant County Administrator
Sally A. Bishop, Director, Emergency Management
Jim Bennett, County Attorney
Claretha N. Harris, Chief Deputy Director, Finance Division
Ernst & Young
May 17, 2012

The Honorable Chairman and Members
of the Board of County Commissioners

We have conducted an audit of the Continuity of Operations Plans (CEMP, COOP/COG). Our audit objectives were to:

- Determine if the CEMP meets statutory requirements and adequately plans for the public’s safety.
- Determine if there are adequate COOP/COG plans for critical areas to ensure the continuation of essential functions in the event of a disruption of normal activities.
- Determine if there is adequate reporting of emergency preparedness to the Board of County Commissioners (BCC), citizens, and coordinating agencies.
- Verify compliance with terms and conditions of selected emergency management grants from which funding was received during the audit period.

We conclude that Emergency Management:

- Submitted the CEMP to the Florida Division of Emergency Management (FDEM). The CEMP is currently being reviewed by FDEM.
- Is coordinating the implementation of the countywide continuity plan. The COOP plan is progressing at a satisfactory level.
- Is adequately reporting the status of emergency preparedness to the BCC, citizens, and coordinating agencies.
- Has established supporting agreements for emergency operations in disasters.
- Website adequately presents and disseminates emergency preparedness information to the citizens and stakeholders of Pinellas County.
- Properly administered the emergency management related grants reviewed under the audit period.

Opportunities for Improvement are presented in this report.
We appreciate the cooperation shown by the staff of Emergency Management during the course of this review. We commend management for their responses to our recommendations.

Respectfully Submitted,

Hector Collazo, Jr., Director
Division of Inspector General

Approved:

Ken Burke, CPA*
Clerk of the Circuit Court
Ex Officio County Auditor

*Regulated by the State of Florida
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INTRODUCTION

Synopsis

Emergency Management has:

- Submitted the Comprehensive Emergency Management Plan (CEMP) to the Florida Division of Emergency Management (FDEM). The CEMP is currently being reviewed by FDEM.
- The countywide Continuity of Operations Plan (COOP)/Continuity of Government (COG) is progressing at a satisfactory level.
- The Emergency Management website adequately presents emergency preparedness information to the citizens of Pinellas County.

Scope and Methodology

We have conducted an audit of the Pinellas County CEMP and the supporting COOP/COG Plan. In order to meet our objectives, we have:

- Interviewed Emergency Management department management responsibility for the administration of the plans to obtain a clear understanding of the operations.
- Reviewed legal requirements and suggested best practices to determine if CEMP and COOP/COG procedures were adequate to meet plan objectives.
- Reviewed procedures and documentation of exercises, training, and drills to ensure that plans were tested.
- Reviewed selected grants for compliance with specific terms and conditions.

We performed such other audit procedures that we considered necessary in the circumstances.

Our objectives were to:

- Determine if the CEMP meets statutory requirements and adequately plans for the public's safety.
- Determine if there are adequate COOP/COG plans for critical areas to ensure the continuation of essential functions in the event of a disruption of normal activities.
- Determine if there is adequate reporting of emergency preparedness to the Board of County Commissioners (BCC), citizens, and coordinating agencies.
- Verify compliance with terms and conditions of selected emergency management grants from which funding was received during the audit period.
Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and the *Standards for Offices of Inspector General*, and accordingly, included such tests of records and other auditing procedures as we considered necessary in the circumstances. The audit period was October 1, 2010 through December 31, 2011. However, the processes reviewed may not be limited by the audit period.

**Overall Conclusion**

We conclude that Emergency Management:

- Submitted the CEMP to the Florida Division of Emergency Management (FDEM). The CEMP is currently being reviewed by FDEM.
- Is coordinating the implementation of the countywide continuity plan. The COOP plan is progressing at a satisfactory level.
- Is adequately reporting the status of emergency preparedness to the BCC, citizens, and coordinating agencies.
- Has established supporting agreements for emergency operations in disasters.
- Website adequately presents and disseminates emergency preparedness information to the citizens and stakeholders of Pinellas County.
- Properly administered the emergency management related grants reviewed under the audit period.
## Action Plan

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<td>Pinellas County Comprehensive Emergency Management Plan (CEMP) Draft Has Been Submitted To The Florida Division Of Emergency Management (FDEM) As Required By The Florida Administrative Code.</td>
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The Department of Emergency Management is responsible for providing effective and orderly government control and coordination of emergency operations in disasters resulting from natural, manmade, or accidental causes. Emergency Management follows an "All Hazards" planning strategy in the classic "Four Phases of Emergency Management:" Mitigation, Preparedness, Response, and Recovery. The Department is responsible for developing and maintaining CEMP for all potential hazards and coordinating these plans with all municipalities, county departments, and Federal/State disaster response agencies.

The Pinellas County Emergency Management Department, in cooperation with municipalities, essential non-governmental agencies, and the Pinellas County Disaster Advisory Committee 2006 plan was reviewed and found in compliance with Florida Administrative Code 9G-6, and was approved by the State Division of Emergency Management on May 22, 2006. The Board
of County Commissioners, on August 22, 2006, passed Resolution 06-136 adopting the CEMP.

The Department maintains and manages the County’s Emergency Operation Center during response and recovery disaster operations. The Department provides the funding necessary to ensure the County’s ability to adequately prepare for, respond to, recover from, and mitigate the impacts of natural, technological, or attack-related emergencies.
Our audit disclosed certain policies, procedures, and practices that could be improved. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the Opportunities for Improvement presented in this report may not be all-inclusive of areas where improvement may be needed.

1. **CEMP Draft Has Been Submitted To FDEM As Required By The Florida Administrative Code.**

   Emergency Management submitted the Pinellas County Comprehensive Emergency Management Plan (CEMP) to the Florida Division of Emergency Management (FDEM) on February 23, 2011. Management used several published guidance documents in developing the format and information contained in the CEMP. The FDEM review team forwarded comments to Emergency Management on two segments of the plan. Management has responded to these comments and is awaiting further input from the State. The State is currently reworking their CEMP review criterion, which seems to be delaying the State CEMP review process. Emergency Management continues to work with FDEM on the review and approval of Pinellas County’s CEMP.

   Until the State approves the Pinellas County CEMP, Emergency Management cannot request approval of the plan from the BCC.

   Florida Administrative Code 9G-6.0023, County Comprehensive Emergency Management Plans, requires:

   1. Each county emergency management agency established pursuant to the authority contained in Section 252.38(2), F.S., shall develop and submit to the Board of County Commissioners for adoption a County Comprehensive Emergency Management Plan in compliance with the requirements, format, and standards contained in this rule chapter.

   2. County Comprehensive Emergency Management Plans will be coordinated and consistent with the provisions of the State Plan. The county emergency management plan will include an evacuation component, a shelter component (risk and host events), and a post-disaster and recovery component and will consist of provisions addressing aspects of preparedness, response, recovery and mitigation. The county plan will assign lead and support responsibilities for county agencies and personnel that coordinate with the emergency support functions outlined in the State Plan.

   We recommend management continue with the CEMP review process to work with FDEM on the review and approval of Pinellas County’s CEMP.
Management Response:

I concur with the audit finding and add the additional information for clarification. Since our meeting, the State of Florida Division of Emergency Management has completed the review of our Comprehensive Emergency Management Plan (CEMP) and has found it to be in compliance.

2. **Countywide COOP Development Is Proceeding On Schedule.**

Emergency Management’s project for the development of the countywide COOP plan is progressing at a satisfactory level. The following three departments have been unable to complete their input:

1. Business Technology Services (BTS)
2. Department of Environment and Infrastructure (DEI)
3. Finance Division, Clerk of the Circuit Court (Finance)

Finance has defined the functional needs, but not the resource requirements for the operations. Furthermore, Finance does not have a deadline to complete their input due to the ongoing OPUS project. BTS and DEI plans are scheduled to be completed in a timely manner.

The plan, when fully developed with all appointed authority departments, at a minimum will provide:

- Identification of essential functions, resources, and personnel for 30 days in a post hurricane/disaster environment.
- Procedures to implement the plan and personnel notification and accountability; delegations of authority; and lines of succession.
- Identification of alternative facilities and related infrastructure, including those for communications.
- Identification and protection of vital records and databases.

COOP/COG functions are essential to ensuring that the State and its political subdivisions continue to provide vital services throughout the emergency or disaster period. Responsibilities for internal county emergency actions, and for the direction and control of emergency operations, rest with the County Appointing Authorities. The County Administrator’s Office, as the Board of County Commissioners representative, will play a lead role in assuring coordination of internal emergency plans. All county departments, and other organizations and agencies providing support during an emergency, are responsible for the preparation of internal operating procedures and departmental continuity plans.

**We recommend** management continue the coordination and oversight of the Pinellas County COOP project and ensure the three remaining departments complete their plans.
Management Response:

I concur with the audit findings and add the additional items for clarification. The countywide COOP Planning work is being completed in Phases based on emergency assignments and functions versus no emergency assignments and functions. Phase 1 departments are nearly complete, with the following status:

1. Business Technology Services — completed
2. Department of Environment and Infrastructure — completed
3. Finance Division of the Clerk of the Circuit Court — on hold until higher priority issues can be completed. Approximate date for COOP work to restart is June of 2012.

Phase 2 of COOP planning is underway with an estimated completion of July 2012. Phase 3 is estimated to begin June 2012 with an estimated completion by December 2012, barring any major emergencies. There may be a Phase 4 based on items that influence work calendars and cannot be changed (elections, budgets, etc.), requiring that COOP's work be flexible when these departments are otherwise occupied with major work.
DIVISION OF INSPECTOR GENERAL

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