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

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

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

DATE: October 24, 2013

For your review and filing in the Official Records, I am enclosing a copy of the follow-up audit dated October 24, 2013 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
    Bruce Moeller, Executive Director, Safety and Emergency Services
    Sally A. Bishop, Director, Emergency Management
    Jim Bennett, County Attorney
    Claretta N. Harris, Chief Deputy Director, Finance Division
    Crowe Horwath
Follow-Up Audit of Continuity of Operations Plan (CEMP, COOP/COG)

Hector Collazo, Jr., Director
Inspector General/Chief Audit Executive

Audit Team
Ken Green, CIGA – Inspector General Manager
Flo Riggie, CIA, CISA, CRISC, CIGA, ITIL-F – Inspector General Auditor II

OCTOBER 24, 2013
REPORT NO. 2013-31
October 24, 2013

The Honorable Chairman and Members
of the Board of County Commissioners

We have conducted a Follow-Up Audit of the Continuity of Operations Plans (CEMP, COOP/COG). The objectives of our review were to determine the implementation status of our previous recommendations.

Of the two recommendations contained in the audit report, we determined that one has been implemented and one has been partially implemented. The status of each recommendation is presented in this follow-up review.

We appreciate the cooperation shown by the staff of Emergency Management during the course of this review.

Respectfully Submitted,

Hector Collazo, Jr., Director
Division of Inspector General

Approved:

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

*Regulated by the State of Florida
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INTRODUCTION

Scope and Methodology

We conducted a follow-up audit of the Pinellas County Comprehensive Emergency Management Plan (CEMP) and the supporting Continuity of Operations Plan (COOP)/Continuity of Government (COG). The purpose of our follow-up review is to determine the status of previous recommendations for improvement.

The purpose of the original audit was to:

1. Determine if the CEMP meets statutory requirements and adequately plans for the public's safety.
2. 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.
3. Determine if there is adequate reporting of emergency preparedness to the Board of County Commissioners (BCC), citizens, and coordinating agencies.
4. Verify compliance with terms and conditions of selected emergency management grants from which funding was received during the audit period.

To determine the current status of our previous recommendations, we surveyed and/or interviewed management to determine the actual actions taken to implement recommendations for improvement. We performed limited testing to verify the process of the recommendations for improvement.

Our follow-up 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. Our follow-up testing was performed during the month of October 2013. The original audit period was October 1, 2010 through December 31, 2011. However, transactions and processes reviewed were not limited by the audit period.

Overall Conclusion

Of the two recommendations in the report, we determined that one was implemented and one was partially implemented. We commend management for implementation of one of our recommendations and continue to encourage management to fully implement the remaining recommendation.
## Status

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<th>OFI NO.</th>
<th>PREVIOUS RECOMMENDATION</th>
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<td>1</td>
<td><strong>CEMP Draft Has Been Submitted To FDEM As Required By The Florida Administrative Code.</strong></td>
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<td>We recommended that management continue with the CEMP review process to work with FDEM on the review and approval of Pinellas County’s CEMP.</td>
<td>✓</td>
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<td>2</td>
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<td>✓</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.
STATUS OF RECOMMENDATIONS

This section reports our follow-up on actions taken by management on the Recommendations for Improvement in our original audit of the Continuity of Operations Plans (CEMP, COOP/COG). The recommendations contained herein are those of the original audit, followed by the current status of the recommendations.

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 Recommended that management continue with the CEMP review process to work with FDEM on the review and approval of Pinellas County’s CEMP.
Status:

Implemented.

The Resolution Approving the Pinellas County Comprehensive Emergency Management Plan is documented in the June 5, 2012 agenda of the Board of County Commissioners’ meeting.

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 Recommended** that management continue the coordination and oversight of the Pinellas County COOP project and ensure the three remaining departments complete their plans.
Status:

Partially Implemented.

Of the three departments remaining at the time of the original audit, two have successfully completed their Phase 1 COOP project plan. The Clerk’s Finance Department’s plan is still in progress.

Emergency Management intends to continue to provide coordination and oversight of the Pinellas County COOP project; however, the project is currently halted. Due to major changes in personnel within the Department beginning in August of 2012, the position assigned this project was empty from August 2012 until December of 2012, and is again empty after being occupied for 6 months. Position recruiting is underway and project resumption is targeted for mid-year 2014 after the new EOC is completed and the department has moved and brought the new facility to full operational readiness.