



Office of Inspections
Office of Inspector General
U.S. General Services Administration

Agency Management Alert
GSA's Continuity Plan is Outdated and Insufficient
(Redacted)

Report JE19-006
September 26, 2019

Summary

During the course of an ongoing evaluation, the OIG Office of Inspections identified a significant deficiency in the General Services Administration's (GSA) continuity program that warrants your immediate attention. We found that the GSA Office of Mission Assurance (OMA) does not have an updated and approved agency-wide continuity plan that includes plans for the reconstitution of the agency and for supporting the physical reconstitution of the Executive Office of the President and federal executive departments and agencies, which is GSA's primary mission essential function (PMEF) during a catastrophic emergency.

The purpose of this alert is to bring to management's attention deficiencies in GSA's compliance with the U.S. Department of Homeland Security Federal Emergency Management Agency's (DHS/FEMA) *Federal Continuity Directive 1 (FCD-1), Federal Executive Branch National Continuity Program and Requirements*, January 17, 2017. This Directive requires GSA (1) to have a continuity plan approved and signed by the Organization Head or their designee, (2) to review the continuity plan annually, and (3) to update the plan as required.¹

Without comprehensive and current national continuity and reconstitution plans, GSA leadership and the federal government lack assurance that GSA can reconstitute itself or support the reconstitution of the Executive Branch during and after a disaster.

Background

FCD-1 establishes continuity program and planning requirements for federal executive departments and agencies. The Directive assigns four agencies, including GSA, additional responsibilities to "support reconstitution of the Executive Branch" under FEMA's coordination.² GSA's responsibility is to provide the Executive Branch "facility services for temporary space acquisition or identification of a new permanent facility to include contracted support as well as coordinating repairs to damaged facilities."³

In order that executive departments and agencies maintain a viable and effective continuity capability, FCD-1 requires that departments and agencies appoint an Assistant Secretary level Continuity Coordinator responsible for coordinating with the Organization Head and national continuity leadership.⁴

The GSA Administrator assigned the OMA Associate Administrator to serve as the GSA "senior accountable official for continuity."⁵ That officer is responsible for developing and

¹ FCD-1, Annex A: Program Management, Plans, and Procedures, page 2 § 1(b).

² FCD-1, Annex J: Reconstitution, pages 1-2.

³ *Id.* GSA defines its primary mission essential function is to "Lead Government Reconstitution: Lead and coordinate Federal Government physical reconstitution efforts, including acquisition and providing of real property, commercial goods, and contract services." GSA Order ADM 2430.2, *The U.S. General Services Administration Continuity of Operations Mission Essential Functions*, February 9, 2017, at Background, 2(b) and (c), page 1 (emphasis omitted).

⁴ FCD-1, Part V, page 5.

⁵ GSA Order ADM 2430.1A, *The U.S. General Services Administration Continuity Program*, October 29, 2017, Appendix B: GSA Administrator and Individual Service and Staff Office Responsibilities at page 3.

maintaining a comprehensive continuity plan.⁶ The Continuity Coordinator also must focus the agency's continuity planning, preparation, and execution on ensuring the ability to continue performing GSA's primary mission essential function and the agency's mission essential functions, including reconstitution of the Executive Branch.⁷

The agency's national continuity plan must provide critical information to allow the organization to continue or rapidly resume mission essential functions following a change to normal operating conditions.⁸ FCD-1 defines reconstitution as the continuity of government process by which surviving and replacement executive department and agency personnel resume normal operations.⁹ Accordingly, GSA's continuity plan must address GSA's internal essential functions. GSA's continuity plan also must address its external primary mission essential function under FCD-1 to support the reconstitution of the Executive Branch.

Findings

We found that OMA has not reviewed and updated the agency's national continuity plan since February 2012, when it was last approved and signed by then Administrator Martha Johnson. We asked several OMA leaders, including OMA Associate Administrator Robert Carter and Deputy Associate Administrator Robert Shaw, why the national continuity plan had not been updated since 2012. Carter and Shaw stated that OMA's focus had been on real world events, and they were unable to update the 2012 national continuity plan.

We also found that the 2012 plan does not address GSA's primary mission essential function for supporting the physical reconstitution of the Executive Office of the President and executive departments and agencies. Initially, Carter directed the OIG to OMA Director of Operations and Plans [REDACTED] or Shaw for the reconstitution plan.* However, [REDACTED] told us that he did not have a copy of the reconstitution plan, and that he had also requested a copy from other OMA personnel, but no one could find the last approved copy. When we made our request again to Carter, his Acting Chief of Staff provided us incomplete drafts from 2009 and 2011.

The continuity program directive that governed GSA when Administrator Johnson approved the current plan was the February 2008 DHS/FEMA *Federal Continuity Directive 1, Federal Executive Branch National Continuity Program and Requirements*. Eight months after Administrator Johnson approved the GSA continuity plan, DHS/FEMA replaced the 2008 version of FCD-1 with an October 2012 version.¹⁰ The current, January 2017 version of FCD-1 supersedes the 2012 version.

The 2017 version of FCD-1 contains additional guidance on continuity planning and

⁶ *Id.*

⁷ *Id.*, pages 3-4.

⁸ FCD-1, Annex N, Definitions, page 3.

⁹ FCD-1, Annex N, Definitions, page 7.

¹⁰ See DHS/FEMA *Federal Continuity Directive 1, Federal Executive Branch National Continuity Program and Requirements*, October 2012.

reconstitution.¹¹ Pursuant to the updated guidance, GSA's national continuity plan must include a comprehensive reconstitution plan that clearly identifies roles and responsibilities, as well as processes and procedures to ensure continued business operations during a catastrophic event. However, we found that GSA's 2012 continuity plan has not been updated to include plans for the reconstitution of the agency and for supporting the physical reconstitution of the Executive Office of the President and federal executive departments and agencies, which is GSA's primary mission essential function during a catastrophic emergency.

The failure to revise or adjust GSA's 2012 plan in light of the 2012 and 2017 revisions to FCD-1 creates a high risk that the agency's current plan is inadequate to achieve continuity and reconstitution for GSA, much less the physical reconstitution of the Executive Branch. For example, both the 2012 and the 2017 FCD-1 versions require a designated Reconstitution Manager to oversee all phases of the reconstitution process, a criterion not previously found in the 2008 version.¹² However, GSA has not yet designated a Reconstitution Manager, and OMA leadership provided conflicting information regarding who should hold that role. More importantly, GSA's plan does not contain information on Executive Branch reconstitution priorities. The deficiencies in GSA's current plan could lead to confusion that, at best, delays reconstitution for critical agencies and, at worst, fails to achieve the priorities that DHS/FEMA established. As a consequence, GSA's 2012 plan does not meet current FCD-1 requirements.

Conclusion

The GSA national continuity plan has not been reviewed or updated since 2012, and GSA cannot rely upon the 2012 plan as it no longer meets FCD-1 requirements. Most significantly, GSA does not have a continuity plan that addresses the agency's own reconstitution or the reconstitution of other federal executive departments and agencies.

It is critical to the agency's business operations that GSA maintain national continuity and reconstitution plans to enable GSA to resume its essential functions, and support the reconstitution of the Executive Branch. Without a current and accurate national continuity plan, GSA may not be able to continue business operations, and may fail in its primary mission essential function of helping reconstitute the Executive Office of the President and other executive departments and agencies during or after a disaster or emergency.

Recommendations

The Office of Mission Assurance Associate Administrator should:

1. Review, update, and obtain approval for the agency-wide GSA national continuity plan that reflects current business operations, meets federal requirements, provides for reconstituting GSA's operations, and supports the physical reconstitution efforts of the Executive Office of the President and the executive departments and agencies.

¹¹ FCD-1, Part I, page 3. The Directive identified reconstitution as one of the four phases of continuity: 1) Readiness and Preparedness, 2) Activation, 3) Continuity Operations, and 4) Reconstitution. According to the Directive, these four phases should be used to build continuity processes and procedures, establish goals and objectives, and support the performance of organizational primary mission essential functions and mission essential functions during a catastrophic emergency. *Id.*, at Appendix L, Continuity Operational Phases and Implementation, page 1.

¹² 2017 FCD-1, Annex J, Reconstitution, page 2; 2012 FCD-1, Annex M, Reconstitution Operations, page 2.

2. Establish a formal, annual process for reviewing GSA's national continuity plan, making adjustments and revisions as appropriate, and securing formal approval for any adjustments and revisions.

Agency Response

GSA provided a response to this report on October 2, 2019. (See Appendix A.) As we discussed with GSA's Deputy Administrator, to date the OIG has received inconsistent and unverified information regarding the existence and progress toward completion of a national continuity plan that supports the reconstitution of the Executive Branch. We issued this report to ensure leadership awareness of and attention to this critical need. We appreciate GSA's response and will address the issues raised in it in our upcoming evaluation report.



APPENDIX A

Deputy Administrator

October 2, 2019

MEMORANDUM FOR: PATRICIA D. SHEEHAN
ASSISTANT INSPECTOR GENERAL FOR INSPECTIONS

FROM: ALLISON FAHRENKOPF BRIGATI
DEPUTY ADMINISTRATOR

SUBJECT: Response to Agency Management Alert Report Number: JE19-006

This is in response to *Agency Management Alert: GSA's Continuity Plan is Outdated and Insufficient* dated September 26, 2019. While we appreciate efforts by the Office of Inspector General (OIG) to alert agency management of matters that warrant immediate attention, we note that the Office of Mission Assurance (OMA) has already undertaken extensive work to update the agency continuity plan in accordance with the *Federal Continuity Directive 1* (FCD-1) and other requirements. I understand that your office has been aware of those efforts since at least July 2019. As you know, the updated continuity plan was pending final clearance by the agency at the time you issued this report. We expect the updated plan to be finalized and signed by the Administrator in the coming weeks.

We also note that the agency's existing continuity plan has been reviewed and successfully tested each year at the national Eagle Horizon exercise since OMA was created in 2014. In fact, as part of the 2017 exercise, FEMA evaluated GSA's overall continuity elements and rated each element as "green." FEMA concluded: "GSA has a strong continuity program that ensures the performance of essential functions during emergencies."

OMA continues to train GSA's senior executives and their staffs on the agency's continuity program several times per year. Furthermore, in accordance with FCD-1, the agency biennially conducts a Business Impact Analysis (BIA) and Business Process Analysis (BPA) to ensure essential functions and continuity requirements are met. The OMA staff also represents GSA on a number of federal continuity working groups, including the NSC Domestic Resiliency Group, the Recovery Support Function Leadership Group, the FEMA Continuity Advisory Group (both as a participant and as Committee Chair), the Continuity Communications Managers Group, and the Executive Committee for National Security Communications. GSA is an active, voting participant on all committees.

GSA takes its responsibilities to support reconstitution of the Executive Branch seriously. The agency is committed to fulfilling those responsibilities in accordance with FCD-1 and all other requirements. The agency will notify the OIG upon formalization of the updated continuity plan in the coming weeks. In the meantime, please do not hesitate to contact me with any questions or concerns.



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