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Report to the Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Committee on Homeland Security and Governmental Affairs, U.S. Senate

July 2011

EMERGENCY PREPAREDNESS

Agencies Need Coordinated Guidance on Incorporating Telework into Emergency and Continuity Planning

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EMERGENCY PREPAREDNESS

Agencies Need Coordinated Guidance on Incorporating Telework into Emergency and Continuity Planning

Why GAO Did This Study

When historic snowstorms forced lengthy closings of federal offices in the National Capital Region in 2010, thousands of employees continued to work from their homes, making clear the potential of telework in mitigating the effects of emergencies. GAO was asked to (1) describe the guidance lead agencies have issued pertaining to the use of telework during emergencies; (2) describe Office of Personnel Management (OPM) and other assessments related to agencies' incorporation of telework into emergency or continuity planning, and the extent to which the lead agencies have provided definitions and practices to support agency planning; and (3) assess the extent to which OPM and the Federal Emergency Management Agency (FEMA) coordinated with other agencies on recent guidance documents. To address these objectives, GAO reviewed relevant statutes, regulations, guidance documents, and OPM's telework survey methodology, and interviewed key officials of agencies providing telework and telework-related emergency guidance.

What GAO Recommends

GAO recommends that OPM consult with other lead agencies to develop a definition and cohesive set of practices for incorporating telework into emergency and continuity planning; improve its related data collection; and establish an interagency coordination process for guidance. OPM concurred with GAO's recommendations.

What GAO Found

OPM, the General Services Administration (GSA), FEMA, and the Federal Protective Service (FPS) offer a host of telework and telework-related emergency guidance. These lead agencies provide advice to other federal agencies through regulations, directives, guides, bulletins, and other documents. Several of these guidance documents have expanded significantly in recent years, broadening the scope of the topics that they address and describing broader responsibilities for the lead agencies.

The Telework Enhancement Act of 2010 requires agencies to incorporate telework policies into their continuity of operations plans, but recent OPM reviews and other agency reports identify potential problems agencies may face in achieving this incorporation in various operational areas. GAO's review of the OPM, GSA, FEMA, and FPS governmentwide guidance on telework or telework-related emergency planning found that none of the documents provide a definition of what constitutes incorporating telework into continuity and emergency planning or a cohesive set of practices that agencies could use to achieve this type of incorporation. Additionally, this lack of a definition or description calls into question the reliability of the results of a survey OPM annually conducts to assess agencies' progress. In reviewing several lead-agency guidance documents, GAO found a number of practices, in areas such as information technology (IT) infrastructure and testing, that could help agencies incorporate telework in aspects of their continuity or emergency planning. However, because the practices are scattered among various documents principally concerned with other matters, it would be difficult for an agency to use these practices to help achieve telework incorporation and assess its progress.

Both OPM and FEMA coordinated the development of their recent guidance. OPM updated its Washington, D.C., area dismissal and closure procedures to introduce "unscheduled telework," a new option for federal employees to telework when emergencies disrupt commuting. While developing these procedures, OPM officials reported coordinating with GSA, agency human-capital officials, FEMA, unions, and the Metropolitan Washington Council of Governments, among others. However, OPM and GSA did not work together to reach out to agency chief information officers regarding potential agency capacity limitations. Consequently, officials did not offer any governmentwide guidance on ways to address IT infrastructure limitations or provide direct assistance to agencies regarding the adequacy of their IT infrastructure. In February 2011, FEMA provided agencies with more-detailed guidance for developing continuity plans. According to FEMA officials, in 2010 they shared a draft of the guidance with the interagency community, including both continuity coordinators and continuity planners, and GSA.

Contents

Abbreviations

AWA	alternative workplace arrangement
CHCO	Chief Human Capital Officer
CIO	Chief Information Officer
COOP	continuity of operations
DHS	Department of Homeland Security
DOE	Department of Energy
FCD 1	Federal Continuity Directive 1
FEB	Federal Executive Board
FEMA	Federal Emergency Management Agency
FMR	Federal Management Regulation
FPS	Federal Protective Service
GSA	General Services Administration
IT	information technology
MOU	Memorandum of Understanding
NARA	National Archives and Records Administration
NCP	National Continuity Programs
NRC	Nuclear Regulatory Commission
OEP	occupant emergency plan
OPM	Office of Personnel Management

G A O
Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

July 22, 2011

The Honorable Daniel K. Akaka
Chairman
The Honorable Ron Johnson
Ranking Member
Subcommittee on Oversight of Government Management, the Federal
  Workforce, and the District of Columbia
Committee on Homeland Security and Governmental Affairs
United States Senate

Historic snowstorms forced the Office of Personnel Management (OPM) to close federal executive agencies in the Washington, D.C., area[1] for 4 consecutive days in February 2010. The closure resulted in a particularly lengthy interruption in the government's routine operations and hours of employee productivity were lost. Despite being unable to commute to their offices, thousands of federal employees continued to work, to some degree, by teleworking from their homes, according to OPM estimates.[2] Drawing on this experience, the Director of OPM testified in March 2010 that telework was "the one effective and important tool that could make the difference between shutting down federal government services and continuing to operate with minimal interruption in emergency situations."[3]

While achieving widespread use of telework during emergencies could enhance the federal government's operational resilience and reduce the

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[1]For the purposes of dismissals and closures, OPM defines the Washington, D.C., area as the District of Columbia; Montgomery and Prince George's counties in Maryland; Arlington and Fairfax counties, and the independent cities of Alexandria, Fairfax, and Falls Church in Virginia. According to OPM, 302,000 federal employees worked in this area in December 2010.

[2]Telework refers to a flexible workplace arrangement where employees perform their duties, responsibilities, and other authorized activities from approved worksites. The approved worksite is different than the location from which the employee would typically work.

[3]Statement of John Berry, Director, U.S. Office of Personnel Management, before the Subcommittee on Economic Development, Public Buildings, and Emergency Management, Transportation and Infrastructure Committee, United States House of Representatives, *Snow Disasters for Local, State and Federal Governments in the National Capital Region: Response and Recovery Partnerships with FEMA* (Washington, D.C.: Mar. 23, 2010).

GAO-11-628 Telework in Emergency/Continuity Planning

costs of lost productivity, making use of telework during emergencies governmentwide is not a simple undertaking. As we have previously reported, implementing telework during normal conditions affects several areas of consideration, such as human-capital policies and procedures, information technology infrastructure (equipment, software, and security), telecommunication infrastructure, and facility space utilization.[4] In addition, implementing the use of telework during an emergency situation requires its incorporation into the unique requirements of emergency planning and operations.

Three agencies have drawn on their respective areas of responsibility and expertise to offer guidance to executive-branch agencies on how to incorporate telework into routine and emergency operations. OPM provides governmentwide human-capital policies, and within that context has provided guidance to agencies on using telework during routine and emergency operations. OPM has also provided technical assistance to agencies on implementing their telework programs, such as through reviewing their telework policies. The General Services Administration (GSA) provides governmentwide guidance on the use of federal facilities and the purchase of equipment, and has issued guidance regarding facilities, technology, and workplaces to help promote telework. The Federal Emergency Management Agency (FEMA) provides governmentwide guidance on emergency preparedness, and within that context, has offered guidance relating to the potential use of telework in agency continuity of operations (COOP) plans and operations.[5] In addition to these three agencies, the Federal Protective Service (FPS) provides governmentwide guidance that could influence the potential use of telework during emergencies. FPS provides security at GSA-owned or leased facilities and has issued guidance to agencies on developing plans to keep building occupants safe during emergencies.

In response to your request to evaluate the role these lead agencies are playing in providing guidance that promotes the use of telework during emergencies, this report will (1) describe the guidance that OPM, GSA,

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[4]GAO, *Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts*, GAO-03-679 (Washington, D.C.: July 18, 2003).

[5]COOP efforts are a comprehensive set of steps agencies must undertake to help ensure that they can continuously provide essential operations and resume full services to the American public in the face of long-term, severe emergencies requiring agencies to occupy alternate facilities.

FEMA, and FPS have issued pertaining to the use of telework during emergencies; (2) describe OPM and other assessments related to agencies' incorporation of telework into emergency or continuity planning, and the extent to which the lead agencies have provided definitions and practices to support agency planning; and (3) assess the extent to which OPM and FEMA coordinated with other agencies on the development of their recently released guidance documents pertaining to the use of telework during emergencies.

To address these three objectives, we reviewed governmentwide telework and emergency-related statutes. We also reviewed regulations and guidance issued by OPM, GSA, FEMA, and FPS and conducted interviews with key officials from each of these agencies regarding each objective. We conducted additional data collection and analyses to answer selected objectives. To assess the extent to which OPM's recent reviews of the agencies' telework policies and programs addressed the incorporation of telework into continuity plans, we reviewed OPM's annual telework survey and its 2010 evaluation of agency telework policies. We compared the methodologies OPM used to generally accepted survey and evaluation methodologies. To identify practices suggested by OPM, GSA, FEMA, and FPS for incorporating telework into continuity or emergency planning, we reviewed these agencies' related governmentwide regulations and guidance. We compared these practices to practices that GAO previously suggested for the same purpose and identified examples of practices suggested by OPM, GSA, FEMA, and FPS that were similar to GAO-suggested practices.

We conducted this performance audit from February 2010 through July 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Legislation related to telework began to emerge from Congress in the 1990s. For example, beginning in 1992, Congress provided funding to

GSA to establish the first federal telework centers.[6] Three years later, Congress permanently authorized federal agencies to spend money to install telephone lines and related equipment and pay monthly charges for federal workers authorized to work at home, in accordance with OPM guidelines.[7] Within the legislation that evolved from 1992 through 2009, the most significant congressional action was the enactment of Section 359 of Pub. L. No. 106-346 in October 2000. This section required each executive-branch agency to establish a telework policy "under which eligible employees of the agency may participate in telecommuting to the maximum extent possible without diminished employee performance."[8] It also directed OPM to provide that the law's requirements were applied to 25 percent of the federal workforce by April 2001 and to an additional 25 percent of the federal workforce in each subsequent year, until 2004 when the law was to be applied to 100 percent of the federal workforce.

From 2005 through 2009, federal workforce participation in routine telework has remained low. In calendar year 2009, according to OPM's latest survey of federal agency telework coordinators, less than 6 percent of federal employees employed by the 79 agencies that responded to the survey teleworked at least 1 day per month, while less than 4 percent of the federal workforce employed by these agencies teleworked at least 1 day per week. The estimated percentage of employees teleworking at least 1 day per month, relative to the number of the federal employees employed by the agencies that responded to the survey, has remained between 5 and 7 percent, since calendar year 2005.

The legislation for telework provided both OPM and GSA with leadership roles in the implementation of telework in the federal government. However, in 2003, we reported that the lack of coordination between

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[6]Pub. L. No. 102-393, 106 Stat. 1729, 1745 (Oct. 6, 1992). A GSA-sponsored telework center was a facility that (1) provided, on a fee for use/service basis, workstations and other office facilities/services used by federal employees from several agencies and was used as a geographically-convenient alternative worksite for its users. In November 2010, GSA announced that it planned to end its sponsorship and funding of its 14 telework centers by March 2011, due to the high cost of maintaining the centers relative to their low usage, and the increased, widespread use of residential telework.

[7]Section 620 of Pub. L. No. 104-52, 109 Stat. 468, 501 (Nov. 19, 1995); 31 U.S.C. 1348 note.

[8]Section 359 of Pub. L. No. 106-346, 114 Stat. 1356, 1356A-36 (Oct. 23, 2000); 5 U.S.C. § 6120 note.

OPM and GSA had resulted in executive agencies receiving conflicting messages on several telework-related topics, including emergency closings of government offices. These conflicting messages had created confusion for federal agencies in implementing their individual telework programs. To provide federal agencies with consistent, inclusive, unambiguous support and guidance related to telework, we recommended that OPM and GSA better coordinate their efforts.[9] In response, OPM and GSA agreed later that year on a Memorandum of Understanding (MOU).[10] Under this MOU, OPM and GSA agreed to the respective responsibilities listed in table 1.

Table 1: Agency Responsibilities under 2003 OPM-GSA Telework MOU

Agency	Agency responsibilities
OPM	• Continue to maintain the joint website www.telework.gov.
	• Continue to conduct an annual survey of agency telework programs and report to Congress.
	• Develop human-resources management policy and guidance to help agencies promote telework, in coordination with GSA.
GSA	• Provide guidance on innovative workplace initiatives.
	• Continue to develop, pilot-test, promote, and provide guidance on innovative workplace initiatives.
	• Continue to provide telecenters where a demonstrated need exists.
	• Continue to seek resolution to issues regarding information technology (IT) support for telework where concerns about the selection, acquisition, funding, and support for home IT equipment continue to be a barrier to the successful implementation of telework programs. OPM will work with GSA to reach appropriate groups of chief information officers (CIO) to facilitate their greater involvement in agency long-term planning.
	• Develop innovative workplace policy and guidance as well as policy and guidance in other areas under GSA's mission (such as travel, facility management/real property, or telecommunications policy) to help agencies promote telework, in coordination with OPM.
	• Continue to maintain the federal telework listserv and communications with the network of federal agency telework coordinators.

Source: OPM, GSA.

The agencies also agreed in the MOU to continue to share draft telework documents to ensure mutual concurrence.

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[9]GAO-03-679, 30.

[10]*Memorandum of Understanding (MOU) Between the U.S. Office of Personnel Management (OPM) and the U.S. General Services Administration (GSA) Regarding the Government-wide Telework Program* (October 2003).

Recently, Congress passed a framework for implementing a comprehensive federal telework program. Congress passed the Telework Enhancement Act of 2010[11] in November 2010, and the President signed it into law in December 2010. The law requires each executive agency to designate a telework managing officer, establish a telework policy, and submit an annual report to the Chair and Vice Chair of the Chief Human Capital Officers (CHCO) Council[12] on the agency's efforts to promote telework. Under the act, OPM is to play a leading role in helping agencies implement the new telework provisions. The law requires OPM to provide policy and policy guidance for telework in several areas, including pay and leave, agency closure, performance management, official worksite, recruitment and retention, and accommodations for employees with disabilities. In developing its telework policy and policy guidance, OPM is to consult with FEMA, GSA, and the National Archives and Records Administration (NARA) relative to their designated areas of policy responsibility, as listed in table 2. NARA provides guidance to agencies on ensuring the federal government's essential records are, among other things, secure and accessible to key federal personnel during emergencies.

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[11]Pub. L. No. 111-292, 124 Stat. 3165 (Dec. 9, 2010), codified at chapter 65 of title 5, United States Code.

[12]The Chief Human Capital Officers Act of 2002, enacted as part of the Homeland Security Act of 2002, established a Chief Human Capital Officers Council to advise and coordinate the activities of member agencies on such matters as the modernization of human-resources systems, improved quality of human-resources information, and legislation affecting human-resources operations and organizations. Pub. L. No. 107-296, § 1303, 116 Stat. 2135, 2288-89 (Nov. 25, 2002), 5 U.S.C. § 1401 note.

Table 2: OPM's Policy and Policy Guidance Consultation Responsibilities, per the Telework Enhancement Act of 2010

Agency	Designated areas of policy and policy guidance for telework
GSA	• Telework centers
	• Travel
	• Technology
	• Equipment
	• Dependent care
FEMA	• COOP
	• Long-term emergencies
NARA	• Efficient and effective records management
	• Preservation of records, including Presidential and Vice-Presidential records

Source: Telework Enhancement Act.

The Telework Enhancement Act also includes several provisions related to the potential use of telework during emergencies. The law requires agencies to incorporate telework into their COOP plans. OPM is to report annually to Congress and provide its assessment of each agency's progress toward its goals, such as the effect of telework on emergency readiness. Finally, the act requires the Director of OPM to research the utilization of telework that identifies best practices and recommendations for the federal government and review the outcomes associated with an increase in telework. Agencies with jurisdiction over such matters as energy consumption, urban transportation patterns, and planning the dispersal of work during periods of emergency, shall work cooperatively with the Director, as necessary, to carry out these research responsibilities.

OPM, GSA, FEMA, and FPS Have Provided Agencies with Guidance Related to Using Telework during Emergencies

OPM, GSA, FEMA, and FPS offer a host of guidance on telework or telework-related emergency planning.[13] Several of these guidance documents have expanded significantly in recent years, broadening the scope of the topics that they address and describing broader responsibilities for the lead agencies.

After Congress required agencies to establish a telework policy in 2000,[14] OPM provided several telework guidance documents to agencies. OPM's major telework guidance is contained in the *Guide to Telework in the Federal Government*.[15] According to Federal Continuity Directive 1 (FCD 1), OPM is also responsible for developing and promulgating personnel guidance to support the operation of federal executive-branch agencies during emergencies.[16] OPM has also issued regulations providing uniform instructions to agencies on making payments to employees evacuated due to, among other reasons, natural disasters and pandemic health crises.[17] OPM also has the lead role, by mutual agreement with other agencies in the region, in determining when to close federal offices and dismiss employees in the Washington, D.C., area. According to OPM, these procedures, referred to as the Dismissal Guide, ensure a coordinated response to areawide disruptions, which is important given the concentration of federal employees in this area. According to an OPM official, its dismissal and closure procedures are updated annually. The latest procedures were issued in December 2010.[18] While these procedures directly apply only to executive agencies in the Washington, D.C. area, OPM officials explained that agency leaders in other regions of the United States use OPM's procedures as a model. In addition, OPM's

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[13]For the purposes of this report, we use "guidance" as a generic term to refer to regulations, directions, guides, bulletins, and other documents that these agencies have issued for use by federal agencies.

[14]Section 359 of Pub. L. No. 106-346 (Oct. 23, 2000).

[15]Office of Personnel Management, *Guide to Telework in the Federal Government* (Washington, D.C.: April 2011). This guide is referred to as "OPM's Telework Guide" in this report.

[16]Federal Emergency Management Agency, *Federal Executive Branch National Continuity Program and Requirements*, FCD 1(Washington, D.C.: February 2008).

[17]5 C.F.R. part 550, subpart D, Payments During Evacuation.

[18]Office of Personnel Management, *Washington, DC Area Dismissal or Closure Procedures* (Washington, D.C.: December 2010).

guidance on managing human-capital resources during emergencies and continuity events was included in FEMA's directive to executive agencies on developing and implementing continuity plans.[19] Table 3 lists examples of OPM guidance relating to the use of telework during various types of emergencies, as provided in OPM and FEMA documents.

Table 3: OPM Guidance Related to Use of Telework during Emergencies

Policy area	Sources
Pay and leave	• Federal regulation 5 C.F.R. part 550, subpart D, Payments During Evacuation. • *Handbook on Pay and Leave Benefits for Federal Employees Affected by Severe Weather Conditions or Other Emergency Situations* (Washington, D.C.: June 2008).
Emergency-specific	• *Human Resources Flexibilities Available to Assist Federal Employees During Emergencies* (Washington, D.C.: May 5, 2009). Guidance memos pertaining to specific events, such as: • *Inclement Weather Response in the Washington, DC Area for February 5, 2010.* • *Planning for Pandemic Influenza* (Washington, D.C.: May 2009) and *Pandemic Influenza 2009: Additional Guidance* (Washington, D.C.: July 2009).
Regional-specific	• *Washington, DC Area Dismissal and Closure Procedures* (Washington, D.C.: December 2010).
Continuity planning	• Annex J, "Human Capital," in FEMA's FCD 1 (Washington, D.C.: February 2008).
Telework	• *Guide to Telework in the Federal Government* (Washington, D.C.: April 2011).

Source: OPM and FEMA.

Since 2000, OPM has expanded the scope of its guidance on the use of telework in the federal government. For example, the telework guidance OPM issued in 2001 listed several topics agencies should address in their telework policies. The current version of OPM's guidance for routine telework, the 2011 Telework Guide, provides guidance for managers and employees on an array of topics, such as the telework agreement, purchasing equipment, communications, and performance management.[20] This guide also provides advice on using telework during emergencies, continuity events, and pandemics. Compared to the 2006 Telework Guide, the immediate predecessor to the 2011 Guide, the 2011 Guide added

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[19]Federal Emergency Management Agency, "Human Capital," annex J, *Federal Continuity Directive 1.*

[20]Until OPM issued an updated telework guide in April 2011, OPM's main telework guidance document was *A Guide to Telework in the Federal Government* (OPM-VI-I), which was issued in 2006, according to an OPM official.

- a summary of the major sections of the Telework Enhancement Act;
- the checklist items that OPM used to evaluate telework policies to help agency officials assess and revise their policies;
- guidance on pay, leave, and work-schedule flexibilities, including the new option of unscheduled telework; and
- telework and reasonable accommodations for employees with disabilities.

During the same period, OPM expanded some of its emergency-related pay and leave policies. For example, OPM broadened its regulations on pay during an evacuation to include, in the event of a pandemic health crisis, permission for agencies to order employees to work from home (or an alternative location), regardless of whether they have a telework agreement.

As the lead agency in the management of federal workplaces, GSA provides governmentwide workplace guidance related to telework, emergency planning, and continuity planning and operations. Under its authority to provide guidance, assistance, and oversight on the establishment and operation of alternative workplace arrangements, such as telework,[21] GSA has issued guidelines, through Federal Management Regulation (FMR) Bulletins, on the use of information and telecommunication technology to support telework and the implementation and operation of alternative workplace arrangements, as shown in table 4. GSA, under its responsibility to operate, maintain, and protect the buildings and grounds it controls, also leads the federal Occupant Emergency Program, which consists of short-term emergency-response programs for particular facilities.[22] Under this program, each agency or facility develops and maintains an occupant emergency plan (OEP) which details the procedures for safeguarding lives and property, such as evacuation or shelter-in-place, in response to a wide range of emergencies.[23] At the agency level, the OEP and the continuity plan are the principal emergency-response plans. According to GSA's regulations,

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[21]40 U.S.C. §587 (c)(3). GSA also has authority to establish telecommuting centers pursuant to 40 U.S.C. §587(b)(1).

[22]6 U.S.C. § 232; GSA regulations on occupant emergency programs are found at 41 C.F.R. §§ 102–74.230 to 102–74.260.

[23]Shelter-in-place refers to a set of emergency procedures taken inside a building to protect occupants when an emergency situation makes it dangerous for occupants to evacuate.

GSA approves OEPs for GSA-controlled facilities. Lastly, as described in FCD 1, GSA is also responsible for assisting FEMA and other federal agencies in continuity planning and operations. GSA's ongoing responsibilities include coordinating the provision of facilities to support the continuity of the executive-branch agencies and providing data on alternate facilities.

Table 4: Sources of GSA Guidance Related to Use of Telework during Emergencies

Policy area	Sources
Alternative workplace arrangements and telework	• Federal regulation 41 C.F.R. §§ 102–74.585 to 102–74.600 on Telework. • Federal Management Regulation (FMR) Bulletin 2006-B3, "Guidelines for Alternative Workplace Arrangements," 71 Fed. Reg. 13845 (Mar. 17, 2006). • FMR Bulletin 2007-B1, "Information Technology and Telecommunications Guidelines for Federal Telework and Other Alternative Workplace Arrangement Programs," 72 Fed. Reg. 9532 (Mar. 2, 2007).
Emergency planning	• Federal regulation 41 C.F.R. §§ 102–74.230 to 102–74.260 on the Occupant Emergency Program. • FEMA, "Continuity Facilities," Annex G, FCD 1 (Washington, D.C.: February 2008).

Sources: GSA, FEMA.

GSA issued regulations on telework in 2005.[24] These regulations included references to existing statutory provisions on telecommuting and OPM's 2001 guidance regarding telework and telework centers. In these regulations, GSA also described the statutory obligation of agencies to consider whether the need for space could be met by alternative workplace arrangements[25] and offered to assist agencies with alternative workplace arrangements. In 2006, GSA issued an FMR Bulletin that provided significantly expanded guidance to agencies on using alternative workplace arrangements. In addition to what had been stated in the regulation, the bulletin provided detailed information on implementing alternative work arrangements, such as teleworking and telework centers. The bulletin addressed such topics as the agency's provision of equipment, payment of telework-related expenses, and factors to consider in using alternative workplace arrangements, often with citations to related federal regulations or other guidance. GSA issued another FMR bulletin the following year that provided agencies with recommendations on the type of information technology (IT), telecommunications, and

[24]41 C.F.R. §§ 102–74.585-600.

[25]40 U.S.C. § 587(c)(2).

peripheral services and equipment,[26] as well as security, needed to adequately support telework. Like its predecessor, the bulletin also provided citations to related federal regulations or guidance issued by other federal agencies.

FEMA and FPS provide governmentwide guidance to federal agencies on responding to emergencies. FEMA is responsible for leading the nation in developing a national preparedness system, including serving as the executive branch's lead agent on matters concerning the continuity of national operations.[27] To help federal agencies develop continuity plans and programs, FEMA offers direction in the FCD 1. According to this directive, each federal agency has continuity responsibilities and certain agencies have leadership responsibility for providing governmentwide guidance or services. For instance, all federal agencies are responsible for, among other things, developing plans to ensure the continuation of their essential functions and incorporating continuity requirements into their daily operations. Among other continuity guidance FEMA has issued, FEMA has also provided agencies with a COOP plan template to help them develop their plans. Both FEMA documents, listed in table 5, include guidance relating to the potential use of telework.

FPS is authorized to protect the buildings, grounds, and property that are under the control and custody of GSA, as well as the persons on the property.[28] Towards that end, FPS provided agencies with a guide, template, and instructions on developing an OEP and guidelines on responding to various emergency situations. The OEP guide refers to the potential use of telework during emergencies. A GSA official indicated that those federal agencies that have delegated authority to own and operate their own, non-GSA facilities, are required to have their own

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[26]Peripheral services and equipment may include video conferencing, printers, and scanners.

[27]6 U.S.C. §§ 313- 314.

[28]FPS was part of GSA until it was transferred to the Department of Homeland Security (DHS) in 2003 pursuant to the Homeland Security Act of 2002. Under the act, except for the law enforcement and related security functions retained by FPS, GSA retained all powers, functions, and authorities related to the operation, maintenance, and protection of its buildings and grounds. As a result of the act, GSA and FPS both have protection responsibilities for GSA-controlled buildings and grounds. 6 U.S.C. §§ 203 and 232; 40 U.S.C. § 1315.

version of the OEP. He said that most of these agencies follow FPS's guidance in developing their OEPs.

Table 5: Sources of FEMA and FPS Guidance Related to Use of Telework during Emergencies

Department of Homeland Security (DHS) agency	Policy area	Guidance documents
FEMA	Continuity planning	• *Federal Executive Branch National Continuity Program and Requirements*, FCD 1 (Washington, D.C.: February 2008). • *Continuity of Operations Plan Template and Instructions* (Washington, D.C.: February 2011).
FPS	Emergency planning	• *Occupant Emergency Plans: Development, Implementation and Maintenance* (Washington, D.C.: May 2010). • *Occupant Emergency Plans, Supplement 1: Emergency Situations* (Washington, D.C.: May 2010). • *Occupant Emergency Plans, Supplement 2: Template Instructions* (Washington, D.C.: May 2010). • *Occupant Emergency Plans, Supplement 3: OEP Template* (Washington, D.C.: May 2010).

Source: FEMA, FPS.

As with some of the OPM and GSA guidance documents, the current version of FEMA's guidance on continuity planning, FCD 1, issued in 2008, has expanded since the original version was issued in 2004.[29] For example, in the 2008 version of FCD 1, the description of GSA's responsibilities included such additional duties as coordinating the provision of executive-branch facilities to support continuity operations. Similarly, the description of OPM's additional responsibilities include providing guidance to agencies on developing personnel policies that address continuity plans and procedures, as well as alternate work options, and coordinating continuity efforts before, during, and after an

[29]In 2004, guidance to executive-branch agencies on continuity planning and programming was contained in FEMA's Federal Preparedness Circular 65, *Federal Executive Branch Continuity of Operations* (Washington, D.C.: June 15, 2004). Federal Preparedness Circular 65 was succeeded in 2008 by FEMA's Federal Continuity Directive 1 (FCD 1) (Washington, D.C.: February 2008). FCD 1 was intended to help implement the National Security Presidential Directive 51 / Homeland Security Presidential Directive 20 (NSPD-51/HSPD-20) *National Continuity Policy* (Washington, D.C.: May 2007), by providing direction to the federal executive branch on the development of continuity plans and programs.

emergency with the Federal Executive Boards (FEB).[30] In addition, FEMA broadened the scope of the guidance to include such topics as using risk management to maximize an agency's readiness, and aligning acquisition and budgeting to support the continuity program.

Agencies May Need Assistance with Incorporating Telework into Emergency or Continuity Operations

Recent Reports Point Out Potential Problems with Incorporating Telework into Emergency or Continuity Operations in Various Operational Areas

Several recent reports from OPM, inspectors general, and GAO have identified several examples of potential problems with incorporating telework into emergency or routine operations at various agencies. These examples identified problems in such operational areas as planning, IT, personnel readiness, and program monitoring. For instance, in 2010 OPM evaluated the telework policies of 72 executive-branch departments and agencies to determine whether the policies provided a foundation for effective telework programs.[31] Each policy was evaluated against two objectives: (1) whether the policy could be clearly understood and easily used and (2) whether the policy included elements essential to the development and support of an effective program, with respect to program implementation, participant responsibilities, and program operations. For each evaluation objective, OPM developed a checklist of items that OPM evaluators used to assess the agencies' telework policies. One of the policy checklist questions asked the evaluators to assess whether the telework policy "references agency emergency

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[30]FEBs are located in 28 major U.S. metropolitan areas. Their mission is to foster communication, coordination, and collaboration with federal, state, and local government agencies. One of the FEBs' three lines of business is to create effective collaboration on emergency response and readiness, and to educate the federal workforce on health and safety issues in emergency situations.

[31]Office of Personnel Management, *An Evaluation of Federal Telework Policies: Summary Report, Discussion Draft* (Washington, D.C.: June 2010). According to an OPM official, this is the final version of the report.

policies (e.g., COOP and pandemic)." According to the report, OPM evaluators scored 25 of the 73 agency telework policies (35 percent) as not referencing the agencies' emergency policies at all.

Other recent reports indicated potential problems in such operational areas as IT, personnel, and program monitoring:

- Information Technology
  - In 2010, we reported that federal wireless networks were increasingly vulnerable to attack and that information on the networks was vulnerable to unauthorized use and disclosure.[32]
  - In 2009, on the basis of our review of a 2007 Department of Homeland Security (DHS) report, we concluded that, in the event of a protracted emergency where 40 percent or more of the population was absent from school or work, residential users in most locations in the United States, including federal teleworkers, would likely experience congestion when attempting to use the Internet.[33]
- Personnel Readiness
  - While OPM's Telework Guide indicates that the potential to use telework during an emergency depends on agencies implementing routine telework as broadly as possible, OPM's latest telework survey, as noted earlier, reported that less than 6 percent of federal employees employed by the 79 agencies responding to the 2009 survey teleworked at least 1 day per month.
  - In 2010, the Inspector General for the U.S. Nuclear Regulatory Commission (NRC) reported that, as of October 2009, most of NRC's offices had not identified all of the individuals needed to perform essential functions and high-priority tasks while teleworking during a pandemic.[34]

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[32]GAO, *Information Security: Federal Agencies Have Taken Steps to Secure Wireless Networks, but Further Actions Can Mitigate Risk*, GAO-11-43 (Washington, D.C.: Nov. 30, 2010).

[33]GAO, *Influenza Pandemic: Key Securities Market Participants Are Making Progress, but Agencies Could Do More to Address Potential Internet Congestion and Encourage Readiness*, GAO-10-8 (Washington, D.C.: Oct. 26, 2009).

[34]Office of Inspector General, U.S. Nuclear Regulatory Commission, *Audit of NRC's Telework Program*, OIG-10-A-13 (Washington, D.C.: June 9, 2010).

- Program Monitoring
  - According to an OPM official, few agencies in the Washington, D.C., area during the winter of 2011 were able to provide data on employees' use of telework during an emergency. In issuing its Dismissal Procedures in December 2010, OPM requested that agencies in this area provide data on the use of telework following any OPM-announced dismissal or closure. However, by March 2011, OPM withdrew its request because, according to an OPM official, few agencies in the area provided the requested data.

Current Governmentwide Guidance Does Not Provide a Definition or Set of Practices for Incorporating Telework into Continuity and Emergency Planning

Our review of the OPM, GSA, FEMA, and FPS governmentwide guidance on telework and telework-related emergency planning found that none of the documents provided a definition of what constitutes incorporating telework into continuity and emergency planning or operations, or a cohesive set of practices that agencies could use to achieve this type of incorporation. Such practices would address the wide range of factors that could affect the potential use of telework during emergency operations such as planning, training, IT infrastructure (equipment, software, and security), testing, facilities, data collection, and program monitoring.

OPM's Annual Telework Survey Does Not Define "Integration" of Telework into Emergency Plans

OPM, in partnership with GSA, has conducted an annual survey of the executive-branch agencies since 2001 to ascertain the status of telework and gauge agency progress in various aspects of their telework programs, such as participation, policy, eligibility, cost savings, and technology. Since 2002, OPM has used the survey results to prepare its annual report to Congress on the status of telework in the federal government.

Since 2004, the survey has asked agency telework coordinators about whether telework had been integrated or incorporated[35] into the agency's emergency or continuity plans, or both. In the latest survey, the 2009

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[35]The exact wording of this question has varied over the years. For example, recent annual reports have described the survey as asking whether telework had been "integrated" into the agency's emergency preparedness or continuity plans, while earlier reports describe the question as asking whether telework had been "incorporated" into these plans. We principally use "incorporation" in this report, as used in the Telework Enhancement Act, but on occasion we also use "integrate" when it is used in the document being described.

Telework Survey, the question was worded as follows: "Telework has been integrated into your agency emergency preparedness / COOP plans." The survey asks the coordinators to respond with either Yes or No. A review of the responses to this question, for calendar years 2004 through 2009, shows that the number of agencies reporting they had integrated telework into their emergency preparedness or continuity plans increased from 27 of 78 agencies responding for calendar year 2005 (or 35 percent), to 57 of 79 agencies responding for calendar year 2009 (or 72 percent). OPM reported that the 2009 Telework survey results were an example of an encouraging use of telework implementation practices.[36]

However, OPM's survey instrument does not describe what OPM means by "integrating" telework into emergency or continuity planning and operations. The survey does not provide a definition or citation to another document. This is also the case for the 2004 through 2008 surveys. One reference the telework coordinators might have turned to was OPM's 2006 Telework Guide, the version in use at the time of the 2007 through 2009 surveys. However, the 2006 guide did not provide a definition or describe a set of practices required to integrate telework into emergency or continuity planning and operations, or refer to other federal guidance containing such a definition or set of practices.

This lack of a definition or description calls into question the reliability of the survey results for assessing agencies' progress. As GAO has previously indicated, survey questions should use unambiguous language and concrete terms, and specify the conditions that the respondents are to report on.[37] Without a common understanding of what OPM means by "integration," the agency telework coordinators who responded to the survey would have applied their own understanding of what integration means. As a result, OPM officials could not describe what agencies meant when they reported they had integrated telework into agency emergency preparedness / COOP plans. The question is also vague in that it does not define what it means by emergency preparedness plans and seems to treat emergency preparedness plans the same as

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[36]Office of Personnel Management, *2010 Status of Telework in the Federal Government* (Washington, D.C.: February 2011).

[37]For example, see GAO, *Federal Transit Administration: Progress and Challenges in Implementing and Evaluating the Job Access and Reverse Commute Program,* GAO-09-496 (Washington, D.C.: May 21, 2009) and *Developing and Using Questionnaires,* GAO/PEMD-10.1.7 (Washington, D.C.: October 1993).

continuity plans. As noted earlier, agencies may have several different types of emergency preparedness plans. The question does not explain whether the agency is to reply "Yes," if telework has been "integrated" into just one emergency preparedness plan, or only if telework has been "integrated" into all of the emergency preparedness plans, as well as the COOP plan. Lastly, the response choice of Yes or No does not permit the coordinator to report interim progress, as would be possible if the response choices reflected various stages of integration.

Taken Together, Practices Suggested by Four Agencies Could Help to Define the Set of Practices Needed to Incorporate Telework in Continuity and Emergency Plans

The Telework Enhancement Act of 2010 now requires that federal agencies incorporate telework into their COOP plans. However, the act itself does not define the standards for adequate incorporation. Nevertheless, we found that three lead telework agencies and FPS have provided some governmentwide guidance that could help agencies in their efforts to incorporate telework into their continuity and emergency plans and operations.

In reviewing several current OPM, GSA, FEMA, and FPS guidance documents, we found a number of practices that could help agencies incorporate telework into aspects of their continuity or emergency planning. Appendix II provides a listing of practices that OPM, GSA, FEMA, and FPS have suggested in various telework or emergency-related guidance documents. These practices address a variety of operational areas, such as human capital, training, facilities, testing, and technology infrastructure. However, it would be difficult for an agency to use these practices to help achieve telework incorporation and assess their progress. First, the practices are included in guidance documents that are principally concerned with matters other than incorporating telework into emergency plans. For example, as noted earlier, OPM's Dismissal Guide describes the announcements and procedures that federal executive agencies in the Washington, D.C., area are to follow when there are work disruptions in the region, but also reminds the agencies that they have a responsibility to ensure that their equipment and technical support have been tested, and their IT infrastructure can support a large number of teleworkers simultaneously. However, the guide does not provide a cross-reference to additional OPM or GSA guidance that would help agencies use IT equipment and services to support telework, or suggest consultation with the agencies' chief information officers (CIO). Moreover, according to their 2003 MOU, OPM and GSA agreed to work together to help agencies use IT to support telework and facilitate the CIOs involvement in related planning. Second, these practices are scattered across a wide range of documents, so it is

difficult to be certain that agencies would consider all operational areas required to fully incorporate telework into emergency or continuity planning. For example, as illustrated in appendix II, OPM guidance dealing with a range of human-capital topics, such as pay and leave and human-resource flexibilities, also includes practices that could help agencies incorporate telework into their continuity and emergency planning. But without lead agency collaboration and consensus on a comprehensive set of practices on incorporating telework into emergency and continuity planning, agencies and OPM cannot be sure that each agency has considered all of the relevant areas of its operations that may need to be adapted to support teleworkers during an emergency.

It is also not unusual for a lead agency to draw practices, in whole or in part, from other lead agencies' guidance. While this helps the reader become aware of the potential crosscutting implications of the guidance, the description of these practices often does not provide a reference to more-specific guidance available from the other lead agency, which would also be helpful. For example, FEMA's FCD 1 suggests repeatedly that agencies consider using telework to support continuity operations, but does not reference OPM or GSA telework guidance.

OPM and FEMA Coordinated Recently Issued Guidance with Some Stakeholders, but OPM Did Not Tap into the CIO Community

OPM and FEMA's Recent Telework-Emergency Guidance Was Coordinated with Some Stakeholders

OPM and FEMA have both recently released updated guidance pertaining to telework and emergency planning, and both agencies reached out to some of their stakeholder communities. Following the extended closings of federal agencies in the Washington, D.C., area during the February 2010 snowstorms, OPM updated the Dismissal Guide to introduce "unscheduled telework," a new option for federal employees to telework, to the extent possible, when severe weather conditions or other circumstances disrupt commuting. OPM officials believe this option will help maintain the productivity and resilience of the

federal workforce during periods of heavy snow accumulation, national security events, and other regional emergencies and help ensure the safety of employees. This new option had effects in areas of policy and guidance, such as pay and leave, agency IT capacity, telework data collection, and emergency operations. Although only applicable to executive-branch agencies in the Washington, D.C., area, OPM officials indicated that the guide also serves as a reference and model for closures and dismissals due to snow and other emergencies in other regions. The guide notes that FEBs coordinate similar dismissal or closure procedures in other major metropolitan areas.

Officials from OPM's Pay and Leave Office led the development of the 2010 Dismissal Guide. The OPM officials' goal was to coordinate among stakeholders and issue the guide before the arrival of winter storms. According to these officials, they developed potential revisions and began the process of coordination among many stakeholders on October 28, 2010, by briefing the deputy Chief Human Capital Officers (CHCO) on the new concepts and asking for their reactions.

During November 2010, OPM officials continued to share concepts and drafts, receive comments, and incorporate revisions to the draft guide. During this period, they sought additional reviews of the draft guide from agency human-capital officials. The Executive Director of the CHCO Council distributed the draft for agency comment to the deputy CHCOs, requesting that they share the draft with the points of contacts within their agencies. In addition, OPM officials said they consulted with unions, the Metropolitan Washington Council of Governments, and the FEMA Office of National Capital Region Coordination, among others.

In December 2010, the OPM officials completed their stakeholder reviews and OPM completed its internal clearance process to issue the guide. They presented the new Guide to the CHCO Council members and the White House staff on December 14 and held a media briefing on the new guide when it was issued on December 15. On the same day, OPM officials reported they also briefed the FEBs on the new guide.

FEMA also provided updated guidance in 2010 to agencies on developing their continuity plans. In 2004 FEMA issued a template to help agencies develop continuity plans. The template provided general guidance, sample text, and a template containing all the elements of a viable continuity plan. This enabled agencies to insert information from the template into their continuity plans as they deemed appropriate. FEMA began developing its latest version of the template in 2009. By May 2009,

FEMA National Continuity Programs (NCP) officials had developed the updated template sufficiently to share an initial version of it with departments and agencies to prepare for the 2009 continuity exercise called Eagle Horizon.[38]

FEMA NCP officials continued to update the template during 2010. According to NCP officials, the template was discussed during Interagency Continuity Working Group meetings and Continuity Advisory Group meetings.[39] In September and October 2010, NCP officials e-mailed more than 100 members of the interagency community, including both continuity coordinators and continuity planners, requesting comments on the updated template draft. In addition, NCP officials provided the GSA Office of Emergency Response and Recovery, which has responsibility for policy guidance on alternate continuity facilities,[40] the opportunity to review and comment on the template.

FEMA finalized the continuity template in February 2011 and posted it on its website. The template provided agencies with more-detailed guidance for each section of the plan, including proposed language, citations for supporting authorities and a glossary of terms. This template included guidance on the use of alternative facilities, including telework.

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[38]According to FEMA, Eagle Horizon is an annual continuity exercise for all executive-branch departments and agencies within the National Capital Region that requires federal departments and agencies to demonstrate their capability to perform mission-essential functions in the event of a major emergency.

[39]According to FCD 1, the Continuity Advisory Group consists of continuity managers from federal agencies. It meets quarterly to discuss interagency implementation of continuity programs.

[40]According to annex G of FCD 1, an alternate continuity facility is a facility that replicates essential capabilities of the department or agency's primary facility by providing systems and configurations that are used in daily activities, such as secure communications and access to vital records, and can accommodate the relocation of a limited number of key leaders and staff, for up to 30 days.

OPM and GSA Coordinated on the Dismissal Guide, but Did Not Involve the CIO Community

Although OPM officials shared drafts of the Dismissal Guide with other federal agencies, including GSA, the coordination between OPM and GSA did not involve working together to involve the agencies' CIO community.[41] As noted earlier, to address coordination issues between OPM and GSA, in 2003, the two agencies committed to an MOU. Under the MOU, GSA agreed to develop innovative workplace policy and guidance and to seek resolution to issues regarding IT support for telework where concerns about home IT equipment continue to be a barrier to the successful implementation of telework programs. OPM is to work with GSA to reach appropriate groups of CIOs to facilitate their greater involvement in agency long-term planning.

The Dismissal Guide noted that the new option of "unscheduled telework" could occasion large numbers of employees teleworking simultaneously. Consequently, the Dismissal Guide advised agencies that they should ensure that their IT infrastructure was in place to support this. IT infrastructure includes equipment, software, and security.

However, in 2009, we reported that 12 agencies, including GSA, as indicated in table 6, had done some, little, or no testing of the ability of their IT infrastructure to handle telework or similar arrangements during a protracted emergency, such as a pandemic influenza.[42]

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[41]For the purposes of this report, we define the CIO community as including the members of the federal Chief Information Officers Council (http://www.cio.gov/) and their designees. The council is the principal interagency forum for improving agency practices related to the design, acquisition, development, modernization, use, operation, sharing, and performance of federal government information resources. 6 U.S.C. §3603.

[42]During a pandemic flu, telework is a key measure to achieve social distancing, and large numbers of employees may be expected to telework simultaneously. (See GAO, *Influenza Pandemic: Increased Agency Accountability Could Help Protect Federal Employees Serving the Public in the Event of a Pandemic*, GAO-09-404 (Washington, D.C.: June 12, 2009).

Table 6: Agencies' Responses on the Extent to Which They Have Tested IT Infrastructure to Ensure That It Is Capable of Handling Telework or Work-at-Home Arrangements during a Pandemic Influenza Outbreak

Extent	Agencies
To a great extent	National Science Foundation
To a moderate extent	Department of Commerce, Department of Energy, Department of the Interior, Department of Labor, Department of State, Department of Transportation, Department of Education, Environmental Protection Agency, OPM, NRC, Social Security Administration
To some extent	Department of Justice, Department of Health and Human Services, Department of Housing and Urban Development, Department of Defense, Department of the Treasury, U.S. Agency for International Development, Department of Veterans Affairs
To little or no extent	DHS, GSA, National Aeronautics and Space Administration, Small Business Administration, Department of Agriculture

Source: GAO.

Note: Data are from GAO-09-404.

Without adequate testing of IT infrastructure, agencies would not know whether they could rely on unscheduled telework to sustain operations during emergencies. Some agencies may have limited IT capacity to support large numbers of employees attempting to telework simultaneously, and might have to take steps to distribute system load until the agency capacity is increased. For example, the Department of Energy's (DOE) Inspector General reported in 2010 that DOE's COOP plan estimates peak employee absenteeism during a pandemic event could be as high as 40 percent, or approximately 3,000 employees at DOE headquarters; however, DOE's remote access server can only accommodate 800 concurrent users.[43] GSA's last assessment of the telework technology environment and the technologies required to support 25 to 50 percent of the federal workforce teleworking was conducted in 2006. At that time, GSA concluded, "In general most organizations do not provide their teleworkers the same level of access to agency applications, data, and technical support as their office workers, which can hinder a teleworker's ability to perform all job duties from their telework site."[44]

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[43]Inspector General, *Improvements Needed in the Department's Emergency Preparedness and Continuity of Operations Planning*, DOE/IG-0845 (Washington, D.C.: Department of Energy, January 2011).

[44]General Services Administration, *Telework Technology Cost Study*, Executive Summary, (Washington, D.C.: May 2, 2006).

Despite the importance of agency IT capacity to support telework during emergencies, OPM and GSA did not work together, as outlined in their MOU, to reach out to the CIO community regarding potential agency capacity limitations. At the time of development of the new policy, each of the OPM and GSA officials responsible for coordinating on the MOU did not recognize the opportunity to involve the CIO community. The OPM official thought the agency telework coordinators and CHCOs were aware of the IT capacity issue and would consider this in implementing their telework programs. The GSA official thought the policy was targeted to the human-resources community and the technology issue would be more effectively dealt with in a document directed to the IT community. Consequently, GSA officials did not offer any governmentwide guidance on ways to address infrastructure limitations or provide direct assistance to agencies regarding the adequacy of their IT infrastructure. The senior OPM official responsible for telework programs acknowledged that consulting with the CIO Council prior to issuing the Dismissal Guide would have been worthwhile. Going forward, coordination will become even more important because the Telework Enhancement Act of 2010 requires OPM to consult with GSA on policy and policy guidance for telework in the areas of telework technology and equipment.

Conclusions

The Telework Enhancement Act of 2010 requires agencies to incorporate telework into their COOP plans. However, there is no governmentwide definition or cohesive set of practices for incorporating telework into COOP plans. Recent reports offered several examples of challenges agencies may face in supporting the use of telework during emergencies in such key areas as planning, IT, and personnel readiness. The absence of a definition of what constitutes incorporation of telework into emergency and continuity plans did not create these potential problems in readiness. However, a definition accompanied by a set of practices that acknowledged the broad range of operational areas affected by incorporating telework into emergency preparedness might help agencies identify, avoid, or address any operational problems. Such practices would help agencies take the appropriate steps, measure their progress, and know when they have achieved success. Some practices already in OPM, GSA, FEMA, and FPS guidance documents could provide a starting point.

The lack of a definition for incorporating telework into emergency and continuity planning has also affected the reliability of recent OPM telework survey results and assessment of agency progress. Since 2004, OPM has used its annual survey of agency telework coordinators to report on

the status of agencies' telework program and policies, including agencies' incorporation of telework into emergency plans. However, problems with OPM's telework survey methodology, such as a lack of a definition for incorporation or integration into continuity and emergency planning, and vagueness in question construction, call into question the reliability of reported results with respect to this issue. Without reliable data, OPM is unable to assess the extent to which the federal government as a whole, or an individual agency, is making progress on incorporating teleworking into emergency planning and operations.

Over the years, governmentwide telework and emergency-related guidance from OPM, GSA, FEMA, and FPS has broadened in scope to include references to the potential use of telework during emergencies. In addition, these guidance documents suggest practices drawn from other lead agencies' guidance. While these guidance features can heighten agency officials' awareness of the crosscutting considerations bearing on the potential use of telework during emergencies, without lead-agency collaboration and consensus on the crosscutting passages in the guidance, coordination with a key policy area may be missed. In a recent instance, while OPM coordinated with other agencies on its new Dismissal Guide, the guide did not address important areas of agency IT operations—despite the existence of an MOU between OPM and GSA intended to improve interagency coordination specifically on this issue. In developing future telework policy and policy guidance relating to emergency and continuity planning and operations, OPM will need to consult with agencies responsible for key policy areas, now including NARA, to ensure all key policy areas are fully considered.

Recommendations for Executive Action

To enhance the potential use of telework during emergencies, we recommend that the Director of OPM, in consultation with agencies responsible for key policy areas specified under the Telework Act and with other agencies providing governmentwide guidance on emergency preparedness, such as FPS, take the following three actions:

- Develop (1) a definition of what constitutes incorporating telework in emergency and continuity plans and (2) a cohesive set of practices that agencies should implement to achieve successful incorporation.
- Revise OPM's data-collection methodology to ensure agencies and OPM report reliable results on the extent to which agencies have incorporated telework into their emergency and continuity planning and operations.

- Establish an interagency coordination process among OPM, FEMA, FPS, GSA, and NARA to ensure all major areas of agency operations are considered when OPM issues new or updated guidance related to using telework during emergencies.

Agency Comments and Our Evaluation

We provided a draft of this report to the Secretary of Homeland Security, the Administrator of GSA, and the Director of OPM for review and comment. The Director of OPM and the Director of the Departmental GAO/OIG Liaison Office for DHS provided written comments, which we have reprinted in appendixes III and IV. In summary, OPM concurred with our recommendations and highlighted a number of actions the agency has under way or plans to undertake in response. OPM and DHS also provided technical comments, which we incorporated as appropriate. GSA had no comments on the draft.

We are sending copies of this report to the congressional committees with jurisdiction over DHS and GSA, and their activities; the Secretary of Homeland Security; the Administrator of GSA; and the Director of Office of Management and Budget. In addition, the report will be available at no charge on the GAO website at http://www.gao.gov.

If you have any questions about this report, please contact me at (202) 512-6543 or steinhardtb@gao.gov. Key contributors to this report are listed in appendix V. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report.

Bernice Steinhardt
Director, Strategic Issues

Appendix I: Objectives, Scope, and Methodology

This report (1) describes the guidance that the Office of Personnel Management (OPM), General Services Administration (GSA), Federal Emergency Management Agency (FEMA), and Federal Protective Service (FPS) have issued pertaining to the use of telework during emergencies; (2) assesses the extent to which OPM's recent reviews of the agencies' telework policies and programs address the incorporation of telework into continuity plans, and the extent to which OPM, FEMA, GSA, and FPS offer guidance on incorporating telework into emergency and continuity planning; and (3) assesses the extent to which OPM and FEMA coordinated with other agencies on the development of their recently released guidance documents pertaining to the use of telework during emergencies.

To address these three objectives, we reviewed governmentwide telework and emergency-related statutes. We also reviewed regulations issued by OPM and GSA, and related governmentwide guidance that OPM, GSA, FEMA, and FPS had issued over the past 10 years. Lastly, we conducted interviews with key officials from each of these agencies regarding each objective. We conducted additional data collection and analyses to answer selected objectives, as described below.

To assess the extent to which OPM's recent reviews of the agencies' telework policies and programs addressed the incorporation of telework into continuity plans, we reviewed OPM's annual telework survey and its 2010 evaluation of agency telework policies. We compared the survey question relating to whether telework had been integrated into the agency's emergency preparedness / continuity of operations (COOP) plans to generally accepted survey methodology. We also reviewed the survey results for this question from the first year it was included in the survey, in 2004, through the most recent survey, conducted in 2009. We also compared OPM's description of the methodology it used to evaluate agency telework policies to GAO guidelines for developing and using checklists. We also reviewed the cumulative scores that OPM evaluators assigned to the checklist item—whether the telework policy "references agency emergency policies (e.g., COOP and pandemic)." In addition to reviewing OPM's recent telework assessments, we reviewed recent GAO and inspector general reports to identify examples of problems agencies might be having with potentially using telework during emergencies.

To identify practices suggested by OPM, GSA, FEMA, and FPS for incorporating telework into continuity or emergency planning, we reviewed these agencies' related governmentwide regulations and guidance, and identified suggested practices for incorporating telework

into continuity or emergency planning. We compared these practices to practices that GAO previously suggested for the same purpose and identified examples of OPM, GSA, FEMA, and FPS suggested practices that were similar to GAO-suggested practices.

We conducted this performance audit from February 2010 through July 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Examples of Practices Suggested to Federal Agencies for Incorporating Telework into Emergency and Continuity Planning and Operations

In reviewing several current guidance documents, we found that the Office of Personnel Management (OPM), General Services Administration (GSA), Federal Emergency Management Agency (FEMA), and Federal Protective Service (FPS) have suggested to federal agencies, in various telework or emergency-related guidance documents, several practices for incorporating telework into various aspects of continuity or emergency planning.

Table 7: Examples of Practices That OPM, GSA, FEMA, or FPS Have Suggested to Federal Agencies for Incorporating Telework into Emergency or Continuity Planning

Agency suggesting practice	Practice related to incorporating telework into emergency or continuity planning	Guidance document describing suggested practice[a]
OPM	• Agencies should ensure that the equipment, technology, and technical support have been tested. • Agencies should ensure that the IT infrastructure is in place to allow large numbers of employees to telework simultaneously. • At least annually, agencies should identify emergency employees (including COOP employees) and notify them in writing, including the requirement that emergency employees report for work or remain at work (or work at home or report to an alternative work site) when government operations are disrupted.	OPM, *Washington, DC Area Dismissal or Closure Procedures* (Washington, D.C.: December 2010).
	• All teleworkers and telework managers should receive telework and information-security training. • All teleworkers should have signed agreements, even for emergency telework arrangements.	OPM, *Planning for Pandemic Influenza* (Washington, D.C.: May 2009).
	Employees' telework agreements should state what the agency's expectation of employees is regarding teleworking during a disruption or emergency.	OPM, *Guide to Telework in the Federal Government* (Washington, D.C.: September 2008).
	Agencies should maximize their telework capacity by, among other things, conducting exercises to test employees' ability to access agency networks from home.	OPM, *Human Resources Flexibilities Available to Assist Federal Employees During Emergencies* (Washington, D.C.: May 5, 2009).
	• Agencies utilize human-capital flexibilities, including telework, to help the agency continue essential functions during an emergency. • Agency develops a process to communicate its human-capital guidance for emergencies (e.g. pay, leave, benefits) to managers.	FEMA, Annex J, "Human Capital," *Federal Executive Branch National Continuity Program and Requirements,* Federal Continuity Directive 1 (FCD 1), (Washington, D.C.: August 2008).
	An agency may order one or more employees to evacuate from their work site and perform work from their homes (or an alternative location mutually agreeable to the agency and the employee) during a pandemic health crisis without regard to whether the agency and the employee have a telework agreement in place at the time the order to evacuate is issued.	Federal regulation 5 C.F.R Part 550, Subpart D, Payments During Evacuation.

Agency suggesting practice	Practice related to incorporating telework into emergency or continuity planning	Guidance document describing suggested practice[a]
	In emergency situations, agencies may designate the location of the employee's reporting office prior to the emergency as the official work site for location-based pay entitlements, such as locality pay and special rates.	OPM, *Handbook on Pay and Leave Benefits for Federal Employees Affected by Severe Weather Conditions or Other Emergency Situations* (Washington, D.C. June 2008).
GSA	Agencies may provide or purchase technical equipment and services to support teleworkers.	Federal Management Regulation: Guidelines for Alternative Workplace Arrangements, Federal Management Regulation (FMR) Bulletin 2006-B3, (Mar. 17, 2006).
	• Teleworkers should receive adequate training on the use of IT systems and applications needed for effective job performance. • Agencies should provide adequate access to IT systems by means of broadband, direct dial, or virtual private network technology.	*Information Technology and Telecommunications Guidelines for Federal Telework and Other Alternative Workplace Arrangement Programs,* FMR Bulletin 2007-B1, (Mar. 2, 2007).
	In addition to alternate facilities, implement other nontraditional continuity facility options or virtual offices, including work at home / telework.	FEMA, Annex G, "Continuity Facilities," *Federal Executive Branch National Continuity Program and Requirements,* FCD 1, (Washington, D.C.: February 2008).
FEMA	• Agencies identify and provide for communication capabilities at other continuity sites, including telework sites, and provide both essential and nonessential staff with related training. • Agencies should conduct an annual exercise that incorporates the deliberate and preplanned movement of continuity personnel to an alternative facility or location. • Agencies should demonstrate the capability to perform their essential functions within 12 hours after an event and under all threat conditions, from their alternate facilities, to include virtual office options including telework. • Agencies should annually test their capabilities for protecting classified and unclassified vital records, and for providing access to them from the alternate facility, as reflected in agency testing records.	FEMA, *Federal Executive Branch National Continuity Program and Requirements*, FCD 1, (Washington, D.C.: February 2008).
	• Have a telework agreement for continuity personnel, if applicable. • All organizations must identify and maintain at least one alternate facility, which could include alternate uses of existing facilities to help initiate and sustain agency operations. • Conduct personnel briefings on continuity plans that involve using or relocating to continuity facilities (including teleworking) or other facilities.	FEMA, *Continuity of Operations Plan Template* (Washington, D.C.: November 2010).
FPS	• To facilitate postemergency recovery, consider encouraging teleworking to help when circumstances make the main work site difficult to access. • In developing the OEP, planners should refer to the agency's continuity and other plans, and not duplicate these other plans.	FPS, *Occupant Emergency Plans: Development, Implementation and Maintenance* (Washington, D.C.: May 2010).

Agency suggesting practice	Practice related to incorporating telework into emergency or continuity planning	Guidance document describing suggested practice[a]
	Agencies conduct training to ensure all tenants understand emergency procedures and their individual responsibilities.	FPS, *Occupant Emergency Plans, Supplement 3: OEP Template* (Washington, D.C.: May 2010).
	During a pandemic, an office could implement flexible work site (telework) policies and flexible work hours (staggered shifts), if appropriate.	FPS, *Occupant Emergency Plans, Supplement 1: Emergency Situations* (Washington, D.C.: May 2010).

Source: GAO analysis of agency data.

Notes: Descriptions of practices paraphrase more-detailed descriptions in the guidance document.

[a]The source document was one of the agencies' guidance documents that included the listed practice. Other agency guidance documents may have also included the listed practice.

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

The Director

JUN 3 0 2011

Ms. Bernice Steinhardt
Director, Strategic Issues
U.S. General Accountability Office
441 G St. NW
Washington DC 20548

Dear Ms. Steinhardt:

Thank you for providing the U.S. Office of Personnel Management (OPM) the opportunity to comment on the Government Accountability Office draft report, "Emergency Preparedness: Agencies Need Coordinated Guidance on Incorporating Telework into Emergency and Continuity Planning." We appreciate the opportunity to provide you with comments about this report.

Response to Recommendation

RECOMMENDATION: To enhance the potential use of telework during emergencies we recommend that the Director of OPM, in consultation with agencies responsible for key policy areas specified under the Telework Act, and other agencies providing governmentwide guidance on emergency preparedness, such as FPS, take the following actions:

- Develop (1) a definition of what constitutes incorporating telework in emergency and continuity plans and (2) a cohesive set of practices that agencies should implement to achieve successful incorporation.

- Revise its data collection methodology to ensure agencies and OPM report reliable results on the extent to which agencies have incorporated telework into their emergency and continuity planning and operations.

- Establish an interagency coordination process among OPM, FEMA, FPS, GSA, and NARA to ensure all major areas of agency operations are considered when OPM issues new or updated guidance related to using telework during emergencies.

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We will address each recommended action separately.

MANAGEMENT RESPONSE:

- **Develop (1) a definition of what constitutes incorporating telework in
  emergency and continuity plans and (2) a cohesive set of practices that
  agencies should implement to achieve successful incorporation.**

We concur. As we have previously observed, the Telework Enhancement Act of 2010 does not
confer regulatory or interpretive authority on OPM with regard to telework. Nonetheless, OPM
has touched upon the topic of incorporating telework into emergency planning in guidance
documents, including OPM's *Washington, DC, Area Dismissal and Closure Procedure*
guidance. In order to facilitate agency telework planning, OPM would be willing to develop a
template for a program for incorporating telework into emergency and continuity of operations
planning in consultation with FEMA and the other lead agencies named in the Telework
Enhancement Act, as appropriate. Such a template would provide agencies with a basic model
that would set out essential steps to undertake to ensure that telework is fully incorporated into
emergency and continuity planning.

- **Revise its data collection methodology to ensure agencies and OPM report
  reliable results on the extent to which agencies have incorporated telework
  into their emergency and continuity planning and operations.**

We concur. Since 2002 OPM has asked agencies to participate in a telework data call (Call).
Several items in the Call queried whether agencies integrated telework into their emergency and
continuity of operations plans. The items were of low content validity and resulting data are
unlikely to exhibit reliability. Moreover, the Telework Enhancement Act of 2010 expanded
OPM's overall research and reporting requirements with respect to telework. Consequently,
OPM formed and implemented a telework measurement group to (1) advise upon the
development of a general research protocol for telework and (2) address some of the recurring
validity issues with items included in the Call more specifically. OPM has worked with the
measurement group since January 2011 to ensure that agencies have the tools to meet major
measurement and reporting requirements in the Act.

Membership in the measurement group is both inter and intra-agency. OPM members include
experts in statistics, evaluation and survey research. The member from General Services
Administration is an expert in survey method and subject matter, and subject matter and policy
experts are included from the Department of Energy, NASA, Department of Defense,
Commerce's Patent and Trademark Office and the Defense Information Systems Agency.
To date, the measurement group has engaged in major revision of survey definitions and items.
A pilot of the instrument is scheduled and agencies will be trained in use of the final instrument.
Emergency and continuity of operations plans are among those items subject to revision. A
subject matter expert in emergency preparedness has reviewed the items included in the Call and
final comments will be used in the final revision of the instrument for the pilot.

- **Establish an interagency coordination process among OPM, FEMA, FPS, GSA, and NARA to ensure all major areas of agency operations are considered when OPM issues new or updated guidance related to using telework during emergencies.**
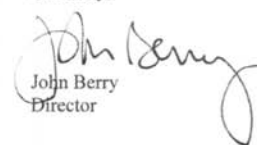
We concur. On February 17, 2011, OPM held a meeting with agency representatives from the Federal Emergency Management Agency (FEMA), General Services Administration (GSA), Executive Office of the President (EOP), National Archives and Records Administration (NARA) and the Office of Management and Budget (OMB) to discuss implementation of the Telework Enhancement Act of 2010. During that meeting, the group identified additional agencies that should be included in future discussions and meetings. While the group has not met since the initial meeting on February 17th, OPM will schedule a follow-up meeting with all identified appropriate agency representatives, including the Federal Protective Service, to ensure an interagency coordination process takes place when new or updated guidance related to telework during emergencies is proposed.

Technical comments to the draft report are enclosed. Unless otherwise noted, the suggested revisions are meant to provide technical accuracy.

Please contact Ms. Janet Barnes, Deputy Director, Internal Oversight & Compliance on (202) 606-3270, should your office require additional information.

Again, my thanks to your office for providing this opportunity to update and clarify information in the draft report.

Sincerely,

John Berry
Director

Enclosure

Appendix IV: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528

Homeland Security

July 1, 2011

Bernice Steinhardt
Director, Strategic Issues
441 G Street, NW
U.S. Government Accountability Office
Washington, DC 20548

Re: Draft Report GAO 11-628, "EMERGENCY PREPAREDNESS: Agencies Need Coordinated Guidance on Incorporating Telework into Emergency and Continuity Planning"

Dear Ms. Steinhardt:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's work in planning and conducting its review and issuing this report.

The Department is pleased to note the positive acknowledgment of the Federal Emergency Management Agency (FEMA) and the Federal Protective Service's (FPS) leadership role in providing governmentwide guidance on telework-related continuity and emergency planning. Although the report does not contain any recommendations specifically directed at DHS, the Department remains committed to continuing its work with interagency partners, such as the U.S. Office of Personnel Management (OPM), refining and enhancing guidance concerning the potential use of telework during emergency situations, as appropriate. For example, FEMA is currently working with OPM to update and expand Federal Continuity Directive 1, in part, as it relates to telework.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were submitted under separate cover. We look forward to working with you on future Homeland Security engagements.

Sincerely,

Jim H. Crumpacker
Director
Departmental GAO/OIG Liaison Office

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Bernice Steinhardt, (202) 512-6543 or steinhardtb@gao.gov

Staff Acknowledgments

In addition to the contact named above, William Doherty, Assistant Director, and Patricia Farrell Donahue, analyst-in-charge, led the development of this report. Sharon Hogan and Robert Gebhart made significant contributions to this report. Gregory Wilmoth and Tom Beall assisted with the design and methodology. Karin Fangman provided legal counsel. Robert Love, Len Benning, and James Sweetman provided technical assistance. William Trancucci verified the information in the report.

Related GAO Products

Federal Work/Life Programs: Agencies Generally Satisfied with OPM Assistance, but More Tracking and Information Sharing Needed. GAO-11-137. Washington, D.C.: December 16, 2010.

Human Capital: Telework Programs Need Clear Goals and Reliable Data. GAO-08-261T. Washington, D.C.: November 6, 2007.

Human Capital: Greater Focus on Results in Telework Programs Needed. GAO-07-1002T. Washington, D.C.: June 12, 2007.

Continuity of Operations: Agencies Could Improve Planning for Telework during Disruptions. GAO-06-740T. Washington, D.C.: May 11, 2006.

Continuity of Operations: Selected Agencies Could Improve Planning for Use of Alternate Facilities and Telework during Disruptions. GAO-06-713. Washington, D.C.: May 11, 2006.

Agency Telework Methodologies: Departments of Commerce, Justice, State, the Small Business Administration, and the Securities and Exchange Commission. GAO-05-1055R. Washington, D.C.: September 27, 2005.

Human Capital: Key Practices to Increasing Federal Telework. GAO-04-950T. Washington, D.C.: July 8, 2004.

Facilities Location: Progress and Barriers in Selecting Rural Areas and Using Telework. GAO-03-1110T. Washington, D.C.: September 4, 2003.

Human Capital: Further Guidance, Assistance, and Coordination Can Improve Federal Telework Efforts. GAO-03-679. Washington, D.C.: July 18, 2003.