

OFFICE OF AUDITS & ADVISORY SERVICES



BUSINESS CONTINUITY AND DISASTER RECOVERY

FINAL REPORT

Chief of Audits: [Juan R. Perez](#)
Audit Manager: [Lynne Prizzia, CISA, CRISC](#)
Senior Auditor: [Wasim Akand, MPA, CGAP, CIA](#)

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County of San Diego

TRACY DRAGER
AUDITOR AND CONTROLLER

AUDITOR AND CONTROLLER
OFFICE OF AUDITS & ADVISORY SERVICES
5530 OVERLAND AVENUE, SUITE 330, SAN DIEGO, CA 92123-1261
Phone: (858) 495-5991

JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Susan Brazeau, Director
Department of Human Resources

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

Enclosed is our report on the Business Continuity and Disaster Recovery Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board of Supervisors Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. You or your designee will receive email notifications when these quarterly updates are due, and these notifications will continue until all actions have been implemented.

If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Ebony N. Shelton, Deputy Chief Administrative Officer/Chief Financial Officer
Tracy Drager, Auditor and Controller
Judy Ying, Group Finance Director, Finance and General Government Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Amy Harbert, Director
Department of Environmental Health and Quality

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

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JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Sarah Aghassi, Deputy Chief Administrative Officer, Land Use and Environment Group
Tracy Drager, Auditor and Controller
Jennifer Lawson, Chief Operations Officer, Land Use and Environment Group
Renee Loewer, Group Finance Director, Land Use and Environment Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Marko Medved, Director
Department of General Services

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

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JUAN R. PEREZ
Chief of Audits

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Enclosure

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Judy Ying, Group Finance Director, Finance and General Government Group



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JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Jack Pellegrino, Director
Department of Purchasing and Contracting

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

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JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Ebony N. Shelton, Deputy Chief Administrative Officer/Chief Financial Officer
Tracy Drager, Auditor and Controller
Judy Ying, Group Finance Director, Finance and General Government Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Anthony Ray, Interim Sheriff
Office of the Sheriff

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

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If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Holly Porter, Deputy Chief Administrative Officer, Public Safety Group
Tracy Drager, Auditor and Controller
Rosemarie Degracia, Group Finance Director, Public Safety Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Jeff Toney, Director
Office of Emergency Services

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

Enclosed is our report on the Business Continuity and Disaster Recovery Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

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If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Holly Porter, Deputy Chief Administrative Officer, Public Safety Group
Tracy Drager, Auditor and Controller
Rosemarie Degracia, Group Finance Director, Public Safety Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

June 14, 2022

TO: Dr. Wilma Wooten, Public Health Officer
Public Health Services

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

Enclosed is our report on the Business Continuity and Disaster Recovery Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

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If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Patty Kay Danon, Chief Operations Officer, Health and Human Services Agency
Tracy Drager, Auditor and Controller
Amy Thompson, Executive Finance Director, Health and Human Services Agency

INTRODUCTION

Audit Objective The Office of Audits & Advisory Services (OAAS) completed an audit of Business Continuity and Disaster Recovery. The objective of the audit was to evaluate the Continuity of Operations Plan (COOP) and related protocols and processes in place to minimize disruption of services during and after disasters and emergencies.

Background The COOP ensures an individual organization can continue to perform its essential functions, provide essential services, and deliver core capabilities during a disruption to normal operations. Essential functions are functions that County departments are required to perform by statute, executive order, or County policy, and are necessary to provide vital services, exercise civil authority, maintain the safety and well-being of the general populace, and sustain the industrial/economic base in an emergency. The changing threat environment and recent events, both here and abroad, have shifted awareness to the need for COOP capabilities that enable local governments to continue their essential functions across a broad spectrum of emergencies.

According to the County of San Diego (County) Administrative Manual (Admin Manual) No. 0050-01-12, it is the policy of the Chief Administrative Officer to establish and implement a plan which provides standard operating procedures to minimize any potential disruption in services to the public and to efficiently and expeditiously restore mission critical functions in the wake of a catastrophic event.

The Office of Emergency Services (OES) established a standardized COOP template to assist County departments in documenting the processes and resources needed to restore vital County services after a disaster. Federal Emergency Management Agency (FEMA) guidance on continuity of operations planning was used in development of the COOP template and other readiness procedures.

According to OES, departments are responsible for developing and maintaining plans and procedures, delivering necessary training in the use of the procedures, and establishing regular testing and validation of their plans. OES assists in providing training and improving readiness Countywide. Each department has a designated COOP coordinator (DCC), and each group has a group COOP coordinator (GCC) to assist their respective departments' DCCs and serve as a liaison between departments and OES.

Audit Scope & Limitations The scope of the audit focused on COOP planning processes, including governance, templates and tools, policies, and procedures, for ensuring readiness in the event of a disaster.

OAAS also assessed the capability of departments to execute the plan by selecting at least one department from each County business group for detailed review. The scope included review of department COOPs from FY 2019-20.

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing prescribed by the Institute of Internal Auditors as required by California Government Code, Section 1236.

Methodology

OAAS performed the audit using the following methods:

- Reviewed applicable FEMA guidance and recommended procedures.
- Reviewed the COOP plan template for consistency with core components of FEMA Continuity Guidance Circular.
- Assessed the governance structure and Countywide guidance to ensure COOP expectations are clear, roles are defined, and departments are prepared to execute COOP plans if needed.
- Assessed the COOP SharePoint site to ensure adequate availability and security.
- Reviewed department COOP plans submitted during FY 2019-20 to ensure timeliness of submission and proper approvals.
- Reviewed a sample of six department COOP plans with mission essential functions for evidence that FEMA Continuity Guidance Circular core components existed, including
 - Business objectives, critical operations identified and prioritized.
 - Vital records, databases and systems identified.
 - Order of succession and delegation of authority established.
 - Roster of personnel performing essential functions established.
 - Alternate work sites and communication capability identified.
 - Recovery and resumption of operations established.
 - Regular COOP plan updates and testing established.
- Assessed whether sampled COOP plans were adequately maintained, by ensuring:
 - Training and guidance were provided.
 - Testing and exercises were scheduled and performed, including after-action reports.
 - Third-party agreements and memorandum of agreements were in place, active, and monitored.

AUDIT RESULTS

Summary

OES has provided direction, tools, and procedures that are consistent with core components defined in the FEMA Continuity Guidance Circular.

Within the scope of the audit, however, OAAS has the following findings and recommendations related to the governance and management of the COOP program.

Finding I:

Governance and Oversight of the COOP Program Needs Improvement

OES does not appear to actively monitor the COOP program or update COOP documents. Specifically,

COOP plans were not submitted in a timely manner – Thirty three percent (33%) of County departments did not submit an updated COOP plan during FY 2019-20. Also, of those COOPs which were submitted, ten percent (10%) did not have evidence of management approval. According to the County Admin Manual No. 0050-01-12, departments are required to submit signed department head confirmation of COOP review, along with the updated COOP, to a central COOP repository (as identified by OES). Additionally, OES is responsible to annually track and notify executive office staff (group Site Evacuation Plan/COOP coordinators) of department compliance. Evidence of executive office staff notification and follow-up, however, could not be verified since according to the OES COOP Coordinator, notification was conducted verbally and not documented. If the County COOP program is not adequately monitored, to ensure departments are proactively updating their COOPs, the County may not be sufficiently prepared in the event of an actual emergency or disaster.

COOP templates and guidance were not current – COOP templates and readiness procedures posted to the OES SharePoint site were dated from 2006-2007 and did not reflect current FEMA standards and best practices. According to the County Admin Manual No. 0050-01-12, OES shall update templates as necessary. OES reiterated that, in accordance with Admin Manual No. 0050-01-12, the COOP templates and procedures are reviewed and updated at the discretion of the OES COOP Coordinator, and not according to a formal schedule. If COOP documents are not periodically reviewed and updated, departments may not have adequate resources to develop an effective COOP.

COOP templates should include Applications Manager review and update– Applications Manager (Apps Manager), which is a system of record to support IT disaster recovery planning and recovery, has not been adequately updated due to insufficient monitoring by departments. Although departments are required to annually update vital systems and equipment within the IT Outage Annex of their COOP, the Apps Manager is not explicitly identified in the Annex as requiring update.

Incomplete or inaccurate Recovery Time Objective (RTO), backup, and vendor contact information for all mission critical applications managed by departments may prolong or delay critical applications being recovered in the event of a disaster. Per the County Technology Office and Peraton, Apps Manager is the system of record containing critical County application information such as the RTO, dependencies, priority classification, backup information, vendor contact, etc., that are needed during disaster recovery.

- Recommendation:**
1. OES should track and notify executive office staff regarding each department's submittal of a COOP in a timely manner, in accordance with the County Admin Manual No. 0050-01-12, and document the communication.
 2. OES should work with County Counsel to amend the County Admin Manual No. 0050-01-12, to state that OES shall review COOP templates and related guidance according to a routine schedule and update, as necessary.
 3. OES should update the COOP template and related guidance to include review of the Apps Manager within the IT Outage Annex and update any application information that is missing or inaccurate.

Finding II: COOP Exercise Requirements and After-Action Reporting Needs Clarification

COOP exercises were not adequately performed – COOP exercises were not performed for two of six sampled departments. Additionally, of those departments which conducted exercises, the methods and scope used were inconsistent.

According to the County Admin Manual No. 0050-01-12, each department shall conduct COOP exercises every other year, while OES is to provide training and exercise opportunities. Additionally, it was noted that the COOP template establishes additional exercises, with OES as the lead for Department Functional Exercises, but which does not correspond to requirements within Admin Manual No. 0050-01-12. Based on feedback received from sampled departments, this inconsistency creates confusion regarding whether OES or the department is responsible to initiate COOP exercises. Departments have also stated that there was a lack of instruction regarding how to properly conduct a COOP exercise. If COOP exercises are not routinely conducted in a consistent manner, the County may not be able to validate continuity plans to ensure viability.

After-Action reporting should be required – For sampled departments which conducted COOP exercises, two did not complete an after-action report. Although OES has provided instructions to complete an after-action report following an exercise, the report is not required to be submitted to OES for evaluation, nor does the Admin Manual require an

after-action report to be performed. If after-action reports are not prepared and evaluated, the County may not be able to identify and address gaps and areas for improvement.

According to the FEMA Continuity Guidance Circular, organizations should incorporate evaluations, after-action reports, and lessons learned into the development and implementation of an improvement plan. The corrective actions identified during individual exercises, real world incidents, and assessments are tracked to completion, ensuring tangible improvements in capabilities.

- Recommendation:**
1. OES should work with County Counsel to amend the County Admin Manual No. 0050-01-12 to ensure consistency between requirements identified in the Admin Manual and OES COOP templates and guidance. In addition, the following should be included,
 - OES shall define COOP training and exercise requirements, including after-action reporting.
 - OES shall provide standardized tools and templates to facilitate COOP training, exercises, and after-action reporting.
 - Departments shall create and submit after-action reports to the COOP Central Repository, following all departmental COOP exercises.
 2. Departments should adhere to exercise requirements and after-action reporting, in accordance with the County Admin Manual No. 0050-01-12.

Finding III: Individuals with Special Needs and Disabilities should be Considered during COOP Planning, Training, and Exercises

None of the sampled departments considered the needs and accessibility of employees and members of the public with disabilities during COOP planning, training, and exercises. According to feedback received by department COOP coordinators, adequate guidance related to the Americans with Disabilities Act (ADA) requirements, were not provided by OES, nor specified within the COOP template instructions. If the needs of individuals with disabilities is not properly addressed during COOP development, County departments may not be compliant with the ADA, as required by County Board of Supervisors Policy A-125 (Americans with Disabilities Act: Employment Provisions) and the Administrative Manual 0010-09.

According to the Board of Supervisors Policy A-125, it is the policy of San Diego County to extend reasonable accommodations to enable qualified individuals with disabilities to perform the essential functions of the job without causing undue hardship to the County.

The County Admin Manual No. 0010-09 states that departments shall take such actions as are necessary to provide access to their services, programs, and activities. Also, accessibility shall be considered as an essential part of facility planning and development. The policy further states that departments shall ensure that alternate telecommunications systems, such as text telephones, open or closed captioning, relay services, or other services or devices, are available for use in communicating with persons with hearing or speech impairments, and that department personnel are aware of these systems and trained in their use.

Additionally, according to the FEMA Continuity Guidance Circular (February 2018), organizations are responsible for ensuring that continuity planning takes into account personnel with different types of hidden or visible disabilities. During normal operations, a person's disability may not require a reasonable accommodation. However, during an emergency and continuity plan activation, the unpredictability and unstable environment may disproportionately impact personnel with disabilities. To mitigate this effect, organizations should disseminate continuity plans to personnel in advance of an emergency. The process for requesting a reasonable accommodation should be fully articulated within the continuity plan, and organizations should incorporate commonly requested reasonable accommodations into the plan at the outset. In addition, according to the FEMA Guide to Continuity Program Management (May 2020), organizations should test measures to ensure accessibility for employees and members of the public with disabilities.

- Recommendation:**
1. OES should update the COOP template and guidance to ensure that the needs and accessibility of employees and members of the public with disabilities, are adequately addressed during COOP planning, training, and exercises.
 2. Departments should ensure the needs of employees and members of the public with disabilities, are considered in COOP planning, training, and exercises in accordance with County policies.

Office of Audits & Advisory Services

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DEPARTMENT'S RESPONSE
(DEPARTMENT OF HUMAN RESOURCES)



County of San Diego

SUSAN BRAZEAU
DIRECTOR

DEPARTMENT OF HUMAN RESOURCES
EXECUTIVE OFFICE
1600 PACIFIC HIGHWAY, ROOM 203 SAN DIEGO, CA 92101-2463
(619) 531-5100 / FAX (619) 236-1353

May 19, 2022

TO: Juan R. Perez
Chief of Audits

FROM: Susan Brazeau *SB*
Director, Human Resources

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: A20-014 BUSINESS CONTINUITY AND DISASTER RECOVERY AUDIT

I appreciate the opportunity to respond to your finding resulting from the Business Continuity and Disaster Recovery Audit.

Finding III: Individuals with special needs and disabilities should be considered during COOP planning, training, and exercises.

OAAS Recommendation 2: Departments should ensure the needs of employees and members of the public with disabilities, are considered in COOP planning, training, and exercises in accordance with County policies.

Action Plan: DHR considers the needs and accessibility of employees with special needs and disabilities on a daily basis and engages in the interactive process with employees with disabilities to ensure that the Department can accommodate their needs. DHR takes the necessary actions to ensure that the employees with disabilities are accommodated and reviewed on a regular basis in the following manners:

- When an employee with an identified disability or special needs starts at DHR, the DHRO will review any requested accommodations and ensure that all necessary equipment and accessibility are provided to the employee. As part of this review, there is a confidential documented interactive conversation and a checklist that is agreed upon for the new employee and responsible supervisor to ensure the employee has all necessary equipment to perform their job.

- If the employee requires additional assistance from DHR staff in cases of an emergency, there will be a “buddy” that is designated for the employee to ensure safety during emergency situations (i.e. drills, actual).
 - During fire and emergency drills, those with disabilities are provided with the “buddy” and transported or sheltered in designated areas.
- The DHR suite is equipped with accessibility doors and all required ADA requirement for employees to have access to its services, programs, and activities.
 - Example: former staff had a switch on own wheelchair that gave access to doors.

Members of the public do not have access inside DHR’s COC suite, but have appropriate access to common areas. Members of the public have access to the DHR CAC office and are provided the required ADA accessibility. Should the COOP be activated, members of the public will be able to access DHR by email and/or phone and can transact business on our website.

In the event our COOP is activated, the needs of our employees have already been assessed and have been taken into consideration from their first day of employment and they will be prepared to work from an alternative location in the event the COOP is activated.

While Board Policy A 125 and Administrative Manual 0010-09 are silent with regards to departmental COOP plans, DHR will add what has been detailed above to the revised COOP template when it is available. Until such time, DHR will continue to exercise all daily reviews and accommodations for its employees. The Department ensures that all employees are able to work and thrive daily and when a COOP is activated.

Planned Completion Date: N/A – Already completed. Will await for OES to provided COOP template and guidance.

Contact Information: Elena Lepule, elena.lepule@sdcounty.ca.gov (858) 505-6375.

DEPARTMENT'S RESPONSE
(DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY)



County of San Diego

AMY HARBERT
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
Phone: (858) 505-6700 or (800) 253-9933 Fax: (858) 505-6890
www.sdcdehq.org

HEATHER BUONOMO, REHS
DIRECTOR OF ENVIRONMENTAL HEALTH

May 31, 2022

TO: Juan R. Perez
Chief of Audits

FROM: Amy Harbert, Director
Department of Environmental Health and Quality

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: BUSINESS CONTINUITY AND DISASTER RECOVERY

Finding III: Individuals with Special Needs and Disabilities should be Considered during COOP Planning, Training, and Exercises

OAAS Recommendation: Departments should ensure the needs of employees and members of the public with disabilities are considered in COOP planning, training, and exercises in accordance with County policies.

Action Plan: DEHQ agrees with the audit recommendation and will be taking actions to address this finding. DEHQ has already verified that the Department Operations Center location accommodates employees and members of the public with disabilities and will be updating the COOP planning documents to include this Access and Functional Needs (AFN) information. DEHQ will additionally confirm the COOP planning, training, and exercise documents are conformance with County AFN related policies. When onboarding new DEHQ staff with AFN, DEHQ will work with employees to identify and meet their needs for COOP planning, training, and exercises.

Completion Date: September 9, 2022

Contact Information for Implementation: Todd Burton, Environmental Health Specialist III

If you have any questions, please contact me at (858) 505-6672.

A handwritten signature in blue ink that reads "Amy Harbert".

Amy Harbert
Director, Department of Environmental Health and Quality

cc: Sarah Aghassi, Deputy Chief Administrative Officer, Land Use and Environment Group
Renee Loewer, Group Finance Director, Land Use and Environment Group

DEPARTMENT'S RESPONSE
(DEPARTMENT OF GENERAL SERVICES)



County of San Diego

DEPARTMENT OF GENERAL SERVICES

5560 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123

(858) 694-2338

MARKO MEDVED, PE, CEM
DIRECTOR

NICOLE J. ALEJANDRE
ASSISTANT DIRECTOR

June 2, 2022

TO: JUAN R. PEREZ, Chief of Audits
Auditor & Controller

FROM: MARKO MEDVED, PE, CEM, Director Medved, Marko
Department of General Services

Digitally signed by Medved, Marko
Date: 2022.06.07 15:45:15 -07'00'

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: BUSINESS CONTINUITY AND DISASTER RECOVERY

Finding II: COOP Exercise Requirements and After-Action Reporting Needs Clarification

OAAS Recommendation:

1. Departments should adhere to exercise requirements and after-action reporting, in accordance with the County Admin Manual No. 0050-01-12.

Action Plan: DGS agrees with this audit finding. Ensure that the COOP is included in DGS new-hire orientation. Schedule a semi-annual COOP refresher and annual department tabletop exercise. Ensure that an after-action report is completed after every tabletop exercise.

Planned Completion Date: 6/30/2022

Contact Information for Implementation: Trevor Lane at (619) 415-3610

Finding III: Individuals with Special Needs and Disabilities should be Considered during COOP Planning, Training, and Exercises

OAAS Recommendation:

1. Departments should ensure the needs of employees and members of the public with disabilities, are considered in COOP planning, training, and Exercises in accordance with County policies

Action Plan: DGS agrees with this audit finding. A Voluntary Individual Site Evacuation Plan for Alternate Location was added to the DGS COOP in December 2021. DGS will

edit Section IX. COOP Test, Training, and Exercises to read as follows: *“Testing and exercising COOP capabilities are essential to demonstrating and improving the ability of departments to execute their COOPs. They serve to validate or to identify improvements to the COOP’s policies, procedures, systems, and locations. Periodic testing and exercising also helps to ensure that equipment, procedures, and ADA compliance are maintained in a constant state of readiness.”*

Planned Completion Date: 6/30/2022

Contact Information for Implementation: Trevor Lane at (619) 415-3610

If you have any questions, please contact Cynthia Lerma, Chief of Facilities Support, at (619) 623-4687.

cc: Nicole J. Alejandre, Assistant Director
Michael Curtis, Deputy Director

DEPARTMENT'S RESPONSE
(DEPARTMENT OF PURCHASING AND CONTRACTING)



County of San Diego

JOHN M. PELLEGRINO
DIRECTOR

DEPARTMENT OF PURCHASING AND CONTRACTING
5560 OVERLAND AVENUE, SUITE 270, SAN DIEGO, CALIFORNIA 92123-1204
Phone (858) 505-6367 Fax (858) 715-6452

ALLEN R. HUNSBERGER
ASSISTANT DIRECTOR

June 10, 2022

TO: Juan R. Perez
Chief of Audits

A handwritten signature in blue ink that reads "John M. Pellegrino".

FROM: Jack Pellegrino, Director
Department of Purchasing and Contracting

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: BUSINESS CONTINUITY AND DISASTER RECOVERY

Finding II: COOP Exercise Requirements and After-Action Reporting Needs Clarification.

OAAS Recommendation: Departments should adhere to exercise requirements and after-action reporting, in accordance with the County Admin Manual No. 0050-01-12.

Action Plan: DPC concurs that it followed the COOP training, exercise, and after-action report requirements contained within the COOP template without recognizing that they were not in alignment with the requirements set forth in the County Admin manual. DPC will follow the County Admin Manual requirements for the 2022 calendar year as well as complete the recommended after-action reports.

Planned Completion Date: 12/31/2022

Contact Information for Implementation: Allen Hunsberger, Assistant Director

Finding III: Individuals with Special Needs and Disabilities should be considered during COOP Planning, Training, and Exercises.

OAAS Recommendation: Departments should ensure the needs of employees and members of the public with disabilities, are considered in COOP planning, training, and exercises in accordance with County policies.

Action Plan: DPC agrees with the recommendation. DPC has included consideration of individuals with special needs and/or disabilities in its latest revision to the COOP within the existing template and will incorporate this content in future trainings and exercises.

Planned Completion Date: Completed 12/28/2021

Contact Information for Implementation: Allen Hunsberger, Assistant Director

If you have any questions, please contact me at (858) 231-7500.

DEPARTMENT'S RESPONSE
(OFFICE OF THE SHERIFF)



COUNTY OF SAN DIEGO

INTER-DEPARTMENTAL CORRESPONDENCE

May 31, 2022

TO: Juan R. Perez
Chief of Audits

FROM: Robert T. Smith, Support Commander
San Diego Sheriff's Department

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: BUSINESS CONTINUITY AUDIT

Finding II: COOP Exercise Requirements and After-Action Reporting Needs
Clarification

OAAS Recommendation: Departments shall create and submit after-action reports to the COOP Central Repository, following all departmental COOP Exercises

Action Plan: The San Diego Sheriff's Department will complete and submit an after-action report to the COOP Central Repository within 10 days of the next COOP training exercise.

Finding III: Individuals with Special Needs and Disabilities should be
Considered during COOP Planning, Training, and Exercises

OAAS Recommendation: Departments should ensure the needs of employees and members of the public with disabilities are considered in COOP planning, training, and exercises in accordance with County policies.

Action Plan: Employees and members of the public with disabilities will be a consideration in future COOP training exercises carried out by the San Diego Sheriff's Department.

Planned Completion Date: 2023 – Next COOP training exercise (exact date TBD)

Contact Information for Implementation: Lieutenant Anthony O'Boyle, Sheriff's
Emergency Planning Detail. (858) 956-4996

RESPONSE TO AUDIT RECOMMENDATION

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May 31, 2022

If you have any questions, please contact me at (858) 974-2261



Robert T. Smith
Law Enforcement Bureau
Support Commander
Email: Robert.Smith@SDSheriff.org
Desk Phone: (858) 974-2261
SAN DIEGO COUNTY
SHERIFF'S DEPARTMENT



DEPARTMENT'S RESPONSE
(OFFICE OF EMERGENCY SERVICES)

May 31st, 2022

TO: Juan R Perez Chief of Audits

FROM: Jeff Toney (Director)

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: Business Continuity and Disaster Recovery

Finding I: Governance and Oversight of the COOP Program Needs Improvement

OAAS Recommendation:

1. OES should track and notify executive office staff regarding each department's submittal of a COOP in a timely manner, in accordance with the County Admin Manual No. 0050-01-12, and document the communication.
2. OES should work with County Counsel to amend the County Admin Manual No. 0050-01-12, to state that OES shall review COOP templates and related guidance according to a routine schedule and update, as necessary.
3. OES should update the COOP template and related guidance to include review of the Apps Manager within the IT Outage Annex and update any application information that is missing or inaccurate.

Action Plan:

1. OES agrees with this finding. A tracking sheet will be created to monitor and oversee the annual submission of department COOPs each calendar year. The OES COOP Coordinator shall send quarterly notifications to all COOP Group Coordinators reminding them to inform their various departments of the December 31st deadline.
2. OES agrees with this finding. OES will work with County Counsel to amend the County Admin Manual No. 0050-01-12 and shall perform a triennial review of the Countywide COOP template and related guidance and update, as necessary.
3. OES agrees with this finding. The IT Outage Annex will be reviewed and updated alongside all other aspects of the COOP template during the triennial review and update.

Planned Completion Date:

1. 12/31/22
2. 12/31/22
3. 12/31/22

Finding II: COOP Exercise Requirements and After-Action Reporting Needs Clarification

OAAS Recommendation:

1. OES should work with County Counsel to amend the County Admin Manual No. 0050-01-12 to ensure consistency between requirements identified in the Admin Manual and OES COOP templates and guidance. In addition, the following should be included:
 - OES shall define COOP training and exercise requirements, including after-action reporting.
 - OES shall provide standardized tools and templates to facilitate COOP training, exercises, and after-action reporting.
 - Departments shall create and submit after-action reports to the COOP Central Repository, following all departmental COOP exercises.
2. Departments should adhere to exercise requirements and after-action reporting, in accordance with the County Admin Manual No. 0050-01-12.

Action Plan:

1. OES agrees with this finding.
 - All department COOP Coordinators shall provide annual refresher training on the COOP to department staff and leadership. All departments shall conduct a biannual COOP exercise and submit an exercise after-action report in conjunction with their annual COOP submission, to meet the biannual COOP exercise requirement.
 - OES shall provide standardized tools and templates to facilitate COOP training, exercises, and after-action reporting.
 - All departments will complete and submit an after-action report alongside their annual COOP if they perform an exercise during that calendar year.
2. OES agrees with this finding. All departments shall perform a biannual COOP exercise. All departments will complete and submit an after-action report alongside their annual COOP if they perform an exercise during that calendar year.

Planned Completion Date:

1. 12/31/22
2. 12/31/22

Finding III: Individuals with Special Needs and Disabilities should be Considered during COOP Planning, Training, and Exercises

OAAS Recommendation:

1. OES should update the COOP template and guidance to ensure that the needs and accessibility of employees and members of the public with disabilities, are adequately addressed during COOP planning, training, and exercises.
2. Departments should ensure the needs of employees and members of the public with disabilities, are considered in COOP planning, training, and exercises in accordance with County policies.

Action Plan:

1. OES agrees with this finding. OES will include access and functional needs considerations within the Countywide COOP template.
2. OES agrees with this finding and will incorporate best practices for persons with access and functional needs within COOP activities.

Planned Completion Date:

1. 12/31/22
2. 12/31/22

Contact Information for Implementation: Cody Gallagher (Emergency Services Coordinator)

If you have any questions, please contact me at (619) 340-3957.

Jeff Toney

Director

**Jeffrey
Toney**

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Jeffrey Toney
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DEPARTMENT'S RESPONSE
(PUBLIC HEALTH SERVICES)



County of San Diego

NICK MACCHIONE, FACHE
AGENCY DIRECTOR

HEALTH AND HUMAN SERVICES AGENCY
PUBLIC HEALTH SERVICES
3851 ROSECRANS STREET, MAIL STOP P-578
SAN DIEGO, CA 92110-3134
(619) 531-5800 • FAX (619) 542-4186

ELIZABETH A. HERNANDEZ, Ph.D.
PUBLIC HEALTH SERVICES DIRECTOR

May 31, 2022

TO: Juan R. Perez
Chief of Audits

FROM: Elizabeth A. Hernandez, Ph.D., Public Health Services Director
Public Health Services

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: BUSINESS CONTINUITY AND DISASTER RECOVERY

Finding III: Individuals with Special Needs and Disabilities should be Considered during COOP Planning, Training, and Exercises

Office of Audits and Advisory Services Recommendation:

1. OES should update the COOP template and guidance to ensure that the needs and accessibility of employees and members of the public with disabilities, are adequately addressed during the COOP planning, training, and exercises.
2. Departments should ensure the needs of employees and members of the public with disabilities, are considered in COOP planning, training, and exercises in accordance with County policies.

Action Plan: PHS agrees with the audit recommendations. PHS will implement updated standards upon issuance of the revised OES template and will additionally take the following actions.

- PHS will implement a section within PHS COOP training that discusses the process and procedures to field and address access and functional needs (AFN) of employees during a COOP activation.
- PHS will incorporate conducting a staff AFN assessment to the PHS COOP activation checklist.
- PHS will develop a process for employees to submit requests for AFN consideration during a COOP activation.
- PHS will review alternate work site locations to see if they include AFN infrastructure (doorways, bathrooms, elevators, etc.). If alternate work site locations do not meet the AFN criteria, PHS will implement specific AFN actions at those locations to ensure accommodation for the public and/or employees.

Planned Completion Date: June 1, 2023

Juan R. Perez
May 31, 2022
Page 2 of 2

**Contact Information for Implementation: Elizabeth A. Hernandez, Public Health Services
Director**

If you have any questions, please contact me at (619) 293-4710.

Sincerely,
Hernandez,
Elizabeth A.

ELIZABETH A. HERNANDEZ, Ph.D.
Public Health Services Director
Public Health Services