



AUDITOR GENERAL

WILLIAM O. MONROE, CPA



SELECTED STATE AGENCIES' CONTINUITY OF OPERATIONS AND INFORMATION TECHNOLOGY DISASTER RECOVERY PLANNING

Information Technology Audit

SUMMARY

Florida law¹ establishes that the Division of Emergency Management (Division) within the Department of Community Affairs (Department) has the responsibility for maintaining a comprehensive Statewide program of emergency management² to ensure that Florida will be sufficiently prepared to manage all hazards. In addition, after the unprecedented attacks on the United States of America on September 11, 2001, the Florida Legislature amended Florida law³ to change State agency disaster preparedness from an individual agency responsibility primarily in response to an emergency within its own agency to a coordinated requirement for disaster preparedness. The 2004 hurricane season renewed concerns about how prepared State of Florida Executive Branch agencies were in the event a hurricane occurred in the Tallahassee, Florida area.

The disaster preparedness plans, otherwise referred to as Continuity of Operations (COOP) plans, establish policy and guidance to ensure the execution of Florida's Executive Branch agencies' mission essential functions in the event that any State agency or facility is threatened, incapacitated, or required to relocate its personnel or functions. The amendments to Florida law⁴ assigned the Division specific duties to provide guidelines for developing and implementing COOP plans and to approve State agencies' COOP plans. The head of each Executive agency

covered by this amendment and the appointed State agency emergency coordination officer are assigned specific duties related to the State agency's COOP plan preparation and implementation.

Our audit focused on COOP plan and information technology (IT) disaster recovery plan preparation, approval, and implementation for the period March 2005 through June 2005, including selected actions through August 2005, at the following Executive Branch agencies: the Department of Community Affairs (DCA), State Technology Office (STO), Department of Management Services (DMS), Department of Transportation (DOT), Department of Health (DOH), Department of Agriculture and Consumer Services (DACS), Department of Business and Professional Regulation (DBPR), Department of State (DOS), and Department of Citrus (Citrus). We also evaluated the Division's progress with providing State agencies guidance for preparing and implementing their COOP and IT disaster recovery plans and the process used by the Division to approve the State agency COOP plans as required by Florida law⁵.

The results of our audit are summarized below:

Finding No. 1: COOP plans prepared by Executive Branch agencies and submitted to the Division for approval did not in all instances meet the requirements outlined in Florida law or the Division's COOP Implementation Guidance and not all plans had been approved as of August 2005.

¹ Section 20.18(2)(a), Florida Statutes

² Section 252.35, Florida Statutes

³ Section 252.365, Florida Statutes

⁴ Section 252.365, Florida Statutes

⁵ Section 252.365, Florida Statutes

Finding No. 2: Division procedures to ensure that State agency IT disaster recovery plans are complete and viable needed improvement. Not all agency plan testing had been completed or performed annually as of June 2005, and some agency plans lacked evidence of being updated since the original version was prepared.

Finding No. 3: Division procedures for providing guidance and approval of State agency COOP and IT disaster recovery plans needed improvement.

Finding No. 4: Division COOP Implementation Guidance concerning the Division's periodic review of the State agency COOP plans needed clarification, and the periodic review was not addressed in existing Florida law.

Finding No. 5: Distribution controls protecting the nonpublic contents of COOP and IT disaster recovery plans needed improvement.

BACKGROUND

COOP planning is necessary for State agencies to ensure the continuation of essential operations in the event of a major disruption or disaster. A renewed focus on COOP plans has occurred following more recent events such as the terrorism incidents of the Oklahoma City Bombing, the attack on the World Trade Center on September 11, 2001, and the 2004 Florida hurricane season. These incidents heightened awareness of the need for a viable COOP plan, along with the comprehensive Statewide program of emergency management, which is needed to ensure the success of the continuity of government. This planning enables State agencies to continue their mission essential functions across a broad range of emergencies, whether man-made or natural, and continue providing their services to the public. As a result, COOP plans are no longer simply a good business practice that each State agency should have, but have become a requirement in Florida law⁶.

Florida law⁷ requires that a disaster preparedness plan be developed by July 1, 2003, for all State of Florida Executive Branch departments, agencies, commissions, water management districts, universities, prisons, and independent organizations, hereinafter referred to as State agencies. All office buildings or facilities owned, operated, or maintained by the State of Florida shall develop and implement comprehensive disaster preparedness plans, hereinafter referred to as COOP plans. The plans were to be developed in coordination with the applicable local emergency-management agency (county agency) and the Division.

Florida law⁸ states that COOP plans should identify, at a minimum, the following elements: identification of essential functions, programs, and personnel; procedures to implement the plan, and personnel notification and accountability; delegations of authority and lines of succession; identification of alternative facilities and infrastructure, including those for communications; identification and protection of vital records and databases; and schedules and procedures for periodic tests, training, and exercise. The COOP plan emphasizes the recovery of a State agency's operational capability and may not necessarily include the information technology operations. An IT disaster recovery plan that addresses the recovery of essential information technology functions used by a State agency to perform its mission essential functions is often a separate plan but a required element of the overall disaster preparedness process. An IT disaster recovery plan refers to a coordinated strategy involving plans, procedures, and technical measures that enable the recovery of IT systems, operations, and data after a major disruption or disaster.

On September 9, 2002, the Division provided the State agencies written guidance in a COOP Implementation Guidance document. Additional information was provided to assist the State and

⁶ Section 252.365, Florida Statutes

⁷ Section 252.365, Florida Statutes

⁸ Section 252.365(3)(b), Florida Statutes

county agencies in developing a viable COOP plan and was made available on the Division's Web site.

Along with the implementation guidance, a County Coordination Checklist was provided initially on January 31, 2003, and an updated version was distributed on June 14, 2004, to provide assistance for addressing information needed in the COOP plans. This checklist provided the State agencies with the ability to assure that their plans contained all of the required information, as set forth in Florida law⁹, and assist the applicable county agency and the Division in the approval of the State agencies' COOP plans.

The Division recommended that the completed State agency COOP plans and County Coordination Checklist for each facility be submitted to the county agency where the facility is located. Each county agency was to review the State agency's plan to assure that its plan would not adversely affect the county's COOP plan or the county's comprehensive Statewide program of emergency management. The county agency was to submit the State agency's COOP plan and the County Coordination Checklist to the Division for final approval. The plans were to be reviewed to ensure that all the criteria on the County Coordination Checklist had been met and that the county agency did not have any issues with the plan before the Division approved the plan. If the plan was denied, the County Coordination Checklist would be returned to the State agency with documentation indicating what areas needed to be addressed in the plan. If the plan was approved, a letter was sent to the State agency indicating that the plan had passed the Division's approval process.

On May 30, 2003 the STO¹⁰, in coordination with the Division, released an IT disaster recovery plan guidance, template, and checklist to be used by State agencies in the preparation of their IT disaster recovery plans. These documents were provided to each of the Executive Branch agency heads, each

agency Chief Information Officer (CIO), and each agency COOP Coordinator.

During our audit, we noted aspects of the State agency COOP plan and IT disaster recovery plan preparation, approval, and implementation process, and Division oversight thereof, that needed improvement. These matters are discussed in the following paragraphs.

Finding No. 1: State Agency COOP Plans

As previously discussed, Florida law¹¹ provided requirements for minimum contents within State agency COOP plans to be completed by July 1, 2003; separate COOP plans to be developed for individual State agency facilities; coordination with the county agencies; and approval by the Division. The Division's COOP Implementation Guidance required each State agency to submit its COOP plan to the Division for approval on or before June 30, 2003.

Based on information compiled by the Division, since the COOP plan development process began in September 2002, 38 State agencies and 67 counties had developed plans. The Division reported that the 38 State agencies were required by Florida law¹² to create plans for all of their essential facilities, and these State agencies identified their essential facilities based on the functions of the facility. According to the Division, all 38 State agency COOP plans had been submitted to the Division. However, as of August 12, 2005, 14 out of 38 (37 percent) State agency COOP plans had not been approved by the Division.

We examined each of the nine State agency COOP plans included in our audit to determine whether the plans contained all elements required in Florida law¹³. The County Coordination Checklist template provided by the Division itemized all of the COOP plan required elements. Our audit tests disclosed that the Division had given eight of the nine State agency

⁹ Section 252.365, Florida Statutes

¹⁰ Effective July 1, 2005, the responsibilities of the STO were assimilated by DMS.

¹¹ Section 252.365(3)(a)/(c), Florida Statutes

¹² Section 252.365, Florida Statutes

¹³ Section 252.365(3)(a)/(b), Florida Statutes

COOP plans a pass status. DOH was not given a pass because the Division review of DOH's COOP plan and County Checklist indicated that more work was needed to address most of the required elements.

Of the eight State agency COOP plans with a pass status, seven had been approved by the Division. DBPR's COOP plan had not been approved by the Division as of June 30, 2005. DBPR, with four facilities within Leon County, had requested approval from the Division for DBPR to have one COOP plan for Leon County addressing the four facilities and one County Coordination Checklist for the Leon County facilities. According to Division staff, the Division's approval of this change was pending.

Without a completely developed, implemented, and approved COOP plan, the risk is significantly increased that a State agency will not be prepared to continue its mission critical functions in the event of a major disruption or disaster.

Recommendation: The Division should work with the State and county agencies to complete and approve all State agency COOP plans as required by Florida law and the Division's COOP Implementation Guidance to help ensure continuation of State agency mission critical functions in the event of a major disruption or disaster.

Finding No. 2: Division Guidance For IT Disaster Recovery Plans

State agency COOP plans are required by Florida law¹⁴ to identify a baseline of preparedness for a full range of potential emergencies, thereby establishing a viable capability to perform essential functions during any emergency or other situation that disrupts normal operations. Most organizations today are heavily dependent on information systems for their critical business functions, which create an inherent relationship between an IT system and the business process it supports. Ultimately, an organization would

use a suite of plans to properly prepare response, recovery, and continuity activities for disruptions affecting the organization's mission essential systems, including IT systems. IT disaster recovery planning represents a broad scope of activities designed to sustain and recover critical IT services following an emergency. While Florida law¹⁵ regarding agency COOP plans does not specifically address IT disaster recovery plans, STO rules¹⁶ require a written IT disaster recovery plan that has been tested at least annually to provide for the prompt and effective continuation of critical State missions in the event of a disaster. Equally important, an IT disaster recovery plan must be continually maintained, updated, and tested. A plan that is not maintained and tested may prove to be ineffective or may exacerbate the problems in an actual processing disruption.

During our audit testing of the IT disaster recovery plan process, we were provided guidance and checklist documents that had been developed for the State agencies to use in preparation of their plans. The STO and the Division had informally agreed that the STO would provide the templates, guidance, and checklists for the State agency IT plans, and that the STO would participate in the review process. We noted the following deficiencies relating to the monitoring of the IT disaster recovery plan process:

- The Division had not clarified the relationship of the IT disaster recovery plan to the COOP plan or addressed the IT disaster recovery plan in the COOP Implementation Guidance.
- While IT disaster recovery plan guidance and checklist documents were prepared by the STO, the Division's original informal agreement with the STO did not address:
 - Approval of the plans as an expected outcome,
 - Any procedures for documentation retention to show that the reviews had been completed, or

¹⁵ Section 252.365, Florida Statutes

¹⁶ Chapter 60DD-2.007(2)(a)/(b), Florida Administrative Code

¹⁴ Section 252.365(3)(a), Florida Statutes

- Any provision for documented review comments of items that were deficient if the plans were not adequate.

In addition, the STO's memorandum to the State agency heads, dated May 30, 2003, that accompanied the STO's IT disaster recovery plan guidance, template, and checklist to be used by the agencies, provided for the STO to conclude its review of State agency IT disaster recovery plans at the end of August 2003. According to the STO, it subsequently returned all documentation relating to the IT disaster recovery plans to the State agencies. In response to our audit inquiry, the Division Technological Planning Manager indicated that the Division was not aware of the STO memorandum and the scheduled ending of the review until December 2004, over a year later.

- As a result of the discontinuance of the STO review of the IT disaster recovery plans and the Division being unaware of this condition, the Division had not resumed or completed the IT disaster recovery plan review and approval process. The Division had ultimate responsibility for providing guidance in the preparation and implementation of the State agency COOP plans, including the IT disaster recovery plans, and ensuring that the State agency COOP plans are approved when they meet the criteria as provided in Division's COOP Implementation Guidance. According to the Division's IT disaster recovery plan status report dated March 14, 2005, it had not received 19 of 38 (50 percent) State agency IT disaster recovery plans for review.

Of the nine State agencies included in our audit, eight State agencies had prepared an IT disaster recovery plan. The remaining agency, DMS, was included in the STO's plan because the STO was responsible for DMS's IT services. As a result of our audit testing to determine if the eight State agency IT disaster recovery plans followed appropriate business practices in the development and implementation of their IT disaster recovery plans, we also found:

- Six of the eight (75 percent) State agencies were at various stages of testing their IT disaster recovery plans but their testing had either not been completed, or had not been performed at least annually as required by the STO rule¹⁷. During our audit, various agencies within our scope expressed the need for clarification addressing the comprehensiveness of testing intended to be performed annually pursuant to the rule. Some agencies expressed concern over the significant task of trying to perform a comprehensive test of the entire entity each year.
- The IT disaster recovery plan guidance document addressed a change management element to update the plan to keep it current and effective. Each plan contained procedures addressing change management. However, the IT disaster recovery plan guidance did not specify any requirement to track changes. Evidence, such as modification dates or version numbers, did not exist in six of the eight (75 percent) plans to demonstrate that the plans had been changed and, therefore, precluded us from determining whether the plans were being appropriately updated.

Without the Division completing the monitoring of the IT disaster recovery plan process, providing the State agencies with feedback of the deficiencies found in the plans, and providing proper guidance relating to tracking of plan changes, the risk is increased that the State agency plans will not be completed, kept current, and be effective to help ensure that State agencies have adequately addressed the mission critical IT functions to maintain a comprehensive and complete State agency COOP plan.

Recommendation: The Division should resume the IT disaster recovery plan review and approval process to ensure that all 38 State agency IT disaster recovery plans have been completed and approved. The Division should also update the IT disaster recovery plan guidance to include a methodology for tracking changes. The State agencies should satisfy all requirements, including periodic testing and change

¹⁷ Chapter 60DD-2.007(2)(b), Florida Administrative Code

management requirements, and follow the Division's methodology to indicate that the plan has been updated, to ensure that the plans are current and effective. Also, the Division should address the comprehensiveness of the IT disaster recovery testing in its guidance or seek clarification in the applicable STO rule.

Finding No. 3:

Division Guidance for COOP Plan and IT Disaster Recovery Plan

As previously mentioned, the Division prepared and distributed a COOP Implementation Guidance dated September 9, 2002, to fulfill its obligation for providing guidance in the preparation of the State agency COOP plans. The Division had also provided training classes on the preparation of the State agency COOP plan, and had prepared a document detailing changes that should be addressed as a result of lessons learned from the COOP plan approval process. During our audit tests of the COOP plan and IT disaster recovery plan approval process, we noted the following deficiencies in the Division's guidance procedures:

- The COOP Implementation Guidance did not define the requirements to obtain a pass and an approval of the COOP plan or IT disaster recovery plan. The COOP Implementation Guidance did not define how the terms pass and approved were being used for the facility and State agency COOP plans or County Coordination Checklists. As previously discussed in Finding No. 1, DBPR had issues with the approve status of its COOP plan.
- Supporting documentation for the COOP plan and IT disaster recovery plan reflecting the status of each of the 38 State agencies was not available in all instances. No IT disaster recovery plan documentation was saved by the STO except for a spreadsheet showing, among other items, each of the 38 State agencies, the date the plan was received, and the date the STO reviewed the plan. Our audit tests, performed to verify the status of the COOP plans and IT disaster recovery plans for each of the nine State agencies within the scope of this audit, found that in

certain instances the documentation to support the spreadsheets prepared by either the Division or the STO was not available.

- The Division had not clarified the role of the COOP Coordinator in relation to the emergency coordination officer role established by Florida law¹⁸. Florida law requires that each State agency designate an emergency coordination officer and an alternate, and assigns them specific duties related to the State agency COOP plans. The Division's COOP Implementation Guidance required each State agency head to appoint a COOP coordinator and provide the name and contact information to the Executive Office of the Governor and the Division, but had not defined their duties. The Division did not require the State agencies to notify the Division whenever the COOP Coordinator changed, although Florida law¹⁹ has a notification requirement when changing the emergency coordination officer or alternate.
- The COOP Implementation Guidance did not address the County Coordination Checklist used in conjunction with the COOP plan approval process. No procedures existed within the COOP Implementation Guidance for the preparation of the County Coordination Checklist or the submission of the COOP plan and County Coordination Checklist to the county agency for review. Additionally, the IT disaster recovery plan Checklist prepared by the STO was not mentioned in the COOP Implementation Guidance or found on the Division's Web site.
- The COOP Implementation Guidance did not address the State agency's periodic maintenance of its COOP plan to ensure that it was being kept current and effective. During our audit tests, instances were noted where call lists contained the names of individuals who no longer worked at the State agency and, in some cases, there were no modification dates or revision indications on the provided COOP plans.

¹⁸ Section 252.365(1)/(3), Florida Statutes

¹⁹ Section 252.365(4), Florida Statutes

In the absence of industry standards for COOP planning, the importance of clear direction from the Division is increased. The above-described omissions and inefficiencies in procedural and responsibility requirements for COOP and IT disaster recovery planning may have impeded the timely completion of the approval and implementation of the plans.

Recommendation: The Division should enhance its COOP guidelines to address the above-listed deficiencies and clarify the submission requirements and the review and approval process that State agencies are expected to follow for COOP planning, including, as a subset, IT disaster recovery planning. Additionally, the Division should clarify the role of the COOP coordinator in relation to the emergency coordination officer and alternate roles, and make any necessary adjustments to its guidelines, such as further defining specific job duties, where necessary.

Finding No. 4:
Division Periodic Review of Plans

The Division's COOP Implementation Guidance requires the Division to conduct periodic assessments of the COOP plans. However, Florida law²⁰ does not have a similar requirement.

During our audit, we noted that the COOP plan approval and recommendations for plan improvements required of the Division within Florida law appeared to be a one-time event to occur after the State agency COOP plan due date of June 30, 2003. The COOP Implementation Guidance stated that the Division should conduct periodic assessments of State agency COOP capabilities and approve State agency plans; however, the term periodic was not defined and the scope and purpose of the periodic reviews were not described. COOP plans and IT disaster recovery plans are dynamic documents that should be updated regularly to remain current and viable. Because IT has become an essential service that supports mission critical functions of State agencies, IT disaster preparedness in the form of the IT disaster recovery

plan is essential to ensuring continuity of operations. Hence, an ongoing COOP and IT disaster recovery plan program should be designed to keep the plans tested and maintained.

Without procedures that clearly define and provide the purpose of the Division's periodic review of the State agency COOP plans and a specific statutory requirement addressing the periodic review, the risk is increased that State agency COOP plans could be outdated, resulting in inadequate disaster preparedness.

Recommendation: The Division should review its guidelines and seek further clarification of the nature, frequency, and scope of required periodic COOP plan assessments, and, as appropriate, make recommendations for statutory changes to the Legislature with respect to periodic reviews of the COOP plans.

Finding No. 5:
Distribution Controls

Prudent business practices call for the limited distribution of State agency disaster preparedness plans, or pertinent portions thereof, including the IT disaster recovery plans, to safeguard the sensitive information contained in the plans from unauthorized disclosure. By definition, the State agencies' most mission critical functions and the necessary information to recover these functions in case of a disruption are included in the plans. Hence, the plans usually contain information that is considered in Florida law²¹ to be confidential or exempt from public disclosure. Examples of exempt information that can be found in these documents include State agency personnel names, home addresses, and telephone numbers on contact lists for some staff; building plans, blueprints, schematic drawings, and diagrams which depict the internal layout and structural elements of a building or facility owned or operated by a State agency; and security system plans. STO rules²²

²¹ Sections 119.07(6)(i)1., (ee), and 119.071(2), Florida Statutes

²² Chapter 60DD-2.008, Florida Administrative Code

²⁰ Section 252.365(1)/(3), Florida Statutes

provide that State agencies shall conduct background investigations for personnel in positions of special trust or having access to sensitive locations in accordance with Florida law²³.

The COOP and IT disaster recovery plan approval process required that the plans and supporting documentation be distributed among multiple organizations, including the affected State agencies, the Division, the county agencies, and the STO. Our audit disclosed deficiencies in distribution controls protecting confidential and exempt information within COOP and IT disaster recovery plans. Specifically:

- The Division requested that each State agency submit an electronic copy of its COOP and IT disaster recovery plan for storage at the Division. No procedures existed at the Division for the storage of the plans, including the protection of confidential and exempt information within the plans.
- No requirement existed for background checks for individuals who handle the confidential or exempt information within the plans.
- No Division procedures or guidance existed for documenting the individuals who had been given access to the confidential or exempt information. Our audit testing found only one of the nine State agencies within the scope of our audit that had procedures in place addressing the distribution of COOP and IT disaster recovery plans.

Without an established methodology governing the controls over who has access to the COOP plan and IT disaster recovery plan and their proper storage, the risk is increased that nonpublic information will be shared or used by individuals who do not have a specific need-to-know. The information could, therefore, be used in unintended ways to circumvent controls put in place by the State agency to protect data and resources.

²³ Sections 110.1127 and 435.04, Florida Statutes

Recommendation: The Division should review the COOP Implementation Guidance, the IT disaster recovery plan guidance, STO rules, and Florida law relating to nonpublic records and background checks, and establish additional procedures within the COOP and IT disaster recovery plan review and approval process to ensure the protection of nonpublic information contained within these documents.

OTHER MATTERS

As noted throughout this report, the STO, in accordance with Florida law²⁴, had established various rules and guidelines regarding the use and protection of the State's IT resources. During the 2005 Legislative session, a bill²⁵ that would have reorganized and reassigned the functions and duties of the STO was passed by the Legislature and presented to the Governor for signature. The bill was vetoed on June 27, 2005. Since the law²⁶ was unchanged, the rulemaking authority statutorily remained with the STO. However, the STO underwent defacto dissolution as the 2005 General Appropriations Act²⁷ made no appropriation for the funding of positions in the STO. As of the completion of our audit, rulemaking authority and responsibility for promoting or enforcing compliance with existing STO rules had not been established.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to evaluate State agencies' actions to promote compliance with Florida law²⁸ with respect to emergency coordination officers and disaster preparedness plans; to determine whether State agencies follow appropriate business practices in the development, implementation, training, updating, and testing of COOP and IT disaster recovery plans; to evaluate the progress of the Department of

²⁴ Section 282.102(2), Florida Statutes

²⁵ 2005 SB 1494: Relating to Information Technology Management

²⁶ Section 282.102(2), Florida Statutes

²⁷ Chapter 2005-70, Specific Appropriation 2728/2757, Laws of Florida

²⁸ Section 252.365, Florida Statutes

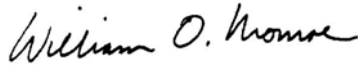
Community Affairs, Division of Emergency Management in providing guidelines for the preparation and implementation of Executive Branch COOP plans and approving State agency COOP plans; and to identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Florida law²⁹. The scope of this audit focused on State agency COOP planning and IT disaster recovery planning, for the period March 2005 through June 2005, including selected actions through August 2005, at the following Executive Branch agencies: the Department of Community Affairs (DCA), State

Technology Office (STO), Department of Management Services (DMS), Department of Transportation (DOT), Department of Health (DOH), Department of Agriculture and Consumer Services (DACS), Department of Business and Professional Regulation (DBPR), Department of State (DOS), and Department of Citrus (Citrus). In conducting the audit, we interviewed appropriate State agency personnel, observed State agency processes and procedures, reviewed documentation, and performed various other audit procedures to test selected controls related to COOP and IT disaster recovery planning.

²⁹ Section 11.45(7)(h), Florida Statutes

AUTHORITY

Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our information technology audit.



William O. Monroe, CPA
Auditor General

STATE AGENCIES' RESPONSES

In letters dated September 1, 2005, through September 26, 2005, the heads of the applicable agencies provided responses to our preliminary and tentative findings. These letters are included at the end of this report. A response was not required from or submitted by the Department of Agriculture and Consumer Services because no findings were reported for that agency. A response from the Department of Management Services was only required and submitted for issues related to the State Technology Office.

To promote accountability and improvement in government operations, the Auditor General makes audits of the information technology programs, activities, and functions of governmental entities. This information technology audit was made in accordance with applicable standards contained in *Government Auditing Standards* issued by the Comptroller General of the United States. This audit was conducted by Shera Bake, CISA, and supervised by Tina Greene, CPA*, CISA. Please address inquiries regarding this report to Jon Ingram, CPA*, CISA, Audit Manager, via e-mail at joningram@aud.state.fl.us or by telephone at (850) 488-0840.

This report and other audit reports prepared by the Auditor General can be obtained on our Web site (<http://www.state.fl.us/audgen>); by telephone (850 487-9024); or by mail (G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450).

*Regulated by State of Florida.



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ANDREW R. TAYLOR
CHAIRMAN
FLORIDA CITRUS COMMISSION

September 1, 2005

William O. Monroe, Auditor General
State of Florida
G74 Claude Pepper Building
111 W. Madison Street
Tallahassee, Fl 32399

Dear Mr. Monroe:

This letter is in response to the P&T audit findings detailed in the Selected State Agencies' Continuity of Operations and Information Technology Disaster Recovery Planning document. We were asked to provide a written statement of explanation concerning Finding No. 2 only, including our actual or proposed corrective actions.

A. The IT disaster recovery plan testing had not been completed or performed at least annually as required by the STO rule.

RESPONSE:

Agree. The Florida Department of Citrus plans to test its IT disaster recovery plan during the current fiscal year of FY 05-06. Upon completion of the testing, the plan will be updated as needed. Then the testing will be documented and submitted, along with the revised plan, to the Division in a timely manner.

B. The IT disaster recovery plan contains procedures addressing change management. However, evidence, such as modification dates or version numbers, does not exist in the plan to demonstrate that the plan had been changed.

RESPONSE:

Agree. Upon completion of the testing of the plan, as described in the above response, the plan will be updated as needed. The updated plan will be clearly marked with the modification date to demonstrate that the plan has been changed. The modified report will be submitted to the Division in a timely manner.

Should you require additional information in this process, please contact me at 863-499-2517.

Sincerely,

Billy G. Weathers
Inspector General

To enhance the welfare of Florida citrus growers and the groves they operate.



STATE OF FLORIDA
DEPARTMENT OF STATE

JEB BUSH
Governor

GLEND A. HOOD
Secretary of State

September 14, 2005

William O. Monroe, CPA
Florida Auditor General
Claude Denson Pepper Building
111 West Madison Street
Tallahassee, FL 32399-1450

Re: Department of State Response to the Information Technology Audit of Selected Agencies
Continuity of Operations and Information Technology Disaster Recovery Planning

Dear Mr. Monroe:

Thank you for the opportunity to respond to your preliminary and tentative findings for the audit report referenced above. It is our understanding that the scope of your audit included nine agencies and that the Department of State is only responsible for responding to Finding Number 2 shown in the summary section of your report as follows:

Finding No. 2: Division procedures to ensure that State agency IT disaster recovery plans are complete and viable needed improvement. Not all agency plan testing had been completed or performed annually as of June 2005, and some agency plans lacked evidence of being updated since the original version was prepared.

As required, the Department of State (DOS) submitted the Continuity of Operations Plan (COOP) and Information Technology Disaster Recovery Plan (ITDRP) to the Division of Emergency Management (DEM) with the understanding that the DEM would review both plans and provide DOS with feedback applicable to any deficiencies and/or plan approvals. Initially, the DEM provided the DOS with feedback on the COOP and ultimately received a pass/approval for the plan. The DEM did not provide feedback or pass/approval for the ITDRP.

During the 2004 and 2005 hurricane seasons, the DOS tested its ITDRP through actual implementation procedures required as a result of real hurricane conditions which occurred in and around the State of Florida. Also, the DOS exercised various phases of disaster preparation and redirection of the DOS network during this time period. In the future, the DOS plans to better document its test exercises and actual implementation of the ITDRP. However, in order to enhance the DOS' plan test procedures, the DOS requests guidance and clarification on the comprehensiveness of the annual test requirements.

Since inception, the DOS updated its ITDRP on an as needed basis; however, the DOS did not incorporate version numbers to reflect changes made. The DOS plans to incorporate a version number system to document modifications to all future ITDRP updates.

Thank you for your assistance in this matter. Please contact my office if you need additional information.

Sincerely,

Handwritten signature of Glenda E. Hood in cursive.

Glenda E. Hood, Secretary

cc. Dave Mann, Assistant Secretary
Sarah Smith, Chief, Bureau of Departmental Operations & Technical Support
Dave Tepper, Chief, Bureau of Departmental Services
Kirby J. Mole, Inspector General



Florida Department of Transportation

JEB BUSH
GOVERNOR

605 Suwannee Street
Tallahassee, FL 32399-0450

DENVER J. STUTLER, JR.
SECRETARY

September 15, 2005

William O. Monroe, CPA
Auditor General
Office of the Auditor General
Room G74, Claude Pepper Building
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Mr. Monroe:

We are pleased to respond to the preliminary and tentative audit findings and recommendations concerning the audit of the:

**Selected State Agencies' Continuity of Operations and
Information Technology Disaster Recovery Planning
March 2005 through June 2005**

As required by Section 11.45(4)(d), Florida Statutes, our response to the findings is enclosed.

We appreciate the efforts of you and your staff in assisting to improve our operations. If you have any questions, please contact Cecil Bragg, our Inspector General, at 410-5800.

Sincerely,

Denver Stutler, Jr., P.E.
Secretary

DS:hmt

Enclosure

Finding No. 2: Division Guidance For IT Disaster Recovery Plans

- Six of the eight (75%) State agencies were at various stages of testing their IT disaster recovery plans but their testing had either not been completed, or had not been performed at least annually as required by the STO rule 17. During our audit, various agencies within our scope expressed the need for clarification addressing the comprehensiveness of testing intended to be performed annually pursuant to the rule. Some agencies expressed concern over the significant task of trying to perform a comprehensive test of the entire entity each year.
- The IT disaster recovery plan guidance document addressed a change management element to update the plan to keep it current and effective. Each plan contained procedures addressing change management. However, the IT disaster recovery plan guidance did not specify any requirement to track changes. Evidence, such as modification dates or version numbers, did not exist in six of the eight (75%) plans to 17 Chapter 60DD-2.007(2)(b), Florida Administrative Code demonstrate that the plans had been changed and, therefore, precluded us from determining whether the plans were being appropriately updated.

Recommendation: The Division should resume the IT disaster recovery plan review and approval process to ensure that all 38 State agency IT disaster recovery plans have been completed and approved. The Division should also update the IT disaster recovery plan guidance to include a methodology for tracking changes. The State agencies should satisfy all requirements, including periodic testing and change management requirements, and follow the Division's methodology to indicate that the plan has been updated, to ensure that the plans are current and effective. Also, the Division should address the comprehensiveness of the IT disaster recovery testing in its guidance or seek clarification in the applicable STO rule.

Management Response: Concur. The FDOT contract with SunGard was signed on September 10, 2004. Converting our IT Disaster Recovery Plans to SunGard's system and testing our entire environment was not practical during the first year. Districts 1 and 4 tested their plans May 2005 in Philadelphia. Districts 2 and 7 were scheduled to test their plans the first part of September 2005. During the next contract year, FDOT's Central Office and additional districts will be scheduled for testing. With the recovery plan for FDOT's Central Office in the process of being converted to SunGard's system, only critical changes/updates are being made to our current plan to facilitate the conversion which is scheduled for completion at the end of September 2005.



STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

September 21, 2005



Mr. William O. Monroe
Auditor General
State of Florida
G74 Claude Pepper Building
111 West Madison Street
Tallahassee, FL 32399-1450

Job Bush
Governor

Simone Marstiller
Secretary

Dear Mr. Monroe:

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1940 North Monroe Street
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I am in receipt of your letter dated August 26, 2005, in which you provide preliminary and tentative audit findings and recommendations on the Information Technology Audit of Selected State Agencies' Continuity of Operations and Information Technology Disaster Recovery Planning for the period March 2005 through June 2005, including selected actions through August 2005. I am also in receipt of an e-mail which indicates the Department of Business and Professional Regulation is responsible for responding to Finding Nos. 1 and 2 of the preliminary and tentative audit.

Finding No 1: COOP plans prepared by the Executive Branch agencies and submitted to the Division for approval did not in all instances meet the requirements outlined in Florida law or the Division's COOP Implementation Guidance and not all plans had been approved as of August 2005.

Recommendation: The Division should work with the State and county agencies to complete and approve all State agency COOP plans as required by Florida law and the Division's COOP Implementation Guidance to help ensure continuation of State agency mission critical functions in the event of a major disruption or disaster.

DBPR Response: DBPR agrees and is ready to work with the Division of Emergency Management to reach approval of the COOP plan.

Finding No 2: Division procedures to ensure that State agency IT disaster recovery plans are complete and viable needed improvement. Not all agency plan testing had been completed or performed annually as of June 2005, and some agency plans lacked evidence of being updated since the original version was prepared.

Recommendation: The Division should resume the IT disaster recovery plan review and approval process to ensure that all 38 State agency IT disaster recovery plans have been completed and approved. The Division should also update the IT disaster recovery plan guidance to include a methodology for tracking changes. The State agencies should satisfy all requirements, including periodic testing and change management requirements, and follow the Division's methodology to indicate that the plan has been updated, to ensure that the plans are current and effective. Also, the Division should address the comprehensiveness of the IT disaster recovery testing in its guidance or seek clarification in the applicable STO rule.

Mr. William O. Monroe
September 21, 2005
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DBPR Response: DBPR received funding from the Legislature in FY 04-05 to perform non-strategic systems upgrades. The purchase and installation of these systems were completed at the end of FY 04-05. As a result, DBPR is in the process of completing the necessary updates to its IT disaster recovery plan. In this process, evidence of the changes such as modification dates and version numbers, will be documented using our change control methodology.

Please contact Ms. Lynn Furiato, Chief Information Officer, at 850-921-5392 if you have any questions regarding the above responses or need further clarification.

Sincerely,


Simone Marstiller
Secretary

SM/km

cc: Lynn Furiato
Ron Russo



DEPARTMENT OF MANAGEMENT SERVICES

"We serve those who serve Florida"

JEB BUSH Governor

Tom Lewis, Jr. Secretary



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September 23, 2005

Mr. William O. Monroe, CPA Auditor General Office of the Auditor General Claude Denson Pepper Building 111 West Madison Street Tallahassee, Florida 32301

Dear Mr. Monroe:

Pursuant to Section 11.45(4)(d), Florida Statutes, this is our response to your report, Selected State Agencies' Continuity of Operations and Information Technology Disaster Recovery Planning, Information Technology Audit. Our response corresponds with the order of your tentative and preliminary findings and recommendations contained in the draft report.

Finding No. 2: Division Guidance For IT Disaster Recovery Plans

Division (Division of Emergency Management) procedures to ensure that State agency IT disaster recovery plans are complete and viable needed improvement. Not all agency plan testing had been completed or performed annually as of June 2005, and some agency plans lacked evidence of being updated since the original version was prepared.

Recommendation:

(The Division should resume the IT disaster recovery plan review and approval process to ensure that all 38 State agency IT disaster recovery plans have been completed and approved. The Division should also update the IT disaster recovery plan guidance to include a methodology for tracking changes.) The State agencies should satisfy all requirements, including periodic testing and change management requirements, and follow the Division's methodology to indicate that the plan has been updated, to ensure that the plans are current and effective. (Also, the Division should address the comprehensiveness of the IT disaster recovery testing in its guidance or seek clarification in the applicable STO rule.)

Mr. William O. Monroe
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Page 2

Response:

Concur: The Department of Management Services will incorporate a change management process and testing schedule into the COOP and ITDRP process to assure that the plans are effective and up to date. These items should be completed by January 2006.

If further information is needed concerning any of our responses, please contact Steve Rumph, Inspector General, at 488-5285.

Sincerely,



Tom Lewis, Jr.
Secretary

TL/taw

cc: Julie Madden, Deputy Secretary

John Ford, Director
Telecommunications and Wireless Services

Tom Clemons, Director
Administration

Ken Granger, Chief Information Officer

Mike Russo, Chief Information Security Officer



STATE OF FLORIDA
DEPARTMENT OF COMMUNITY AFFAIRS
"Dedicated to making Florida a better place to call home"

JEB BUSH
 Governor

THADDEUS L. COHEN, AIA
 Secretary

September 26, 2005

William O. Monroe, Auditor General
 G74 Claude Pepper Building
 111 West Madison Street
 Tallahassee, Florida 32399-1450

RE: August 26, 2005 Letter, Information Technology Audit of Selected State Agencies'
 Continuity of Operations and Information Technology Disaster Recovery Planning

Dear Mr. Monroe:

As the Auditor General's report suggests, Continuity of Operations Planning (COOP) is an intricate part of state government. The ability to continue to provide services to the citizens of Florida during an emergency or disaster is a very important task. The Department of Community Affairs would like to offer the following responses to the findings identified in the report.

Finding No. 1: COOP Plans prepared by the Executive Branch agencies and submitted to the Division for approval did not in all instances meet the requirements outlined in Florida law or the Division's COOP Implementation Guidance and not all plans had been approved as of August 2005.

The following steps are suggested to address the first finding:

- Continued guidance will be provided to each state agency that has not had its COOP plan approved.
- Training classes and workshops have been provided and will continue to be provided to assist each state agency in the development of its plan.
- Technical assistance will continue to be provided to each state agency regarding training and exercising of its COOP plan.

Several points of clarification are necessary in response to this finding. First, Section 252.365, Florida Statutes, provides no specific time frame for the Division's approval of disaster preparedness plans. As the audit notes, the only specific time frame identified in statute is the agencies' deadline to complete and submit the plans. Given the limited resources available and

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William O. Monroe
September 26, 2005
Page Two

the far-reaching implications of the plans, the Division has made a significant effort to ensure that state agencies understand COOP concepts and requirements, and to review and provide specific comments on the plans. As noted in our response above, the Division is committed to continuing this effort.

Finding No. 2: Division procedures to ensure that State Agency IT Disaster Recovery Plans are complete and viable needed improvement. Not all agency plan testing had been completed or performed annually as of June 2005, and some agency plans lacked evidence of being updated since the original version was prepared.

The following steps are suggested to address the second finding:

- Legislative clarification should be proposed regarding whether Information Technology Disaster Recovery Plans (ITDRPs) are to be incorporated into each agency Continuity of Operations Plan. Section 252.365, Florida Statute, does not reference ITDRPs.
- The agency(s) with the subject matter experts (SME) to review the ITDRPs should be identified by the state. The Division of Emergency Management does not possess this expertise and does not have the resources to develop that expertise. Once this SME entity is established, that entity should provide guidance on exercising and testing ITDRPs.
- Should the Legislature determine that the COOP is the appropriate document to house the ITDRP information, the COOP guidance can be updated to include information from the SME entity regarding ITDRP requirements.

Finding No. 3: Division procedures for providing guidance and approval of State Agency COOP and IT disaster recovery plans needed improvement.

The following steps are suggested to address the third finding:

- Clarification will be provided within the Implementation Guidance regarding the definition of an "approved" plan.
- Documentation of each agency's COOP status will be kept within a database that will be created to assist each state agency in developing and updating its COOP plan. Should the Legislature determine that the COOP is the appropriate vehicle for the ITDRP requirements, this status will be included in the database if provided to the Division by the ITDRP reviewing entity, as determined by the proposal in Finding No. 2.
- Definitions, as well as the roles and responsibilities of the COOP Coordinator, will be enhanced within the Implementation Guidance.

William O. Monroe
September 26, 2005
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- The Implementation Guidance will also be modified to enhance information on the development of each agency's COOP.

Finding No. 4: Division COOP Implementation Guidance concerning the Division's periodic review of the State Agency COOP plans needed clarification, and the periodic review was not addressed in existing Florida law.

Section 252.365 does not provide for a periodic review cycle for the COOPs. The Division will consider legislative action to include a periodic review cycle. It should be noted that there are no recurring resources available to support this effort.

Finding No. 5: Distribution controls protecting the non-public contents of COOP and IT disaster recovery plans needed improvement.

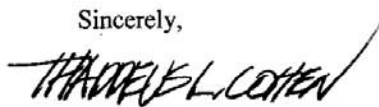
The following suggestions are offered to address Finding No. 5:

- Plan control guidance will be provided on the following:
 - * A specific reference to the exemption from the public records requirements will be provided in Implementation Guidance.
 - * COOP Plans are considered security systems documents and therefore are considered to obtain confidential information.

The Department and the Division understands the importance of these plans and will continue to take the appropriate actions to provide guidance and technical assistance to state agencies as they outline their preparation and practices to be able to continue those mission essential functions that they provide to the citizens of Florida.

If you have any questions, please feel free to contact me.

Sincerely,



Thaddeus L. Cohen, AIA
Secretary



Jeb Bush
Governor

M. Rony François, M.D., M.S.P.H., Ph.D.
Secretary, Department of Health

September 26, 2005

Mr. William O. Monroe, C.P.A.
Auditor General
Room G74, Claude Pepper Building
111 West Madison Street
Tallahassee, FL 32399-1450

Dear Mr. Monroe:

This letter is in response to your August 26 correspondence regarding the preliminary and tentative findings of your report entitled, *Selected State Agencies' Continuity of Operations and Information Technology Disaster Recover Planning*. The agency's response and corrective action plans to your findings and recommendations may be found in the enclosed document.

We appreciate the work of your staff and will diligently pursue appropriate resolution to the findings.

If I may be of further assistance, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Rony François, M.D., M.S.P.H., Ph.D." with a stylized flourish at the end.

M. Rony François, M.D., M.S.P.H., Ph.D.
Secretary, Department of Health

MRF/kir
Enclosure

Selected State Agencies' Continuity of Operations and Information Technology Disaster Recover Planning

Finding:

COOP plans prepared by the Executive Branch agencies and submitted to the Division for approval did not in all instances meet the requirements outlined in Florida law or the Division's COOP Implementation Guidance and not all plans had been approved as of August 2005. DOH was not given a pass because the Division review of DOH's COOP plan and County Checklist indicated that more work was needed to address most of the required elements.

Recommendation:

The Division should work with the State and county agencies to complete and approve all State agency COOP plans as required by Florida law and the Division's COOP Implementation Guidance to help ensure continuation of State agency mission critical functions in the event of a major disruption or disaster.

Management Response:

The Department of Health (DOH) will continue to work with the Department of Community Affairs, Division of Emergency Management (DEM) to address Continuity of Operations (COOP) elements that DEM identified as needing additional work to comply with the required elements identified in the "County Coordination Checklist - Continuity of Operations". The majority of DEM's comments focused on the operational components of the DOH COOP (e.g. call-down list, procedures).

This year, DOH has systematically met with each of the Divisions to identify and address COOP deficits. Divisions have tested their plans via training and exercise activities. DOH will continue to provide technical assistance (regarding plan development, exercising plans and general operability) to the Divisions to assure that all remaining DOH COOP deficits are corrected and documentation provided to DEM.

Corrective Action Plan:

- 1. Work with Central Office Divisions to operationalize their current plans, including:
 - Update COOP Management Teams for each Division
 - Update and verify alternate site locations for all Central Office Divisions
 - Update the DOH COOP sharepoint web link
- 2. Develop and conduct a DOH Capital Circle Office Complex (CCOC) COOP tabletop exercise. 3. Revise and update the DOH COOP Plan based on lessons learned from the tabletop exercise. 4. Submit an updated DOH COOP Plan to Division of Emergency Management, DCA

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