

# Performance Audit Report

## Emergency Preparedness at Williston State College Report No. NP-012-17

February 5, 2018

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## *Transmittal Letter*

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April 4, 2018

State Board of Higher Education  
Members of the North Dakota Legislative Assembly

We are pleased to submit this performance audit. The subject matter of this audit included certain aspects of emergency operations at Williston State College

We conducted this audit under the authority granted within North Dakota Century Code Section 54-10-30. Included in the report are the audit scope and objectives, findings and recommendations, and management responses.

Craig Hashbarger, CPA, CIA, CFE was the audit manager. Inquiries or comments relating to this audit may be directed to the audit manager by calling (701) 239-7274. We wish to express our appreciation to the staff and management of Williston State College for the courtesy, cooperation, and assistance they provided to us during this audit.

Respectfully submitted,

/S/

Joshua C. Gallion  
State Auditor

# ***WSC Emergency Preparedness Report Highlights***

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## ***Emergency Operations Plan***

Williston State College (WSC) has a written emergency operations plan. However, there are opportunities to improve the design and implementation of the plan consistent with SBHE policy and applicable best practices.

- Although WSC has two committees which periodically discuss aspects of its emergency operations plan, the plan does not define the members of the team, nor does it define roles or responsibilities for the team members.
- Although WSC has conducted a high-level enterprise risk assessment which included some areas related to campus safety, WSC has not conducted a risk assessment focused specifically on emergency operations and for developing and implementing its emergency operations plan.
- WSC has not incorporated the elements of a base plan into its emergency operations plan, and has not developed formalized goals and objectives for each significant potential incident identified in the plan.
- WSC conducts periodic training on emergency preparedness topics, however, the minimum training requirements are not documented in WSC's emergency operations plan.
- Other than periodic fire drills, WSC's does not have documented minimum exercise requirements or assignment of exercise responsibilities in WSC's emergency operations plan.
- WSC doesn't have a formally documented process for reviewing and revising WSC's emergency operations plan.

WSC does not have a comprehensive continuity of operations plan. As a result, in an emergency or other continuity event, there is an increased risk of extended interruption of some of WSC's essential functions, or excess cost and effort needed to maintain its essential functions.

## *Glossary*

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**Base Plan** – Document(s) that provide an overview of the institution’s emergency response organization and policies and a general understanding of the institution’s approach to emergency response and recovery.

**Collaborative Planning Team** – a team of representatives from across the IHE who have roles and responsibilities in IHE emergency management before, during, and after an incident.

**Continuity of Operations Plan (COOP)** – A plan to assure the capability exists to continue essential functions across a wide range of potential disasters or emergencies.

**Emergency Operations Plan (EOP)** – A comprehensive, integrated plan that addresses emergency preparedness, emergency management, and continuity of operations.

**Exercises** – A tool to prepare for and practice potential emergency situations in a risk-free environment.

**Federal Emergency Management Agency (FEMA)** – Federal agency whose stated mission is “helping people before, during, and after disasters.”

**Goals** – Broad, general statements that indicate the desired outcome in response to the threat or hazard identified by planners in the risk assessment.

**Institution of Higher Education (IHE)** – College or University.

**Objectives** – Specific, measurable actions that are necessary to achieve the goals. Often, planners will need to identify multiple objectives in support of a single goal.

**Risk Assessment** – A process that collects information and assigns a value to risks for the purpose of informing priorities, developing or comparing courses of action, and informing decision making.

**Training** – Teaching that provides knowledge, skills and abilities needed to perform key tasks

# ***Background Information***

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## ***Introduction***

Institutions of higher education, as with any other public or private entity, are at risk of being impacted by a variety of emergencies, ranging from natural disasters such as floods, blizzards and tornadoes, to fires, active shooter incidents, and pandemics. These disasters can, and do, result in injury and loss of life, as well as damage to infrastructure and business interruptions.

## ***Emergency Operations Plans***

The State Board of Higher Education, in recognition of the importance of North Dakota University System's (NDUS) emergency preparedness, adopted Policy 906 (SBHE 906) effective May 16, 2012. SBHE 906 establishes the requirement for all NDUS institutions to "develop and implement comprehensive Emergency Management Plans." SBHE 906 defines an emergency management plan as "a comprehensive, integrated plan that addresses emergency preparedness, emergency management, disaster and emergency response and recovery, mitigation, and continuity of operations."

The Federal Emergency Management Agency (FEMA) states that emergency preparedness "establishes organizational readiness to minimize the adverse impact of these events by means of active responses to protect the health and safety of individuals and the integrity and functioning of physical structures." (Fundamentals of Emergency Management chapter 9 AEMRC). In other words, the purpose of an emergency management plan is to save lives, prevent or mitigate injury, and prevent or reduce damage to critical infrastructure. An emergency management plan also facilitates timely recovery and restoration of the institution's functions.

The federal government recognizes the importance of robust emergency operations plans in the nation's colleges and universities. Accordingly, in 2013 the US Department of Education, in cooperation with six federal agencies, developed a Guide for Developing High Quality Emergency Operations Plans for Institutions of Higher Education (IHE Guide). The IHE Guide recognizes that "postsecondary institutions are entrusted to provide a safe and healthy learning environment for students, faculty, and staff who live, work and study on campus."

The IHE Guide states an emergency operations plan is complete if it incorporates all courses of action to be accomplished for all selected threats and hazards; integrates the needs of the whole IHE community; provides a complete picture of what should happen, when, and at whose direction; estimates time for achieving objectives; identifies success criteria and a desired end state; and complies with applicable state and local requirements.

The term "emergency management plan" is used by SBHE 906, and "emergency operations plan" is used by FEMA and the IHE guide. Both terms can be used interchangeably for purposes of this report, but for the sake of clarity we will use the term "emergency operations plan," or "EOP."

## ***Continuity of Operations Plans***

Institutions of higher learning are at risk of being impacted by a variety of emergencies, ranging from natural disasters such as floods, blizzards and tornadoes, to fires, active shooter incidents, cyber-attacks, and pandemics (“continuity events”). In addition to risking lives, injury and/or property damage, these disasters can, and do, result in disruptions in teaching, research, public service and other business operations. According to the FEMA publication *Building a Disaster-Resistant University*, continuity events can harm institutions of higher learning by resulting in “faculty and student departures, decreases in research funding, and increases in insurance premiums.”

In recognition of the risk posed by disruptions in organizations’ essential functions, FEMA provides guidance for development and implementation of continuity of operations plans (COOPs). A COOP provides a framework to enable an organization to continue essential functions, if an event at the organization or in the region threatens operations or requires the relocation of select personnel and functions. In 2009, FEMA, to provide guidance to non-federal entities in developing COOPs, issued Continuity Guidance Circular 1, *Continuity Guidance for Non-Federal Entities* (CGC 1).

CGC 1 outlines ten elements deemed necessary for an “effective continuity capability.” Some of these ten elements include: identification of an organizations essential functions; continuity facilities; continuity communications; tests, training, and exercises (TT&E) among others. Identification of essential functions is the base of a continuity capability. CGC 1 states, “the primary goal of continuity is the continuation of essential functions.”

While a COOP is an important component of an EOP, the mission, goals and objectives of a COOP may not necessarily be the same as those of an EOP. The EOP addresses all aspects of prevention, protection, mitigation, response and recovery, while a COOP focuses on continuing to carry out essential functions of the entity and maintaining them during and after an incident. Moreover, not all emergencies will result in a continuity event, and not all continuity events are a result of an emergency.



# ***Objectives, Scope and Methodology***

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## ***Purpose and Authority***

This performance audit of Williston State College's Emergency Preparedness has been conducted by the Office of the State Auditor pursuant to authority within North Dakota Century Code ("NDCC") Chapter 54-10.

Performance audits are defined as engagements that provide assurance or conclusions based on an evaluation of sufficient, appropriate evidence against stated criteria, such as specific requirements, measures, or defined business practices. Performance audits provide objective analysis, so management and those charged with governance and oversight can use the information to improve performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability. The purpose of this report is to provide analysis, findings and recommendations with respect to the audit objectives.

## ***Objective of the Audit***

The objective of our audit was to answer the following question:

- To what extent are Williston State College's emergency operations and continuity of operations plans designed and implemented in accordance with SBHE policy and applicable best practices?

## ***Audit Scope***

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We primarily used two sources of criteria for developing our findings and conclusions.

SBHE 906, effective May 16, 2012, was implemented with the intention of "meeting federal and state emergency preparedness requirements." SBHE Policy 906 identifies several requirements for all NDUS institutions with respect to the development and implementation of emergency operations plans, including specific elements required to be included in each plan.

The IHE Guide, developed in 2013 in cooperation with various federal agencies, is a source of "good practices and matters to consider for planning and implementation purposes." It is not considered to be a source of laws or regulations; rather, it is a source of overarching principles, best practices and implementation guidance to enable institutions of higher learning to develop and implement effective emergency operations plans.

The subject matter for this objective consisted primarily of the Williston State College emergency preparedness policies and procedures in place as of August 31, 2017.

## ***Relevant Laws, Policies, Contracts and Agreements***

The most significant applicable policy relating to emergency preparedness is SBHE Policy 906.

SBHE Policy 906.1 states “The Chancellor and each institution president are responsible for ensuring that the NDUS Office and each institution develop and implement a comprehensive Emergency Management Plan, including emergency preparedness and continuity of operations, in order to meet federal and state requirements and NDUS and institution needs.”

While federal law is not specifically tested in the scope of this audit, the IHE Guide incorporates several federal laws in its guidance. The most significant of these is the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (better known as the Clery Act.) The Clery Act includes institutional notification responsibilities, focusing on emergency notification and timely warning requirements. It also includes requirements for reporting crime statistics and security-related policies, as well as performing a minimum number of tests of the institution’s “emergency response and evacuation procedures.”

# ***Audit Results – Emergency and Continuity of Operations Plans***

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## ***Statement of Objective and Conclusion***

The objective of our audit was to answer the following question:

- To what extent are Williston State College’s emergency operations and continuity of operations plans designed and implemented in accordance with SBHE policy and applicable best practices?

We determined that while Williston State College has an emergency operations plan, there are opportunities to improve the design and implementation of the plan consistent with SBHE policy and applicable best practices. We determined Williston State College does not have a comprehensive continuity of operations plan.

We communicated certain matters of lesser significance in a separate letter to management.

## ***Audit Methodologies***

To accomplish our objective, we conducted inquiries of members of management responsible and/or knowledgeable about emergency operations and security at WSC. We also reviewed documented emergency operations policies and procedures.

## ***Findings, Recommendations, and Responses***

### **Collaborative Planning Team**

The IHE Guide recommends the formation of a “collaborative planning team” for developing and implementing the EOP. The IHE Guide recommends the team include representatives from throughout the institution of higher education (IHE), as well as student and faculty representatives as applicable. This helps to ensure the interests of all significant stakeholders are represented. The IHE Guide also suggests the planning team should include first responders, local emergency managers or others who “have roles and responsibilities in IHE emergency management before, during, and after an incident.”

SBHE Policy includes similar requirements of its institutions. SBHE 906.4 requires EOPs to include “establishment of an institution emergency management task force or committee, chaired by the institution’s chief emergency officer.”

Furthermore, the IHE Guide states that “Each person involved in the development and refinement of the plan should know his or her role and responsibilities in the planning process.” These roles ensure that team objectives are met and members are held accountable. SBHE 906 requires “identification of and assignment of responsibilities to officers and employees in different units and various levels within the institution,” as well as “clear and complete statements of assigned responsibilities.”

SBHE 906 also requires roles and responsibilities be identified within the plan, “so that the institution has a system in place that assigns and trains employees within institutional units as necessary to develop unit or building specific responses and helps communicate institution and unit requirements.”

WSC has two committees, a loss control committee and an executive cabinet, which periodically discuss aspects of the emergency operations plan. The committees, which are made up of individuals from across the institution, serve collectively to function as a collaborative planning team. The EOP, however, does not define the members of the collaborative planning team; and WSC does not have formally defined roles or responsibilities for members of the collaborative planning team.

### **Recommendation 1**

**We recommend Williston State College identify and document the members of its collaborative planning team in its emergency operations plan. We further recommend Williston State College develop and implement roles and responsibilities for members of the collaborative planning team and document them in the emergency operations plan.**

#### **WSC Response:**

**Agree: The Loss Control/Emergency Management committee was created in 2016 prior to the NDUS Audit. The committee was formed to improve WSC’s emergency response plan.**

**Specific roles and responsibilities of its collaborative planning team will be formally included within the Risk Management / Emergency Operations Committee policy by 6/30/19.**

### **Risk Assessment**

Upon assembly of the collaborative planning team, SBHE policies and the IHE Guide recommend the collaborative planning team conduct a formalized risk assessment of potential emergency events. This risk assessment process facilitates an appropriately tailored emergency operation plan which allocates each institution’s limited resources to the highest risk threats.

SBHE 906.5 states, in part, that “[emergency operation plans] may also include...a threat analysis and risk assessment of potential natural, technological and adversarial hazards which may impact an institution.”

According to the IHE Guide, the emergency operations planning team “first needs to understand the threats and hazards faced by the IHE and surrounding community.” In order to develop an appropriately tailored emergency operations plan, management should use its internal expertise, as well as that of outside experts as appropriate, to identify a range of potential threats. Upon identifying those potential threats, management should evaluate the risk posed by each threat or hazard. According to the IHE guide, management should consider the probability a threat or hazard may occur, severity of the impact, time to warn students and other stakeholders, and how long the threat may last. Such assessments may take many forms and involve a wide variety of tools and methods.

Because the nature of certain risks may change over time, the IHE Guide states risk assessments should not only occur upon initial development of the plan, but also on an ongoing basis to “inform updates and revisions to the plan.”

Based on our testing WSC does not have a formal risk assessment process for identifying and evaluating potential emergency events. WSC did conduct a high-level enterprise risk assessment which addressed some areas of campus safety; however, that enterprise risk assessment did not address the specific elements of “potential natural, technological and adversarial hazards” which may impact the institution, as defined in SBHE 906.

## **Recommendation 2**

**We recommend Williston State College implement a formal risk assessment process to periodically identify and evaluate potential threats and hazards. Furthermore, we recommend Williston State College incorporate the identified threats and hazards identified in the formal risk assessment into its EOP.**

### **WSC Response:**

**Agree: An informal risk assessment process was instituted during the NDUS ERM Risk Register Process mid-2017.**

**A formalized risk assessment process will be described in the revised Emergency Operations Manual by 6/30/19 subject to funding and staff constraints as noted in NDUS policy 906.8.**

**WSC has contracted with the Department of Homeland Security to conduct an extensive Risk Assessment during Summer 2018. The assessment and results will be shared with WSC when complete. WSC anticipates that the results will detail areas for improvement and comparison data to similar colleges throughout the United States. This information will be used to help WSC update and strengthen WSC’s Emergency Operations Plan. WSC will continue to modify and adjust our assessment each year during the summer semester.**

## **Develop Emergency Operations Plan- Base Plan**

While there are numerous potential forms an EOP could take, both SBHE 906 and the IHE Guide specifically identify a “traditional” plan format, which includes a basic/base plan accompanied by functional and hazard-specific annexes.

SBHE 906 recommends institution EOPs include “A Base Plan that provides an overview of the institution's emergency response organization and policies, and a general understanding of the institution's approach to emergency response and recovery for all involved departments and offices”.

The IHE Guide states that “The Basic Plan section of the higher ed EOP provides an overview of the IHE’s approach to operations before, during, and after an emergency. This section addresses the overarching activities the IHE undertakes regardless of the function, threat, or hazard. The content in this section provides a solid foundation for the IHE’s operations.”

Based on our testing WSC has not incorporated the elements of a base plan into the emergency operations plan.

### **Recommendation 3**

**We recommend Williston State College develop and include a comprehensive base plan in its emergency operations plan as recommended by the IHE Guide and SBHE 906.**

### **WSC Response:**

**Agree: WSC will develop and include a comprehensive base plan in its emergency operation plan as recommended by the IHE Guide and SBHE 906 by 6/30/19 subject to funding and staff constraints as noted in NDUS policy 906.8.**

## **Goals and Objectives**

The IHE Guide recommends the planning team develop goals and objectives for each significant emergency threat and hazard based on the formalized risk assessment. The IHE Guide recommends development of at least three goals for each applicable threat and hazard, indicating the desired outcome before, during, and after the emergency event. Each identified goal should include one or more objective(s) which the IHE Guide define as “specific, measurable actions that are necessary to achieve the goals.”

The following is an example identified in the IHE Guide of possible goals for an IHE with respect to the threat of fire. These are only examples and are not intended to serve as a substitute for the judgment of the collaborative planning team:

- Hazard Goal Example 1 (*before*): Prevent a fire from occurring in IHE-governed student housing facilities.
- Hazard Goal Example 2 (*during*): Protect all persons from injury and property from damage by the fire.
- Hazard Goal Example 3 (*after*): Provide necessary medical attention to those in need.

The IHE guide provided the following example objectives related to these goals:

- Objective 1.1 (*before*): Provide fire prevention training to all students and resident advisors who use combustible materials or equipment.
- Objective 2.1 (*during*): Evacuate all persons from the building immediately.
- Objective 3.1 (*after*): Immediately notify fire department and EMS personnel of any fire in a student housing facility.

Based on our testing WSC has not developed formalized goals and objectives with respect to emergency threats or hazards within the emergency operations plan.

#### Recommendation 4

**We recommend Williston State College establish formalized disaster-specific related goals and objectives for each significant emergency incident. Each significant disaster should have at least three goals and the desired outcome before, during, and after the emergency event.**

#### **WSC Response:**

**Agree. WSC will establish formalized disaster-specific related goals and objective for each significant emergency incident by 6/30/19, subject to funding and staff constraints as noted in NDUS policy 906.8. Each significant disaster will contain three goals and desired outcomes before, during and after the emergency event. A formal process for ongoing reevaluation of risks and potential emergency events to adapt to changing policies and best practices will also be included.**

#### **Implement the Emergency Operations Plan**

Both SBHE 906 and the IHE Guide provide guidelines for implementing the EOP.

SBHE 906.4 requires each EOP to include “Minimum training requirements...and assignment of training responsibilities.” It also requires the EOP to include “minimum exercise requirements and assignment of exercise responsibilities.” The IHE Guide also emphasizes the importance of both training and exercises. Training, as defined by the IHE Guide, involves familiarizing the campus community with the EOP and community partners; and training campus community members on necessary skills to enable them to carry out the EOP.

WSC conducts periodic training on emergency preparedness topics; however, the EOP does not have documented minimum training requirements for emergency personnel.

#### Recommendation 5

**We recommend that Williston State College develop and implement formalized training requirements for emergency response personnel and incorporate them into its EOP in accordance with SBHE 906.**

#### **WSC Response:**

**Agree: Specific training requirements for WSC emergency response personnel will be included in the Emergency Operations Plan by 6/30/19 subject to funding and staff constraints as noted in NDUS policy 906.8.**

Exercising the EOP is separate from training. The IHE Guide defines “exercises” as follows: “Exercises provide opportunities to practice with community partners including first responders and local emergency management as well as to identify gaps and weaknesses in the plan.” In other words, exercising the plan involves practicing the implementation of the plan under various emergency scenarios. Exercises typically include some combination of tabletop exercises, drills, functional exercises, and full-scale exercises.

WSC’s EOP does not have a documented policy for exercising the EOP.



## **Recommendation 6**

**We recommend Williston State College develop and implement formalized exercise requirements for responding to emergency threats and hazards.**

### **WSC Response:**

**Agree. WSC will conduct 1 table top exercise per calendar year. Along with each exercise, a formal after-action review will take place. WSC conducts 2 fire drills in all residential life buildings each semester. After Action reviews are also conducted after each significant live event. WSC will formalize a minimum training requirement for policy for all operations team personnel and emergency management team support staff by 6/30/19.**

## **Maintain the Plan**

As with any statement of policies and procedures, the EOP should include a process for reviewing, revising, and maintaining the plan. As the planning team learns new information and insight, or the risk related to certain events increases or decreases, the plan should be modified accordingly.

SBHE 906 includes several requirements related to maintaining, reviewing and updating the EOP. SBHE 906.4 requires each plan to include “a process to review and update the Plan as necessary, not less frequently than every four years.”

The IHE Guide suggests the collaborative planning team, in addition to developing the plan, review and maintain the plan. The IHE Guide further recommends that each part of the plan be reviewed and revised at least once every two years. It states that an IHE may find it useful to review specific portions of the plan rather than reviewing the entire plan all at once. It also recommends each institution consider reviewing and updating the plan after certain events such as actual emergencies, formal exercises, changes in key personnel, or changes in threats or hazards.

WSC currently does not have a formal review process for the EOP.

## **Recommendation 7**

**We recommend Williston State College implement formal policies for periodically reviewing and revising the EOP involving the collaborative planning team. The policy for reviewing the EOP should provide for updates arising from actual emergencies, drills, and exercises (and subsequent after-action meetings). It should also ensure all parts of the plan are reviewed at least every two years.**

### **WSC Response:**

**Agree: WSC will revise its Emergency Operations Plan as well as include a formal statement in the EOP manual requiring future review and revisions to occur every two years at a minimum. The President, or designee, will review the revised Emergency Operations Plan and if approved, will sign the document accepting the plan into official WSC Policy. The revised process will be included in the**



**Emergency Operations manual by 6/30/19 again subject to staff constraints as noted in NDUS policy 906.8.**

## **Continuity of Operations Plan (COOP)**

In addition to risks of injury, loss of life, and property damage, emergencies can also cause an interruption of the organization's important functions. SBHE 906 defines Continuity of Operations as "a plan to assure the capability exists to continue essential agency or institution functions across a wide range of potential disasters or emergencies." In other words, a Continuity of Operations Plan (COOP) is a plan in which the institution identifies its essential functions and identifies the means to carry out those functions, if an emergency event occurs.

SBHE 906.1 requires each institution to have a continuity of operations plan as part of its comprehensive EOP. SBHE 906.4 requires institutional EOPs to include "identification of critical infrastructure, key assets and **essential functions**." (emphasis added)

The IHE Guide provides some examples of "essential functions" applicable in a higher education setting. These may include: business services such as payroll or purchasing; facilities maintenance; safety and security; and continuity of instruction. The IHE Guide suggests that the COOP should be designed "so that it can be activated at any time and [the identified essential functions] sustained for up to 30 days."

WSC does not have a formalized COOP in place. As a result, in an emergency or other continuity event, there is an increased risk of extended interruption of some of WSC's essential functions, or excess cost and effort needed to maintain such functions.

### **Recommendation 8**

**We recommend Williston State College implement a comprehensive continuity of operations plan.**

### **WSC Response:**

**Agree. WSC Response: Agree: The development process of a Continuity of Operations Plan will encompass various departments across the University and will require coordination and collaboration to ensure the plan is thorough. WSC will develop and incorporate a Continuity of Operations Plan into official WSC policy by 6/30/19 subject to funding and staff constraints as noted in NDUS policy 906.8.**

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