AUDIT OF COVID-19 RESPONSE

Pandemic Preparedness

ABSTRACT

The City generally has appropriate plans in place to respond to disaster situations – including a Pandemic Influenza Preparedness Plan; however, most of these plans should be updated to incorporate pandemic-specific considerations like social distancing and teleworking.

Internal Audit Department

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Audit at a Glance

Why we did this Audit:
On March 13, the City declared a local disaster in response to the COVID-19 Pandemic. During a pandemic, public health and safety is of primary importance for local governments, which must be equipped with adequate plans and resources to respond effectively. This audit was included as part of the COVID-19 Response Audit Series, which was included on the City’s amended the fiscal year 2019-20 Audit Plan as approved by the City Council.

What we Found:
The City has established and implemented several disaster management plans – including a Pandemic Influenza Preparedness Plan. Still, additional considerations in these plans would ensure the City is more prepared for potential future pandemics. The following discusses our findings:

Planning. Generally, the City’s disaster management plans comply with relevant laws and are well defined; however, they should be updated to include the following pandemic-related considerations:
• Non-congregate sheltering and mass care;
• Socially distant Emergency Operations Center (EOC) procedures;
• Teleworking and virtual meetings; and
• Prolonged, unanticipated financial impacts.

Training & Exercises. While the EOC Manual establishes appropriate training and exercise requirements, it is difficult to tell if these requirements are being met. Clarifying who must complete training requirements and centralizing the responsibility for managing training and exercise documentation would further ensure the City is prepared for future disasters – including pandemics.

COVID-19 EOC Documentation. The City partially activated its EOC in response to the COVID-19 Pandemic on March 13. Despite the Pandemic continuing into Aug. 2020, no operational records for the EOC after April 30 were found. In addition, there is no record that the EOC was deactivated.

Without proper maintenance of EOC records it is difficult to tell what emergency management activities have occurred, which may potentially hinder communication and reporting to federal, state, and local agencies as well as to the public.

What we Recommend:
Recommendations 1, 2, 7, 8 & 9
Fire, Tech. Services, Public Affairs, and Finance should update their relevant plans to include pandemic considerations for non-congregate sheltering, a socially distant emergency operations center, telework & virtual meetings, and prolonged financial impacts.

Recommendation 3
Fire should create and maintain records for operating and deactivating the emergency operations center for the current COVID-19 Pandemic.

Recommendation 4
Fire should clarify which City staff are required to complete disaster management training.

Recommendations 5 & 6
Fire should create a central repository and retain documentation for disaster management training and emergency operations exercises.
Introduction

The Internal Audit Department is responsible for providing: (a) an independent appraisal\(^1\) of City operations to ensure policies and procedures are in place and complied with, inclusive of purchasing and contracting; (b) information that is accurate and reliable; (c) assurance that assets are properly recorded and safeguarded; (d) assurance that risks are identified and minimized; and (e) assurance that resources are used economically and efficiently and that the City’s objectives are being achieved.

The Internal Audit Department has completed a performance audit of pandemic preparedness processes. 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Management Responsibility

City management is responsible for ensuring that resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

Audit Objectives, Scope, and Methodology

The Internal Audit Department has completed an audit of pandemic preparedness processes. This audit’s scope is specifically focused on assessing the pandemic readiness of the City of Denton. This report is intended to provide assurance that City administration has established adequate plans, procedures, and controls to respond to pandemics.

Audit fieldwork was conducted during June, July, and August of 2020. The scope of review varied depending on the procedure being performed. The following list summarizes major procedures performed during this time:

- Reviewed documentation to develop criteria including industry standards, best practices, policies, and procedures;
- Reviewed various disaster and emergency management plans and procedures adopted by the City to verify their applicability and adequacy to deal with pandemics;
- Reviewed financial reserves policies to evaluate the City’s financial preparedness for pandemics;
- Verified compliance with disaster management provisions of the Texas Government Code;
- Reviewed the Emergency Operations Center (EOC) Manual along with EOC activities and logs maintained during the COVID-19 Pandemic to verify compliance;
- Reviewed disaster management training requirements and verified compliance; and

\(^1\) The City of Denton Internal Auditor’s Office is considered structurally independent as defined by generally accepted government auditing standard 3.56.
• Interviewed Technology Services, Finance, and Fire department staff and Denton County Emergency Management officials.

Background

According to the World Health Organization, a pandemic is the worldwide spread of a new disease. On Jan. 30, the World Health Organization declared an outbreak of a novel coronavirus – commonly known as COVID-19. On March 11, the COVID-19 outbreak was declared a pandemic. Just two days later, the United States President declared the COVID-19 Pandemic a national emergency. The City of Denton’s Mayor issued a Local Disaster Ordinance that same day.

The City’s Disaster Declaration was issued with the intention to reduce or stop the spread of COVID-19 and to mitigate the economic impact of the COVID-19 Pandemic in the City of Denton. This declaration has since been extended through Sept. 30.

Based on the ongoing COVID-19 disaster, during a pandemic, public health and safety is of primary importance for local governments, which must be equipped with adequate plans and resources to respond effectively. Pandemic preparedness is critical for local governments to curb the impact of a new disease on its community and residents.
Findings & Analysis

The National Incident Management System (NIMS) defines preparedness as "a continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response."

**Figure 1: NIMS Preparedness Cycle**

This audit evaluated the pandemic preparedness of the City of Denton, considering the preparedness cycle as defined by NIMS (see Figure 1). The auditors identified various emergency and disaster-related plans and procedures adopted by the City and compared them with the industry’s pandemic-specific best practices.

**Emergency Management Planning Activities Adequately Consider Pandemics**

Texas Government Code Section 418.106 requires each local government to prepare and implement an emergency management plan providing for disaster mitigation, preparedness, response, and recovery in its jurisdiction. The Emergency Management Plan must include planning activities for pandemic situations. In June 2020, the Federal Emergency Management Agency also issued guidance for mass care, emergency assistance functions, and unique planning considerations during pandemics.

**What We Found**

- The City has a well-defined Emergency Management Plan in place to deal with disasters, including pandemics. It also contains a hazard and vulnerability assessment for epidemics. The Plan conforms with the Emergency and Disaster Planning and Response policy implemented under Chapter Nine of the City’s Code of Ordinances.

- The City’s Emergency Management Plan complies with Chapter 418 of the Texas Government Code in terms of its contents and operational requirements. It provides general guidance for

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2 This audit did not evaluate the availability of pandemic-response equipment (i.e. personal protective equipment).
emergency management activities including methods of mitigation, preparedness, response, and recovery.

- The City has adopted the National Incident Management System (NIMS) framework under its Emergency Management Plan following the applicable Presidential Homeland Security Directives.
- The Plan specifies provisions for activating and operating the Emergency Operations Center.
- The “Shelter and Mass Care” provisions of the Emergency Management Plan do not include social distancing and non-congregate sheltering arrangement guidelines to be administered during pandemics.

- The City adopted a Pandemic Influenza Preparedness Plan in 2009, which was further updated in March 2020 to include guidance for the COVID-19 Pandemic.
  - This plan does include some pandemic-specific considerations such as social distancing for City employees, environmental cleaning and disinfection guidelines, and operational guidelines. That being said, it does not provide guidance on establishing non-congregate shelters.

Why It Matters

Public health officials generally agree that implementation of social distancing is critical to slow and mitigate the outbreak of a virus. During a pandemic, the City may need to arrange sheltering and mass care for residents to curb the spread of an infectious disease. Updating the “Shelter and Mass Care” provision in the Emergency Management Plan and the Pandemic Influenza Preparedness Plan to include social distancing and non-congregate sheltering arrangement considerations would provide guidance to City administration and Emergency Management staff to act quickly and strategically during pandemics.

Recommendation:

1. Review and update the City’s Emergency Management Plan and the Pandemic Influenza Preparedness Plan to include specific guidelines for non-congregate sheltering and socially distant mass care during pandemics.

Fire Department Comments: The Fire Department is planning on having an outside consultant evaluate the entire Emergency Management Program by the end of the calendar year. Once the evaluation is complete we will have the proper language to insert for this item. The expected completion is 03/01/2021.
Standard EOC Procedures may be Insufficient for Pandemics

The Emergency Operations Center (EOC) plays a vital role in the City's response to disaster situations as it centralizes emergency management, allowing decision makers to gather and all be supplied with the most current information – helping better decisions be made.

What We Found

- The City has a well-defined EOC Manual which provides guidance for activation, deactivation, and operations during emergencies. The EOC Manual describes potential incidents, initial actions, and typical EOC staffing needs for different activation levels of the EOC during weather-related incidents. The Manual does not:
  - Provide direction for activating and operating a socially distanced EOC, which may be required during a pandemic; or
  - Provide guidance on how the activation level categories should apply to pandemics.

- The EOC Manual requires staff to maintain accurate logs recording disaster response and recovery activities, including EOC activation and deactivation times and dates.
  - Documentation was found indicating that the EOC was partially activated in response to the COVID-19 Pandemic on March 13.
  - No operational records of the EOC were found after April 30 and no documentation was found clarifying when the EOC was deactivated during the ongoing COVID-19 Pandemic. For this reason, it is unclear at what level the EOC is still operating, if at all.

Why It Matters

The EOC functions as a centralized emergency response hub during disasters and facilitates a coordinated response to public health emergencies. Guidelines for the activation and operation of a socially distant EOC would facilitate emergency management activities during potential future pandemics.

In addition, the EOC plays an important role in public health activities. Consistent data collection, tracking, and reporting in emergency situations is critical for this operation. Without proper maintenance of EOC records it is difficult to tell what emergency management activities have occurred. This could potential hinder communication and reporting to federal, state, and local agencies as well as to the public.

Recommendation:

2. Revise the Emergency Operations Center Manual to include procedures for activating and operating a socially distant emergency operations center during pandemics.

Fire Department Comments: The Fire Department is planning on having an outside consultant evaluate the entire Emergency Management Program by the end of the calendar year. Once the evaluation is complete, we will have the proper language to insert for this item. The expected completion is 03/01/2021.
3. Create and maintain appropriate records for operating and deactivating the Emergency Operations Center for the current COVID-19 Pandemic.

**Fire Department Comments:** The Fire Department is planning on having an outside consultant evaluate the entire Emergency Management Program by the end of the calendar year. Once the evaluation is complete, we will have the proper language to insert for this item. The expected completion is 03/01/2021. During this evaluation period we will also be researching the best electronic software for emergency management functions so we can keep all of the files neatly sorted electronically. The Fire Department will also determine when the last virtual EOC meeting was with the former EMC around late April or early May. We will then document that the EOC operations for COVID were ended on that date.

### Emergency Management Training Requirements are not Well Defined or Tracked

Texas Government Code Section 418.005 requires the City’s Emergency Management Coordinator (as the Mayor’s designee), the Police Chief, and the Fire Chief to complete at least three hours of disaster management training within 180 days of taking office.\(^3\) In addition, the Emergency Operations Center (EOC) Manual requires EOC staff to complete specific disaster management training classes; EOC Command staff is required to complete additional, advanced disaster management training classes.

### What We Found

- Per training records, all three required City officers have completed at least three hours of emergency management training – this fulfills the state law requirement.
  - All three officers have completed the trainings required by the EOC Manual for EOC Command staff.

<table>
<thead>
<tr>
<th>NIMS Course</th>
<th>Fire Chief</th>
<th>Emergency Mgmt. Coord.</th>
<th>Police Chief(^4)</th>
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<tr>
<td>ICS-400</td>
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- The EOC Manual does not clearly specify which City employees are required to complete disaster management training. In addition, there is no guidance specifying when and how frequently this training must be completed. Based on the current EOC Manual, there is reason to believe that many City staff across departments are required to obtain this training.

- That being said, there are no processes or procedures for tracking EOC training requirements. Additionally, there is no central repository that stores training completion certificates for all relevant EOC staff.

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\(^3\) These requirements are based on a legal opinion received from the City Attorney’s Office.

\(^4\) In 2013, the Police Chief took a 40-hour position specific training course for the Operations Section Chief. Based on a review of [FEMA’s website](https://www.fema.gov), this training course appears to include all of the courses required by the City’s EOC Manual.
• Similarly, the EOC Manual requires the Emergency Management Coordinator to organize periodic discussion- and operations-based disaster exercises. Per Emergency Management staff, the City holds an annual operations-based exercise in May and an annual discussion-based exercise in the fall.
  o According to Fire Department management, several discussion- and operations-based exercises have been conducted in previous years that would include personal protective equipment training relevant to a pandemic response. Nevertheless, documentation of who attended these events and what training activities were covered was not available.

Why It Matters

Clear emergency management training requirements in the City’s EOC manual and proper maintenance of training records would facilitate effective administration of disaster management training. Without tracking training completions, the City’s emergency plans and procedures may not be properly followed in the event of a real emergency or disaster situations, including pandemics.

Similarly, disaster exercises ensure staff receive periodic reminders about different emergency response activities; However, without adequate documentation, it is difficult to tell if all necessary staff have taken part in these activities. In addition, documentation of what activities have been covered would help emergency management determine what emergency response activities should be covered in future exercises.

Recommendation:

4. Update the EOC Manual to clarify which City staff are required to complete disaster management training, including how often and by when these training requirements should be complete. The EOC manual should also delegate responsibility for communicating these training requirements to the necessary individuals.

Fire Department Comments: We will be developing a matrix to better clarify which courses are required and by who. This item should be completed by the end of this calendar year. BC Lahart talked with the former EMC and he stated that the had a meeting this calendar year with NIMS compliance members of most City departments that were responsible for their employees (some compliance members oversee a few departments). We still believe that the ultimate fix will be to house a copy of these certificates electronically so that the EM office can easily access the records. This can either be an EM type of software program or maybe some type of software that HR houses.

5. Create a central repository for the required disaster management training certificates and centralize the responsibility for ensuring these trainings are completed appropriately.

Fire Department Comments: We will establish a temporary repository for training certificates by the end of the calendar year. A permanent solution will occur when we can find and implement an Emergency Management Software Program.
6. Document disaster exercises including who attended and what emergency response activities were tested.

Fire Department Comments: The exercises are well documented and meet all of the criteria set forth by the state. They also include sign-in sheets, etc. Unfortunately they are currently all in paper form for the past 7 years. All of the folders are located in the filing cabinet in the Emergency Manager’s Office. A better process will be investigated including an Emergency Management Software Program to manage these huge files and better organize the contents. We are hoping to have a new software program to track several emergency management functions going forward.

The Business Continuity Plan Needs to Include Planning for Pandemics

Business continuity planning guides local governments’ critical functions and systems during emergencies. During pandemics, the Business Continuity Plan should help smooth the transition to teleworking and virtual meetings caused by increased absenteeism and social distancing.

What We Found

- The City has a comprehensive Business Continuity Plan, which includes provisions for the continuity of City operations and systems under various disaster situations such as a fire, tornadoes, loss of technology services, severe weather, violence, and other artificial and natural disasters. The Business Continuity Plan contains guidance and procedures for response, recovery, and communication during disasters.
  - The Plan does not include business continuity planning for pandemics and does not include criteria for activation if a pandemic occurs.

- The Business Continuity Plan has a well-defined communication procedure for disaster situations.
  - During the COVID-19 Pandemic, the Technology Services Department effectively communicated with other departments and the City Manager’s Office to provide teleworking infrastructure and technical support.

- The Business Continuity Plan has not been activated during the COVID-19 Pandemic.
  - That being said, Technology Services implemented a Temporary Remote Working Plan on March 18 to provide telecommuting guidance and support to City employees as they continued operations remotely. Additionally, the City implemented virtual meetings for the City Council, City Boards and Commissions, and staff meetings.

Why It Matters

During pandemics, the City's operations would be most affected by employees’ general inability to be physically present at City facilities. Prioritizing teleworking functions would help manage the increased workloads caused by mass teleworking helping to minimize business activity disruption during pandemics. Additionally, including virtual meeting guidelines in the Business Continuity Plan would aid Technology Services and other City departments when transitioning to virtual government meetings during potential future pandemics.
Recommendation:

7. Incorporate planning for telework during pandemics into the existing Business Continuity Plan. Teleworking resources should be prioritized based on critical and non-critical functions.

   **Technology Services Comments:** Technology Services partially concurs. Technology Services agrees that very specific and unusual department needs for remote work should be included in the business continuity plan (BCP). For example, providing Engineering access to their desktops to run applications too powerful for their laptops was outside of normal operations and should be included. Remote work technology (work from home) is considered a normal day to day technology function/service and not something utilized just in an emergency situation. For instance we’ve always provided corporate Wi-Fi and corporate VPN prior to the pandemic. During the beginning stages of the pandemic, Technology Services was busier than normal, but did not provide services beyond normal operations. As a result, Technology Services did not activate the Technology Services BCP plan.

8. Incorporate planning for virtual meeting activities during pandemics into the existing Business Continuity Plan. Public Affairs should consult with Technology Services and the City Attorney’s Office to ensure applicable state laws are considered when planning for virtual meetings.

   **Customer Service and Public Affairs Comments:** Customer Service and Public Affairs concurs with this recommendation. Virtual meeting protocols and guidelines will enable Technology Services, the City Attorney’s Office, Customer Service and Public Affairs, and the City Manager’s Office to more rapidly and reliably consider and, pending Council approval, deploy virtual meetings in a future pandemic or disaster, if needed.

Financial Reserves are Maintained for Unexpected Situations

Financial preparedness is an important aspect when dealing with unanticipated situations such as disasters and pandemics. The Government Finance Officers Association’s best practices recommend that local governments have resiliency-based capital planning to have minimum impact on the local communities. Apart from maintaining financial reserves, the financial preparedness framework generally involves performing cost mitigation activities, identifying potential sources of funding, and assessing liquidity needs.

What We Found

- The City has a resiliency-based Fund Balance Policy in place to mitigate financial risk and unforeseen revenue fluctuations for the General Fund. Additionally, the City’s Utilities Financial Strategies policy establishes requirements for maintaining utility fund operating reserves to deal with unexpected situations.

Table 2 on the next page compares the City’s reserves policies’ requirements with the reserves maintained during the last three fiscal years. Based on this, City administration is duly maintaining General Fund reserves and utility operating reserves per the established requirements.

  - The City’s Fund Policy and Utilities Financial Strategies policy do not consider pandemics, which may have prolonged financial impacts on the City's revenue and operations.
• Based on the Finance Department’s projections, the City is expected to face a combined $20 to $30 million reduction in General Fund and utilities funds’ revenues due to the COVID-19 Pandemic.
  o The City’s administration adopted various cost mitigation measures such as a Voluntary Separation Program for employees, a hiring freeze, project changes, ceased discretionary travel and training, suspended merit increases, and increased electric fund transfer. These measures should help the City to cope with the COVID-19 Pandemic's financial impacts.
  o The City has also secured approximately $7 million in Coronavirus Relief Funding from Denton County distributed by the federal government under the Coronavirus Aid, Relief, and Economic Security Act.

Why It Matters

Pandemics may have prolonged and unanticipated effects on the City’s revenues and expenses due to lockdowns and social distancing guidelines, which is evident from the ongoing COVID-19 Pandemic. Financial plans and maintenance of emergency reserves should consider these prolonged financial impacts to help mitigate a pandemic's economic effect on City operations.

Pandemic-based considerations in the City’s Fund Policy will help strengthen the City’s fiscal capacity to sustain financial losses caused by pandemics. It will also help City to preserve financial stability and recover quickly in long-lasting, unanticipated situations.

Recommendation:

9. Review and potentially update the City’s Fund Balance Policy and Utilities Financial Strategies to account for the prolonged financial impacts caused by pandemics.

Finance Department Comments: The Finance Department concurs with this recommendation. The City currently has reserve targets for all the utility Funds, General Fund and several of the Special Revenue Funds. In the coming months, the Finance Department will complete an in-depth fund balance analysis to determine if the City’s reserve targets are sufficient to sustain a revenue shortfall, major infrastructure failures or prolonged financial impact (i.e. pandemic). This analysis will provide guidance regarding optimal reserve targets to minimize the financial impact to citizens and rate payers. Once completed, recommendations will be presented to the Public Utilities Board (PUB) and Council for consideration.

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5 As a percentage of budgeted expenditures
Appendix A: Management Response Summary

The following summarizes the recommendations issued throughout this report. The auditors found that staff and the Department were receptive and willing to make improvements to controls where needed. Management has provided their response to each recommendation.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Response</th>
<th>Expected Completion</th>
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<tbody>
<tr>
<td>1 Review and update the City’s Emergency Management Plan and the Pandemic Influenza Preparedness Plan to include specific guidelines for non-congregate sheltering and socially distant mass care during pandemics.</td>
<td>Concur</td>
<td>03/01/2021</td>
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| Fire Department Comments: The Fire Department is planning on having an outside consultant evaluate the entire Emergency Management Program by the end of the calendar year. Once the evaluation is complete we will have the proper language to insert for this item. | Responsibility: 
Fire Department Comments: | |
| 2 Revise the Emergency Operations Center Manual to include procedures for activating and operating a socially distant emergency operations center during pandemics. | Concur | 03/01/2021 |
| Fire Department Comments: The Fire Department is planning on having an outside consultant evaluate the entire Emergency Management Program by the end of the calendar year. Once the evaluation is complete, we will have the proper language to insert for this item. | Responsibility: 
Fire Department Comments: | |
| 3 Create and maintain appropriate records for operating and deactivating the Emergency Operations Center for the current COVID-19 Pandemic. | Concur | 03/01/2021 |
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Fire Department Comments: | |
| 4 Update the EOC Manual to clarify which City staff are required to complete disaster management training, including how often and by when these training requirements should be complete. | Partially Concur | 12/31/2020 |
| Fire Department Comments: We will be developing a matrix to better clarify which courses are required and by who. BC Lahart talked with the former EMC and he stated that he had a meeting this calendar year with NIMS compliance members of most City Departments that were responsible for tracking and keeping the certificates for their employees (some compliance members oversee a few departments). We still believe that the ultimate fix will be to house a copy of these certificates electronically so that the EM office can easily access the records. This can either be an EM type of software program or maybe some type of software that HR houses. | Responsibility: 
Fire Department Comments: | |
| 5 Create a central repository for the required disaster management training certificates and centralize the | Concur | 12/31/2020 |
| | | |
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| Responsibility for ensuring these trainings are completed appropriately. |
|------------------------------------------------------------------|-----------------------------|
| Fire Department Comments: We will establish a temporary repository for training certificates by the end of the calendar year. A permanent solution will occur when we can find and implement an Emergency Management Software Program. |
| Responsibility: |

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<td>Technology Services Comments: Technology Services partially concurs. Technology Services agrees that very specific and unusual department needs for remote work should be included in the business continuity plan (BCP). For example, providing Engineering access to their desktops to run applications too powerful for their laptops was outside of normal operations and should be included. Remote work technology (work from home) is considered a normal day to day technology function/service and not something utilized just in an emergency situation. For instance we’ve always provided corporate Wi-Fi and corporate VPN prior to the pandemic. During the beginning stages of the pandemic, Technology Services was busier than normal, but did not provide services beyond normal operations. As a result, Technology Services did not activate the Technology Services BCP plan.</td>
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