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TO: Donovan M. Dela Cruz  
Chairman, Senate Special Committee on COVID 19

FROM: Luke P. Meyers  
Administrator, Hawaii Emergency Management Agency

SUBJECT: Security and Posting of Continuity of Operations Plans

Aloha Mr. Chairman,

Several of the State's emergency management stakeholders have brought to our attention the posting of Departmental Continuity of Operations Plans (COOP) to the Senate Special Committee on COVID-19's webpage.

While HI-EMA supports departmental transparency during the COVID 19 crisis, the posting of Departmental COOPs does raise concerns about security, especially in times of uncertainty. COOP's traditionally are not posted for public viewing because of the sensitive information they include.

- COOP's not only describe infrastructure vulnerabilities and risk levels of departments, but also describe how and what actions are used to mitigate these exposures. Posting the COOP provides mitigation actions to mal actors and therefore, presents an opportunity to render departments ineffectual during emergency and exigent circumstances.
  - Case in point: One of the COOP's posted describes the location and medium of stored essential department information.
- The COOP's have not been redacted and still contain a considerable amount of personnel information of key leaders and employees of departments. Presenting this information publicly exposes key leaders, employees and their families to unnecessary risks.
  - Some of the COOP's list names, cellular phone numbers, and email addresses that can be used to identify and locate key personnel in departments by mal actors.
- The publication of the COOP's has the potential to render the plans ineffectual and thereby reducing or destroying the State's continuity of government operations.

Another concern is the state/content of the COOP's and the ability of the plans to provide public confidence in a government under increased scrutiny.

- A major U.S. military command resides locally; the posting of COOP's may be interpreted as a security breach.
- Most of the COOP's have not been reviewed by HI-EMA.
- Many of the plans posted are incomplete.
- The plans have been developed using different formats, some quite lengthy, while others consist of only three pages.
- Furthermore, a three-page Departmental COOP is highly unlikely to be sufficiently substantial to describe how a department operates in exigent circumstances.

HI-EMA would recommend removing the COOP's, replacing them with a statement about departmental COOP's and then provide other official COVID 19 publications such as:

- Executive Orders
- Public Health Statements
- State Emergency Operation Center / HI-EMA COVID-19 information

Please feel free to contact HI-EMA Administrator Luke Meyers or Executive Officer David Lopez to discuss further and other ways our agency can work together with you during the COVID-19 crisis.

Mahalo,



Luke P. Meyers  
Administrator  
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