



ACM US Public
Policy Council

Association for Computing Machinery (ACM)
US Public Policy Council of ACM (USACM)

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July 10, 2012

Mr. Steven VanRoekel
U.S. Chief Information Officer
Office of Management & Budget
1650 Pennsylvania Avenue, NW
Eisenhower Executive Office Building, Room 412
Washington, DC 20503

Dear Mr. VanRoekel:

We are writing to express our support for initiatives to improve continuity of digital government in the face of unexpected failures and disasters. We are USACM, the U.S. Public Policy Council of the Association for Computing Machinery (ACM). With over 100,000 members ACM is the world's oldest and largest educational and scientific computing society. USACM's comments are informed by our collective experience in computing research and practice, computing technology public policy and our previous work in digital government.

Internet communications are essential to the delivery of accurate and reliable federal, local and state e-government information services. Presidential Executive Order (EO) 13571, Office of Management and Budget Memorandum M-11-24, and the May 2012 White House Digital Government Strategy begin to address this issue. The public, government agencies and the media have grown dependent on the reliability and availability of e-government information; therefore, more must be done to ensure that such information is available, especially when natural and other events challenge the government's ability to provide it.

With an increasing reliance on government services and information delivered online, disruptions to government websites, applications and other online resources (including APIs, cloud computing and mobile services) will affect a growing number of people. In an effort to mitigate the consequences of such disruption, USACM offers the following recommendations that would help the federal government be better prepared to maintain e-government information.

*** Agencies should prepare plans and procedures to minimize website interruption and/or disruption.** Under the guidance of the Federal Chief Information Officer (CIO) in collaboration with agency Chief Information Officers, federal agencies should develop the capacity to have backup sites available in the event that an agency website is rendered inoperable. Such a plan would include a prioritization of services and information in the event a full backup is not possible under particular circumstances.

*** The Federal CIO should develop plans to minimize website interruption/disruption for the Executive Office of the President and the federal government.** Such plans would include practices and principles that agencies can use in general, or customize to fit their specific digital public services and agency needs. Such practices and principles could include a chain of control for websites and designations of alternate personnel in case primary website personnel are unavailable.

*** Federal government plans should coordinate federal e-government tools and resources with local and state e-government services.** The federal government should exchange best practices with state and local governments and develop communication protocols for information exchange among key-government agency contacts in the event of outages and/or reduced services. This communication exchange should also go from state and local governments to the federal government as appropriate.

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It can be vital to have access to reliable and timely e-government information. Seconds matter in a major event and the ability of e-government to respond seamlessly by providing timely, accurate and life-saving information during a crisis requires planning. We believe that plans for e-government should include contingencies that consider the possibility that large scale natural disasters will challenge the ability of e-government to provide accurate, accessible and timely information to those within as well as outside of an affected area. Considering the experience of Hurricane Katrina and the earthquake and tsunami in Japan, government officials in the affected areas may not be in a position to carry out the task of updating online resources, providing online services and other functions that rely on connectivity and other functioning communications infrastructure.

For example, before an event or major natural disaster government agencies should enter into agreements regarding routine remote backup of their public digital government information. These backups should never co-locate with backups of sensitive or non-public digital government agency information.

Government agencies should establish a complete action plan that includes: determining the importance of each agency or sub-agency's digital public information; realistic exercises to test the action plan; designating a CIO chain of custody; and identifying the executive branch agency or office that could appoint an acting CIO. Plans should be created and updated with an understanding of the possible challenges connected to preserving continuity of e-government services, which include preserving the ability of those with disabilities to access information, compliant with Section 508 of the Rehabilitation Act. The complete action plan should guide decision-making in the event the primary source of digital government public information is lost or becomes inaccessible. During a crisis, availability and authentication of executive branch agency personnel, disaster response command and control, and key decision-makers may introduce complexity into the process of establishing access to critical agency public digital government information.

USACM welcomes initiatives to use computing and networking technology to enable organizations and individuals to share, analyze, and understand critical information during crisis-situations. We encourage efforts to implement strategies that promote developing a set of best practices to assist policy makers and agency chief information officers in developing plans to assure access to public content with minimum disruption and the ability of chief information officers to continue to update content on agency websites as needed. Should you have any questions, wish to discuss these recommendations further, or need additional information, please contact our Public Policy Office at 212-626-0541.

Sincerely,

Eugene H. Spafford, Ph.D.
Chair
U.S. Public Policy Council
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