



COMISION NACIONAL DE SEGUROS Y FIANZAS



México, D. F., 14 de enero de 1999

OFICIO-CIRCULAR SF-04/99

Asunto: Seguimiento al Programa para
Modificar los sistemas Informáticos
que Reciban el impacto del inicio del
año 2000.

A LAS INSTITUCIONES Y SOCIEDADES
MUTUALISTAS DE SEGUROS E
INSTITUCIONES DE FIANZAS

Esta Comisión con fundamento en los artículos 107 de la Ley General de Instituciones y Sociedades Mutualistas de Seguros y 67 de la Ley Federal de Instituciones de Fianzas y con el propósito de dar seguimiento al "Programa para modificar los sistemas informáticos que reciban el impacto del inicio del año 2000", dado a conocer mediante Oficio Circular SF-11/97 del 22 de julio de 1997, se les solicita realizar lo siguiente:

- Deberán entregar a esta Comisión a partir del mes de enero de 1999 de forma mensual, el formato de autoevaluación y seguimiento del "Proyecto de Conversión Año 2000", dado a conocer en los Oficios Circulares S-109/98 y F-09/98 ambos del 11 de septiembre de 1998, con fecha de corte al último día del mes de que se trate, dentro de los 8 días naturales siguientes al mismo, en la Dirección General de Informática de este Organismo, de 9:00 a 15:00 y de 17:00 a 19:00 horas, sita Av. Insurgentes Sur 1971 Torre 2 Norte 1er. Piso, Col. Guadalupe Inn, México, D.F., debidamente llenado, por escrito, firmado y en medio magnético (disquete).

Para los trimestres correspondientes a marzo, junio, septiembre, diciembre y al finalizar el proyecto, el formato de autoevaluación y seguimiento, deberá contener los datos generales de la empresa auditora, nombre y firma del auditor externo, así como la opinión avalando el grado de avance del proyecto.

- Deberán entregar a esta Comisión por escrito y por única vez, junto con el formato de autoevaluación y seguimiento correspondiente al mes de enero de 1999, los montos del presupuesto ejercido para el Programa año 2000, de los años 1997, 1998 y el asignado para 1999, de acuerdo al siguiente ejemplo:

Compañía:		
PRESUPUESTO		
EJERCIDO 1997	EJERCIDO 1998	ASIGNADO 1999

- Deberán instaurar una mesa de control de modificaciones de software, que tendrá como propósito garantizar la seguridad de todos los sistemas que se hayan puesto a punto para funcionar con el año 2000. Las compañías deberán informar por escrito a esta Comisión que han cumplido con esta disposición a mas tardar el 28 de febrero del presente año, en el domicilio y horario antes citado.

- Se les comunica que a partir de esta fecha, ya no será necesario entregar a esta Comisión el formato de actualización trimestral (anexo "C"), dado a conocer en las Circulares S-21.6 y F-18.2 ambos del 8 de junio de 1998, ya que esta Comisión determino se utilice solamente el formato de autoevaluación y seguimiento para conocer el avance en todo el sector financiero.
- Así mismo y por recomendación del Grupo de Coordinación de Alto Nivel presidido por el Banco de México, se anexan para su conocimiento y apoyo los siguientes documentos: "Test Announcement Guidelines", "Testing Prioritisation" y "Year 2000 Computing Crisis: Business Continuity and Contingency Planning".

Toda entrega de información deberá acompañarse de un escrito, donde se especifique el periodo de entrega, los datos generales de la compañía y la referencia del o los documentos que serán entregados.

Lo anterior se hace de su conocimiento con fundamento en los artículos 108, fracción IV de la Ley General de Instituciones y Sociedades Mutualistas de Seguros y 68, fracción VI de la Ley Federal de Instituciones de Fianzas y de conformidad con el Acuerdo por el que la Junta de Gobierno de la Comisión Nacional de Seguros y Fianzas delega en el presidente la facultad de emitir las disposiciones necesarias para el ejercicio de las facultades que la ley otorga a dicha Comisión y para el eficaz cumplimiento de la misma y de las reglas y reglamentos, emitido el 2 de diciembre de 1998 y publicado en el Diario Oficial de la Federación el 4 de enero de 1999.

Atentamente
SUFRAGIO EFECTIVO. NO REELECCION.
COMISION NACIONAL DE SEGUROS Y FIANZAS
EL PRESIDENTE


LIC. MANUEL AGUILERA VERDUZCO

Anexos

[Handwritten marks: "19", "H", "203" and a signature]



Global 2000
Co-ordinating Group

www.global2k.com

As of 10 November 1998

An informal grouping of Banks, Securities Firms, and Insurance Companies whose aim is to identify and resource areas where coordinated initiatives will facilitate efforts by the global financial community to improve the readiness of global financial institutions to meet the challenges created by the Year 2000 date change.

Tim Shephard- Walwyn Chairman	Argentina Australia Belarus Belgium Brazil Canada China Colombia Croatia Czech Republic Denmark Estonia Finland France Germany Greece	Hong Kong Hungary India Ireland Italy Jamaica Japan Kuwait Latvia Lithuania Luxembourg Malaysia Mexico Netherlands New Zealand	Norway Poland Romania Russian Federation Singapore Slovak Republic Slovenia South Africa South Korea Spain Sweden Switzerland Thailand United Kingdom USA	c/o UBS AG P.O. Box CH-8098 Zürich / Switzerland Bill Mundt Global 2000 Project Pelikanstrasse 6 CH-8098 Zurich Tel. +41.1.234 8213 Fax. +41.1.234 8527 Bill.Mundt@ubs.com
-------------------------------------	--	--	---	--

Test Announcement Guidelines

EXPOSURE DRAFT

GLOBAL 2000 CO-ORDINATING GROUP

As of 10 November 1998

Global 2000 Co-ordinating Group

Test Announcement Guidelines

Table of Contents

I. Purpose.....	3
Notice period	3
II. Content of the announcement	4
Sponsoring/Co-ordinating organisation	4
Objectives of the test.....	4
Benefits.....	4
Test plan.....	4
List of all participants.....	4
Participation requirements	5
Certification.....	5
Test details	4
Technical pre-requisites	5
Test scripts	5
Registration requirements	5
Schedule of planned communications	5
Additional information.....	5

I. Purpose

This test announcement guideline¹ is designed to aid planning, disseminate information, clarify questions in advance and provides omprehensive overview of an external test.

When test organizers announce tests using these guidelines:

- It will assist participating firms in completing their plans effectively;
- It will cover the commonly asked questions that potential participants might ask as they consider the announcement;
- It will allow firms to have sufficient time for preparation (thus allowing the maximum number of firms to join the tests);
- It will ensure that the participants have the highest probability of testing successfully together.

These guidelines have been derived from practical experience of participants in other industry tests.

Notice period

The test announcement should be made a minimum of 90 days prior to the test start date. If there are detailed technology requirements for the tests, these should be considered and an earlier announcement considered.

¹ Disclaimer

THE INFORMATION CONTAINED IN THIS "TEST ANNOUNCEMENT GUIDELINES" PAPER IS PROVIDED "AS IS." ALL WARRANTIES AND REPRESENTATIONS OF ANY KIND WITH REGARD TO SUCH INFORMATION IS HEREBY DISCLAIMED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE OR WARRANTIES AS TO ANY RESULTS TO BE OBTAINED FROM THE USE OF SUCH INFORMATION OR DERIVED FROM SUCH INFORMATION. The Global 2000 Co-ordinating Group, its participant firms, and all other parties that provided information for the purpose of creating TEST ANNOUNCEMENT GUIDELINES" notice (collectively, the "Co-ordinating Group"), shall not have any liability for any losses (in contract, tort, warranty or otherwise) incurred in connection with (i) any decision made, or any action or inaction taken by any party in reliance upon the information contained in "TEST ANNOUNCEMENT GUIDELINES" paper; or (ii) any inaccuracies, errors in, or omissions of the information contained in the "TEST ANNOUNCEMENT GUIDELINES" paper. Under no circumstances will any Co-ordinating Group participant, or the Global 2000 Co-ordinating Group itself, be liable for any ordinary, direct, consequential, incidental, special, punitive, or exemplary damages arising out of any of the foregoing, even if any Co-ordinating Group participant has been apprised of the likelihood of such damages occurring.

II. Content of the announcement

The announcement should contain at least the following detail:

Sponsoring/Co-ordinating organisation

Include the names, addresses, phone numbers, email address and web-site of Sponsoring/Coordinating organisation. If the help desk details are known at the time of the announcement, these should be included.

Objectives of the test

This should describe why the test is being conducted and what the successful outcome of the tests will demonstrate.

Benefits

Describe the benefits of the test to the sponsoring organization, the participants and to the industry.

State why the test is necessary and why an internal test is not sufficient.

Test plan

Attach an outline test plan, including:

- The functionality or processes being tested
- The products being tested
- The test methodology
- Whether scripts are being used and, if so details of these
- How test data will be generated

Test details

Provide the schedule of the test including:

- The availability of the test service and hours of operation (for example 1st March, 1999 to the 1st June, 1999: Monday to Friday, 9am-5.30pm)
- The Year 2000 dates to be tested (for example 31st December, 1999 on each Monday, 1st January 2000 on each Tuesday).

Clearly a longer window of testing reduces the chance of test conflicts. To avoid conflicts and maximise the potential of participation, the Global 2000 testing calendar should be reviewed².

In the event that the tests will only be conducted once, please indicate any dates reserved for re-testing failures in the future.

List of all participants

Explain who is intended to participate, for example "all members of the stock exchange" or "clearing members". A final list of participants should be distributed prior to the test.

² www.global2k.com

Participation requirements

State whether participation is mandatory or optional? If mandatory, state for whom it is mandatory (clearing members, all members, and so on), and why the tests are mandatory.

In the event that you are planning mandatory tests, be aware that some organizations may have conflicts with other external tests³ and participation may not be possible.

Certification

Is any type of certification required from the participants to show that they have successfully completed the test? If so, please be specific, for example: is an internal audit sign off required?

Are the organisers of the tests planning any feedback on the test results? State if this will be public or private.

Technical pre-requisites

Indicate the technical requirements necessary for participation.

- State the communication linkages (production or backup lines)
- Indicate required configuration changes

If a full description of the pre-requisites is not available at the announcement time, it must be available 60 days prior to the test and a high level description must be provided with this announcement. (If a complex set of technical changes is required, allow plenty of time for this to be set up: this might be more than 90 days.)

Test scripts

Provide a high level description of any test scripts which will be used and the date the detailed test scripts will be available. The detailed test scripts and any other test data must be available at least 60 days prior to the test.

Registration requirements

Provide the date by which test participants must advise the organiser that they plan to participate. Describe any other information required from the participants at registration.

Schedule of planned communications

Provide a schedule of the events planned prior to the scheduled test, including dates when scripts will be available, when master data will be available and so on.

Additional information

Please describe any other things which participants have to prepare prior to the testing.

³ To assess potential conflicts, please see the Global 2000 testing schedule www.global2k.com.



Global 2000
Co-ordinating Group

www.global2k.com

An informal grouping of Banks, Securities Firms, and Insurance Companies whose aim is to identify and resource areas where coordinated initiatives will facilitate efforts by the global financial community to improve the readiness of global financial institutions to meet the challenges created by the Year 2000 date change.

Tim Shephard- Walwyn Chairman	Argentina	Hong Kong	Norway	c/o UBS AG P.O. Box CH-8098 Zürich / Switzerland Bill Mundt Global 2000 Project Pelikanstrasse 6 CH-8098 Zurich Tel. +41.1.234 8213 Fax. +41.1.234 8527 Bill.Mundt@ubs.com
	Australia	Hungary	Poland	
Bill Mundt Secretariat	Belarus	India	Romania	
	Belgium	Ireland	Russian Federation	
	Brazil	Italy	Singapore	
	Canada	Jamaica	Slovak Republic	
	China	Japan	Slovenia	
	Colombia	Kuwait	South Africa	
	Croatia	Latvia	South Korea	
	Czech Republic	Lithuania	Spain	
	Denmark	Luxembourg	Sweden	
	Estonia	Malaysia	Switzerland	
	Finland	Mexico	Thailand	
	France	Netherlands	United Kingdom	
	Germany	New Zealand	USA	
	Greece			

Testing Prioritisation

GLOBAL 2000 CO-ORDINATING GROUP
As of 12 November 1998

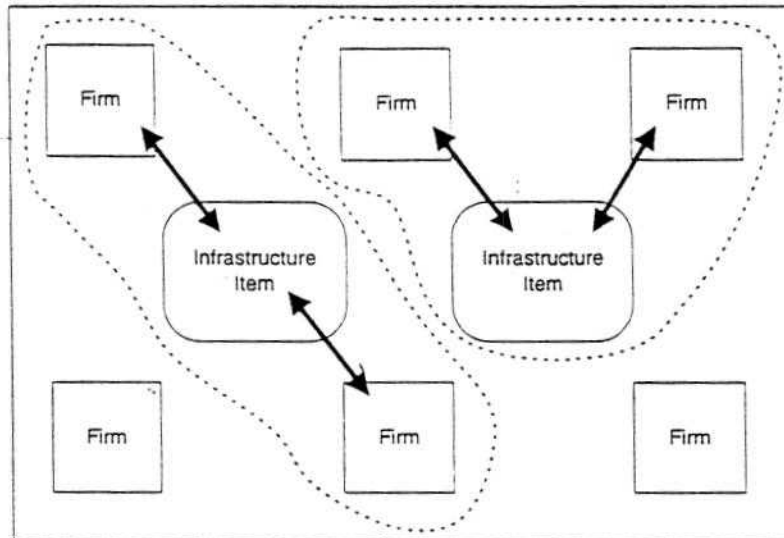
Global 2000 Co-ordinating Group

Test Prioritisation

Table of Contents

I. Introduction	Error! Bookmark not defined.
II. Background	4
III. Testing Prioritisation	4
Overriding Principles	4
1. Internal Testing.....	5
2. Infrastructure Testing	6
3. Co-operative Testing	7
4. Participant Testing.....	8

2. Infrastructure Testing

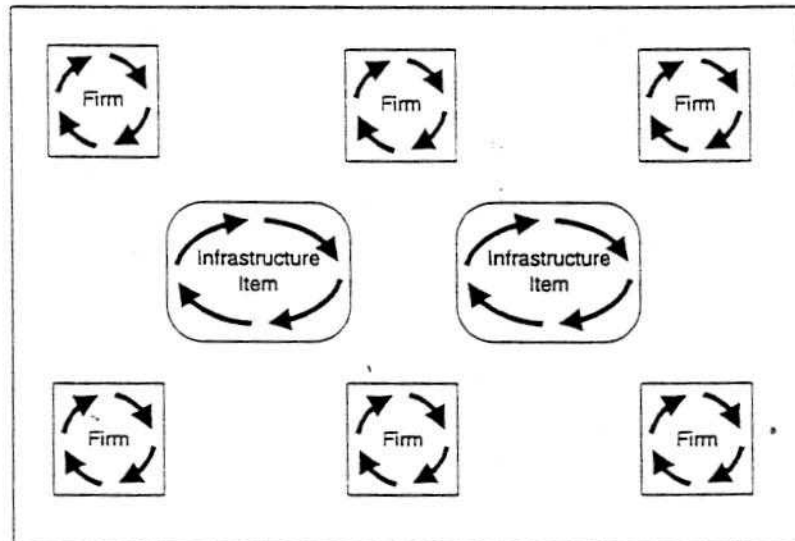


Once internal tests have satisfactorily been completed, firms can participate in infrastructure tests. These tests are designed to prove that components of the financial infrastructure can operate with user firms, and therefore do not require that every user participate. In fact, using a small number of firms to test is likely to be more manageable and a better use of resources, with less risk of failure due to the organisational complexity. In particular, multinational firms may not be able to participate in every test, since date conflicts will inevitably occur.

When such tests have taken place, publishing the results will improve confidence, however test organisers should be careful not to encourage too much publicity before a test, as this could lead to a reduction of confidence in the event of problems during the test. Scheduling several dates which allow for tests to be repeated helps to reduce this risk.

The Global 2000 Co-ordinating Group has published guidelines which outline the information required by firms in order to prepare for such tests. These guidelines are available from the Global 2000 web site, www.global2k.com

1. Internal Testing



As stated above, the group believes that a sound internal testing programme remains the most effective way to find bugs and improve confidence. Disclosure of test status, possibly together with details of tests and results, will improve confidence and could be mandated by the official sector.

It is possible that, in order to test internal applications fully, a firm needs link to part of the infrastructure.

Given the importance and relative effectiveness of internal tests, it is critically important that they are undertaken efficiently and effectively. In particular, it is important that any new bugs introduced as a result of Year 2000 changes are found and fixed - noting that, on average, for every 100 year 2000 bugs fixed, 7 new bugs will be introduced. It is also vital that any new classes of bug found during testing are re-introduced into remediation tools, and already remediated code is re-checked for occurrences.

II. Background

Now that some experience of completing both internal and external Year 2000 testing is available, there is an opportunity to review the testing issue overall to ensure that it is effective and efficient.

It has always been clear that it will not be possible for every firm to test with every customer, exchange, clearing house, payment system, market data provider and every other electronic interface, since the number of participants and possible permutations make this unmanageable. Given this, some prioritisation will be required to ensure that resources dedicated to testing are deployed in the most effective manner.

III. Testing Prioritisation

Experience shows that most of the problems encountered during the wider market tests have been associated with complex testing logistics and test equipment configuration, rather than Year 2000 problems. Hence, whilst such tests are important in improving confidence and raising awareness, the Group believes that a sound internal testing programme is still the most effective way of finding and fixing bugs, and must be carried out before external testing is considered.

This does not mean that external testing is unimportant - to the contrary, it is essential that critical market infrastructure components are adequately tested. The emphasis here should be on how such tests are structured in order that they are both representative and manageable, and so that the effort is shared appropriately.

The Global 2000 Co-ordinating Group believes that resources should be directed to testing that provides the most benefit in terms of preparing for the Year 2000 in the remaining time available. Particularly where testing has yet to be planned, the different Year 2000 testing possibilities can be prioritised to form a hierarchy, which is described on the following pages.

This prioritisation means that firms doing Year 2000 testing should ensure that the most important tests are going to be completed before considering involvement in the other tests. In particular, it is vital that resources are not diverted away from internal testing to participate in external tests, which jeopardizes both the individual firm and the integrity of the external test.

Overriding Principles

The following principles of testing should followed for all Year 2000 tests.

The purpose of the test must be clear, and should also be unique and of value.

Critical Functionality should be tested, avoiding little used or unimportant code where appropriate.

Internal and Infrastructure tests should be completed as a priority, and additional testing only considered where this is complete.

I. Introduction

This document has been developed by the Global 2000 Co-ordinating Group based on the experience of organisations which have been involved in the preparation, design and execution of tests internally and externally. It is intended to help those involved in Year 2000 testing in the financial services industry.

A hierarchy of tests is described, to help organisations to understand the importance of internal testing and the care with which external tests must be designed.

THE INFORMATION CONTAINED IN THIS "TESTING PRIORITISATION" PAPER IS PROVIDED "AS IS." ALL WARRANTIES AND REPRESENTATIONS OF ANY KIND WITH REGARD TO SUCH INFORMATION IS HEREBY DISCLAIMED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE OR WARRANTIES AS TO ANY RESULTS TO BE OBTAINED FROM THE USE OF SUCH INFORMATION OR DERIVED FROM SUCH INFORMATION. The Global 2000 Co-ordinating Group, its participant firms, and all other parties that provided information for the purpose of creating the "TESTING PRIORITISATION" notice (collectively, the "Co-ordinating Group"), shall not have any liability for any losses (in contract, tort, warranty or otherwise) incurred in connection with (i) any decision made, or any action or inaction taken by any party in reliance upon the information contained in "TESTING PRIORITISATION" paper; or (ii) any inaccuracies, errors in, or omissions of the information contained in the "TESTING PRIORITISATION" paper. Under no circumstances will any Co-ordinating Group participant, or the Global 2000 Co-ordinating Group itself, be liable for any ordinary, direct, consequential, incidental, special, punitive, or exemplary damages arising out of any of the foregoing, even if any Co-ordinating Group participant has been apprised of the likelihood of such damages occurring.

Contingency plan	In the context of the Year 2000 program, a plan for responding to the loss or degradation of essential services due to a Year 2000 problem in an automated system. In general, a contingency plan describes the steps the enterprise would take--including the activation of manual or contract processes--to ensure the continuity of its core business processes in the event of a Year 2000-induced system failure.
Infrastructure	The computer and communication hardware, software, databases, people, facilities, and policies supporting the enterprise's information management functions.
Metrics	Measures by which processes, resources, and products can be assessed.
Mission-critical system	A system supporting a core business activity or process.
Portfolio	In the context of the Year 2000 program, an inventory--preferably automated--of an agency's information systems and their components grouped by business areas.
Quality assurance	All the planned and systematic actions necessary to provide adequate confidence that a product or service will satisfy given requirements for quality.
Risk assessment	An activity performed to identify risks and estimate their probability and the impact of their occurrence; it is used during system development to provide an estimate of damage, loss, or harm that could result from a failure to successfully develop individual system components.
Risk management	A management approach designed to prevent and reduce risks, including system development risks, and lessen the impact of their occurrence.
Strategic IRM plan	A long-term, high-level plan that defines how the agency will use information technology to effectively accomplish the agency's missions, goals, and objectives.
Strategic plan	A long-term, high-level plan that identifies broad business goals and provides a roadmap for their achievement.
Test	The process of exercising a product to identify differences between expected and actual behavior.

Test facility	An environment that partially represents the production environment but is isolated from it, and is dedicated to the testing and validation of processes, applications, and system components.
Validation	The process of evaluating a system or component during or at the end of the development process to determine whether it satisfies specified requirements.
Year 2000 problem	The potential problems that might be encountered by computer hardware, software, or firmware in processing year-date data for years beyond 2000.

(511469)

Preface

Time is running out for solving the Year 2000 problem. Many federal agencies will not be able to renovate and fully test all of their mission critical systems and may face major disruptions in their operations. At the same time, systems that have been renovated and tested may encounter unanticipated Year 2000 problems.

Despite the efforts of each business, state and local government, and federal agency to race against time and to renovate, validate, and implement their mission-critical information systems every organization remains vulnerable to the disruption of its business processes. Because most federal organizations are highly dependent on information technology to carry out their business, Year 2000-induced failures of one or more mission critical systems may have a severe impact on their ability to deliver critical services. For example:

- The nation's air transportation may face major delays and disruptions because the airlines may not be able to file flight plans with the Federal Aviation Administration.
- Taxpayers may not receive timely tax refunds because the Internal Revenue Service may be unable to process their tax returns.
- Payments to veterans and retirees may be delayed or disrupted by the failure of mission-critical systems supporting the nation's benefit payment systems.
- College students may not receive student education loans promptly.

The risk of failure is not limited to the organization's internal information systems. Many federal agencies also depend on information and data provided by their business partners—including other federal agencies, hundreds of state and local agencies, international organizations, and private sector entities. Finally, every organization also depends on services provided by the public infrastructure—including power, water, transportation, and voice and data telecommunications.

Because of these risks, agencies must have business continuity and contingency plans to reduce the risk of Year 2000 business failures. Specifically, every federal agency must ensure the continuity of its core business processes by identifying, assessing, managing, and mitigating its Year 2000 risks. This effort should not be limited to the risks posed by the Year 2000-induced failures of internal information systems, but must include the potential Year 2000 failures of others, including business partners and infrastructure service providers. One weak link in the chain of critical dependencies and even the most successful Year 2000 program will fail to protect against major disruption of business operations.

The business continuity planning process focuses on reducing the risk of Year 2000-induced business failures. It safeguards an agency's ability to produce *a minimum acceptable level* of outputs and services in the event of failures of internal or external mission-critical information

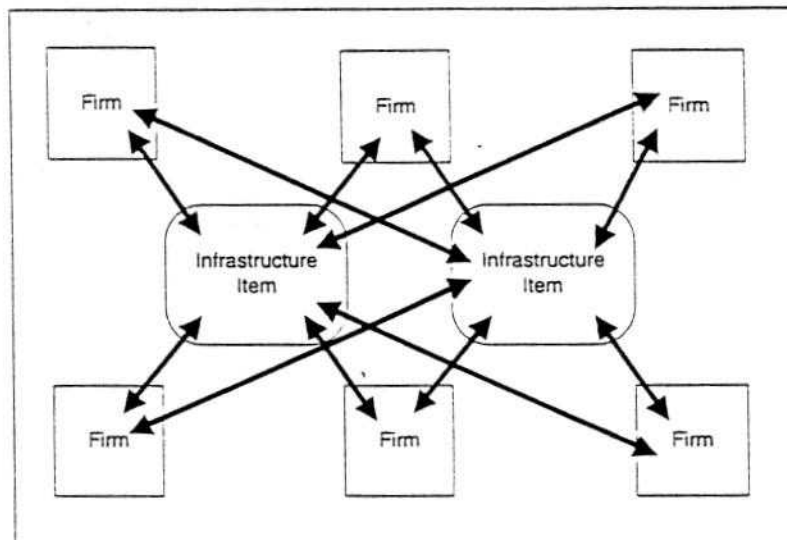
GAO

Accounting and Information
Management Division

August 1998

Year 2000 Computing Crisis: Business Continuity and Contingency Planning

4. Participant Testing



Participant Point to Point Tests

Point to point tests for all participants help to ensure that post-2000 data can be processed, and can help a firm to test their own systems. These tests may be end to end or simply a functionality test with the single infrastructure member. It should be clearly noted that such tests do not test the infrastructure itself. The amount of effort required to make participant tests effective should not be underestimated - in some cases the planning time has exceeded 2 years. If plans are inadequate, the tests are likely at best to be less effective and at worst bring adverse publicity. This testing should only be undertaken when the previous three tests are completed or will clearly be completed.

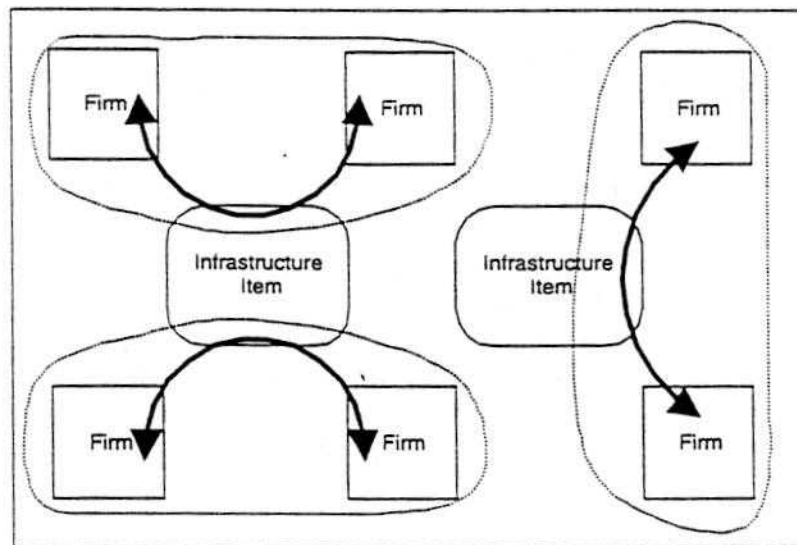
It is particularly important when dates for participant tests are planned that a wide testing window is offered, otherwise firms may be unable to participate in such tests due to schedule conflicts.

Participant Industry Tests

Industry-wide tests which involve many or all participants and cross multiple infrastructure items add a significant level of complexity. They should only therefore be considered following successful completion of participant point to point tests, as well as other the other testing types outlined above.

Given the level of co-ordination required, these tests typically require significant management effort and scripting, in order to ensure that the tests are not counterproductive.

3. Co-operative Testing



For example, this might include a broker testing with a bank, via Swift.

As stated in the introduction, it is simply not possible nor necessary for every firm to test with every counterparty. There is clearly merit in firms testing with some counterparties, and therefore it should be possible for small groups of firms to test together, helping one another to prove their own compliance. If proper disclosure of this testing is done, this may provide adequate proof of readiness for other counterparties to eliminate the need to test with the firm. In assessing this, however, it must be ensured that the scope of the test adequately covers the counterparties' requirements and. Clearly, any risk assessment of counterparties remains the responsibility of the individual firm.

Members of the Global 2000 Co-ordinating Group are developing a standard outline for such tests both to help improve consistency, and also to save duplication of effort.

systems and services. It also links risk management and mitigation efforts to the agency's Year 2000 program, and helps to identify alternate resources and processes needed to operate the agency core business processes. While it does not offer a long-term solution to Year 2000-induced failures, it will help the agency to prepare for a potential crisis, and may facilitate the restoration of normal service at the earliest possible time in the most cost-effective manner.

This guide provides a conceptual framework for helping large agencies to manage the risk of potential Year 2000-induced disruptions to their operations. It provides information on the scope and challenge and offers a structured approach for reviewing the adequacy of agency Year 2000 business continuity and contingency planning efforts.

The guide addresses business continuity and contingency planning issues that are common to most large enterprises. Given the many differences among organizations, we are not prescribing a single, rote approach to business continuity planning. Agencies must tailor their Year 2000 business continuity planning efforts in response to their unique needs while ensuring that the guide's concepts and principles are effectively applied in their business environment to achieve necessary results in the most cost efficient manner.

The guide builds upon our previously issued Year 2000 assessment guide,¹ and draws on a variety of other sources, including research and publications of the Gartner Group, the Disaster Recovery Institute of Canada, the Department of Information Resources for the State of Texas, and the Electrical Engineering Institute of England.

The guide addresses four phases supported by program and project management activities:

- Initiation.
- Business Impact Analysis.
- Contingency Planning, and
- Testing.

In addition to program and project management, the four phases are united by a common theme of accountability at all levels.

If you have any comments or questions about the guide, please contact us, or E. Randolph Tekeley, Technical Assistant Director, at (202) 512-4070; or Mirko J. Dolak, Technical Assistant Director, at (202) 512-6362. We can also be reached by e-mail at *willemsenj.aimd@gao.gov*, *rhodesk.aimd@gao.gov*, *tekeleye.aimd@gao.gov*, and *dolakm.aimd@gao.gov*.

¹ Year 2000 Computing Crisis: An Assessment Guide, (GAO/AIMD10.1.14, issued as an exposure draft in Feb. 1997; issued final in Sept. 1997).

An electronic versions of this guide is available from GAO's World Wide Web server at the following Internet address: <http://www.gao.gov/specialpubs/bcpguide.pdf>.



Joel C. Willemsen
Director
Civil Agencies Information Systems



Keith A. Rhodes
Technical Director
Office of the Chief Scientist

Contents

Preface	1
Business Continuity Planning and the Year 2000 Problem	5
Initiation	6
Business Impact Analysis	9
Contingency Planning	11
Testing	14
Selected Year 2000 Resources	17
Glossary	19

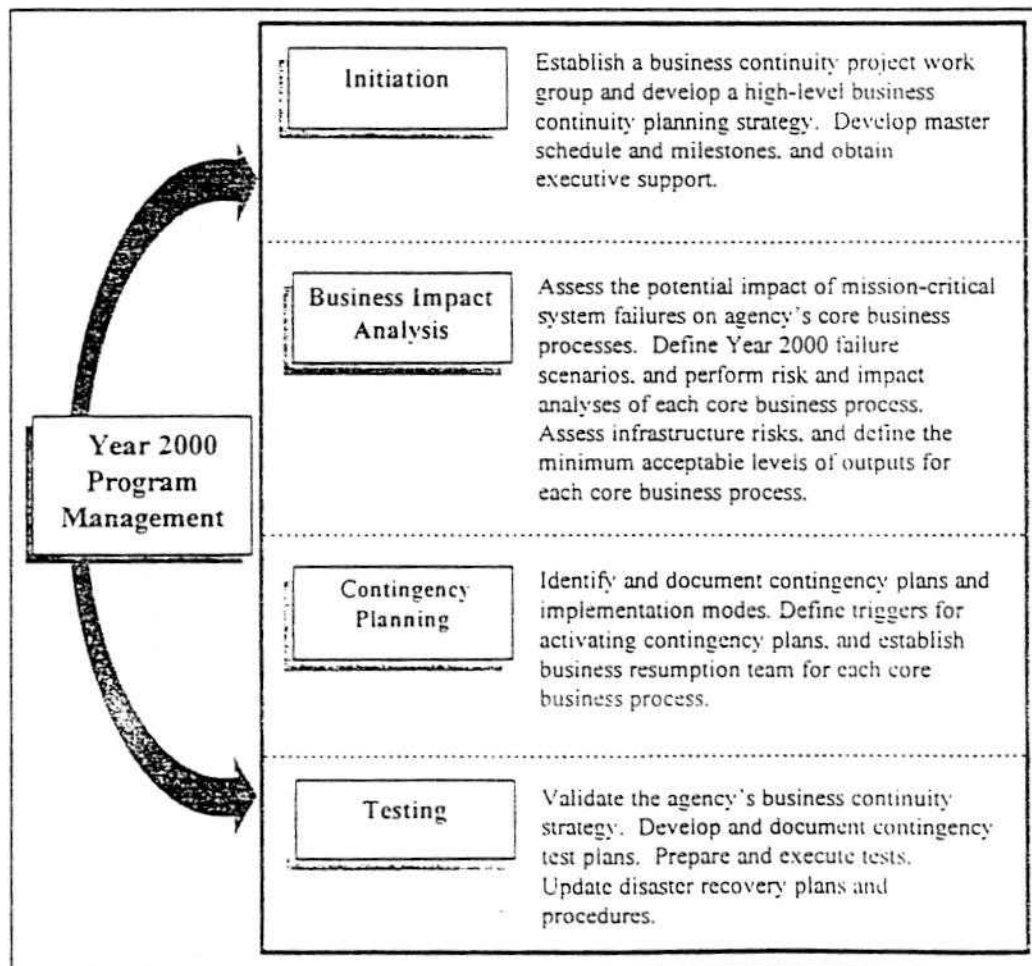
Business Continuity Planning and the Year 2000 Problem

The Year 2000 problem, while technical in nature, is primarily a business problem, with many organizations facing the risk of Year 2000-induced interruptions or failures of their core business processes. Time is running out and many federal organizations may not be able to renovate or replace all of their mission critical systems in time. Organizations must reduce the risk and potential impact of Year 2000-induced information system failures on their core business processes by implementing rigorous business continuity planning processes.

This guide presents a structured approach to aid federal agencies in business continuity and contingency planning. The guide draws on the work of leading organizations in the information technology industry and incorporates their guidance and practices. Many of the Year 2000-related concepts and practices presented in the guide build upon existing best practices in the contingency and disaster recovery areas.

The guide describes four phases--supported by agency Year 2000 program management--with each phase representing a major Year 2000 business continuity planning project activity or segment.

Year 2000 Business Continuity Planning Structure



1.0 Initiation

Executive management needs to be fully aware of the potentially devastating financial, organizational, and political consequences of the failure of one or more mission-critical information systems. Executives responsible for the agency's core business processes must work with the Chief Information Officer, the Chief Financial Officer, and the Year 2000 program manager to reduce the risk of Year 2000-induced business failures. Agency managers must dedicate sufficient resources and staff for the business continuity planning tasks, and ensure that senior managers support this effort.

Key Processes

- 1.1 Establish a business continuity project work group
- 1.2 Develop and document a high-level business continuity planning strategy
- 1.3 Identify core business processes
- 1.4 Define roles and assign responsibilities
- 1.5 Develop a master schedule and milestones
- 1.6 Implement a risk management process and establish reporting system
- 1.7 Assess existing business continuity, contingency, and disaster recovery plans and capabilities
- 1.8 Implement quality assurance reviews

1.1 Establish a business continuity project work group

Establish, within the agency's Year 2000 program office, a business continuity work group. The group should report to executive management and include representatives from the agency's major business units, domain experts in relevant functional areas, business continuity and disaster recovery specialists, operational analysts, and contract specialists. Access to legal advice is also a necessity. This group should work closely with the Year 2000 program manager and staff to ensure access to information on the status of the agency's Year 2000 renovation, validation, and implementation efforts.

1.2 Develop and document a high-level business continuity planning strategy

A high-level business continuity planning strategy provides the agency's executive management with a high-level overview of the Year 2000 business risks and solutions. The strategy should address the project structure, its relationship with the Year 2000 program, metrics and reporting requirements, and the initial cost and schedule estimates.

The risk of business failure is not limited to the organization's internal information systems, but includes risks associated with the potential failure of embedded microprocessors installed in a wide range of building and industrial process control systems. Many federal agencies also depend on information and data provided by their business partners—including other federal agencies, hundreds of state and local

agencies, international organizations, and private sector entities. Finally, every organization also depends on services provided by the public infrastructure—including power, water, transportation, and voice and data telecommunications.

1.3 Identify core business processes

Analyze agency business plans and work with business process owners and Year 2000 program staff to identify core business processes and supporting mission-critical systems for each business area. Ensure that all key business dependencies are clearly identified, including infrastructure and external sources of critical supplies and information. Identify executives responsible for the operation and continuity of each core business process. Use ownership of core business processes to promote executive ownership of the planning effort.

1.4 Define roles and assign responsibilities

Define roles and assign responsibilities for leading the planning effort and for performing analyses and designing business alternatives, including contingent operations for sustained and prolonged disruption. Appoint individuals to lead the development of contingency plans for each of the core business processes. Define responsibilities for documenting the business continuity plan and defining the essential operational activities comprising it.

Ensure that individuals responsible for the various business continuity and contingency planning activities are held accountable for the successful completion of individual tasks, and that the core business process owners are responsible and accountable for meeting the milestones for the development and testing of contingency plans for their core business processes.

1.5 Develop a master schedule and milestones

Develop a schedule for the planning effort and the delivery of interim and final products. Link the schedule to critical stages in the Year 2000 program effort. Update as required.

1.6 Implement a risk management process and establish reporting system

Manage the business continuity planning tasks and activities as a sub-project within the Year 2000 program office. Assist business units in the development of individual contingency plans. Rank business risks and focus the planning effort on the greatest risk to critical core business processes. Identify project risks and develop metrics. Establish reporting system, reporting requirements, and formats. Track estimates and after each step is completed update estimates as needed, especially when new information significantly alters the estimates. Estimate and assign risk to each mission-critical system undergoing renovation or replacement. Track and compare actual costs against estimates.

1.7 Assess existing business continuity, contingency, and disaster recovery plans and capabilities

Assess existing business continuity, contingency, and disaster recovery plans for their applicability. Identify weaknesses and strengths of existing plans.

1.8 Implement quality assurance reviews

Task the agency's quality assurance staff to review the business continuity planning processes. For example, use the quality assurance office staff to ensure that the business continuity team reviews existing contingency plans and that the existing contingency and disaster recovery plans are updated and incorporated into the business continuity plan. The quality assurance reviews should examine the worst case scenarios to ensure that a feasible backup strategy—including private sector solutions—can be successfully implemented in a national emergency.

2.0 Business Impact Analysis

The principal objective of the Year 2000 business impact analysis is to determine the effect of mission-critical information system failures on the viability and operations of agency core business processes. During the assessment phase of the Year 2000 program, agencies have assessed the impact of potential Year 2000-induced failures on core business areas and associated processes. The business impact analysis takes this process further and provides greater detail. It examines business process composition and priorities, dependencies, cycles, and service levels, and, most important, the business process dependency on mission-critical information systems.

Key Processes

- 2.1 Define and document information requirements, methods, and techniques to be used in developing the business continuity plan
- 2.2 Define and document Year 2000 failure scenarios
- 2.3 Perform risk and impact analyses of each core business process
- 2.4 Assess and document infrastructure risks
- 2.5 Define the minimum acceptable level of outputs and services for each core business process

- 2.1 Define and document information requirements, methods, and techniques to be used in developing the business continuity plan

Define the information requirements for constructing a business continuity plan. These requirements generally fall into four categories: (1) business process composition, execution cycles, and support; (2) operational priorities, service levels, dependencies, and relationships; (3) the primary and collateral Year 2000 business risks and the business scope of their impact; (4) and the costs and benefits of business continuity strategies and alternatives. Each area has detailed information requirements that are essential to providing effective business continuity. For example, the analysis of business process support should provide information on the technical, functional, organizational, and infrastructure support requirements. When collected, analyzed, and synthesized, the information defines a model of critical processes and risks to the business.

- 2.2 Define and document Year 2000 failure scenarios

Assess business vulnerabilities and their impacts and define the Year 2000 risk scenarios. Assume the loss of all mission-critical information systems due to post-implementation failures or delays in renovation and testing. Consider the possibility that Year 2000 date problems may be encountered earlier than expected, and address the potential disruption of essential infrastructure services, including electric power, telecommunications, and transportation. Focus agency business continuity and contingency planning efforts on likely failure scenarios.

2.3 Perform risk and impact analyses of each core business process

Monitor the status and progress of the Year 2000 program and review and verify risk metrics and critical milestones for all mission-critical systems undergoing renovation or replacement. Evaluate Year 2000-related risks posed by customers, suppliers, information technology vendors, and business partners.

Determine the impact of internal and external information system failures and infrastructure services on each core business process. Consider acquiring business impact analysis tools. These tools will provide consistent analytical structure and processes, and help to standardize the impact analyses throughout the enterprise. For the core business processes and supporting business areas, analyze both manual and automated functional requirements, manual and automated system support requirements, infrastructure support requirements, suppliers, customers, service levels, processing cycles, and the external and internal business drivers. Identify critical functions, recovery priorities and timing, and dependencies to other systems and processes.

If a core business process receives data from an external organization, contact that organization and obtain the status of its Year 2000 remediation effort. If there are reasons to be concerned, address these concerns in contingency plans.

Estimate the potential cost of service disruptions. In estimating impacts, address the duration of each disruption. Consider using a scorecard to aggregate and track the risk and impact information.

2.4 Assess and document infrastructure risks

Monitor the Year 2000 readiness of the public infrastructure, including power and telecommunications services. Assess the risk of service outages, and the potential impact of outages on the core business processes. Review existing contingency and disaster recovery plans to determine whether emergency services may be available to mitigate outages.

2.5 Define the minimum acceptable level of outputs and services for each core business process

For each core business process, define the minimum acceptable level of output and the recovery time objective.

3.0 Contingency Planning

Contingency planning integrates and acts on the results of business impact analysis. The output of this process is a business continuity plan consisting of a set of contingency plans--with a single plan for each core business process and infrastructure component. Each plan should provide a description of the resources, staff roles, procedures, and timetables needed for its implementation.

Key Processes

- 3.1 Assess the cost and benefits of identified alternatives and select the best contingency strategy for each core business process
- 3.2 Identify and document contingency plans and implementation modes
- 3.3 Define and document triggers for activating contingency plans
- 3.4 Establish a business resumption team for each core business process
- 3.5 Develop and document "zero day" strategy and procedures

- 3.1 Assess the cost and benefits of identified alternatives and select the best contingency strategy for each core business process

Assess benefits, costs, and risks of alternative contingency strategies. Select a strategy that is practical, cost-effective, and appropriate to the organization. In addition, the alternatives and strategies should provide a high level of confidence in recovery capability.

Three important factors in the selection process are

- functionality: the degree to which the replacement functionality supports the production of a minimum acceptable level of output for a given core business process,
- deployment schedule: the time needed to acquire, test, and implement, and
- cost: life-cycle cost, including acquisition, testing, training, and maintenance.

The goal is to maximize the functionality and speed of business resumption.

3.2 Identify and document contingency plans and implementation modes

Develop a contingency plan including strategies capable of meeting minimum acceptable output requirements for each core business process. Consider the following strategies:

- *quick fix.*
- *partial replacement.*
- *full redundancy or replacement, and*
- *outsourcing to the private sector.*

Consider three basic implementation modes for the quick fix, partial, and full replacement of functionality provided by failed mission-critical systems:

- *automated replacement.*
- *semi-automated replacement, and*
- *manual replacement.*

Some core business processes may be fully supported by compliant off-the-shelf application packages that can be purchased and rapidly installed. However, even projects that rely on off-the-shelf replacement packages may fall behind schedules. A semi-automated alternative can implement "bare bones" functionality, using a combination of compliant off-the-shelf applications, such as accounting software or standard database products. A manual alternative normally requires hiring and training of additional staff. While this is not a desirable solution, in some instances it may be used to replace all or part of a failed automated process. Finally, redundant business services may be provided through outsourcing contracts.

3.3 Define and document triggers for activating contingency plans

Once the business continuity planning team selects the best contingency alternative for each core business process, it must then define triggers that would implement each plan. The information needed to define the implementation triggers for contingency plans is derived from two key sources:

- *the deployment schedule for each contingency plan and*
- *the implementation schedule for the renovated or replaced mission-critical systems.*

The deployment schedule establishes the date at which the contingency plan must be implemented if it is to be fully tested before December 31, 1999. For example, if the contingency plan calls for an 8-month deployment schedule, the tentative implementation date should be set for April 30, 1999.

3.4 Establish a business resumption team for each core business process

Work with core business process owners to establish business resumption teams and business resumption priorities. These teams would be responsible for managing the implementation of contingency plans and would deal with a wide range of operational problems, including the potential failures of systems thought to be renovated and tested, and the potential failures of external systems and data exchanges.

3.5 Develop and document "zero day" strategy and procedures

Develop a risk-reduction strategy and procedures for the period between Thursday, December 30, 1999, and Monday, January 3. This strategy may include an agencywide shutdown of all of its information systems on Friday, December 31, 1999, and a phased power-up on Saturday, January 1, 2000. The agency may consider extending the shutdown to infrastructure systems, including local area networks, elevators, and building management systems.

4.0 Testing

The objective of business continuity testing is to evaluate whether individual contingency plans are capable of providing the desired level of support to the agency's core business processes and whether the plans can be implemented within a specified period of time. In instances where a full-scale test may be too costly, the agency may consider end-to-end testing of key contingency plan components. An independent audit of the plan can validate the soundness of the proposed contingency strategy. Similarly, a legal review can provide assurance that the plans comply with government regulations and that liabilities and exposures are being adequately addressed.

Key Processes

- 4.1 Validate business continuity strategy
- 4.2 Develop and document contingency test plans
- 4.3 Establish test teams and acquire contingency resources
- 4.4 Prepare for and execute tests
- 4.5 Validate the capability of contingency plans
- 4.6 Rehearse business resumption teams
- 4.7 Update the business continuity plan based upon lessons learned and re-test if necessary
- 4.8 Update disaster recovery plans and procedures

4.1 Validate business continuity strategy

Develop and implement a strategy for validating the business continuity plan within the time that remains. A typical strategy defines a minimum number of individual and joint exercises that combine training with testing. There are several common techniques that can be employed, including reviews, rehearsals, and quality assurance audits.

4.2 Develop and document contingency test plans

Define and document the contingency test plans. Review the test plans and make needed changes. Ensure that management approves the plans. Disseminate the documents, provide guidance, and establish a help desk. Test plans should address the following:

- *test objectives,*
- *test approach,*
- *required equipment and resources,*
- *necessary personnel,*
- *schedules and locations,*
- *test procedures, and*
- *expected results and exit criteria.*

4.3 Establish test teams and acquire contingency resources

Establish test teams responsible for preparing and executing the contingency plan tests. Test preparation may include hiring and training needed staff.

4.4 Prepare for and execute tests

Assign responsibilities to test team members, including executives, observers, and contractors.

4.5 Validate the capability of contingency plans

Validate the functional capability of each contingency plan. Examine test results for accuracy and consistency and note discrepancies. For each contingency plan, ensure that

- the plan adequately supports a core business function;*
- there is adequate capability to manage, record, and track the contingency transactions through the alternative business process;*
- the manual activities in particular, and the alternative business process in general, meet an acceptable level of performance;*
- an acceptable level of quality control is provided to critical parts of the alternative business process, and an acceptable level of integrity and consistency is provided to alternative databases; and*
- an acceptable level of security is provided to the data captured by an alternative data capture mechanism.*

4.6 Rehearse business resumption teams

Rehearse business resumption teams to ensure that each team and team member is familiar with business resumption procedures and their roles.

4.7 Update the business continuity plan based upon lessons learned and re-test if necessary

Resolve shortcomings and problems noted during testing and update each continuity plan. When under time constraints, prioritize the problem areas. For example, procedural problems involving internal administrative functions are not as serious as technical problems directly affecting the resumption of operations. Ongoing changes in systems, software, applications, communication, and operations will also require updates to the plan. A re-test may be required to ensure that the problems do not recur and that the updated plan does provide the specified capability.

4.8 Update disaster recovery plans and procedures

Update disaster recovery plans. Ensure that all newly developed or acquired contingency applications and other software components are included in the disaster recovery update cycle.

Selected Year 2000 Resources

There are many readily accessible sources of useful information on the Year 2000 problem, with many government and industry organizations establishing Year 2000 web sites. These sites provide information about Year 2000 business continuity and contingency planning issues.

Selected Year 2000 Web Sites

Federal Year 2000 Web Sites

- ☐ The President's Council on Year 2000 Conversion
<<http://www.y2k.gov/>>
- ☐ CIO Council Subcommittee on Year 2000
<<http://www.itpolicy.gsa.gov/inks/yr2000/y201toc1.htm>>
- ☐ MITRE/ESC Year 2000 Homepage
Y2K Contingency Management Plan Outline
<http://www.mitre.org:80/research/y2k/docs/CONTINGENCY_PLAN.html>
- ☐ Federal Deposit Insurance Corporation
Guidance Concerning Contingency Planning
<<http://www.fdic.gov/banknews/fils/1998/fil9851b.html>>

General Year 2000 Sites

- ☐ The Year 2000 Information Center
<<http://www.year2000.com>>
- ☐ The Institute for Electrical Engineers in the United Kingdom
<<http://www.iee.org.uk/2000risk>>

Business Continuity and Contingency Planning Sites

- ☐ Department of Information Resources for the State of Texas
Guidelines for Contingency Planning
<<http://www.dir.state.tx.us/oops/ctgyplan/index.html>>
- ☐ Disaster Recovery Institute of Canada
<<http://www.dr.org/ppover.htm>>

- ☐ University of Wisconsin - Disaster Management Center
<<http://epdwww.engr.wisc.edu/dmc>>
- ☐ Disaster Recovery Journal
<<http://www.drj.com>>
- ☐ The Journal of Business Continuity
<http://www.business-continuity.com/business_continuity.html>

Glossary

The definitions in this glossary were developed by the project staff or were drawn from other sources, including the Computer Dictionary: The Comprehensive Standard For Business, School, Library, and Home, Microsoft Press, Washington, D.C., 1991; The Year 2000 Resource Book, Management Support Technology Corp., Framingham, Massachusetts, 1996; The Year 2000 and 2-Digit Dates: A Guide for Planning and Implementation, International Business Machines Corporation, 1997; Denis Howe's "Free On-line Dictionary of Computing," at <<http://wombat.doc.ic.ac.uk/>>; and the Gartner Group's "IT Glossary" at <<http://gartner5.gartnerweb.com/gartner/itglossary/dlist.html>>.

Application	A computer program designed to help people perform a certain type of work. Depending on the work for which it was designed, an application can manipulate text, numbers, graphics, or a combination of these elements.
Architecture	A description of all functional activities to be performed to achieve the desired mission, the system elements needed to perform the functions, and the designation of performance levels of those system elements. An architecture also includes information on the technologies, interfaces, and location of functions and is considered an evolving description of an approach to achieving a desired mission.
Business area	A grouping of business functions and processes focused on the production of specific outputs.
Business function	A group of logically related tasks that are performed together to accomplish a mission-oriented objective.
Business plan	An action plan that the enterprise will follow on a short-term and/or long-term basis. It specifies the strategic and tactical objectives of the enterprise over a period of time. The plan, therefore, will change over time. Although a business plan is usually written in a style unique to a specific enterprise, it should concisely describe "what" is planned, "why" it is planned, "when" it will be implemented, by "whom" it will be implemented, and "how" it will be assessed. The architects of the plan are typically the principals of the enterprise.