

Crosswalk Comparing DOE O 150.1A to DOE O 150.1B

Topic Area(s)	DOE O 150.1A, Dated 3/31/2014	DOE O 150.1B, Dated 12/21/2021
Length of Order	Total of 56 pages	Total of 132 pages
Structure of Order	Base of Order – Introduction/Purpose/References Section 5 ½ pages	Base of Order – Introduction/Purpose/References Section 7 ¾ pages
	Chapter I – Continuity Program Requirements 19 ¼ pages	Appendix A – Requirements for Headquarters Offices to include Continuity Program Requirements, Requirements for Continuity of Operations (COOP) Plans, Communication and Information System Requirements, and Roles and Responsibilities 33 ¼ pages
	Chapter II – Communications Requirements 2 ¼ pages	Appendix B – Requirements for Field Elements to include Continuity Program Requirements, Requirements for COOP Plans, Communication and Information System Requirements, and Roles and Responsibilities 26 ¾ pages
	Chapter III – Responsibilities 10 ¼ pages	Appendix C – Requirements for the Office of Emergency Operations to include Continuity Program Requirements, Requirements for COOP Plans, Communication and Information System Requirements, and Roles and Responsibilities 17 pages
	Attachment 1 – Contractor Requirements Document to include high level COOP Program requirements 2 ½ pages	Attachment 1 – Contractor Requirements Document to include greater specificity regarding Continuity Program Requirements, Requirements for COOP Plans, Communication and Information System Requirements, and Roles and Responsibilities 22 ¾ pages
	Attachment 2 – Definitions 7 ¼ pages	Attachment 2 – Definitions 15 ¾ pages
	Attachment 3 – Acronym List 1 ½ pages	Attachment 3 – Acronym and Initialism List 3 ½ pages

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Federal Requirements on Which the Order Was Based	National Security Presidential Directive 51 (NSPD 51) / Homeland Security Presidential Directive 20 (HSPD 20), <i>National Continuity Policy</i> , dated May 9, 2007	Presidential Policy Directive (PPD) 40, <i>National Continuity Policy</i> , dated July 15, 2016
	Federal Continuity Directive 1 (FCD 1), <i>Federal Executive Branch National Continuity Program Requirements</i> , dated October 19, 2012	Federal Continuity Directive 1 (FCD-1), <i>Federal Executive Branch National Continuity Program and Requirements</i> , dated January 17, 2017
	Federal Continuity Directive 2 (FCD 2), <i>Federal Executive Branch Mission Essential Function and Candidate Primary Mission Essential Function Identification and Submission Process</i> , dated July 2013	Federal Continuity Directive 2 (FCD-2), <i>Federal Executive Branch Mission Essential Functions and Candidate Primary Mission Essential Functions Identification and Submission Process</i> , dated June 13, 2017
	National Communications System Directive 3-10 (NCS D 3-10), <i>Minimum Requirements for Continuity Communications Capabilities</i> , dated November 7, 2011	Office of Science and Technology Policy/Office of Management and Budget Directive 16-1, (OSTP/OMB D-16-1), <i>Minimum Requirements for Federal Executive Branch Continuity Communications Capabilities</i> , dated December 15, 2016
		Federal Mission Resilience Strategy (FMRS), dated December 7, 2020
		Executive Order 13961, Governance and Integration of Federal Mission Resilience, dated December 7, 2020
Business Process Analysis (BPA) Requirements	The only reference alluding to BPAs was a requirement for the Office of Continuity Programs to “identify MEFs and PMEFS using the business process methodology outlined in FCD 2.”	The Office of Continuity Programs is required to develop an enterprise-wide BPA addressing all DOE/NNSA PMEFS and MEFs and review BPA documentation biennially.
		Headquarters Offices, Field Elements, and Management and Operating (M&O) contractors are required to develop a BPA for each DOE/NNSA MEF they perform and submit the BPA to the Office of Continuity Programs biennially.
Business Impact Analysis (BIA) Requirements	Requirement for all Departmental Elements to conduct a BIA for all capabilities associated with the continuance of MEFs every five years.	The Office of Continuity Programs will complete an initial, biennial and, in the case of emerging threats, an as needed BIA addressing enterprise-wide PMEFS and MEFs.
		Field Offices and M&Os are also to complete an initial, biennial and, in the case of emerging threats, an as needed BIA.

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Devolution	Headquarters Offices and Field Elements must address devolution of operations for essential functions and devolution of command and direction to another geographical location until normal operations can resume.	Headquarters Offices: “Coordinate with the Office of Continuity Programs to address how the Headquarters Office will identify and transfer organizational command and control, as well as responsibility for performing essential functions, if applicable, to personnel at a geographically dispersed location unaffected by the incident.”
		Field Elements: “Address how the Field Element will identify and transfer organizational command and control, as well as responsibility for performing essential functions, if applicable, to personnel at a geographically dispersed devolution partner unaffected by the incident. At a minimum, each Field Element is to consider whether they can identify a suitable devolution partner who can receive command and control responsibilities related to providing control and direction, addressing contracting issues, accounting for all personnel, retrieving essential records, and beginning the process to address reconstitution.”
	M&O contractors must provide internal procedures for executing essential functions that have been devolved from Headquarters Offices or Field Elements.	M&O contractors: “Address how the contractor will identify and transfer organizational command and control, as well as responsibility for performing essential functions, if applicable, to the contractor’s personnel at a geographically dispersed devolution partner unaffected by the incident. At a minimum, each contractor is to consider whether they can identify a suitable devolution partner who can receive management, supervision, and personnel accountability responsibilities related to providing guidance and direction, addressing contracting issues, accounting for all personnel, coordinating with the Field Office Manager (or DOE/NNSA Headquarters Office, if applicable), retrieving essential records, and beginning the process to address reconstitution.”
Requirements for Continuity Program Readiness / Improvement	Mission Readiness Program containing 2 ½ pages of requirements.	Continuous Improvement Program containing 1 ½ pages of many of the same requirements as DOE O 150.1A but documented in a more streamlined manner.

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Personnel Accountability Testing Requirements	<p>The Order did not require quarterly personnel accountability testing but contained the following language regarding personnel accountability programs and testing of alert and notification procedures:</p> <ul style="list-style-type: none"> All Departmental Elements are required to establish a personnel accountability program to document the location, contact information, and well-being of all personnel during a continuity event. The Office of Continuity Programs is responsible for testing alert and notification procedures for Headquarters and the Field using the DOE automated notification system on a quarterly basis. 	<p>All Departmental Elements are required to account for all employees (not limited to continuity personnel) during quarterly accountability drills and other exercises. Organizations can submit a request to the Office of Continuity Programs for an exemption from participating in a quarterly drill on an as needed basis.</p>
		<p>The Order adds roles and responsibilities for Accountability Points-of-Contact for each Headquarters Office, Field Element, and M&O contractor</p>
Acceptance of Risk	<p>DOE O 150.1A requires Headquarters Offices and Field Elements to identify, evaluate, and assess potential hazards to the implementation of MEFs, determine what levels of relative risk are acceptable for MEFs, and prioritize and allocate resources and budgets to ensure continuity of MEFs during continuity events. The Order does not identify a process for accepting the risk of not performing affected MEFs.</p>	<p>In the event that MEFs and ESAs performed by the Field Element or their respective M&O contractor cannot be reasonably moved nor performed at an alternate location, the Field Element Manager or cognizant DOE/NNSA Headquarters Office Leadership may accept the risk of not performing any affected MEFs or ESAs and must inform the Office of Continuity Programs.</p>
Information System Contingency Plans	<p>DOE O 150.1A does not address IT disaster recovery planning in any manner.</p>	<p>Headquarters Offices, Field Elements, and M&O contractors “must document an annual review of the COOP plan and associated system-specific plans, (such as Disaster Recovery Plans [DRPs] and Information System Contingency Plans [ISCPs]), if applicable, and revise the plans, as necessary.”</p>
Flexibility in Meeting Certain Requirements in the Order	<p>The Order did not specify any situations where Field Elements or M&O contractors could be excused from meeting any of the requirements.</p>	<p>Field Elements and M&O contractors that do not directly perform or support DOE/NNSA Primary Mission Essential Functions (PMEFs), Mission Essential Functions (MEFs), or associated Essential Supporting Activities (ESAs) are subject to a reduced set of requirements. The Order goes on to document specific instances where Field Elements (9 instances) and M&O contractors (8 instances) are excused from meeting requirements if the organizations do not directly perform or support DOE/NNSA PMEFs, MEFs, or ESAs.</p>

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Flexibility in Meeting Certain Requirements in the Order (continued)	The phrases “as applicable” and “if applicable” appear in the Order in 16 instances.	The phrases “as applicable” and “if applicable” appear in the Order in 162 instances.
	M&O contractors and federal Field Elements were encouraged to establish one COOP plan for the site, eliminating the need to develop separate COOP plans.	Field Elements and M&O contractors have flexibility in the format of their plans, provided they meet the requirements of the Order. Field Elements have the flexibility to establish one COOP plan, or multiple COOP plans for the site with contractors, eliminating the need to develop separate plans. The Field Element and contractor can make the determination through collaboration to decide the most effective option.
Budget and Funding Requirements	The Department, including each individual Headquarters Office and Field Element, must identify and provide continuity funding and specific budgetary requirements, to establish and maintain a viable continuity capability. The Department must also identify provisions for the acquisition and procurement of necessary equipment, supplies, resources, and personnel that are not already in place at the continuity facilities and needed to sustain operations until normal operations resume.	<p>DOE O 150.1B identifies the following requirements for Headquarters Offices, Field Elements, and M&O contractors.</p> <p>Identify continuity requirements that will ensure appropriate and necessary resources are available to meet established regulatory requirements. Resources should be sought to address the following goals:</p> <ul style="list-style-type: none"> • Establish and maintain a viable continuity program. • Acquire and maintain resources—equipment, supplies, and personnel—necessary to sustain operations and personnel at alternate locations for a minimum of 30 days or until normal operations are resumed. • Establish techniques and procedures to streamline standard acquisition processes and support emergency acquisitions of equipment, supplies, services, and personnel to support continuity operations. • Integrate continuity funding and acquisition requirements, as applicable, into existing and future contract awards and MOAs/MOUs, as applicable, to ensure the continuation of MEFs. (Not Applicable to M&O contractors) • Integrate continuity funding and acquisition requirements, as applicable, into annual tasks and objectives, performance metrics, and mandatory reporting. (Not Applicable to M&O contractors)
	Headquarters Offices and Field Elements are to identify, evaluate, and assess potential hazards to the implementation of MEFs, determine what levels of relative risk are acceptable for MEFs, and prioritize and allocate resources and budgets to ensure continuity of MEFs during continuity events. Hazard and risk assessments performed for other Departmental requirements may be combined with COOP risk management to ensure continuity of MEFs.	
	PSO and Staff Office Directors are responsible for ensuring budget submissions for facilities, activities, and transportation functions are adequate for the effective implementation and maintenance of COOP.	