

# Get Control of Yourself - Risk Moves Pretty Fast<sup>Public</sup>

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It was incredibly difficult figuring out how to start this article. In a time when coronavirus concerns outweigh practically everything, some might think this is not the time to discuss internal controls.

However, watching our industry leaders proactively address this situation has been a good reminder that a properly aligned internal control program can help entities respond to the risks they are facing. Times like these can show how your internal control program flexes and retracts, and this can help you reassess, address and mitigate the risks at hand.

Ferris Bueller said, "Life moves pretty fast. If you don't stop and look around once in a while, you could miss it." I would change that to: "Risk moves pretty fast." The front page of "USA Today" on January 27 discussed how the coronavirus had spread through China. At that time, the U.S. had diagnosed five people with the virus. Fast forward a mere three months, and we are in the middle of a pandemic. Risk can move fast.

The nature of our business ensures that we plan. It is likely that one of the controls you have implemented due to the pandemic is a Business Continuity Plan (BCP). Among the various activities that could be included in a BCP, it usually includes a Disaster Recovery plan, a Contingency plan, and a Crisis Management plan.

A Crisis Management plan is a reactive control consisting of an underlying framework that, at a minimum, should identify:

- 1) What the organization identifies as a crisis. This should include the criteria to determine a crisis and an outline of the initial steps to take for each type of crisis identified. It should provide enough information to allow for the determination of when to escalate the plan and should be scalable to fit each event.
- 2) An established crisis management team that includes representation from each key department. These personnel should be aware of the expected "must do" tasks for their department.

3) Established communication networks, including details for what information to communicate, how to communicate it, and to whom. This could include personnel who are not normally included in day-to-day operations; therefore, consideration must be made to ensure that this information is current and accurate.

4) A resource library of any key documentation that could be critical during a time of high stress (i.e., checklists, one line drawings, etc.).

The amount of details you may have had to address during this unprecedented event depends largely on how much your existing plans contemplated pandemics. However, the process to determine which internal controls you should add has remained the same. First, you had to identify your risk.

What was the initial risk? It was that control center and field personnel could be compromised and not available to perform their duties. We learned from the Centers for Disease Control and Prevention (CDC) that the virus spreads through respiratory droplets from an infected person. Alternatively, it might spread through touching your face, eyes, nose or mouth after coming in contact with a surface that has the virus on it.

Therefore, based on the CDC and possibly the Electricity Subsector Coordinating Council recommendations<sup>1</sup>, you may have implemented some (or all) of the following control activities.

- a) To reduce the possibility of transmission between employees, you may have:  
encouraged sick employees to stay home,



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<sup>1</sup>[Electricity Subsector Coordinating Council - Assessing and Mitigating the Novel Coronavirus \(COVID-19\)](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html)  
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*Continued from page 7*

established a process to ensure prompt notification of changes, educated employees on steps to protect themselves and reduce spreading the virus, and identified that sharing phones and other equipment should be avoided.

b) To ensure critical grid operations are maintained, you may have: identified a point person responsible for COVID-19 issues and their impact, talked with your vendors to determine the control activities they are performing to ensure they meet your established guidelines, maintained contact with suppliers to determine if they are having issues in order to implement back-up supplier procedures, and considered contacting neighboring entities to establish back-up capabilities.

c) To maintain a safe work environment, you may have: identified ways to increase ventilation within the facility, established a routine to perform disinfecting of frequently-touched workstations/surfaces, and put up signs to remind employee to wash their hands and clean their areas. You also may have set reminders for these control activities, considering they are not normally performed during each shift.

Now that you have established the appropriate controls, we are finished. Right? Actually, the hard part is just beginning because none of these controls are commonplace. We share items like phones and workstations on a daily basis and often without a second thought.

Now, add to these habits that it is human nature to be distracted and revert back to previous activities in times of high stress. Plus, our governments are starting to talk about loosening some restrictions. So, do we really need to continue these controls? The CDC would say, Yes!

So how do we continue to mitigate this risk? If you had the opportunity to attend the RF Internal Controls Workshop in February, you know that this is when the importance of monitoring begins. This includes checklists, sign-off sheets and whatever controls you deem necessary to ensure that what you want to happen, consistently continues to happen.

If ever the importance of departmental monitoring was apparent, that time is now. We have been raising the conversation regarding controls outside of Standards. No Standard addresses this huge risk.

Risk can move fast. With the correct control framework in place and the understanding that we must remain agile in order to address the appropriate

risk at the correct time, we will get through this. The time and effort that has been put into our control programs should, and will, assist you in responding to these events.

We'll talk again soon. Until then, stay safe and healthy.

