March 23, 2018

Dr. Soraya M. Coley, President
California State Polytechnic University, Pomona
3801 W. Temple Avenue
Pomona, CA 91768

Dear Dr. Coley:

Subject: Audit Report 17-10, Emergency Management, California State Polytechnic University, Pomona

We have completed an audit of Emergency Management as part of our 2017 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors’ International Standards for the Professional Practice of Internal Auditing.

I have reviewed the management response and have concluded that it appropriately addresses our recommendations. The management response has been incorporated into the final audit report, which has been posted to the Office of Audit and Advisory Services’ website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,

Larry Mandel
Vice Chancellor and Chief Audit Officer

C: Timothy P. White, Chancellor
EMERGENCY MANAGEMENT

California State Polytechnic University, Pomona

Audit Report 17-10
February 22, 2018
EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls for emergency management and to ensure compliance with relevant governmental regulations; Trustee policy; Office of the Chancellor directives; campus procedures; and where appropriate, federal guidance and industry-accepted standards.

CONCLUSION

We found the control environment for the areas reviewed to be in need of major improvement.

Based upon the results of the work performed within the scope of the audit, the operational and administrative controls for emergency management as of December 14, 2017, were unlikely to provide reasonable assurance that risks were being managed and objectives were met.

Overall, we found that the campus was not effectively administering some of the required components of its emergency operations plan (EOP), which was updated in November 2017. Specifically, we found that emergency preparedness training for both the general campus population and individuals with emergency management roles was not always provided as required. In addition, we noted that the campus did not always conduct, complete, and document required emergency exercises, simulations, and drills in accordance with policy. Further, we noted that the EOP itself was not updated, reviewed, and approved timely, and the current EOP contained gaps in critical role assignments. Also, the EOP did not include off-site campus locations, and the campus could not provide evidence that these locations had separate emergency preparedness plans. Additionally, we noted that the campus did not maintain accurate records regarding the location, amounts, and status of critical emergency supplies and equipment, including generators.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.
OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. EMERGENCY PREPAREDNESS TRAINING

OBSERVATION

Emergency preparedness training was not always provided as required.

We reviewed training records for the years 2015 through 2017 and found that:

- The campus did not have documentation showing that eight of the ten emergency operations center members we reviewed were provided with annual specialized training related to their specific leadership roles.

- The campus did not have documentation showing that 23 of the 30 building evacuation team members we reviewed had completed annual specialized training specific to their role in safe evacuation.

- The campus did not have documentation showing that 11 of the 20 newly hired faculty and staff we reviewed had been given emergency overview training within one year of their hire dates.

This is a repeat finding from the 2009 Emergency Preparedness audit.

Executive Order (EO) 1056, *California State Emergency Management Program*, requires specialized training for all building evacuation personnel and emergency management team members and annual overview training for every employee within one year of employment.

Completing and documenting emergency preparedness training provides greater assurance that students, faculty, and staff will respond appropriately and effectively to incidents and emergencies, increases safety, and reduces the risk of noncompliance with campus and California State University (CSU) requirements.

RECOMMENDATION

We recommend that the campus create a process to monitor and track the provision and completion of specialized training for individuals with specific emergency preparedness roles, and for new hires required to complete training within one year.

MANAGEMENT RESPONSE

We concur. The campus will develop a process to monitor and track the provision and completion of specialized training for individuals with specific emergency preparedness roles, and for new hires required to complete training within one year.

Expected completion date: June 30, 2018
2. EMERGENCY EXERCISES

OBSERVATION

The campus did not always conduct, complete, and document required emergency exercises, simulations, and drills in accordance with policy.

We reviewed emergency exercise records for the years 2015 through 2017 and found that:

- Tabletop exercises were not performed in 2015.
- Functional exercises were not performed at least every other year.
- Full-scale exercises, as defined by EO 1056, were not performed in the past five years.
- Drills and exercises performed by the campus were concentrated and repeated in specific areas, while the rest of the campus buildings were not included in any of the listings of evacuation drills and trainings provided by the campus.
- Seventeen of the 20 drills and exercises we reviewed did not meet the post-exercise documentation and review requirements stated in EO 1056.

EO 1056 requires that campuses conduct tabletop emergency exercises and emergency drills at least annually; functional exercises, including realistic simulations and activation of the emergency operation center (EOC), every other year; and full-scale exercises, including tests of mutual aid and assistance agreements, every five years.

Completing and documenting emergency drills and simulations ensures that emergency team members, students, faculty, and staff will be properly prepared to respond to an emergency situation, increases safety, and reduces the risk of noncompliance with campus and CSU requirements.

RECOMMENDATION

We recommend that the campus:

a. Create processes to ensure that training, drills, and exercises are regularly scheduled and performed as required.

b. Ensure that training, drills, and exercises adequately cover on-campus and off-campus locations.

c. Ensure that training, drills, and exercises are documented adequately and accurately, in the form of corrective action plans or after-action reports, as required by EO 1056.

MANAGEMENT RESPONSE

We concur. The campus will create processes to ensure that:
a. Training, drills, and exercises are regularly scheduled and performed as required.

b. Training, drills, and exercises adequately cover on-campus and off-campus locations.

c. Training, drills, and exercises are documented adequately and accurately, in the form of corrective action plans or after-action reports, as required by EO 1056.

Expected completion date: May 31, 2018

3. EMERGENCY OPERATIONS PLAN

OBSERVATION

The campus EOP had not been reviewed or updated on an annual basis, and the current version of the EOP had not been fully implemented as of the date of our review.

We found that:

• The campuswide EOP was not reviewed or updated in 2015 or 2016.

• The approval page in the 2017 version of the campus EOP, meant to document the review and approval of the plan by the campus emergency policy group, was not completed and did not include an approval field for one of the senior managers in the policy group.

• Twenty-one of the 38 emergency team positions in the 2017 emergency plan were unassigned.

• The 2017 emergency plan did not address development of emergency resource and contract listings, in compliance with CSU requirements.

• The procedures documented in the 2017 emergency plan to address the needs of individuals with limited English proficiency had not been implemented.

EO 1056 requires campuses to develop a campus emergency plan and to review, update, and distribute the plan at least annually.

A current and comprehensive EOP provides assurance that the campus can effectively respond to emergencies and decreases the risk of loss and injury to the campus community.

RECOMMENDATION

We recommend that the campus:

a. Obtain all required approvals for the 2017 EOP and develop and implement a procedure to ensure that the EOP is reviewed at least annually.

b. Complete assignments for vacant emergency team positions in the EOP.
c. Revise and update the EOP to include emergency resource and contract listings.

d. Implement procedures in the plan for addressing the needs of individuals with limited English proficiency.

**MANAGEMENT RESPONSE**

We concur. The campus will review the 2017 EOP and update it as needed to ensure that:

a. The campus has a procedure in place to review the EOP annually.

b. The campus assigns all of the emergency team positions.

c. The EOP is updated to include emergency resource and contract listings.

d. Procedures in the plan for addressing the needs of individuals with limited English proficiency are implemented.

Expected completion date: April 30, 2018

4. **OFF-SITE LOCATIONS**

**OBSERVATION**

Off-site campus locations were not included in the current EOP or in any of the campus emergency policies and procedures.

The campus could not provide evidence that the five off-campus locations used by students and/or faculty and staff had:

- Established their own emergency plans, including building and area evacuation plans.
- Performed periodic evacuation/emergency drills, testing, and training.
- Appointed and trained building marshals or floor captains.
- Provisioned emergency supplies and equipment.

Addressing emergency response protocols and processes for off-site locations increases safety and provides assurance that the campus would be able to effectively respond in the event of an emergency occurring when employees or students are participating in campus activities in buildings or areas outside of the main campus.

**RECOMMENDATION**

We recommend that the campus maintain emergency procedures for the five off-site locations or incorporate the sites into the campus EOP so they can be easily referenced in the event of an emergency.
MANAGEMENT RESPONSE

We concur. The campus will ensure that the off-site locations will either maintain their emergency procedures or will incorporate them into the campus EOP so they can be easily referenced in the event of an emergency.

Expected completion date: June 30, 2018

5. EMERGENCY RESOURCES

OBSERVATION

Not all rosters of emergency resources and supplies reviewed were complete, accurate, and in compliance with CSU requirements.

We reviewed 14 emergency resource and supply rosters and found that:

- Eight were outdated or did not have an “updated as of” date.
- Eight were not accurate or complete.

We further noted that at three of the roster locations, emergency supplies were expired.

EO 1056 requires campuses to develop a roster of campus resources and contracts for materials and services that may be needed in an emergency situation and to update the roster at least annually. The EO further requires that an “updated as of” date be included on each roster.

Maintaining adequate and fresh emergency supplies and ensuring that rosters of emergency resources are accurate and complete provides assurance that critical resources will be available within a reasonable time frame in the event of an emergency.

RECOMMENDATION

We recommend that the campus:

a. Review and inventory existing rosters of emergency supplies and equipment to ensure that they are complete, accurate, and in compliance with CSU requirements.

b. Examine perishable emergency supplies to ensure that they are not expired.

MANAGEMENT RESPONSE

We concur. The campus will review and update the rosters for emergency supplies and equipment to ensure that they are complete, accurate, and in compliance with CSU requirements. The campus will also develop a process to ensure that all of the perishable emergency supplies are not expired.

Expected completion date: April 15, 2018
6. BACKUP GENERATORS

**OBSERVATION**

Emergency generators were not always timely tested or inspected.

We reviewed eight generators and noted gaps in the monthly maintenance logs for two. The longest gap between maintenance checks was approximately six months.

Performing timely inspections of emergency generators provides assurance that critical resources would be readily available and functioning in the event of an emergency.

**RECOMMENDATION**

We recommend that the campus develop a procedure to ensure that periodic generator checks and maintenance are conducted as required by campus policies and procedures.

**MANAGEMENT RESPONSE**

We concur. The campus will develop a procedure to ensure that periodic generator checks and maintenance are conducted as required by campus policies and procedures.

Expected completion date: March 31, 2018
GENERAL INFORMATION

BACKGROUND

The CSU consists of 23 campuses, with approximately 479,000 students and more than 50,000 faculty and staff. Each campus is responsible for the safety and general welfare of all members of the campus community. Because emergencies and disasters can occur with little to no warning and encompass a wide range of events, including earthquakes, fires, active-shooter situations, pandemics, protests or riots, and other natural and manmade disasters, it is critical that campuses plan ahead so that when emergencies happen, an appropriate response can be coordinated. The president of each CSU campus has been delegated responsibility for the implementation and maintenance of the campus emergency management program.

The Federal Emergency Management Agency (FEMA) is the federal agency that leads the country in preparing for, preventing, responding to, and recovering from disasters. FEMA emphasizes the use of hazard mitigation planning to reduce the loss of life and property due to natural and other hazard risks and publishes a number of emergency planning guides, including Building a Disaster Resistant University and the Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education. The Department of Education (DOE) and the National Fire Protection Agency (NFPA) have also developed relevant federal guidance for emergency management programs.

On February 28, 2003, the president of the United States issued Homeland Security Presidential Directive 5, Management of Domestic Incidents, which directed that the National Incident Management System (NIMS) be developed. NIMS provides a common approach to managing incidents that allows government departments and agencies, nongovernmental organizations, and the private sector to work together. NIMS requires the use of a standard organizational framework, the Incident Command System (ICS), for incident response. Federal departments and agencies, as well as state, local, and tribal governments, are required to fully comply with NIMS and adopt ICS to receive federal preparedness funding and grants.

The cornerstone of California’s emergency response system is the Standardized Emergency Management System (SEMS), which state agencies are required by law to use when responding to emergencies involving multiple jurisdictions or agencies. Key components of SEMS, codified in Government Code §8607, include the use of ICS, multiagency coordination, mutual aid, and defined operational areas. SEMS was developed as a result of the 1991 East Bay Hills fire in Oakland, which drew attention to the need for better coordination among emergency services responders.

As a result of federal and state regulations, all CSU campuses are required to incorporate NIMS, SEMS, and ICS into their emergency management program. Executive Order (EO) 1056, California State University Emergency Management Program, defines the key components of an effective campus emergency management program. At the systemwide level, the Office of Risk Management (ORM) has administrative oversight and programmatic responsibility for the emergency management function and coordinates the Emergency Coordinators working group, an advisory body for CSU systemwide emergency management. In 2014, ORM commissioned an outside consultant to review campus emergency management plans, and each campus received a written assessment with recommended improvements.
At California State Polytechnic University, Pomona (Cal Poly Pomona), the executive director of institutional risk and emergency management functions as the emergency operations manager. He and his department staff are responsible for overseeing the campus emergency operations program and advising university administrators and executives on disaster preparedness, response, and recovery issues. The team is also charged with providing adequate and appropriate emergency training to campus students and staff. The campus experienced turnover in the positions of emergency management executive, emergency operations manager, and university police chief during the audit period. This resulted in loss of knowledge and experience concerning the campus’ emergency management programs and a disruption in the oversight and administration of campus emergency management. The campus emergency operations manager started with the campus in January 2017 and has since spearheaded several emergency management initiatives, such as the review and update of the campus emergency plan, the acquisition of new emergency supplies and equipment, and the creation of new training programs for members of the campus’ emergency teams. The executive director of institutional risk and emergency management reports to the vice president for administration, finance, and strategic development/chief financial officer, who is also the executive responsible for overseeing the campuswide emergency management program. Additionally, the campus has an advisory council, the emergency operations policy group, which consists of the campus president and her cabinet. The policy group gives authority to the emergency operations group to make decisions during a critical incident or disaster. The group’s main role is to provide policy guidance and make major decisions that affect the campus community.

SCOPE

We visited the Cal Poly Pomona campus from November 6, 2017, through December 14, 2017. Our audit and evaluation included the audit tests we considered necessary in determining whether administrative and operational controls are in place and operative. The audit focused on procedures in effect from July 1, 2015, through December 14, 2017.

Specifically, we reviewed and tested:

- Emergency management administration and organization, including clear lines of organizational authority and responsibility, and current and comprehensive policies and procedures.
- The emergency operations plan and event-specific annexes, including integration of SEMS, NIMS, and ICS components, and considerations for special populations on campus such as international students, students and personnel with limited English proficiency, and people with access and functional needs.
- The emergency operations center, emergency equipment, and related emergency supplies and resources.
- Coordination with other agencies, including mutual aid and assistance.
- The effectiveness of the building marshal or similar program and evacuation procedures and drills.
- Emergency management training for new hires and emergency management team members.
• Testing and drills for emergency communication systems and emergency incidents, and
the preparation of appropriate after-action reports.

As a result of changing conditions and the degree of compliance with procedures, the
effectiveness of controls changes over time. Specific limitations that may hinder the
effectiveness of an otherwise adequate system of controls include, but are not limited to,
resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and
management overrides. Establishing controls that would prevent all these limitations would
not be cost-effective; moreover, an audit may not always detect these limitations.

Our testing and methodology, which was designed to provide a review of key administrative
and operational controls, included interviews, walkthroughs, and detailed testing on certain
aspects of the campus emergency operations program. Our review was limited to gaining
reasonable assurance that essential elements of the campus emergency management
program were in place and did not examine all aspects of the program.

CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and
guidance; CSU Board of Trustee policies; Office of the Chancellor policies, letters, and
directives; campus procedures; and other sound administrative practices. This audit was
conducted in conformance with the Institute of Internal Auditors’ International Standards for
the Professional Practice of Internal Auditing.

This review emphasized, but was not limited to, compliance with:

• EO 943, University Health Services
• EO 1056, California State University Emergency Management Program
• Coded memorandum Human Resources 2004-10, Mutual Aid
• 20 United States Code §1092(f), Higher Education Opportunity Act
• Code of Federal Regulations Title 28, Part 36, American Disabilities Act
• Code of Federal Regulations Title 29, Part 1910, Occupational Safety and Health Standards
• DOE, Action Guide for Emergency Management at Institutions of Higher Education
• FEMA, Guide for Developing High-Quality Emergency Operations Plans for Institutions of
Higher Education
• NFPA 1600, Standard on Disaster/Emergency Management and Business Continuity/
Continuity of Operations Programs
• Government Code §8607
• Government Code §13402 and §13403
• Cal Poly Pomona 2017 Emergency Operations Plan
• Cal Poly Pomona Building Marshal and Floor Captain Roles and Responsibilities

AUDIT TEAM

Assistant Vice Chancellor and Deputy Chief Audit Officer: Janice Mirza
Audit Manager: Ann Hough
Senior Auditor: Jon Scololo