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August 31, 2018

Dr. Tomás D. Morales, President
California State University, San Bernardino
5500 University Parkway
San Bernardino, CA 92407-2393

Dear Dr. Morales:

Subject: Audit Report 18-48, *Emergency Management*, California State University, San Bernardino

We have completed an audit of *Emergency Management* as part of our 2018 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 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

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The California State University
Audit and Advisory Services

EMERGENCY MANAGEMENT

**California State University,
San Bernardino**

Audit Report 18-48
July 30, 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 some of the areas reviewed to be in need of improvement.

Based upon the results of the work performed within the scope of the audit, except for the weaknesses described below, the operational and administrative controls for emergency management as of May 18, 2018, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

Overall, we found that the campus had an appropriate framework for emergency management. The campus emergency manager, in conjunction with the former executive director for risk management, recently strengthened the campus emergency program by updating the campus emergency operations plan (EOP), providing training and position checklists to emergency team members, including the building and floor marshals, and documenting attendance and after-action reports for emergency exercises. However, we found that due to turnover in the emergency manager position, some components of the existing emergency management program needed improvement. Specifically, we found that not all buildings on campus participated in annual evacuation drills; the California State University, San Bernardino (CSUSB) Palm Desert campus (PDC) was not included in simulated emergency exercises such as tabletops and functional exercises; sufficient documentation showing that housing department resident assistants and student coordinators had completed training had not been retained; the emergency operations center (EOC) and emergency supplies needed improvement; and the EOP needed to be updated to include certain elements and distributed.

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

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. EVACUATION DRILLS

OBSERVATION

The performance and documentation of campus evacuation drills needed improvement.

During our review, we found that:

- The campus annual fire safety report indicated that student housing evacuation drills were conducted during the fall and winter quarters; however, student housing evacuation drills were only performed in the fall quarter, and after-action reports, which are required by systemwide policy, were not created to document the results of these drills.
- Annual evacuation drills did not incorporate all buildings on campus. Between 2016 and 2018, the campus conducted several evacuation drills; however, several buildings on campus were either not included in the drills at all or were not included consistently each year.
- The annual security reports for CSUSB and PDC did not include a statement of current policies and procedures to test the campus emergency response and evacuation procedures on an annual basis, as required by federal regulations.

Properly performing and documenting evacuation drills and issuing complete annual security reports helps to ensure that the campus is prepared to effectively respond to emergency situations and helps to ensure compliance with systemwide and federal regulations.

RECOMMENDATION

We recommend that the campus:

- a. Perform student housing evacuation drills as required to ensure consistency with the annual campus fire safety report, and create after-action reports to document the results of these drills.
- b. Develop and document a plan to perform annual campuswide evacuation drills.
- c. Update the annual security report, for both CSUSB and PDC, and include a statement of current policies and procedures to test the campus emergency response and evacuation procedures on an annual basis, and communicate the updated annual security reports to the campus community.

MANAGEMENT RESPONSE

We concur. Management's action plan will be to:

- a. Perform student housing evacuation drills as required to ensure consistency with the annual campus fire safety report, and create after-action reports to document the results of these drills.
- b. Develop and document a plan to perform annual campuswide evacuation drills.
- c. Update the annual security report, for both CSUSB and PDC, and include a statement of current policies and procedures to test the campus emergency response and evacuation procedures on an annual basis, and communicate the updated annual security reports to the campus community.

Our anticipated date for full implementation of these recommendations is January 31, 2019.

2. PALM DESERT CAMPUS

OBSERVATION

The emergency management program for PDC needed improvement.

PDC has an established incident management plan that is incorporated into the CSUSB EOP. During an emergency incident, the EOC team at CSUSB would be responsible for managing the incident with assistance from the emergency team members at PDC. In our review, we found that:

- The PDC incident management plan needed to be evaluated. The plan established two incident command posts, structured like a primary and secondary EOC, with various emergency team member positions. However, we found that there were limited resources at PDC to support this structure, and various emergency team positions were vacant. Additionally, PDC emergency team members had not completed annual specialized training as required by systemwide policy.
- Building and floor marshals at PDC did not complete annual training from 2016 to 2017, as required by systemwide policy. Building and floor marshals are responsible for ensuring that buildings are properly and safely evacuated during an emergency and are required to receive annual training specific to these roles.
- PDC was not incorporated into simulated emergency exercises such as tabletops, functional, and full-scale exercises conducted by the CSUSB emergency team. We found that the simulated emergency exercises performed at CSUSB did not incorporate scenarios or incidents involving PDC, and PDC emergency team members did not participate in the exercises.

A properly established emergency program provides assurance that emergency teams are properly staffed and trained and that the campus will be able to respond to emergencies in an effective and timely manner.

RECOMMENDATION

We recommend that the campus:

- a. Evaluate the PDC incident management plan to determine whether the current structure is adequate based on current resources and document the results of this evaluation. If needed, update the incident management plan accordingly and communicate the information to key emergency management personnel at CSUSB and PDC.
- b. Provide annual training to PDC emergency team members, including building and floor marshals, and maintain adequate documentation to substantiate the training.
- c. Develop and document a plan to incorporate PDC and PDC emergency team members in simulated emergency exercises as noted above.

MANAGEMENT RESPONSE

We concur. Management’s action plan will be to:

- a. Evaluate the PDC incident management plan to determine whether the current structure is adequate based on current resources and document the results of this evaluation. If needed, we will update the incident management plan accordingly and communicate the information to key emergency management personnel at CSUSB and PDC.
- b. Provide annual training to PDC emergency team members, including building and floor marshals, and maintain adequate documentation to substantiate the training.
- c. Develop and document a plan to incorporate PDC and PDC emergency team members in simulated emergency exercises as noted above.

Our anticipated date for full implementation of these recommendations is April 30, 2019.

3. BUILDING AND FLOOR MARSHAL PROGRAM

OBSERVATION

The campus did not always retain sufficient documentation to substantiate the completion of annual building/floor marshal training, and building-specific emergency action plans were not always updated as required.

We found that:

- The housing department did not retain documentation showing that housing department resident assistants and student coordinators, who function as building and floor marshals, attended required annual training, as there was no process in place to document attendance. As such, we could not verify that all five housing department resident assistants and student coordinators we selected for review had attended training.

- Five of the seven building-specific emergency action plans we reviewed were not annually updated and submitted to the emergency manager during 2016 and 2017.

Completing and documenting specialized training for building and floor marshals and maintaining current building-specific emergency action plans helps to ensure the safety of the campus community in the event of an emergency and increases compliance with systemwide requirements.

RECOMMENDATION

We recommend that the campus:

- a. Develop a process to document training attendance for resident assistants and student coordinators, and retain this information in accordance with campus and systemwide policy.
- b. Remind key emergency personnel to annually update building-specific emergency action plans and submit them to the emergency manager, and obtain the updated emergency action plans for the buildings noted above.

MANAGEMENT RESPONSE

We concur. Management’s action plan will be to:

- a. Develop a process to document training attendance for resident assistants and student coordinators, and retain this information in accordance with campus and systemwide policy.
- b. Remind key emergency personnel to annually update building-specific emergency action plans and submit them to the emergency manager, and obtain the updated emergency action plans for the buildings noted above.

Our anticipated date for full implementation of these recommendations is January 31, 2019.

4. EMERGENCY OPERATIONS CENTER AND EMERGENCY RESOURCES

OBSERVATION

The campus primary and secondary EOCs and emergency resources needed improvement.

Specifically, we found that:

- There was no emergency food at either the primary or secondary location to support a fully staffed EOC, as required by systemwide policy.
- There were no copies of the current EOP in either the primary or secondary EOC. The hard-copy EOPs located in the EOCs were dated June 2014.

- All perishable first aid emergency resources in the mass-care trailer were expired and needed to be replaced.

Maintaining a well-equipped EOC and having adequate emergency resources provides assurance that the campus emergency team will have all necessary resources available to respond to and manage emergency situations.

RECOMMENDATION

We recommend that the campus:

- a. Develop and execute a plan to obtain emergency food to support a fully staffed EOC in accordance with systemwide requirements.
- b. Replace the outdated copies of the EOP with the current version as noted above.
- c. Replace all of the expired emergency resources in the mass-care trailer as noted above.

MANAGEMENT RESPONSE

We concur. Management’s action plan will be to:

- a. Develop and execute a plan to obtain emergency food to support a fully staffed EOC in accordance with systemwide requirements.
- b. Replace the outdated copies of the EOP with the current version as noted above.
- c. Replace all of the expired emergency resources in the mass-care trailer as noted above.

Our anticipated date for full implementation of these recommendations is January 31, 2019.

5. EMERGENCY OPERATIONS PLAN

OBSERVATION

The campus EOP needed to be updated and communicated to EOC team members.

We reviewed the 2018 EOP and found that:

- The current and complete EOP was not distributed to the EOC team as required by systemwide policy. We found that several EOC team members had a copy of the EOP from 2014, and although a copy of the current EOP was available on the emergency management website, this version did not include all annexes and appendices.
- The EOC contact list included as Appendix 5 of the EOP was outdated and had last been reviewed in 2014.

- The EOP did not address the needs of international students or individuals with limited English proficiency.
- The EOP did not define the roles and responsibilities, including training requirements, of the student health center (SHC) staff during disasters that may require emergency medical services, as required by systemwide policy.
- The EOP did not include a section describing the critical training and exercise activities the campus would conduct to support the plan. We found that although the campus performed various types of exercises at CSUSB and PDC, such as evacuation drills and other simulated emergency exercises, the type and frequency of these exercises was not clearly outlined in the EOP. Additionally, the EOP did not define the training requirements for EOC team members, and it was unclear how many Federal Emergency Management Authority (FEMA) courses EOC team members were required to complete. Of the eight EOC team members we reviewed, only four had completed all of the FEMA courses required by the emergency manager and outlined in the CSUSB training matrix.

A current and comprehensive EOP provides assurance that the campus will be able to effectively respond to emergencies, decreases the risk of loss and injury to the campus community, and ensures that roles and responsibilities are clearly outlined.

RECOMMENDATION

We recommend that the campus:

- a. Update the EOP contact list in Appendix 5 to reflect current information.
- b. Update the EOP to address the needs of international students and individuals with limited English proficiency.
- c. Update the EOP to clearly define the role and responsibilities, including training requirements, of SHC staff during emergency situations that may require medical services.
- d. Update the EOP to include a comprehensive section on exercise activities for CSUSB and PDC, as well as a comprehensive section on training requirements for emergency team members, as noted above.
- e. Ensure that all EOC team members complete the required FEMA courses as noted above.
- f. Distribute the updated EOP, including all appendices and annexes, to the campus EOC team and other key emergency personnel.
- g. Distribute the updated EOP to the campus community.

MANAGEMENT RESPONSE

We concur. Management's action plan will be to:

- a. Update the EOP contact list in Appendix 5 to reflect current information.

- b. Update the EOP to address the needs of international students and individuals with limited English proficiency.
- c. Update the EOP to clearly define the role and responsibilities, including training requirements, of SHC staff during emergency situations that may require medical services.
- d. Update the EOP to include a comprehensive section on exercise activities for CSUSB and PDC, as well as a comprehensive section on training requirements for emergency team members, as noted above.
- e. Ensure that all EOC team members complete the required FEMA courses as noted above.
- f. Distribute the updated EOP, including all appendices and annexes, to the campus EOC team and other key emergency personnel.
- g. Distribute the updated EOP to the campus community.

Our anticipated date for full implementation of these recommendations is April 30, 2019.

GENERAL INFORMATION

BACKGROUND

The California State University (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.

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. At CSUSB, the office of emergency management and business continuity planning, a unit of the risk management department, is charged with coordinating the activities needed to

prepare for and respond to campuswide emergencies or disasters. The responsibilities of the office of emergency management and business continuity planning include planning, implementing, and maintaining an emergency management program on campus, including emergency preparedness, planning, training, response, and recovery. The emergency management program is overseen by the emergency manager, who is responsible for coordinating all activities related to preparedness, response, and recovery on campus. The emergency manager is also responsible for maintaining the campus EOP and administering the building and floor marshal program. The emergency manager previously reported to the executive director for risk management; however, due to recent organizational changes, the emergency manager now reports to the chief of police. Both the risk management and university police department report to the vice president for administration and finance.

Further, the campus EOP incorporates the PDC incident management plan, which describes emergency preparedness for that campus. PDC is located in the Coachella Valley and was established in 1986. PDC currently has three buildings and serves approximately 1,400 students enrolled in both undergraduate and graduate degree programs. The emergency manager at CSUSB maintains the PDC incident management plan with assistance from the PDC director of operations and is responsible for emergency preparedness activities at PDC, including the building and floor marshal program and evacuation drills.

SCOPE

We visited the CSUSB campus from April 2, 2018, through May 18, 2018. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. The audit focused on procedures in effect from January 1, 2016, through May 18, 2018.

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*
- DOE, *The Handbook for Campus Safety and Security Reporting 2016 Edition*
- 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
- CSUSB *Emergency Operations Plan*
- CSUSB *Building and Floor Marshal Reference Guide*
- CSUSB *Department of Housing and Residential Education Emergency Action Plan*
- CSUSB *Student Health Center Emergency Action Plan*
- CSUSB *Annual Safety Report*
- CSUSB *Fire Safety Report*
- CSUSB *Campus Closure and Evacuation Procedures*
- CSUSB *Emergency Communication Notification Procedures*

AUDIT TEAM

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