February 3, 2020

Dr. Lynn Mahoney, President
San Francisco State University
1600 Holloway Avenue
San Francisco, CA 94132

Dear Dr. Mahoney:

Subject: Audit Report 19-38, Emergency Management, San Francisco State University

We have completed an audit of Emergency Management as part of our 2019 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
EMERGENCY MANAGEMENT
San Francisco State University

Audit Report 19-38
January 7, 2020
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

Based upon the results of the work performed within the scope of the audit, the operational and administrative controls for emergency management as of October 31, 2019, 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 many of the required components of its emergency management program. The emergency management program at San Francisco State University (SFSU) resides primarily within the Division of Campus Safety. Campus Safety experienced continuous turnover in the years we reviewed and had vacancies in the emergency services coordinator and emergency manager positions; as a result, the emergency management program had been managed by multiple campus safety employees. In part because of the frequent turnover in administration of the program, we found that recordkeeping in several areas of emergency management was inadequate and did not meet all systemwide requirements. In addition, many components of the program needed significant improvement to ensure that the campus’ emergency management functions would operate effectively and efficiently in the event of an emergency.

Specifically, we found that the campus did not conduct all required simulated emergency exercises and evacuation drills and did not always complete after-action reports. Also, the campus did not have policies and procedures for testing the emergency notification system and for documenting the testing. Additionally, the emergency operations plan (EOP) did not contain all required elements and had not been annually reviewed and updated since March 2016; the emergency operations centers (EOC) and off-site locations were not adequately equipped with emergency resources, and the rosters of emergency resources at EOCs had not been reviewed and updated; the new-hire and specialized emergency preparedness training were not completed or documented; and building evacuation plans had not been developed. We also identified opportunities for improvements related to the building emergency response coordinators (BERC) program, communication of roles and responsibilities for emergency management functions, and testing and inspection of emergency generators.

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

1. EMERGENCY EXERCISES AND EVACUATION DRILLS

OBSERVATION

The campus did not conduct all required simulated emergency exercises and evacuation drills, and after-action reports were not always completed in accordance with systemwide policy.

Specifically, systemwide policy requires that tabletop exercises and drills be performed annually, functional exercises be performed every other year, and full-scale exercises be performed at least every five years. Also, at the completion of each exercise or simulated emergency incident, written documentation of the exercise or test results and lessons learned should be documented in the form of the after-action report.

We reviewed the emergency exercise and evacuation drill records from 2017 to 2019, and we found that:

• For two of the three tabletop exercises conducted, after-action reports were not completed. The one completed after-action report had been reviewed by the emergency planning team but not by the entire campus emergency management team.

• Evacuation drills were not conducted at the campus and off-site locations, the Romberg Tiburon Campus (RTC) and Downtown Campus (DTC), at least annually. We noted that evacuation drills were conducted at two RTC buildings in 2019.

• Fire evacuation drills were not always conducted every semester in all residence halls. The annual fire safety report states that a fire drill is conducted in every residence building each semester, during the fall, spring, and summer semesters, on day and evening shifts.

• Functional exercises were not conducted on a biennial basis.

Completing and documenting emergency exercises and drills ensure 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 California State University (CSU) requirements.

RECOMMENDATION

We recommend that the campus:

a. Conduct emergency exercises and evacuation drills at all noted locations according to systemwide policy.

b. Document the results and lessons learned from all emergency exercises and evacuation drills using the after-action reports, and review the results with the campus emergency management team.
MANAGEMENT RESPONSE

We concur.

a. The campus will conduct emergency exercises and evacuation drills at all locations according to systemwide policy.

b. The campus will document the results and lessons learned from all emergency exercises and evacuation drills using the after-action reports and review the results with the campus emergency management team.

Expected completion date: June 9, 2020

2. EMERGENCY NOTIFICATION SYSTEM

OBSERVATION

The campus did not have policies and procedures for testing the emergency notifications system and did not document emergency notifications system testing.

The campus Annual Security Report states that the assistant vice president and chief of police for the division of campus safety (or designee) will conduct an annual review of operating policies and procedures for the emergency notification system and that a campuswide system test will be conducted at least once during the spring and fall semesters. However, we found that the campus did not have such policies and procedures in place, and the documented emergency notification system testing did not occur from 2017 to 2019.

Policies and procedures and periodic testing of the campus emergency notification system provide assurance that everyone in the campus community will be timely notified in the event of an emergency.

RECOMMENDATION

We recommend that the campus develop and document policies and procedures for emergency notification system testing, and perform and document this testing.

MANAGEMENT RESPONSE

We concur. The campus will develop and document policies and procedures for emergency notification system testing and perform and document this testing.

Expected completion date: June 9, 2020
3. EMERGENCY OPERATIONS PLAN

OBSERVATION

The campus EOP and its supplemental materials, annexes, and appendices had not been annually reviewed and updated and did not contain all elements required by systemwide policy.

Specifically, we found that the most current version of the EOP, including the supplemental materials, annexes, and appendices, was dated 2016 and had not been reviewed and updated from 2017 to 2019.

Additionally, we found that the EOP was not comprehensive and did not address all required elements. Key plan elements that were missing included, but were not limited to:

- Provisions for training and assignment of student health center staff in disasters that may require emergency medical services.
- The unique needs of special populations on campus, including international students and individuals with disabilities, or other functional needs.
- Assessment of threats and hazards unique to the campus based on its geological location, including natural hazards, human-caused events, and technology-caused events.
- Reference to a roster of campus resources and contracts for materials and services that may be needed in an emergency situation.
- Roles and responsibilities outside the emergency management team, including those of parents.
- The integration of any campus auxiliary organizations and locations owned or leased by the university.
- Documentation of review, update, and distribution in the form of a signed and dated written acknowledgement.
- Annexes that detail deny-entry, lockdown, and accounting-for-all-persons procedures.
- Protocols for addressing mental health crises.

Further, we found that the campus did not have a collaborative process to allow various campus departments with responsibilities for emergency response procedures to review the EOP and provide feedback regarding potential issues, opportunities for improvement, and comments for consideration.

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 helps to ensure that roles and responsibilities are clearly outlined.
RECOMMENDATION

We recommend that the campus:

a. Update the EOP to include all required elements mentioned above.

b. Distribute and discuss the updated EOP, including supporting materials, with the campus EOC team and other key emergency personnel.

c. Distribute the updated EOP to the campus community.

d. Establish a process for the annual review and update of the EOP that includes collaboration with campus personnel across the various departments with responsibilities for emergency response procedures and those who have specialized knowledge of the needs of special populations on campus.

MANAGEMENT RESPONSE

We concur.

a. The campus will update the EOP to include all required elements mentioned above.

b. The campus will distribute and discuss the updated EOP, including supporting materials, with the campus EOC team and other key emergency personnel.

c. The campus will distribute the updated EOP to the campus community.

d. The campus will establish a process for the annual review and update of the EOP that includes collaboration with campus personnel across the various departments with responsibilities for emergency response procedures and those who have specialized knowledge of the needs of special populations on campus.

Expected completion date: June 9, 2020

4. EMERGENCY OPERATIONS CENTER AND EMERGENCY RESOURCES

OBSERVATION

The campus primary and secondary EOCs were not adequately equipped to ensure that they would be functional in the event of an emergency, and the campus did not always maintain or update the rosters of emergency resources.

We found that:

• Standard operating procedures had not been developed for the operation of the EOCs, including an initial assessment of the EOC’s operability and procedures to relocate the EOC to a secondary location when deemed appropriate, information processing systems,
communication to outside entities, management of resource requests, and use of action plans.

- The primary and secondary EOCs were not equipped with adequate emergency equipment, such as computers, printers, and communication devices (emergency radios, walkie talkies, satellite phones, and emergency hotline phones).

We also reviewed the rosters of emergency resources at the primary and secondary EOCs and satellite locations, and we found that:

- The emergency resources roster at the primary location was not dated to document its most recent review and revisions. As a result, we were unable to verify that the roster had been reviewed and updated at least annually, as required by systemwide policy.

- The emergency resources roster was not maintained at the secondary EOC location.

- The emergency resources rosters at the satellite locations, the RTC and DTC, had not been reviewed and updated at least annually.

- The primary and secondary EOCs and satellite locations did not have adequate emergency supplies, and some supplies had expired.

Additionally, we found that the listing of emergency supply contractors had not been reviewed annually and most contracts had expired and were not renewed, or had been recently renewed.

Maintaining well-equipped EOCs 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 standard operating procedures for EOC operations that include the items noted above.

b. Inventory emergency equipment and supplies at the EOCs and off-site locations, update or develop the rosters of emergency resources, and equip the EOCs and off-site locations with current emergency supplies.

c. Establish a process to annually review and update the rosters of emergency resources, including the listing of emergency supply contractors.

MANAGEMENT RESPONSE

We concur.

a. The campus will develop standard operating procedures for EOC operations that include the items noted above.
b. The campus will inventory emergency equipment and supplies at the EOCs and off-site locations, update or develop the rosters of emergency resources, and equip the EOCs and off-site locations with current emergency supplies.

c. The campus will establish a process to annually review and update the rosters of emergency resources, including the listing of emergency supply contractors.

Expected completion date: June 9, 2020

5. **NEW-HIRE EMERGENCY PREPAREDNESS TRAINING**

**OBSERVATION**

The campus did not ensure that new employees had completed required emergency preparedness training.

We noted that the environmental health and safety (EHS) department provided new-hire emergency preparedness training to campus employees as part of the new-hire orientation, and the campus university police department provided new-hire emergency preparedness training to auxiliary employees as part of the onboarding process. However, we found that the campus had not maintained documentation showing that new hires, including new auxiliary employees, had attended and received training within their first year of employment.

We also found that the campus did not have a process to monitor completion of new-hire emergency preparedness training.

Provision of emergency preparedness training to new employees ensures that employees are aware of emergency and evacuation procedures, increases safety, and allows for an adequate response in the event of an emergency.

**RECOMMENDATION**

We recommend that the campus develop and document processes to provide and monitor emergency preparedness training to all new hires, including new auxiliary employees, within their first year of employment and retain documentation that this training has been completed.

**MANAGEMENT RESPONSE**

We concur. The campus will develop and document processes to provide and monitor emergency preparedness training to all new hires, including new auxiliary employees, within their first year of employment and retain documentation that this training has been completed.

Expected completion date: June 9, 2020
6. SPECIALIZED EMERGENCY PREPAREDNESS TRAINING

OBSERVATION

EOC team members and counseling and psychological staff did not always complete specialized emergency preparedness training.

We reviewed the training records for ten EOC team members from 2017 to 2019, and we found that none had completed six specific Federal Emergency Management Agency (FEMA) training courses, as required by campus policy.

We also found that the campus did not provide specialized emergency preparedness training to counseling and psychological center staff with responsibilities for emergency management.

Completing and documenting specialized emergency preparedness training ensures that emergency team members and counseling and psychological staff will be properly prepared to respond to emergency situations.

RECOMMENDATION

We recommend that the campus:

a. Develop a process to ensure that EOC team members complete required training, and retain documentation of this training.

b. Provide specialized emergency preparedness training to counseling and psychological staff with responsibilities for emergency management.

MANAGEMENT RESPONSE

We concur.

a. The campus will develop a process to ensure that EOC team members complete required training, and retain documentation of this training.

b. The campus will provide specialized emergency preparedness training to counseling and psychological staff with responsibilities for emergency management.

Expected completion date: June 9, 2020

7. BUILDING EVACUATION PLAN AND BUILDING EMERGENCY RESPONSE COORDINATORS PROGRAM

OBSERVATION

The campus did not have building evacuation plans, and the BERC program needed improvement.
We found that:

- The campus did not have building evacuation plans that included procedures for reporting emergencies, accounting for all employees, performing rescue/medical duties, making accommodations for people with disabilities, and listing contact information for employees who may have questions regarding the plan.

- The campus did not consistently retain documentation to verify that all BERCs received required training. Specifically, the campus did not maintain training records for EOC overview and communication, fire extinguisher, evacuation chair, and first aid/CPR/AED training.

- The BERC Guide Book was in draft form and had not been updated since 2016.

Maintaining building evacuation plans and an effective building coordinator program allows for a quicker and more efficient initial response to an incident and helps to ensure the safety of employees, students, and visitors in the event of an emergency.

RECOMMENDATION

We recommend that the campus:

a. Develop building evacuation plans for the campus and satellite locations that include the items noted above and provide training to BERC on the new building evacuation procedures.

b. Develop a process to monitor BERC training, and maintain training records.

c. Review and finalize the BERC Guide Book and provide it to the BERC.

MANAGEMENT RESPONSE

We concur.

a. The campus will develop building evacuation plans for the campus and satellite locations and provide training to BERC on the new building evacuation procedures.

b. The campus will develop a process to monitor BERC training and maintain training records.

c. The campus will review and finalize the BERC Guide Book and provide it to the BERC.

Expected completion date: June 9, 2020
8. ROLES AND RESPONSIBILITIES

OBSERVATION

Communication regarding roles and responsibilities for emergency management functions needed improvement.

Specifically, we found that:

- The campus had not designated secondary and tertiary individuals with responsibility for campuswide emergency management, as required by systemwide policy.
- The emergency executive was not clearly identified.

Clearly defined and communicated roles and responsibilities help ensure that emergency management duties are understood and performed in compliance with campus and systemwide requirements.

RECOMMENDATION

We recommend that the campus designate secondary and tertiary individuals with responsibility for campuswide emergency management and clearly identify the emergency executive.

MANAGEMENT RESPONSE

We concur. The campus will designate secondary and tertiary individuals with responsibility for campuswide emergency management and clearly identify the emergency executive.

Expected completion date: June 9, 2020

9. EMERGENCY GENERATORS

OBSERVATION

The facilities department did not always timely test and inspect emergency generators.

We noted that the testing and inspections of emergency generators were not included in the facilities work order system and were manually tracked using the monthly maintenance logs. However, these logs included only the locations of the generators, not asset IDs and model or serial numbers, which made it difficult to locate the equipment without the generator listing.

We reviewed eight generators, and we found that:

- For three housing generators, there were gaps in the monthly maintenance logs. The longest gap between maintenance checks was approximately six months.
- Two housing generators were not inspected in 2019.
The generator at one campus building was not included in the monthly inspection log until April 2019, and therefore, we could not verify that the generator was tested and inspected prior to April 2019.

The generator at the RTC was not included in the listing of generators.

Performing timely testing and 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:

a. Develop a process to ensure that monthly generator testing and inspections are timely conducted and consider including the testing and inspection of emergency generators in the facilities work order system so that the facilities department is automatically notified of the need for tests and inspections, or update the monthly maintenance logs to include asset IDs and model or serial numbers.

b. Review and update the listing of generators.

**MANAGEMENT RESPONSE**

We concur.

a. The campus will develop a process to ensure that monthly generator testing and inspections are timely conducted and consider including the testing and inspection of emergency generators in the facilities work order system so that the facilities department is automatically notified of the need for tests and inspections, or update the monthly maintenance logs to include asset IDs and model or serial numbers.

b. The campus will review and update the listing of generators.

Expected completion date: June 9, 2020

**10. MUTUAL AID AGREEMENTS**

**OBSERVATION**

Mutual-aid agreements with external stakeholders were not current.

We found that that all of the campus’ mutual-aid agreements had expired and that campus personnel were not always aware of the existence of mutual aid agreements. Specifically, the following agreements expired and had not been renewed:

- The agreement with the Daly City Police Department on San Mateo County Mutual Aid expired on March 8, 2010.
• The agreement with the Marin County Sheriff’s Department and Marin County Coroner’s Office expired on January 29, 2009.

• The agreement with the University of California, San Francisco and San Francisco Sheriff’s Office expired on June 30, 2015.

• The agreement with the City and County San Francisco Department of Technology expired in 2014.

Current mutual-aid agreements document the resources, services, and support external entities will provide during an incident and help ensure that such support is available in the event of an emergency.

RECOMMENDATION

We recommend that the campus:

a. Renew the expired mutual-aid agreements.
b. Establish a process to periodically review and renew mutual-aid agreements.

MANAGEMENT RESPONSE

We concur.

a. The campus will renew the expired mutual-aid agreements.
b. The campus will establish a process to periodically review and renew mutual-aid agreements.

Expected completion date: June 9, 2020

11. ROSTER OF EMERGENCY MANAGEMENT TEAM PERSONNEL

OBSERVATION

The campus did not have a current roster of emergency management team personnel, and the roster was not annually provided to the Office of the Chancellor (CO), as required by systemwide policy.

A current roster of the emergency management team allows for timely and effective communication during an emergency.

RECOMMENDATION

We recommend that the campus annually maintain and submit the roster of emergency management team personnel to the CO.
MANAGEMENT RESPONSE

We concur. The campus will annually maintain and submit the roster of emergency management team personnel to the CO.

Expected completion date: June 9, 2020
GENERAL INFORMATION

BACKGROUND

The CSU consists of 23 campuses, with approximately 41,000 students and more than 52,000 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, guides campuses on developing and maintaining an emergency management program on each campus. At the systemwide level, the Systemwide Risk Management (SRM) 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 2018, the SRM issued coded memorandum Risk Management 2018-1, Emergency Management, to replace out-of-date sections in EO 1056 and further define the responsibilities and needs of an effective campus management program and two technical
memoranda to provide additional guidance to campuses for building coordinator programs and emergency plans.

At SFSU, the division of Campus Safety under Student Affairs is charged with coordinating the activities needed to prepare for and respond to campuswide emergencies or disasters. The responsibilities at Campus Safety include planning, implementing, and maintaining an emergency management program on campus, including emergency preparedness, training, response, and recovery. The campus safety police lieutenant is the EOC director and is designated as the primary person responsible for campuswide emergency management. He is also the management section chief for the EOC and is responsible for coordination of all functions of campus emergency operations, which includes implementation of training, developing and maintaining relationships with local, state, and federal public agency partners, and implementation of the emergency preparedness program.

**SCOPE**

We visited the SFSU campus from September 23, 2019, through October 31, 2019. 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, 2017, through October 31, 2019.

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.
- Mutual-aid agreements outlining coordination with other agencies.
- 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:

- 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
- NFPA 1600, Standard on Disaster/Emergency Management and Business Continuity/Continuity of Operations Programs
- Government Code §8607
- Government Code §13402 and §13403
- EO 943, University Health Services
- EO 1056, California State University Emergency Management Program
- Coded memorandum Human Resources 2004-10, Mutual Aid
- Coded memorandum Risk Management 2018-01, Emergency Management
- Technical memorandum Risk Management, CSU Campus Emergency Plan Topics
- Technical memorandum Risk Management, CSU Building Coordinator Program
- SFSU Annual Security Reports
- SFSU BERC Guidebook
- SFSU Emergency Operations Center Staff Training Plan
- SFSU Emergency Operations Plan
- SFSU Fire Safety Reports

AUDIT TEAM

Audit Manager: Caroline Lee
Internal Auditor: Cinthia Santamaria