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November 6, 2017

RADM Thomas A. Cropper, President
California State University Maritime Academy
200 Maritime Academy Drive
Vallejo, CA 94590

Dear Admiral Cropper:

Subject: Audit Report 17-29, Police Services, California State University Maritime Academy

We have completed an audit of *Police Services* 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

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POLICE SERVICES

California State University Maritime Academy

Audit Report 17-29
October 6, 2017

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational, administrative, and financial controls for police services and to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, collective bargaining agreements, campus procedures, and where appropriate, 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, administrative, and financial controls for police services as of August 11, 2017, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

In general, we found that California State University Maritime Academy (Cal Maritime) had an appropriate framework for the University Police Department (UPD). However, we identified opportunities for improvement regarding training compliance and clarification of UPD's annual training program, to include elements of California State University (CSU)-mandated training. In addition, records for inventory of weapons/equipment and ammunition needed improvement, and UPD policies for firearms, records management, and property and evidence needed updating. Further, unannounced inspections/audits of property and evidence were not documented.

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

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. TRAINING

OBSERVATION

Some UPD officers did not obtain all training required by the California Commission on Peace Officer Standards and Training (POST), and the UPD’s annual training program was unclear regarding CSU-mandated training topics.

We reviewed the POST compliance analysis report for professional training for calendar years (CY) 2015 and 2016. We found that during this two-year training cycle, some officers did not obtain all perishable skills training, which must be continuously renewed through practice and training.

Specifically:

- One officer missed the communication course.
- One officer missed the firearms course.
- One officer missed the management course.

According to EO 1046, *Police and Public Safety Policy Guidelines*, UPD’s annual training program must cover, at a minimum, the topics of use of force, weapons qualifications, active incidents/active shooters/rapid deployment response, and access to sensitive data. We noted that UPD obtains training on these subjects through POST and other training; however, UPD’s annual training program does not explicitly incorporate these training topics.

Adequate monitoring of required officer training and clarification of elements of the annual training program help to ensure compliance with requirements of the California Commission on POST and EO 1046.

RECOMMENDATION

We recommend that the campus:

- a. Strengthen procedures for monitoring and documenting required training to ensure compliance with POST and UPD’s annual training program.
- b. Update UPD’s annual training program to incorporate the CSU-mandated training topics required by EO 1046, *Police and Public Safety Policy Guidelines*.

MANAGEMENT RESPONSE

We concur. The campus will update the annual training program to include CSU-mandated training topics required by EO 1046. The campus will review and strengthen our procedures for monitoring and documenting POST compliance and annual required training.

Expected completion date: January 2018

2. UPD INVENTORY

OBSERVATION

Campus records for inventory of UPD weapons/equipment and ammunition needed improvement, and UPD Policy 312, *Firearms*, did not include guidance related to the management and reconciliation of ammunition inventory.

We found that:

- UPD's record of inventory for 9-millimeter rounds of ammunition used for training purposes did not match our physical count.
- UPD's 2017 Taser inventory list provided during audit fieldwork did not include a Taser assigned to one officer or the serial number of a Taser assigned to another officer. Further, the inventory list did not include the date of Taser assignment or the signature of management to indicate periodic review and reconciliation.

In addition, we found that the UPD policy on firearms did not include guidance on the tracking of ammunition or procedures for inventory management and reconciliation.

Accurate and complete records of inventory, oversight and reconciliation, and established written procedures help to strengthen the control environment for sensitive items such as weapons and ammunition.

RECOMMENDATION

We recommend that the campus:

- a. Ensure that inventory records for UPD ammunition and Tasers are complete and accurate.
- b. Update UPD policies to incorporate guidance on the tracking of ammunition, including procedures for the management and reconciliation of inventory.

MANAGEMENT RESPONSE

We concur. The campus will update UPD policies to incorporate procedures for tracking ammunition and reconciliation of inventory for ammunition and Taser equipment to ensure accurate and complete inventory records.

Expected completion date: January 2018

3. RECORDS MANAGEMENT

OBSERVATION

The campus had not formally documented its procedures related to UPD records management.

According to UPD Policy 802, *Records Section*, and Policy 806, *Records Maintenance and Release*, the custodian of records must, among other key requirements, establish a records procedure manual and implement procedural rules regarding the inspection and copying of public records. We noted that UPD had adequate processes in place related to records management; however, these processes and standard operating procedures had not been formally documented, as required by UPD policy.

Documented processes and procedures help to strengthen the control environment for records management and promote compliance with UPD policies.

RECOMMENDATION

We recommend that the campus document procedures related to UPD records management, as required by UPD Policy 802, *Records Section*, and Policy 806, *Records Maintenance and Release*.

MANAGEMENT RESPONSE

We concur. The campus will document procedures related to records management as required by UPD Policy 802 and 806.

Expected completion date: February 2018

4. PROPERTY AND EVIDENCE

OBSERVATION

UPD's current process for managing records of property and evidence needed updating and improvement, and unannounced inspections/audits of property and evidence were not documented.

During our review of the property and evidence room, we noted that UPD had multiple manual recordkeeping processes for the collection, storage, and disposition of property and evidence. Specifically, documentation was not recorded and stored consistently, making it cumbersome to navigate. In addition, it was difficult to quickly assess the history for any given piece of property or evidence.

Also, although the UPD conducted annual unannounced inspections/audits of the property and evidence storage areas as required, records of these activities were not formally documented or retained.

Streamlined processes and effective management and oversight of property and evidence improve efficiency and reduce the risk of campus liability from lost, missing, or misplaced property and evidence.

RECOMMENDATION

We recommend that the campus:

- a. Establish and implement standard operating procedures to streamline current UPD property and evidence processes.
- b. Document unannounced inspections/audits of UPD property and evidence as required by UPD Policy 800, *Property and Evidence*.

MANAGEMENT RESPONSE

We concur. The campus will establish and implement standard operating procedures to streamline current UPD property and evidence processes. The campus will also document unannounced inspections/audits of property and evidence as required by UPD Policy 800.

Expected completion date: February 2018

GENERAL INFORMATION

BACKGROUND

The statutory authority for CSU police departments and police officers is contained in the California Education and Penal codes. Campus law enforcement officers have the primary law enforcement authority on campus and share the one-mile radius around the campus as concurrent jurisdiction with local law enforcement. Jurisdiction for each campus is further defined by written agreements, required by the Kristen Smart Campus Safety Act of 1998, with local law enforcement agencies.

Each campus has a UPD that provides a full range of law enforcement and policing services. UPD is responsible for providing a safe and secure environment where students can achieve their educational objectives, staff and faculty can work efficiently and effectively to accomplish the university's mission, and visitors can enjoy the campus environment. Campus police departments emphasize a community policing approach to law enforcement services, which includes the development of crime prevention programs and training and outreach efforts.

In addition to federal and state regulations, the CSU adheres to the California Commission on POST for the employment and training of police officers. Some CSU campuses have also earned accreditation from the Commission on Accreditation for Law Enforcement Agencies or the International Association of Campus Law Enforcement Agencies. CSU systemwide policies and procedures are primarily incorporated in EO 1046, *Police and Public Safety Guidelines*, and EO 787, *Public Safety Policy Manual*, as well as the State University Police Association (SUPA) collective bargaining agreement.

At Cal Maritime, the chief of police and director of public safety reports to the vice president of administration and finance and campus chief financial officer. Cal Maritime UPD currently consists of nine sworn police officers, including the chief and a lieutenant; six port security guards; and two administrative support staff members. The full service department provides 24-hour protection to the waterfront campus community of more than 1,100 corps of cadets, faculty, and staff; the surrounding areas and marina; a historic boathouse; and a number of vessels, including the 500-foot training ship Golden Bear III.

SCOPE

We visited the Cal Maritime campus from July 11, 2017, through August 11, 2017. Our audit and evaluation included the audit tests we considered necessary in determining whether operational, administrative, and financial controls are in place and operative. The audit focused on procedures in effect from July 1, 2015, through August 11, 2017.

Specifically, we reviewed and tested:

- Police services administration and organization, including clear lines of organizational authority and responsibility, defined mission and goals, and current and comprehensive policies and procedures.

- Access to the police services office and automated systems to determine that it is adequately controlled and limited to authorized persons, and that physical security over system hardware is adequate.
- Security and retention of departmental records.
- Administration of services to the public to determine whether they ensure participant safety and minimize campus liability.
- Compliance with CSU policy and state regulations with regard to relationships with outside agencies.
- Compliance with POST standards, state regulations, and CSU policy in the training of police services employees.
- Processes to ensure that costs are appropriately and timely recovered for services provided to campus self-support funds, auxiliary organizations, and external third parties.
- Proper handling of, accounting for, and safeguarding of weapons, equipment, and ammunition.
- Adequate safeguarding and accounting for property and evidence.

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 police services program. Our review was limited to gaining reasonable assurance that essential elements of the campus police services 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 787, *Public Safety Policy Manual*
- EO 1000, *Delegation of Fiscal Authority and Responsibility*
- EO 1031, *Records Retention*
- EO 1046, *Police and Public Safety Guidelines*
- ICSUAM §3552.01, *Cost Allocation/Reimbursement Plans for the CSU Operating Fund*
- ICSUAM §8000, *Information Security*

- SUPA Collective Bargaining Agreement
- POST Administrative Manual
- Education Code §67381, *Kristen Smart Campus Safety Act of 1998*
- Penal Code §13500 to §13553, *Commission on Peace Officer Standards and Training*
- California Department of Justice, *California Law Enforcement Telecommunications System Policies, Practices, and Procedures*
- Government Code §15150 to §15167, *California Law Enforcement Telecommunications System*
- Government Code §13402 and §13403
- Cal Maritime *Police Department Policy Manual (“General Orders”)*

AUDIT TEAM

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