

Office of Audit and Advisory Services  
401 Golden Shore, 4th Floor  
Long Beach, CA 90802-4210

562-951-4430  
562-951-4955 (Fax)  
lmandel@calstate.edu

November 8, 2017

Dr. Eduardo M. Ochoa, President  
California State University, Monterey Bay  
100 Campus Center, Administration Building  
Seaside, CA 93955-8001

Dear Dr. Ochoa:

**Subject: Audit Report 17-42, Police Services, California State University, Monterey Bay**

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

**CSU Campuses**

Bakersfield • Channel Islands • Chico • Dominguez Hills • East Bay • Fresno • Fullerton • Humboldt • Long Beach • Los Angeles • Maritime Academy • Monterey Bay  
Northridge • Pomona • Sacramento • San Bernardino • San Diego • San Francisco • San José • San Luis Obispo • San Marcos • Sonoma • Stanislaus



## **POLICE SERVICES**

**California State University,  
Monterey Bay**

Audit Report 17-42  
September 25, 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 evaluate adherence to 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 4, 2017, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

In general, we noted that California State University, Monterey Bay (CSUMB) had an appropriate framework for the university police department (UPD). However, we noted that training records were not always kept, and training was not always completed or timely completed. Also, campus cost allocation plans were not prepared and approved on an annual basis by the campus chief financial officer (CFO). Additionally, we noted that information technology (IT) procurement contracts did not include required IT provisions. Furthermore, an annual unannounced inspection of the property and evidence storage room was not always conducted and documented.

Specific observations, recommendations, and management responses are detailed in the remainder of this report. Information security-related observations, recommendations, and management responses are detailed in Appendix A.

## OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

### 1. TRAINING PROGRAM

#### OBSERVATION

Training records were not always kept and training was not always completed or timely completed, as required by systemwide policy.

We reviewed 15 training records from January 2015 to July 2017 for ten sworn officers and five community service officers (CSO) and found that training records were not maintained for one of the required trainings. We also found that not all sworn officers and CSOs completed or timely completed required training provided through Skillport, a web-based learning management system that provides access to training resources.

An effective training program ensures that all sworn officers and CSOs are fully qualified to respond to incidents.

#### RECOMMENDATION

We recommend that the campus evaluate and update the current process of providing and tracking training to ensure that:

- a. Training records are properly maintained.
- b. All sworn officers and CSOs timely complete required training provided through Skillport.

#### MANAGEMENT RESPONSE

We concur. Training through Skillport has been reassigned and will be completed by all current employees as appropriate to their assignment by November 1, 2017. Department training will be consolidated into a newly authorized professional standards sergeant position. Updated Skillport training records will be made available immediately after the finalization of the audit report.

### 2. COST ALLOCATION PLAN

#### OBSERVATION

Campus cost allocation plans were not prepared and approved on an annual basis by the campus CFO.

We found that the annual cost allocation plan to document the practices and methodologies used in determining the basis for recovery of UPD costs was not prepared and approved by the campus CFO for fiscal years 2015/16 and 2016/17.

Properly approved and documented cost allocation plans help to ensure that the campus operating fund will be fully compensated for support provided to auxiliary organizations and other enterprises.

**RECOMMENDATION**

We recommend that the campus develop a process to ensure that cost allocation plans are prepared and approved by the campus CFO on an annual basis.

**MANAGEMENT RESPONSE**

We concur. The campus will develop a process to ensure that cost allocation plans are prepared and approved by the campus CFO on an annual basis. The process will be developed by February 28, 2018.

**3. PROCUREMENT CONTRACTS**

**OBSERVATION**

The campus procurement process did not ensure that all contracts for information technology products and services were reviewed by the IT department.

Accordingly, we noted that the services contract for a UPD system did not include the California State University (CSU) *General Provisions for Information Technology Acquisitions (ITA)* or the CSU *Information Security Requirements, Supplemental Provisions*.

Adherence to CSU procurement practices requires that IT systems or services include adequate consideration of security and controls to protect campus information from unauthorized disclosure.

**RECOMMENDATION**

We recommend that the campus ensure that all contracts for IT systems and services be reviewed by the IT department and that the CSU *General Provisions for ITA* and *Information Security Requirements, Supplemental Provisions* be included where appropriate.

**MANAGEMENT RESPONSE**

We concur. The campus will ensure that all contracts for information technology resources (ITR) systems and services are reviewed by the IT department within the scope of ICSUAM and the ITR *Procurement Policy*. CSUMB procurement will issue an instructive memo and prominently post guidelines and instructions regarding the requirement to include CSU *General Provisions for Information Technology Acquisitions*, as well as the CSU *Information Security Requirements, Supplemental Provisions* whenever appropriate. Corrective actions will be completed no later than January 15, 2018.

#### 4. PROPERTY AND EVIDENCE

##### **OBSERVATION**

The campus did not always conduct and document annual unannounced inspections of the property and evidence storage room.

We found that the campus did not conduct an unannounced inspection of the property and evidence storage room in 2015 and did not document the 2014 inspection.

Annual unannounced inspections ensure that property and evidence are adequately safeguarded and accounted for.

##### **RECOMMENDATION**

We recommend that the campus conduct and document annual unannounced inspections of the property and evidence storage room.

##### **MANAGEMENT RESPONSE**

We concur. Documenting annual evidence room inspections started in September 2016, and the September 2017 inspection has been completed and documented. This annual process will continue in the future. Inspection records for 2016 and 2017 will be made available immediately after the finalization of the audit report.

#### 5. WEAPONS QUALIFICATIONS

##### **OBSERVATION**

The campus UPD weapons qualifications policy needed updating.

We found that the UPD weapons qualifications policy required biannual qualifications instead of annual qualifications, as required by Executive Order (EO) 1046. However, the campus practice was to perform the weapons qualifications annually.

Aligning policies and procedures with current practices helps to ensure that inconsistencies and misunderstandings are minimized.

##### **RECOMMENDATION**

We recommend that the campus update its weapons qualifications policy to require annual qualifications.

##### **MANAGEMENT RESPONSE**

We concur. The weapons qualification policy has been updated to accurately reflect EO 1046, with annual qualification required for all officers. The updated copy of CSUMB PD Policy #306, *Firearms*, will be made available immediately after the finalization of the audit report.

## 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 Peace Officer Standards and Training (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 CSUMB, the chief of university police and director of public safety reports to the vice president of administration and finance. UPD currently employs 13 sworn police officers, 19 CSOs, and an active support staff to provide 24-hour protection to the campus community. UPD is responsible for the 1,350-acre Monterey Bay campus, with 7,600 students, 510 faculty and staff, and the surrounding area. CSOs are responsible for providing services such as library security, night escorts, clerical support, parking control, department vehicle maintenance, and a variety of specialized duties as assigned.

### SCOPE

We visited the CSUMB campus from July 11, 2017, through August 4, 2017. Our audit and evaluation included the audit tests we considered necessary in determining whether administrative, financial, and operational controls are in place and operative. The audit focused on procedures in effect from July 1, 2015, through August 4, 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, that data backup procedures are in place, 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*
- Integrated California State University Administrative Manual (ICSUAM) §3552.01, *Cost Allocation/Reimbursement Plans for the CSU Operating Fund*

- ICSUAM §5500.00, *Information Technology Resources Procurement Policy*
- 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
- CSU *General Provisions for ITA*
- CSU *Information Security Requirement Supplemental Provisions to CSU General Provisions for ITA*
- CSUMB *Police Department General Order Policies*

## AUDIT TEAM

Senior Directors: Michael Caldera and Michelle Schlack  
Audit Manager: Caroline Lee  
IT Audit Manager: Greg Dove  
Internal Auditor: Christina Fennell

## **APPENDIX A – INFORMATION SECURITY**

Information security-related observations are not publically posted as they may contain information exempt from disclosure under the California Public Records Act (PRA), California Government Code §6254.19. To make a PRA request, please contact [itaudits@calstate.edu](mailto:itaudits@calstate.edu).