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July 26, 2018

Dr. William A. Covino, President
California State University, Los Angeles
5151 State University Drive
Los Angeles, CA 90032

Dear Dr. Covino:

Subject: Audit Report 18-21, Police Services, California State University, Los Angeles

We have completed an audit of *Police Services* 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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POLICE SERVICES

**California State University,
Los Angeles**

Audit Report 18-21
June 14, 2018

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational, administrative, and financial controls over the administration of police services and to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, collective bargaining agreements, and campus procedures.

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 May 4, 2018, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

Although the campus is actively improving internal controls around the University Police Department (UPD), our review indicated that improvement is needed in some key areas. UPD policies and procedures for officer training and weapons qualifications testing had not been updated since 2012 and did not fully address required elements of the annual training program. In addition, the UPD policy on weapons qualifications testing did not align with the department's practices. We also found that some officers did not receive all training required by the chancellor's office and the California Commission on Peace Officer Standards and Training (POST), and a record of weapons qualifications testing was not always maintained. We further noted that UPD did not always complete investigations arising from citizen complaints in accordance with established timelines or document extensions approved by the chief of University Police and did not always maintain a record of the notification made to parties involved at the conclusion of an investigation.

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

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. TRAINING

OBSERVATION

The UPD annual training program was unclear regarding California State University (CSU)-mandated training topics; practices related to weapons qualifications testing did not align with department policy; and administration of officer training and maintenance of records of weapons qualifications testing needed improvement.

We found that the UPD's policies and procedures for police training and weapons qualifications testing had not been updated since 2012 and did not adequately address elements of the annual training program mandated by Executive Order (EO) 1046, *Police and Public Safety Policy Guidelines*, including use of force, active incidents/active shooters/rapid deployment response, and access to sensitive data. We also found that although UPD policy states that officers must demonstrate proficiency with department-issued weapons at least once annually, in practice, officers were required to qualify to use handguns twice annually.

In addition, we reviewed UPD training logs and weapons qualifications test records for ten randomly selected officers to verify compliance with POST and systemwide requirements, and we found that:

- None of the officers received the annually required sensitive data training in 2017.
- Nine officers did not receive eight hours of first aid/cardioresuscitation (CPR)/automated external defibrillator (AED) training, which is required every two years.
- Three officers did not complete all required weapons qualifications testing for department issued weapons during 2016 and 2017, including for handguns and rifles.
- The campus did not maintain records for two officers approved to use their personal weapons on duty to show that the officers obtained qualification tests for these weapons.

We noted that the UPD's current process of monitoring certain training using manual worksheets and an automated records management system will be improved with the upcoming implementation of a training management system, which will serve as the record-keeper for all in-service and POST-required training.

Clarification of the annual training program and adequate monitoring of required officer training help to ensure compliance with the requirements of POST and EO 1046.

RECOMMENDATION

We recommend that the campus:

- a. Update the annual UPD training program, to incorporate the CSU-mandated training topics required by EO 1046, *Police and Public Safety Policy Guidelines*.

- b. Review UPD policy and practices, determine the appropriate frequency of weapons qualifications testing, and update the policy accordingly.
- c. Ensure that officers receive all required training, and maintain records of completed training.

MANAGEMENT RESPONSE

We concur. The campus will:

- a. Update the annual UPD training program to incorporate the CSU-mandated training topics required by EO 1046, *Police and Public Safety Policy Guidelines*.
- b. Review UPD policy and practices, determine the appropriate frequency of weapons qualifications testing, and update the policy accordingly.
- c. Ensure that officers receive all required training, and maintain records of completed training.

Implementation date is August 31, 2018.

2. CITIZEN COMPLAINTS

OBSERVATION

Administration of citizen complaints needed improvement.

We reviewed five citizen complaints made against the UPD to verify that they were processed in compliance with state regulations, collective bargaining agreements, and CSU policies. We found that:

- None of the complaints were processed within 30 days from the date they were initiated, taking from 62 to 190 days to complete. In addition, there was no documentation on file to indicate that extensions were granted by the chief of University Police, as required by campus policy.
- For three of the citizen complaints, there was no written record indicating that the parties involved, including the complainant and accused officer, were notified of the disposition at the conclusion of the investigation.

Effective administration of citizen complaints helps to create a relationship of trust and confidence between members of the department and the community, which is essential to effective law enforcement.

RECOMMENDATION

We recommend that the campus:

- a. Process all citizen complaints within 30 days, and formally document the reasons for any delay, when applicable.
- b. Ensure that the parties involved in citizen complaints are notified of the disposition at the conclusion of the investigation, and maintain a record of the communication.

MANAGEMENT RESPONSE

We concur. The campus will:

- a. Process all citizen complaints within 30 days and formally document the reasons for any delay, when applicable.
- b. Ensure that the parties involved in citizen complaints are notified of the disposition at the conclusion of the investigation, and maintain a record of the communication.

Implementation date is July 31, 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 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.

The department of Public Safety at California State University, Los Angeles (Cal State LA) has several components, including UPD, investigations/crime prevention, parking services, key control, transportation services, fire-life services, lock shop, emergency preparedness, and security of records. All sections of the department work toward the same goals to ensure that the campus is a safe place to study, teach, work, reside, and visit. The department uses a proactive approach that includes crime prevention and safety programs available on a continuing basis. The chief of university police and director of public safety reports to the vice president of administration and finance. The police department employs 34 full-time personnel, including sworn and non-sworn staff, three part-time staff, and 28 student assistant positions.

SCOPE

We visited the Cal State LA campus from April 2, 2018, through May 4, 2018. 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 January 1, 2016, through May 4, 2018.

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*
- 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 State LA Department of Public Safety, *Department Manual (“Department Orders”)*

AUDIT TEAM

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Senior Auditor: Rick Pyles