

**DISASTER AND CONTINGENCY PLANNING**

**SYSTEMWIDE**

**Report Number 03-35**

**June 29, 2004**

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## **ABBREVIATIONS**

AA	Academic Affairs
BCP	Business Continuity Planning
CEM	Certified Emergency Manager
CSU	California State University
DCP	Disaster and Contingency Planning
DRII	Disaster Recovery Institute International
DSO	Designated School Official
DSWVP	Disaster Service Worker Volunteer Program
EO	Executive Order
EOC	Emergency Operations Center
GC	Government Code
HR	Human Resources, Office of the Chancellor
IAEM	International Association of Emergency Managers
IT	Information Technology
MBCP	Master Business Continuity Professional
MPP	Management Personnel Plan
OES	Governor's Office of Emergency Services, State of California
PASS	Patriot Act SEVIS Solution.
PDSO	Principal Designated School Official
PeopleSoft	Common Management System
SEMS	Standardized Emergency Management System
SEVIS	Student and Exchange Visitor Information System
SWEPT	Systemwide Emergency Preparedness Taskforce
UFP	Committee on University and Faculty Personnel, Board of Trustees

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## **EXECUTIVE SUMMARY**

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2002, the Board of Trustees, at its January 2003 meeting, directed that *Disaster and Contingency Planning* (DCP) be reviewed. DCP was partially audited in 1997 in a sequence of audits on Seismic Safety and Disaster Readiness.

We visited nine campuses from April 1, 2003, through December 18, 2003, and audited the procedures in effect at that time. Campus specific findings and recommendations have been discussed and reported individually.

In our opinion, there were varying degrees of disaster and contingency planning across the California State University (CSU) campuses visited. Measuring the outcomes and effectiveness of emergency preparedness is premature in the absence of an actual catastrophic event when plans can be activated under real circumstances. Although there had been no recent, widespread activations that would have necessitated multiple campuses operating out of emergency operation centers for extended periods of time, significant efforts had been placed on mitigation and simulation of response capabilities. With respect to the recovery and restoration of operations following a disaster, a particular focus was noted on the implementation of automated records and information systems. More specifically, the implementation of the Common Management System (PeopleSoft) with eventual standardization and central warehousing of data was influencing campus plans. However, other elements of business continuity planning lagged behind what had been accomplished in information technology.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **GENERAL ENVIRONMENT [7]**

There was a strong, disproportionate police emphasis on business continuity planning (BCP) in the CSU, low organizational visibility, and a lack of BCP planners with professional certification. Police departments on 19 of 23 campuses were responsible for emergency services and, by default, BCP. The systemwide coordinator for public safety reported to the vice chancellor, human resources, while BCP on a systemwide basis was the responsibility of the director of risk management, who reported to the assistant vice chancellor, financial services. The highest level campus person directly involved in disaster and contingency planning at the nine campuses visited was an associate vice president at one campus, while five of the nine planners had no direct reporting relationship to executives, officers, or cabinet level positions. Additionally, none of the BCP planners at the campuses visited had received professional certification, and personnel in the chancellor's office directly involved in risk management were not certified for emergency management or business continuity planning.

## **EMERGENCY READINESS [8]**

Certain issues were noted with emergency readiness that required improvement. Although operable emergency management plans that covered the basic requirements for emergency response and incident management were in place at all nine campuses visited, eight of these campus plans needed to be improved through the addition of certain items or better updating and approval documentation. Standby/mutual aid agreements were frequently not in place or formalized in writing, while a delegation of authority from the Governor's Office of Emergency Services to register disaster service workers had not been requested and/or an inventory of volunteer skills had not been performed at five of the campuses. The availability of trained responders required improvement at six of the campuses, and an adequately staffed or trained cadre of building coordinators was not in place at five of the campuses. Instances were noted where the roster of designees in key responder positions was incomplete, key responders and their designated alternates were either frequently away from the campus at the same time or no specific alternate arrangements were in place during absence, and training and/or training recordkeeping was insufficient. In addition, emergency management plans were either not extensively tested or test results were not adequately documented at five of the campuses. Further, controls over the monitoring of international (non-immigrant) students needed strengthening, particularly as to segregation of duties between the admission/evaluation process and the issuance of the immigration paperwork and documentation of procedures at seven of the campuses.

## **FACILITY ISSUES [19]**

Although generators were the main source of emergency power, they were not installed in all key locations or adequately tested at five of the nine campuses visited. Emergency generators were not available in certain key locations, including one health center at four campuses, while one other campus had some older generators and weak test protocols.

## **BUSINESS CONTINUITY [21]**

A process incorporating industry comparable plans and evaluation methodologies was not in place to measure the effectiveness of BCP by the campuses. None of the campuses visited had adequate arrangements for business continuity. Critical processes were not well defined and related plans were incomplete, except for recovery of information technology.

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## INTRODUCTION

### **BACKGROUND**

Government Code (GC) §8680.3 defines **disaster** to mean:

A fire, flood, storm, tidal wave, earthquake, terrorism, epidemic, or other similar public calamity that the governor determines presents a threat to public safety.

In California Code of Regulations, Title 19, §2402, Standardized Emergency Management System (SEMS) Regulations, **emergency** is defined to mean:

A condition of disaster or of extreme peril to the safety of persons and property caused by such conditions as air pollution, fire, flood, hazardous material incident, storm, epidemic, riot, drought, sudden and severe energy shortage, plant or animal infestations or disease, the governor's warning of an earthquake or volcanic prediction, or an earthquake or other conditions, other than conditions resulting from a labor controversy.

Mohammad Qayoumi, vice president for administration and finance and chief financial officer at California State University, Northridge, recently authored a book entitled, *Mission Continuity Planning*, published by the National Association of College and University Business Officers. This publication defines two types of disasters: 1) those that happen suddenly and without notice (e.g., earthquakes), and 2) phased disasters where there can be early warning of eminent danger (e.g., winter storms).

There have recently been a number of federal initiatives affecting colleges and universities, including controls over international students and registration requirements surrounding select agents and toxins. The federal Department of Homeland Security has implemented a new system called Student and Exchange Visitor Information System (SEVIS) to record and monitor information about international students. Other federal agencies, including Health and Human Services and the Center for Disease Control, have also issued regulations.

Two sources of industry guidance on standards and terminology are *Business Continuity: Best Practices*, as defined by the Business Continuity Institute, and a *Glossary of Terms* from the Disaster Recovery Institute International (DRII). In *Best Practices*, a disaster recovery plan is "a plan to resume a specific essential operation, function or process of an enterprise." The DRII's *Glossary of Terms* describes disaster recovery as an "approved set of arrangements and procedures that enable an organization to respond to a disaster and resume its critical business functions within a defined time frame."

Disaster recovery/emergency preparedness plans are required of state agencies by GC §8607(a), which states:

The Office of Emergency Services, in coordination with all interested state agencies with designated response roles in the state emergency plan, and interested local emergency management agencies shall jointly establish by regulation a standardized emergency management system for use by all emergency response agencies.

SEMS is the system required by GC §8607(a) for managing response to multi-agency and multi-jurisdiction emergencies in California. SEMS consists of five organizational levels, which are activated as necessary: field response, local government, operational area, regional, and state. By standardizing key elements of the emergency management system, SEMS is intended to facilitate the flow of information within and between levels of the system and facilitate coordination among all responding agencies. SEMS incorporates the use of five essential Incident Command System functions: command, operations, planning/intelligence, logistics, and finance/administration.

Business/mission continuity is frequently considered a broader term than emergency planning. The goal of emergency planning is to address the immediate impacts of the disaster and to respond as needed to bring the emergency to closure. Business/mission continuity is a continuing cycle of preparation that includes:



## **PURPOSE**

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Disaster and Contingency Planning* (DCP) activity and to determine the adequacy of controls over the related processes to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- ▶ Campuses have developed DCP and other processes that address the most probable incidents that may affect the safety of personnel, damage assets, or cause significant business interruptions and that are also designed to comply with recent terrorism measures.
- ▶ Buildings can be safely secured and evacuated, when appropriate, or configured for sheltering-in-place in response to disasters or emergencies.
- ▶ The DCP plan is adequately tested and maintained.
- ▶ Equipment, information (such as the amount of hazardous materials or number of occupants in a building), supplies, and trained personnel will be available when needed.
- ▶ Campuses have a well-equipped emergency operations center.
- ▶ Buildings have been retrofitted to the extent practical and reasonable facility measures have been taken, such as anchoring furniture and other potential falling objects, providing adequate fire suppression measures, and securing building ventilation and air handling systems so potential biological agents cannot be easily introduced to contaminate widespread areas.
- ▶ Campuses have done what they can to reduce the risk of power interruptions.
- ▶ Reasonable business continuity plans have been formulated according to priorities established for critical business applications, processes, and systems.
- ▶ Continuity of operations beyond initial response periods is realistically addressed.

## **SCOPE AND METHODOLOGY**

The proposed scope of the audit, as presented in Attachment B, Agenda Item 2 of the January 23-24, 2003, meeting of the Committee on Audit, stated that DCP includes program and facility readiness and resource planning for actions related to natural and man-made disasters and the recovery therefrom. Potential impacts include injury of students, staff, faculty, and visitors; disruption of programs and services; financial exposures; damage claims from injured parties; and property damage.

Our study and evaluation were conducted in accordance with the *Standards for the Professional Practice of Internal Auditing*, issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. Industry-wide standards were also considered. The audit review period was July 1, 2001, to December 18, 2003. At a preponderance of the campuses visited, the public safety department had overall responsibility for DCP and the extent of resources devoted to the function was typically some fraction of a full-time position.

Our primary focus involved the internal administrative, compliance, and operational controls over DCP management. Specifically, we reviewed and tested:

- ▶ DCP policies and procedures.
- ▶ DCP plans.
- ▶ Availability of DCP resources, including communication systems, equipment, and supplies.
- ▶ Mutual aid agreements.
- ▶ Extent of exercises/tests of DCP capabilities.
- ▶ Training of DCP personnel.
- ▶ Registration and monitoring of visa students.
- ▶ Control of select agents and toxins regulated by the federal government.
- ▶ Preparation of facilities to withstand disasters.
- ▶ Business/mission continuity arrangements for critical processes.

Terrorism was considered a potential man-made emergency/disaster with DCP implications. Two recent, terrorism-related initiatives at the federal level related to controlling select agents and toxins and registering international students were included for review subject to the limitations below:

#### Select Agents and Toxins

In the fall of 2002, the nine campuses visited declared in filings with the federal government that they did not possess any select agents and toxins. The absence of these substances exempted the campuses from compliance with the controls and requirements stipulated in Code of Federal Regulations, Title 42, Part 73, which was promulgated to implement the provisions of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.

#### Registering Non-Immigrant (International) Students

Two key deadlines that affected non-immigrant, international students were as follows:

January 30, 2003 – Any new non-immigrant, international students admitted after this date had to have their immigration authorization documents (commonly called a Form I-20) issued by the host campus through the Student and Exchange Visitor Information System (SEVIS).

August 1, 2003 – Data for continuing non-immigrant, international students had to be entered into SEVIS by this date for tracking status. Campuses became responsible for updating the system based on a number of different reportable events, such as change in address, reduction in course load below full time, or failure to enroll not later than 30 days after the registration or program start date.

Since most of this activity has been relatively recent, the procedures and systems have not had time to mature. Consequently, we were unable to thoroughly audit some of these requirements, particularly on those campuses visited early in the audit before the mandated implementation deadlines.

During the audit, we visited nine campuses: Bakersfield, Fullerton, Los Angeles, Monterey Bay, Pomona, Sacramento, San Diego, San Luis Obispo, and San Marcos. We interviewed personnel involved in DCP; reviewed DCP planning documents, policies, and procedures; toured emergency operation centers; and tested DCP-related transactions.

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# OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

## GENERAL ENVIRONMENT

There was a strong, disproportionate police emphasis on business continuity planning (BCP) in the California State University (CSU), low organizational visibility for BCP, and a lack of planners with professional certification.

On a systemwide basis, we noted that:

- ▶ The police departments on 19 of 23 campuses were responsible for emergency services and, by default, BCP. However, while the systemwide coordinator for public safety reported to the vice chancellor, human resources, the systemwide director of risk management, whose responsibility includes BCP, reported to the assistant vice chancellor, financial services. Recently, these two groups collaborated to form the Systemwide Emergency Preparedness Taskforce (SWEPT).
- ▶ The highest level campus person directly involved in disaster and contingency planning at the nine campuses visited was an associate vice president, and that was at one campus. Five of the nine planners had no direct reporting relationship to executives, officers, or cabinet level positions.
- ▶ None of the BCP planners at the nine campuses visited had received professional certification. Additionally, personnel in the chancellor's office directly involved in risk management were not certified for emergency management or business continuity planning.

Title 5 §42702 states that the chancellor shall make the appointment of all employees in the Office of the Chancellor (except for vice chancellors) and the president of each campus shall make the appointments of campus administrative, non-academic, and Management Personnel Plan (MPP) employees. Sound business practice mandates appointments be based on standards that assure selection of best-qualified employees and appointment of personnel commensurate with planned activities. For MPP employees, Title 5 §42727 states that professional development, maintenance of currency in field, and professional improvement are normal requirements for retention and advancement.

Within the industry, different professional certifications are available. The International Association of Emergency Managers (IAEM) offers the Certified Emergency Manager (CEM) program. Certifications from the Disaster Recovery Institute International (DRII) include:

- ▶ Associate Business Continuity Planner – An entry-level certification for those who have knowledge of business continuity planning and disaster recovery and demonstrate some proficiency through an examination.
- ▶ Certified Business Continuity Professional – The basic certification level for individuals with a minimum of two years experience as a business continuity/disaster recovery planner.

- ▶ Master Business Continuity Professional (MBCP) – This certification is for individuals with significant demonstrated knowledge of the industry and a minimum of five years experience as a business continuity/disaster recovery planner.

Human Resources (HR) coded memorandum 2003-26, dated December 11, 2003, states that the campuses are responsible to ensure that MPP position descriptions reference any special license, certification, and/or registration requirements when necessary for the position.

The systemwide director of risk management stated that most planners had grown into the job and that they would be looking at certification opportunities if and when funding was available.

Lack of experienced, qualified personnel and adequate staffing can result in ineffective business contingency planning and impairments in the ability of the CSU to recover from a disaster.

### **Recommendation 1**

We recommend that the chancellor's office address the systemwide need to:

- a. Assure an emphasis on business continuity planning as an administrative function independent of the police.
- b. Establish preferred experience and qualification standards for participants in emergency management and business continuity planning, including professional certification.

### **Management's Response**

We concur. The Office of the Chancellor recognizes business continuity planning as an integral part of a comprehensive emergency management model that encompasses mitigation, response and recovery. BCP is addressed in the revised Executive Order (EO) No. 696.

A memo will be issued to the presidents emphasizing the importance of both the emergency management and business continuity planning positions. Attached to the memo will be sample job descriptions for both positions.

Due Date: January 2005

## **EMERGENCY READINESS**

### **EMERGENCY PLANS**

Emergency management plans that covered the basic requirements for emergency response and incident management were in place at all nine campuses visited. However, eight of these campus plans were deficient in certain areas, including the need for update/approval of documentation.

Examples of deficient areas included the following:

- ▶ Campus-wide emergency management planning documents were in various stages of revision and, in some cases, plan components were not consolidated in an up-to-date document.
- ▶ Amendments and revisions to the emergency plan were not always subject to documented executive level review and approval.
- ▶ Campus emergency plans did not address such issues as the methodology for assigning incident command system roles and responsibilities, conflicts in emergency responder assignments, sheltering-in-place, headcount procedures after an evacuation, concurrent absences, vacancies/extended leaves by response personnel, the threat and response to terrorism, and building and system restoration priorities.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus president to assure that the emergency management system is maintained and regularly updated.

In most cases, the campus management stated that the campus was proceeding with plan revisions subject to existing resource availability. None of the nine campuses we visited used any type of software to prepare plans, although one campus was investigating the use of such software.

The absence of current, updated emergency management plans undermines the ability of the campuses to properly respond to disasters.

## **Recommendation 2**

We recommend that the chancellor's office:

- a. Remind the campuses of the importance of maintaining complete up-to-date emergency management plans.
- b. Consider the development and issuance of minimum CSU-specific guidelines for items that should be included in the plans.
- c. Investigate the feasibility of all campuses using common planning software for both incident response/management and business continuity.

## **Management's Response**

We concur. Revised EO No. 696 will emphasize the importance of maintaining complete up-to-date emergency management plans and will require review/update on an annual basis. Revised EO No. 696 will also state that the plan must be compliant with Standardized Emergency Management Systems, which provides an outline of what should be contained in an emergency management plan.

The Office of Risk Management will bring forth several planning software packages for review by SWEPT for their review and recommendation to the executive vice chancellor and chief financial office of the CSU. The next scheduled meeting for SWEPT is in early January 2005.

Due date: January 2005

## **MUTUAL AID/STANDBY AGREEMENTS**

Mutual aid/standby agreements were either not in place or not formalized in writing.

Five of the nine campuses visited had either no agreements or a minimal number of agreements. A sixth campus had some arrangements, but they had not been updated in many years.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires each campus president ensure that the following management activities are accomplished in support of emergency preparedness:

- ▶ Determination, acquisition, and maintenance of facilities, equipment, and related supplies for emergency preparedness.
- ▶ Periodic testing of mutual aid agreements.

Federal Emergency Management Agency, *Emergency Management Guide for Business & Industry*, §2, under *Involving the Community*, recommends establishing mutual aid agreements with local response agencies.

The CSU *Report of the Ad Hoc Committee on Emergency Preparedness*, Appendix III b, dated July 19, 1995, states that:

- ▶ Equipment, Supplies and Services: Contracts for these types of off-campus resources should be established prior to the occurrence of a disaster. Examples of contracted resources that may be needed during a disaster include:

- Heavy equipment
- Engineering services (i.e., structural engineer)
- Hazardous materials cleanup
- Generators
- Temporary shelter
- Food and water
- Toilets
- Fencing
- Communication equipment (radios, cellular phones)
- Building materials

- ▶ **Mutual Aid Agreements:** Many universities rely on mutual aid from other campuses for assistance during an emergency. Functional areas that may benefit from mutual aid include police/law enforcement and hazardous materials response and cleanup.

Certain campus management acknowledged that the agreements were a valid planning tool, while others indicated that procurement card programs mitigated the need for any agreements because limits could be increased on certain cards and vendors could be utilized that already had established business relationships with the campus.

The absence of mutual aid/standby agreements for aid and off-campus emergency resources can contribute to the inability of the campuses to effectively respond to emergencies.

### **Recommendation 3**

We recommend that the chancellor's office reevaluate the issue of mutual aid/standby agreements and provide specific direction to the campuses concerning formalized written agreements or viable alternatives.

### **Management's Response**

We concur. The Office of Risk Management will reevaluate the issue of mutual aid/standby agreements utilized within the system. A memorandum will be issued to the campuses providing specific direction concerning formalized written mutual aid/standby agreements and/or viable alternatives.

Due date: January 2005

## **POSITION DESIGNEES**

The availability of trained responders in designated plan positions required improvement.

From our review of nine campuses, we found the following:

- ▶ The roster of designees in key responder positions was incomplete either as to the primary designee or the alternate backup at four campuses.
- ▶ Key responders and their designated alternates were either frequently away from the campus at the same time or no specific arrangements were in place if the plans were activated during their absence at two campuses.
- ▶ Insufficient training and/or training recordkeeping was noted at four campuses.

Title 5 §41302 states that during periods of campus emergency, as determined by the president of the individual campus, the president may, after consultation with the chancellor, place into immediate effect any emergency regulations, procedures, and other measures deemed necessary or appropriate to meet the emergency, safeguard persons and property, and maintain educational activities.

Government Code (GC) §8607(a) requires the use of the Standardized Emergency Management System (SEMS) for managing responses to multi-agency and multi-jurisdiction emergencies in California. SEMS incorporates the use of five essential Incident Command System functions (command, operations, planning/intelligence, logistics and finance/administration) and requires staffing in a number of different positions, such as emergency operations executive, incident commander, and four section managers.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires that there be adequate training of emergency personnel.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part II.A.3, dated December 23, 1994, recommends that a SEMS training recordkeeping system include:

- ▶ An individual training record for each person, kept either in his or her personnel file or in a separate training record. The name of the course, instructor, location, and date of the course should be included in the training record.
- ▶ Maintenance of the individual training record for as long as the person is employed in a position that involves an emergency response role.
- ▶ Documentation of the agency's SEMS training program, including copies of the training materials used, such as instructor syllabus, lesson plans, student notebook, exercises, and tests.

Several campuses were moving away from assigning individuals to specific plan positions in favor of qualifying participants as generalists to fill any role. Also, some campuses were decentralizing responsibilities on training recordkeeping to departments, but there was no review to verify that the documentation was being maintained.

The ability of the campuses to activate emergency management plans and effectively respond to emergencies is impacted if key primary and alternate plan positions are unfilled, if designees are unavailable due to absences, and/or if the campuses have not maintained effective training regimens.

#### **Recommendation 4**

We recommend that the chancellor's office encourage the campuses to:

- a. Adopt a strategy of two-deep designations or ample cross-training to provide a higher level of assurance that key responders will actually be available to staff plan positions when needed.
- b. Establish specific training expectations and training recordkeeping guidelines for participants in campus emergency plans.

### **Management's Response**

We concur. The revised EO No. 696 will cover the adoption of two-deep designations, including cross-training, to provide a higher level of assurance that trained key responders will be available to staff plan positions when needed. Mandatory SEMS training is being conducted for the campuses adopting the two-deep designations. Four members of each campus will be attending the training sessions – two at each session. The sessions will be conducted in December 2004 and in January 2005.

The revised EO No. 696 will require specific training guidelines for participants in the building marshal programs and for those designated as members of the campus emergency management team on an annual basis. Recordkeeping guidelines are also included in revised EO No. 696.

Due date: January 2005

### **BUILDING COORDINATORS**

An adequately staffed or trained group of building coordinators was not in place at five of the nine campuses visited.

We noted the following:

- ▶ Some turnover in positions or work locations where the building marshals were assigned, separation of employment, or unilateral resignation from active participation in the program creating vacancies that were unfilled.
- ▶ Lack of alternates to cover absences.
- ▶ No coordinators assigned to specific buildings, one person serving as primary coordinator for several buildings, and some confusion in co-coordinator responsibilities.
- ▶ One campus with a coordinator program that was still being piloted in limited areas on the campus.
- ▶ Informal coordinator arrangements with incumbents who were not trained.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires that there be adequate training of emergency personnel. The extent of emergency personnel necessary to establish a cadre of trained individuals is assumed.

The CSU's *Report of the Ad Hoc Committee on Emergency Preparedness*, Appendix III, Item 6, dated July 19, 1995, states that campuses should appoint and train building floor wardens (faculty or staff) to work with disaster coordinators.

Campus management cited various reasons for these conditions, including position vacancies and staff moving to different locations or changing jobs. Management at a small campus stated that its

need for building coordinators/marshals would increase as they grew, and management at one other campus stated that it was in the midst of evaluating a pilot program for building coordinators/marshals.

Emergency responsiveness may be delayed without an adequately staffed and trained team of building emergency coordinators to lead emergency evacuations.

### **Recommendation 5**

We recommend that the chancellor's office remind the campuses of the importance of maintaining an adequately staffed and trained group of building coordinators to assist in emergency preparedness and response.

### **Management's Response**

We concur. The Office of Risk Management will issue a memorandum reminding campuses of the importance of maintaining an adequately staffed and trained group of building coordinators/marshals to assist in emergency preparedness and response.

Revised EO No. 696 will also address the issue of the importance of building marshal programs.

Due date: January 2005

## **VOLUNTEERS**

A delegation of authority from the Governor's Office of Emergency Services (OES) to register disaster service workers had not been requested and/or an inventory of volunteer skills had not been performed at five of the nine campuses visited.

We found that three campuses did not have OES authorization to register disaster service workers, and five campuses had not compiled a list of volunteer skills.

California Code of Regulations, Title 19, *Disaster Service Worker Volunteer Program (DSWVP)*, §2570.1 and §2570.2 indicate, in part, that the Legislature has provided a state-funded program of workers' compensation benefits for disaster service worker volunteers who contribute their services to protect the health and safety and preserve the lives and property of the people of the state. A disaster service worker is any person registered with a disaster council or the OES, or a state agency granted authority to register disaster service pursuant to the California Emergency Services Act without pay or other consideration. In the past, the authorization for CSU campuses to register disaster service workers had been delegated individually to those campuses that requested the authority from the OES director.

The CSU's *Report of the Ad Hoc Committee on Emergency Preparedness*, dated July 19, 1995, states that the campus should develop a skills inventory as a basis for recruiting and assigning volunteers and staff for special assignments.

The OES publication, *They Will Come*, revised November 2001, describes the three most common disaster-volunteer management options as:

1. A Convergent Volunteer Management Plan — Unsolicited (convergent) volunteers often overwhelm local government and community agencies following a disaster with offers to help. A Convergent Volunteer Management Plan directs their talents and energy to disaster response and relief efforts. Such a plan requires less staff, funds, and time to maintain than an ongoing disaster volunteer program. It must, however, include staff training; preparing duty checklists, policies, and procedures; and securing necessary supplies and equipment.
2. A Reserve Disaster Volunteer Program — Unlike a convergent volunteer plan, a reserve program requires recruitment and training of the volunteers. Reserve disaster volunteers do not work with paid staff on a daily basis; instead, they are trained to perform a specific function in an emergency. Reserve volunteers can also be trained to carry out ongoing services to help maintain routine services when paid staff are responding to a disaster.
3. An Ongoing Disaster Volunteer Program — Of the three alternatives, an ongoing program requires the most effort, but it is also the most versatile. Unlike the reserve program, volunteers are not limited to response roles, but can work to promote community/agency preparedness and assist with day-to-day operations.

Only one of the nine campuses visited went beyond the minimum necessary for a convergent volunteer program and actively recruited and trained volunteers.

In response to our systemwide Seismic Safety and Disaster Readiness report, dated March 30, 1998, all CSU campuses were reminded of the need to request OES authorization. Since that time, there have been several initiatives within the CSU on volunteers including:

- ▶ In November 2000, the CSU Board of Trustees - Committee on University and Faculty Personnel (UFP) passed resolution UFP 11-04-00 stating that volunteers, while performing services for the CSU, are defined as employees for purposes of workers' compensation coverage.
- ▶ In December 2001, human resources in the chancellor's office issued coded memorandum HR 2001-38 entitled "CSU Volunteer Policy."

Management at the campuses that had not requested the OES delegation stated either that reliance on state employees conscripted pursuant to GC §3100 would cover their needs, they were unaware of the OES arrangements, or there may no longer be any need for the OES authorization considering the committee resolution (UFP 11-04-00) from the CSU Board of Trustees. With respect to compiling volunteer skills or getting prepared in advance for a minimal convergent-level volunteer program, campus management cited a lack of available paid staff dedicated to emergency preparedness and other priorities.

In the absence of OES authorization, the campus is exposed to potential liability for disaster service worker volunteers, and not maintaining an inventory of emergency response skills for disaster service

worker volunteers increases the risk that competent members in the campus community will not be considered.

### **Recommendation 6**

We recommend that the chancellor's office:

- a. Seek clarification on the necessity to obtain authorization from OES to register disaster service worker volunteers and communicate the results to the campuses.
- b. Encourage campuses to specifically identify and justify in planning documents the type of volunteer program they use, as well as compile an inventory of volunteer skills.

### **Management's Response**

The Office of Risk Management spoke to the program coordinators for the OES DSWVP for clarification regarding the necessity to obtain authorization to register disaster service worker volunteers. DSWVP coordinators have confirmed that the campuses must obtain authorization from OES to register disaster service worker volunteers.

A memorandum will be issued communicating the DSWVP program requirements and process. The memorandum will also emphasize to each campus the importance of identification and documentation in planning documents regarding their volunteer program, as well as to encourage them to compile an inventory of skills within their volunteer pool.

Due date: January 2005

### **PLAN TESTING**

Emergency management plans were either not extensively tested or test results were not adequately documented at five of the nine campuses visited.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus president to assure that there is periodic testing of simulated emergency incidents.

California Code of Regulations, Title 19, §2447 requires the use of the standardized emergency management system at all levels of operation when exercises are performed.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part II, dated December 23, 1994, indicates that the suggested exercise program include:

- ▶ A discussion type exercise in the first year and an emergency operations center (EOC) simulation exercise.

- ▶ Ongoing exercises on a four-year cycle involving one full-scale exercise during the four-year cycle and one functional exercise during each of the remaining three years.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part III – After Action Reports, dated December 23, 1994, indicates that the completion of after action reports is a part of the required standardized emergency management system reporting process. The elements of an after action report include response actions, application of the standardized emergency management system, modifications to plans and procedures, training needs, and recovery activities.

Campus management cited several reasons for the minimal plan testing and test documentation including other priorities, such as completing plan revisions or individual training, vacancies in plan positions, and orientation towards handling the test analysis verbally.

Inadequate testing of the emergency management plan and documentation of test results increases the risk of ineffective preparedness.

#### **Recommendation 7**

We recommend that the chancellor's office establish specific expectations for emergency management plan tests, including test results documentation.

#### **Management's Response**

We concur. The revised EO No. 696 will establish specific expectations for emergency management plan tests, including test results documentation.

Due date: January 2005

### **INTERNATIONAL STUDENTS**

Controls over the monitoring of international (non-immigrant) students needed strengthening in the areas of segregation of duties and documentation of procedures.

We noted a lack of segregation of duties between the admission/evaluation process and the issuance of the immigration paperwork commonly known as the I-20 at five campuses. Written procedures had not been developed for various functions, such as admitting international students, monitoring reportable events and distance learning, and reporting information to the Bureau of Citizenship and Immigration Services at five campuses. In addition, certain data discrepancies, missing documentation, or incomplete files were noted at two campuses.

The campuses visited typically had multiple channels by which international students applied and received a "Certificate of Eligibility" called Form I-20. The campus issued Form I-20 through the Student and Exchange Visitor Information System (SEVIS) and sent the form to the student, who then took it to the embassy/consulate in her/his home country to apply for a visa. Most students applied through the admissions process and were admitted to the campus by the admissions office.

Others were accepted through programs that did not require admission to the campus, such as studying English as a second language. The directors of international student programs offices were generally the Principal Designated School Officials (PDSOs), while the Designated School Officials (DSOs) were spread throughout other offices that were not supervised by the PDSO, such as admissions and continuing/extended education.

Code of Federal Regulations, Title 8, Part 214, *Retention and Reporting of Information for F, J and M Non-Immigrants; Student and Exchange Visitor Information System; Final Rule*, dated December 11, 2002:

- ▶ Prescribes institutional responsibilities for reportable events involving international students, including change of address and less than full-time enrollments, and restricts international students to one distance education or online class or three credits per semester towards his/her full course of study requirements.
- ▶ Establishes institutional responsibility for SEVIS in a PDSO and up to nine other DSOs.

When the CSU campuses petitioned the federal government to participate in SEVIS, the application committed the campus to keep and make available the following information:

1. The admission number from the student's Form I-20.
2. Country of citizenship.
3. Address and telephone number in the United States.
4. Status, i.e., full time or part time.
5. Course load.
6. Date of commencement of studies.
7. Degree program and field of study.
8. Expected date of completion.
9. Non-immigrant classification.
10. Termination date and reason, if known.
11. The documents showing the scholastic ability and financial status on which the student's admission to the school was based.
12. Information specified by the federal government as necessary to identify the student and to determine the student's immigration status.

Campuses were also obligated to monitor changes in this information and comply with other restrictions, such as limits on the number of courses that can be taken online or through distance education and concurrent enrollments in multiple institutions.

The CSU last surveyed the status of SEVIS compliance through Academic Affairs (AA) coded memorandum AA-2002-57, dated December 5, 2002, in which campuses were requested to self-report by January 30, 2003, actions undertaken to implement the federal regulations, which at that time were still relatively new. While draft versions of the federal requirements were in circulation and preceded the final rules, this latter document was not published in the federal register until December 11, 2002. Each CSU campus provided a response to AA-2002-57. These responses were reviewed in the chancellor's office, and no additional action was undertaken.

Additionally, the CSU had addressed these homeland security needs via the PeopleSoft implementation through PASS (Patriot Act SEVIS Solution). As of September 2002, PASS could be utilized if PeopleSoft Student Administration version 7.6 or 8.0 was implemented. Student Administration is the last of the three PeopleSoft modules being implemented by the CSU, and campuses are in various stages of this implementation.

State Administrative Manual §20050 indicates that the elements of a satisfactory system of internal accounting and administrative controls include, in part, a system of recordkeeping procedures and a plan of organization that provides segregation of duties.

Campus management cited several reasons for these conditions, including the impracticality of separation of duties due to staffing issues, continuing revisions to procedures to deal with the relatively new requirements, and waiting for the implementation of PeopleSoft.

Inadequate control over the admittance of international students and reporting and maintenance of student information increases the risk of non-compliance with federal regulations.

### **Recommendation 8**

We recommend that the chancellor's office remind the campuses of the importance of compliance with federal regulations concerning international students and regularly advise the campuses concerning best practices for controlling and reporting international student information, including those offered by PeopleSoft.

### **Management's Response**

We concur. The Office of Risk Management will coordinate with the Office of International Programs and the Office of General Counsel in preparation of a memorandum to the campuses to emphasize the importance of compliance with federal regulations concerning international students.

The memorandum will also advise the campuses of best practices endorsed by the Office of International Programs concerning the controlling and reporting of international student information, including those offered by PeopleSoft.

Due date: January 2005

## **FACILITY ISSUES**

Generators were not available in all key locations or adequately tested at five of the nine campuses visited.

Emergency generators were not available in certain key locations at four campuses (including one health center), while one other campus had some older generators and weak test protocols. On one campus, we noted that the generators, including the EOC generator, were an average of 17 years old, with the oldest put into service 30 years ago. Additionally, the generators were not tested under load

or dummy loads to simulate present usage, and the generators with self-test mechanisms did not automatically alert the campus to failed tests.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus president to determine, acquire, and maintain facilities, equipment, and related supplies for emergency preparedness.

The Accreditation Association for Ambulatory Health Care, of which many campuses are members, requires alternate power adequate for the protection of life and safety of patients and staff in student health centers.

The May/June 2003 issue of *Contingency Planning and Management*, in an article entitled “Planning for Emergency Power,” states that the first imperative in emergency power planning is to outfit the essential facilities with permanent backup power and to make certain that existing backup equipment is properly sized and in good repair. Essential facilities are defined to include medical care and emergency response command and control areas.

Management at several campuses cited cost as a factor in the decision not to add/install dedicated emergency generators, while one campus indicated that portable generators would be used as needed.

Without adequate emergency power generators, key areas on some campuses may not be available should a power outage and/or disaster occur.

### **Recommendation 9**

We recommend that the chancellor’s office require campuses to have available emergency generators in all key locations and establish specific expectations for their maintenance and testing, including the types and frequency of tests, generator replacement schedules, verification procedures for unattended generators that might have failed in automated tests, and the extent of required testing documentation.

### **Management’s Response**

We concur. A memorandum will be issued to the campuses that will remind them of the importance of emergency generators in all key locations and provide specific expectations for the maintenance and testing to include:

- Types and frequency of tests.
- Generator replacement schedules.
- Verification procedures for unattended generators.
- Extent of required testing documentation and recordkeeping.

Due date: January 2005

## BUSINESS CONTINUITY

A process was not in place to measure the effectiveness of BCP by the campuses.

None of the campuses visited had adequate arrangements for business continuity. Critical processes were not well defined and related plans were incomplete, except for recovery of information technology. Adequate plans are necessary before testing can occur.

The November 2002 issue of *Contingency Planning and Management*, in an article entitled “Protecting the Halls of Knowledge: BCP at Colleges and Universities,” refers to the University of Denver as an independent institution with approximately 9,300 students in undergraduate, graduate, and professional programs. This particular university identified 125 critical processes that they combined into 72 separate business continuity plans.

The November/December 2003 issue of *Contingency Planning and Management*, in an article entitled “Measuring Your Program,” states that it is always a challenge to determine if your business continuity program measures up against industry standards or benchmarks. The article introduces three different methodologies for evaluating the strength of BC programs.

The California State University, Northridge vice president of administration and finance, in a recently authored book entitled *Mission Continuity Planning*, states that the 11 steps to developing a mission/business continuity plan are:

1. Set organizational goals and identify realistic objectives.
2. Analyze the business impact of unmitigated risks and their primary and secondary consequences.
3. Assign responsibilities to key individuals.
4. Conduct a business impact analysis.
5. For every critical process, assign appropriate individuals who can develop a business recovery plan.
6. Identify the minimum requirements needed to return to full operations.
7. Integrate the individual recovery plans into a draft mission continuity plan.
8. Identify a central location for the mission recovery plan.
9. Develop a cost estimate for implementing the plan.
10. Conduct training sessions, establish a testing schedule, periodically audit the plan, and make appropriate improvements.
11. Identify a mission continuity planning coordinator.

Management at a majority of campuses visited cited reliance on provisions for recovery of information technology as adequate for BCP purposes, although some campuses had started identifying critical processes.

Absence of industry comparable plans and evaluation methodologies increases the risk that the CSU has not adequately streamlined the process, provided consistency across campuses, and assured that there is reasonable coverage for planning necessities for business continuity/resumption.

**Recommendation 10**

We recommend that the chancellor's office adopt a specific BCP format and evaluation methodology for CSU systemwide application and periodically require plan evaluations.

**Management's Response**

We concur. The revised EO No. 696 will discuss business continuity planning as an integral part of comprehensive emergency management. It will also address the preparation and annual review of the plan. Although each plan is unique and designed to the specific campus, the common elements that should be incorporated in each plan will be included in the revised EO No. 696.

Due date: January 2005

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## **APPENDIX A: PERSONNEL CONTACTED**

### Chancellor's Office

Richard P. West	Executive Vice Chancellor and Chief Financial Officer
Gina Caywood	Senior Manager, Human Resources
Pat Dayneko	Director, Contract Services and Procurement
Cathryn Espinosa	Associate Director, Risk Management
Tom Kennedy	Chief of Architecture and Engineering
Marti Lopez	Risk Management Coordinator
Charlene Minnick	Director, Risk Management
Bruce Richardson	Deputy General Counsel
Tom Roberts	Assistant Director, Contract Services and Procurement
Leon Washington	Associate Director, Enrollment Management Services
Deborah Wylie	University Architect

### Others - Systemwide

Spencer Freund	Assistant Vice President; Computing, Communications and Media Services - CSU, Sacramento
Richard Johnson	Associate Director, Environmental Health and Safety - CSU, Long Beach
Ron Norton	Director, Environmental Health and Safety - CSU, Northridge
Mohammad Qayoumi	Vice President for Administration and Finance - CSU, Northridge
Kim Wible	Chief of Police - San Francisco State University

### California State University, Bakersfield (CSUB)

Horace Mitchell	President
Tomás A. Arciniega	President (at time of review)
Anne Black	Fiscal Services Support Assistant
Michelle Blue	Lead Building Marshal, Print Shop/Telecommunications
Bob Brown	Director, Facilities Management
Randy Bye	Manager, CSUB Foundation
Jack Campbell	Interim Director of Public Safety
Stella Chavez	Secretary to the President
Patrick Choi	Building Marshal, Disability Services
Matthew Ducatt	Director, Student Union
Barbara Espinosa	Lead Building Marshal, Dorothy Donahoe Hall
Megan Farwell	Building Marshal, Science I and II
Kellie Garcia	Director, Human Resources
Tina Giblin	Lead Building Marshal, Business Development Center
Diane Hendrickson	Interim Division Director, University Services
Rodney Hersberger	Director, Administrative Computing Services
Karen Hurley	Assistant Director, Administration and Student Services, Intensive English Language Center
Michelle Irvin	Building Marshal, Academic Advising
Pat Jacobs	Director, Facilities Planning, Development, and Operations
Irene Leung	Director, Administrative Computing Systems
Kendyl Magnuson	Associate Director, Admissions and Records
Liz McDonald	Senior Building Marshal, Library
David Merritt	Interim Director, Safety and Risk Management

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APPENDIX A

Claudia Neal	Director of Public Safety
Michael Neal	Vice President, Business and Administrative Services
Bill Perry	Assistant Vice President, Student Life
John Ritter	Senior Building Marshal, Education Building
Carrie Rockwell	Lead Building Marshal, Procurement
Edwin Sasaki	Associate Vice President, Academic Affairs and Dean, Undergraduate Studies
Tonya Snyder	Lead Building Marshal, Administration Building
Michelle St. John	Director, CSUB Antelope Valley
Sharon Taylor	Associate Vice President, Fiscal Services
Denise Tucker	Building Marshal, Student Services
Dave Watts	Director, Telecommunications

California State University, Fullerton

Milton A. Gordon	President
Susan Amdahl	Grant Support Assistant, College of Natural Sciences and Mathematics
Michael Anthony	Associate Director of Maintenance and Operations, Physical Plant
Robert Aylmer	Acting Executive Director, Student Health and Counseling Center
Welson Badal	Manager, Vice President of Administration Information Technology
Robert Baker	Sergeant, University Police
William Barrett	Associate Vice President, Administration
Dick Bednar	Senior Director, Information Technology Services
Robert Belloli	Chair, Chemistry
James Blackburn	Director, Admissions and Records
Jay Bond	Associate Vice President, Facilities Management
Garland Bryan	Chief Engineer, DMS Engineering Services
Pearl Cheng	Director of Finance and Administration, Foundation
Brian Christie	Building Trades Manager, Physical Plant
Debbie Ellis	Administrative Services Supervisor, University Police
Robert Ericksen	Director, International Education and Exchange
Susan Fisher	Radiation Safety Director, Environmental Health and Instructional Safety
Quentin Frazier	Emergency Preparedness Coordinator, University Police
Robert Gill	Environmental Compliance Manager, Environmental Health and Instructional Safety
Willie Glen	Lieutenant, University Police
Naomi Goodwin	Assistant Vice President, Administration
Willie Hagan	Vice President, Administration
Holly Hall	Assistant Director of Operational Services, Physical Plant
Dauida Hopkins-Parham	Executive Assistant to the Vice President, Academic Affairs
Judith King	Director, Public Safety/Chief of University Police
Robert Koch	Vice Chair, Biology
Mark Lopez	Executive Assistant to the Chief Financial Officer
Karyn Magno	New Student Programs Coordinator, Dean of Students
Pam McLaren	Public Affairs Associate
Kandy Mink	Dean of Students
Sherri Newcomb	Chief Financial Officer
Craig Newton	Chief Engineer, Physical Plant
Carmen Peak	Procurement Operations Manager, Contracts and Procurement

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APPENDIX A

Juliana Peterson	Receptionist, Office of the Registrar
Christine Pircher-Barnes	Student Services Coordinator, American Language Program
Lynne Richmond	Director, American Language Program
Lay Tuan Tan	Associate Director, International Education and Exchange
Alexander Tzoumas	Director, Internal Audit
Willem van der Pol	Director, Physical Plant
Juli Waldschmidt	Student Activities Coordinator, American Language Program
Howard Wang	Associate Vice President, Student Affairs
Thomas Whitfield	Director, Environmental Health and Instructional Safety
Sally Yassine	Contract Operations Manager, Contracts and Procurement

California State University, Los Angeles

James M. Rosser	President
Raul Amador	Building Service Engineer, Facilities Services
Kathy Anderson	System Coordinator, Office of Admissions and University Registrar
Karl Beeler	Assistant Vice President, Student Affairs/Enrollment Management, Student Affairs
Becky Bishop	Student Services Coordinator, American Culture and Language Program
Kevin Brady	Director, Risk Management/Environmental, Health & Safety
Gregg Breed	Assistant Director of Facilities Services, General Services
Desiree Bumgarner	Administrative Services Manager, University Police
Ying Cao	Associate Director, International Programs and Services
Susan Cash	Acting Associate Vice President, Academic Programs - Academic Affairs
Doug Davis	University Librarian
Anita Eral	Admissions Consultant
Michael Fels	Director, International Programs and Services
Ben Figueroa	Director of General Services and Risk Programs
Steve Garcia	Vice President, Administration and Finance
Sally Gardner	Director, American Culture and Language Program
Michael Gray	Radiation/Biological Safety Officer
Mark Gutheinz	Director, Facilities Services
Jerry Harding	Fire Technician, University Police
Tom Johnson	Director, Procurement and Contracts
Greg King	Director, Public Safety
Yuet Lee	Assistant Vice President, Administration and Finance/Financial Services
Thomas Leung	University Controller
Tony Liu	Assistant Director of Facilities Services, Utilities
Dave McNutt	Executive Director, Public Affairs
Nancy Miron	Assistant Executive Director for Marketing Communications, Public Affairs
Bev Mitchum	Director, IT Security Management and Compliance – IT Services
Rob Pure	Automotive Garage Supervisor, Facilities Services
Peter Quan	Vice President, Information Technology Services
Blanca Rodriguez	Manager, Payroll
Lisa Sanchez	Director, Human Resource Management
Carol Selkin	Director, Media Relations/Public Information - Public Affairs
Linda Shaffer	University Internal Auditor
Amy Wang	Immigration Counselor
Joan Woosley	Director of Admissions and University Registrar

California State University, Monterey Bay (CSUMB)

Peter P. Smith	President
Carl Andersen	Tech Services Specialists
Rachelle Bass	Administrative Support Coordinator
Valarie Brown	Director of Admissions and Records
Shirelene Campbell	Services and Biographical Assistant
Reyola Carlisle	Contracts Coordinator
Anita Castledine	Administrative Analysts
Brian Dawson	Apartment Area Coordinator
Diane Ehlers	Director of Environmental Protection, Health and Safety
Cheri Everlove	Instructional Support Technician
Brenda First	Administrative Assistant to the President
John Fitzgibbon	Associate Vice President of Finance
Margaret Geissler	Instructional Lab Manager
Fred Hardee	Chief of Police
Sheila Hernandez	Evaluator, Admissions and Records
Troy Holt	Transportation and Parking Services Administrator
Dennis Hungridge	Professional Development Manager
Dan Johnson	Vice President, Administration and Finance
Robin Katsuki	Director of Design and Construction
Dan Kaupie	Food Services Director
Dino Latino	Manager of Risk Services
Cindy Lopez	Director, Office of Grants and Contracts, CSUMB Foundation
Jay McTaggart	Police Lieutenant
Flo Miller	Administrator of Health Center
Anthony Reyes	Director of Facilities Services and Operations
Tim Riggs	Security and Life Safety Systems/Lead Locksmith
Ronald Smith	Associate Director of Information Technology
Ruth Stipp	Director of Accounting
Dennis Sun	Circulation Services Manager
Richard Taylor	Director of Business and Support Services
Pete Torrecillas	Work Control Coordinator
Holly White	Public Information Officer
Linda Wight	Interim Associate Vice President, Director of Human Resources

California State Polytechnic University, Pomona

J. Michael Ortiz	President
Zainab Al-Shabibi	Associate Registrar for Academic Record Services
Daniel Anseltnine	Coordinator, Instructional and Graduate Admissions
Laura Bouamrane	International Student Advisor
George Bradshaw	Director, Admissions and Outreach
Randy Burger	Coordinator, International Student Center
Robert Charles	Network Technician, Cal Poly English Language Institute
Stephanie Doda	Executive Director, Instructional and IT and Telecommunications
Patricia Farris	Vice President, Administrative Affairs
Fred Henderson	Director, Disabled Student Services
Charles Holt	Director, Parking and Transportation Services

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APPENDIX A

Don Johnson	Manager, Mechanical Services, Facilities Management
Darwin Labordo	Associate Vice President, Finance and Administrative Services
Linda Lichthart	Interim Director, Cal Poly English Language Institute
Gerald Lipson	Chief of Police
George Lwin	Director, Facilities Management
Debbi McFall	Emergency Services Coordinator
Judy Mitchell	Coordinator, International Student and Scholar Services
Ann Overman-Scott	Director, Human Resources
David Patterson	Director, Environmental Health and Safety
Art Perez	Assistant Director, University Housing
Sharon Reiter	Director, Risk Management Services Staff Development and Training
Harold Schleifer	Dean, Library
Phyllis Seifert	Assistant Director, Children's Center
Kay Vierra	Interim Director, Student Health Center
Marilyn Wilkerson	Manager, Logistical and Recycling Services, Facilities Management

California State University, Sacramento

Alexander Gonzalez	President
Matt Altier	Associate Vice President, Facilities Management
Kenneth Barnett	Director of Public Safety
Roger Britton	Corporal, Public Safety
Michael Christensen	Director of Environmental Health and Safety
Leslie Davis	Director, University Union
Ed Del Biaggio	Vice President, Administration and Finance (at time of review)
Stephen Garcia	Vice President for Administration
Ronald Grant	Director, Support Services
Linda Hafar	Director, Facilities and Utilities
Joyce Harris	Director, Student Health Center
David Kesty	Lead, A&E Mechanic
Stephen Leland	Industrial Hygienist
Nathaniel Martin	Energy Conservation Coordinator
Kathi McCoy	Director, Auditing Services
Eric Merchant	Coordinator, International Students/Programs
Matthew O'Brien	Building Service Engineer
Daryn Ockey	Manager, Building and Trades
Barbara Oseto	Budget Analyst, Student Affairs
Ann Reed	Associate Vice President, Public Affairs
Dirk Ruthrauff	Associate Director, Student Health Center
Fran Sato	Associate Vice President, Human Resources
Paul Serafimidis	Manager, Engineering Services
Bill Sharar	International Programs Manager, College of Continuing Education
Steve Somsen	Risk Manager
Shirley Uplinger	Vice President, Student Affairs
Julie Yu	Program Coordinator, International Programs, College of Continuing Education

San Diego State University

Stephen L. Weber	President
Cynthia Avery	Director, Student Life and Development

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APPENDIX A

Sue Blair	Director, The Center for Human Resources and Environmental Health and Safety
Scott Burns	Director, Physical Plant
Valerie Carter	Tax and Audit Manager, Business Information Systems
Margaret Casey	Director of Facilities Services, Aztec Shops
Greg Chapman	East Commons Building Supervisor, Aztec Shops
Sandra Cook	Executive Director, Enrollment Services
Millie Dizon	Environmental Hygienist and Institutional Bio Safety Officer, Environmental Health and Safety
Dulce Dorado	Immigration and Admissions Advisor, American Language Institute
Anthony Fulton	Director, Facilities Planning and Management
Terry Gee	Associate Director, Environmental Health and Safety
Jane Kalionzes	Associate Director, International Student Center
Patricia Kroncke	Director, Housing Administration
Linda Lawton	Program Director for Intensive English Communications, American Language Institute
Riny Ledgerwood	Director, Telecommunications and Network Services
Alan Martin	Electrical Services Manager, Physical Plant
Stephen McNett	Associate Dean for Academic Affairs, Imperial Valley Campus
Ron Moffatt	Director, International Student Center
Lawrence Peralez	Director, Business Services
Andrea Peters	Assistant to the Vice President, Business and Financial Affairs
Amy Raymond	Office Manager, Environmental Health and Safety
Dawn Renze-Wood	Assistant Director, International Student Center
Sally Roush	Vice President, Business and Financial Affairs
Richard Scharff	Director, Procurement Services
Joe Shapiro	Associate Dean, College of Extended Studies
Larry Tilton	Supervising Building Services Engineer Mechanical Services, Physical Plant
Joseph Vasquez	Associate Vice President, Business Enterprises
Susan Walters	Admissions Representative, Enrollment Services
Stephen Williams	Captain, Public Safety
Robert Yonemitsu	Buyer, Procurement Services

California Polytechnic State University, San Luis Obispo

Warren J. Baker	President
Donna Amos	Associate Director, Admissions and Recruitment
Bob Anderson	Public Affairs Officer
Deby Anderson	Commuter Services Coordinator, University Police
Barbara Andre	Associate Director, International Education and Programs
Sharon Andresen	Library Circulation Supervisor
Ken Barclay	Director, Student Life and Leadership
Marc Benadiba	Assistant Director, Payroll Services
Martin Bragg	Director, Health and Counseling Services
Cindy Campbell	Associate Director, University Police
Marlene Cartter	Associate Registrar
Gwen Chavarria	Human Resources Manager
Les Ferreira	Department Head, Dairy Science

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APPENDIX A

Vera Gee	Assistant Director, Admissions and Recruitment
Marlene Gibbons	Accounts Payable Accounting Technician, Fiscal Services
Linda Halisky	Director, International Education and Programs
Larry Hammons	Senior Admissions Associate, Admissions and Recruitment
Mark Hunter	Interim Director, Facility Services
Larry Kelley	Vice President, Administration and Finance
Bob Kitamura	Director, Facilities Planning
Leah Kolt	Director, Public Affairs
Lorlie Leetham	Director, Fiscal Services
Johanna Madjedi	Director, Communications and Computing Services
Dara Manker	Analyst/Programmer, ITS Application and Information Management
Jim Maraviglia	Assistant Vice President, Admissions, Recruitment and Financial Aid
Greg Melnyk	Purchasing Supervisor, Contract and Procurement Services
Barbara Melvin	Director, Human Resources
Doug Overman	Assistant Director, Facility Services
Bob Pahlow	Assistant Director, Facility Services
Alan Pepe	Assistant Director, Housing and Business Services
David Ragsdale	Manager, Environmental Health and Safety
Rick Ramirez	Associate Vice President for Finance
Joe Risser	Manager, Risk Management
Matt Roberts	Director, Contract and Procurement Services
Vicki Stover	Associate Vice President for Administration
Mike Suess	Associate Vice President, Academic Personnel
John Sullivan	Travel Coordinator
Susan Tripp	SEVIS Coordinator, International Education and Programs
Johan Uyttewaal	Associate Director, Facilities Planning and Capital Projects
Karen Webb	Associate Director, Budget and Analytic Business Services

California State University, San Marcos

Karen S. Haynes	President
Alexander Gonzalez	President (at time of review)
Roy McTarnaghan	Interim President (at time of review)
Terry Allison	Interim Vice President and Chief Financial Officer, Finance and Administrative Services
Shirley Brady	Interim Controller
George Cagala	Publications Manager
Carla Charlow	Accounts Payable Lead, Direct Pay/Travel
Russ Decker	Director, Planning, Design and Construction
Barbara Dovenbarger	Director of Internal Audit
Charles Evans	Deputy Building Official and Campus Fire Marshall
Regina Frasca	Director, Risk Management and Safety
Steve Garcia	Vice President, Finance and Administrative Services/ Chief Financial Officer (at time of review)
Vicki Golich	Director, Faculty Center and Interim Chair, Political Science
Suzanne Green	Associate Vice President, Finance and Business Services
Deborah High	Safety Officer
Irene LaPolice	Deputy Controller, Payroll Services
Linda Leiter	Associate Vice President, Human Relations and Campus Enterprises

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APPENDIX A

Dean Manship	Special Assistant
Danielle McMartin	International Student and Scholar Advisor
Gil Oswald	Drafting Technician, Facility Services
Jonathan Poullard	Dean of Students
Marion Reid	Dean, Library and Information Services
Jeri Richards	Technical Specialist, Enrollment Services
Richard Riehl	Executive Director, Enrollment Services
Tom Schultheis	Chief of Police
Deborah Smith	Risk Manager
Abigail Stone	Resource and Special Projects Manager
Art Torres	Director, Procurement and Support Services
Wayne Veres	Director, Systems Development and Software Engineering
Chuck Walden	Interim Director, Facility Services
Bill Ward	Director, Telecommunications and Network Operations
Peter Zwick	Director, University Global Affairs
<u>Others</u>	
Anita Chant	Disaster Service Worker Volunteer Program (DSWVP) Coordinator
Judy Miller	DSWVP Coordinator

The California State University System

Office of the Chancellor

# Memorandum

**To:** Mr. Larry Mandel  
University Auditor

**Date:** September 20, 2004

**From:** Richard P. West  
Executive Vice Chancellor/Chief  
Financial Officer

**Phone:** 562-951-4580

**Subject:** Disaster and Contingency Planning, Audit Report Number 03-35

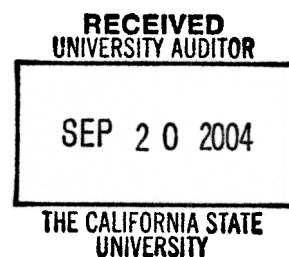
We have reviewed the above captioned report and express our responses in the attached document. Also enclosed is a diskette/file with the audit recommendations and management responses.

Should you have any questions or need further information, please contact Ms. Charlene Minnick, Director Risk Management at extension 1-4580.

RPW:cmm

Attachment

cc: Mr. Dennis Hordyk, Assistant Vice Chancellor, Financial Services  
Ms. Charlene Minnick, Senior Director, Systemwide Risk Management  
Mr. Jim Usher, Audit Manager



**DISASTER AND CONTINGENCY PLANNING  
SYSTEMWIDE**

**Report Number 03-35  
June 29, 2004**

**GENERAL ENVIRONMENT**

**Recommendation 1**

We recommend that the chancellor's office address the systemwide need to:

- a. Assure an emphasis on business continuity planning as an administrative function independent of the police.
- b. Establish preferred experience and qualification standards for participants in emergency management and business continuity planning, including professional certification.

**Management's Response:**

*We concur. The Office of the Chancellor recognizes business continuity planning as an integral part of a comprehensive emergency management model that encompasses mitigation, response and recovery. BCP is addressed in the revised Executive Order number 696.*

*A memo will be issued to the presidents emphasizing the importance of the both the emergency management and business continuity planning positions. Attached to the memo will be sample job descriptions for both positions.*

*Due Date: January, 2005*

**EMERGENCY READINESS**

**EMERGENCY PLANS**

**Recommendation 2**

We recommend that the chancellor's office:

- a. Remind the campuses of the importance of maintaining complete up-to-date emergency management plans.
- b. Consider the development and issuance of minimum CSU-specific guidelines for items that should be included in the plans.

Investigate the feasibility of all campuses using common planning software for both incident response/management and business continuity.

**Management's Response:**

*We concur. Revised Executive Order 696 will emphasize the importance of maintaining complete up-to-date emergency management plans and will require review/update on an annual basis. Revised EO 696 will also state that the plan must be compliant with Standardized Emergency Management Systems which provides an outline of what should be contained in an emergency management plan.*

*The Office of Risk Management will bring forth several planning software packages for review by the Systemwide Emergency Planning Taskforce (SWEPT) for their review and recommendation to the Executive Vice Chancellor and Chief Financial Office of the CSU. The next scheduled meeting for SWEPT is in early January, 2005.*

*Due date: January, 2005*

**MUTUAL AID/STANDBY AGREEMENTS**

**Recommendation 3**

We recommend that the chancellor's office reevaluate the issue of mutual aid/standby agreements and provide specific direction to the campuses concerning formalized written agreements or viable alternatives.

**Management's Response:**

*We concur. The Office of Risk Management will re-evaluate the issue of mutual aid/standby agreements utilized within the system. A memorandum will be issued to the campuses providing specific direction concerning formalized written mutual aid/standby agreements and/or viable alternatives.*

*Due date: January, 2005*

**POSITION DESIGNEES**

**Recommendation 4**

We recommend that the chancellor's office encourage the campuses to:

- a. Adopt a strategy of two-deep designations or ample cross-training to provide a higher level of assurance that key responders will actually be available to staff plan positions when needed.
- b. Establish specific training expectations and training recordkeeping guidelines for participants in campus emergency plans.

**Management's Response:**

*We concur. The revised Executive Order 696 will cover the adoption of two-deep designations including cross training to provide a higher level of assurance that trained key responders will be available to staff plan positions when needed. Mandatory SEMS training is being conducted for the campuses adopting the two-deep designations. Four members of each campus will be attending the training sessions – two at each session. The sessions will be conducted in December 2004 and in January 2005.*

*The revised Executive Order 696 will require specific training guidelines for participants in the building marshal programs and for those designated as members of the campus emergency management team on an annual basis. Recordkeeping guidelines are also included in revised Executive Order 696.*

*Due date: January, 2005*

**BUILDING COORDINATORS****Recommendation 5**

We recommend that the chancellor's office remind the campuses of the importance of maintaining an adequately staffed and trained group of building coordinators to assist in emergency preparedness and response.

**Management's Response:**

*We concur. The Office of Risk Management will issue a memorandum reminding campuses of the importance of maintaining an adequately staffed and trained group of building coordinators/marshals to assist in emergency preparedness and response.*

*Revised Executive Order 696 will also address the issue of the importance of building marshal programs.*

*Due date: January, 2005*

**VOLUNTEERS****Recommendation 6**

We recommend that the chancellor's office:

- a. Seek clarification on the necessity to obtain authorization from OES to register disaster service worker volunteers and communicate the results to the campuses.
- b. Encourage campuses to specifically identify and justify in planning documents the type of volunteer program they use, as well as compile an inventory of volunteer skills.

**Management's Response:**

*The Office of risk Management spoke to the Program Coordinators for the OES Disaster Service Worker Volunteer Program (DSWVP) for clarification regarding the necessity to obtain authorization to register disaster service worker volunteers. Ms. Anita Chant and Ms. Judy Miller, DSWVP coordinators, have confirmed that the campuses must obtain authorization from OES to register disaster service worker volunteers.*

*A memorandum will be issued communicating the DSWVP program requirements and process. The memorandum will also emphasize to each campus the importance of identification and documentation in planning documents regarding their volunteer program as well as to encourage them to compile an inventory of skills within their volunteer pool.*

*Due date: January, 2005*

**PLAN TESTING****Recommendation 7**

We recommend that the chancellor's office establish specific expectations for emergency management plan tests, including test results documentation.

**Management's Response:**

*We concur. The revised Executive Order 696 will establish specific expectations for emergency management plan tests, including test results documentation.*

*Due date: January, 2005*

**INTERNATIONAL STUDENTS****Recommendation 8**

We recommend that the chancellor's office remind the campuses of the importance of compliance with federal regulations concerning international students and regularly advise the campuses concerning best practices for controlling and reporting international student information including those offered by PeopleSoft.

**Management's Response:**

*We concur. The Office of Risk Management will coordinate with the office of International Programs and the Office of General Counsel in preparation of a memorandum to the campuses to emphasize the importance of compliance with federal regulations concerning international students.*

*The memorandum will also advise the campuses of best practices endorsed by the office of International Programs concerning the controlling and reporting of international student information including those offered by PeopleSoft.*

*Due date: January, 2005*

## FACILITY ISSUES

### Recommendation 9

We recommend that the chancellor's office require campuses to have available emergency generators in all key locations and establish specific expectations for their maintenance and testing, including the types and frequency of tests, generator replacement schedules, verification procedures for unattended generators that might have failed in automated tests, and the extent of required testing documentation.

#### Management's Response:

*We concur. A memorandum will be issued to the campuses that will remind them of the importance of emergency generators in all key locations and provide specific expectations for the maintenance and testing to include:*

- *Types and frequency of tests*
- *Generator replacement schedules*
- *Verification procedures for unattended generators*
- *Extent of required testing documentation and recordkeeping.*

*Due date: January, 2005*

## BUSINESS CONTINUITY

### Recommendation 10

We recommend that the chancellor's office adopt a specific BCP format and evaluation methodology for CSU systemwide application and periodically require plan evaluations.

#### Management's Response:

*We concur. The revised Executive Order 696 will discuss Business Continuity Planning as an integral part of comprehensive emergency management. It will also address the preparation and annual review of the plan. Although each plan is unique and designed to the campus specific, the common elements that should be incorporated in each plan will be included in the revised Executive Order 696.*

*Due date: January, 2005*

THE CALIFORNIA STATE UNIVERSITY  
 OFFICE OF THE CHANCELLOR

KERSFIELD

October 8, 2004

CHANNEL ISLANDS

CHICO

DOMINGUEZ HILLS

**MEMORANDUM**

FRESNO

FULLERTON

TO: Mr. Larry Mandel  
University Auditor

HAYWARD

FROM: Charles B. Reed  
Chancellor


HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 03-35 on  
*Disaster and Contingency Planning, Systemwide*

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

In response to your memorandum of October 8, 2004, I accept the response as submitted with the draft final report on *Disaster and Contingency Planning*.

NORTHRIDGE

POMONA

CBR/amd

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Mr. Dennis Hordyk, Assistant Vice Chancellor, Financial Services  
 Mr. Richard P. West, Executive Vice Chancellor and Chief Financial Officer

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS