

**DISASTER AND CONTINGENCY PLANNING**

**SAN DIEGO STATE UNIVERSITY**

**Report Number 03-37**

**November 21, 2003**

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## **ABBREVIATIONS**

BCIS	Bureau of Citizenship and Immigration Services
DCP	Disaster and Contingency Planning
DRII	Disaster Recovery Institute International
EO	Executive Order
SAM	State Administrative Manual
SDSU	San Diego State University
SEMS	Standardized Emergency Management System
SEVIS	Student and Exchange Visitor Information System
UC	University of California

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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 the San Diego State University (SDSU) campus from May 27, 2003, through June 27, 2003, and audited the procedures in effect at that time.

In our opinion, the administration and management of DCP activities need to be improved to ensure reasonable preparation, response, and recovery.

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 [6]**

Delegations of authority for incident command responsibilities and job descriptions were not documented. In addition, budgets were not prepared for disaster and contingency planning fiscal administration.

### **EMERGENCY READINESS [7]**

Certain issues were noted with campus emergency readiness that required improvement. The campus emergency plan did not address the threat and response to terrorism, concurrent absences for incident command personnel and headcount procedures after an evacuation; and incident command personnel did not maintain an off-campus copy of the emergency plan. Mutual aid agreements were not completed to address any activities and resources that might be needed in an emergency. Administration over the reporting of information for non-immigrant students did not include written policies and procedures for monitoring concurrent enrollment at another school and duties for admitting and reporting information was not adequately segregated at a department. In addition, policies and procedures were not in place for certain responsibilities associated with select agents and toxins; administration for emergency exercises and tests did not always sufficiently document test results and a program had not been developed to ensure campus incident command personnel were trained for a potential assignment during an emergency.

### **BUSINESS CONTINUITY [13]**

The business continuity plan did not address the protection of non-electronic information assets in the event of a disaster to campus operations and the resumption of operations affecting the data following a disaster.

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## INTRODUCTION

### BACKGROUND

Government Code §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).

Since the September 11<sup>th</sup> terrorist attacks, there have 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 Practice*, 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 Government Code §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 Government Code §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 there from. 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 date. At San Diego State University, the public safety department has overall responsibility for DCP.

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.

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## **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

### **GENERAL ENVIRONMENT**

#### **AUTHORITY FOR ACTIVITIES**

Authority for disaster and contingency planning activities was not always formalized.

We found that incident command responsibilities in delegations of authority and job descriptions were not documented.

California Office of Emergency Services, *State of California Emergency Plan*, Part One – Basic Plan, dated May 1998, indicates, in part, that a comprehensive business emergency plan includes delegated authority for emergency roles.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part I, §B2, dated December 23, 1994, indicates, in part, that the command function with the incident command system is the action taken to direct, order, or control resources by virtue of some explicit legal agency or delegated authority.

State Administrative Manual (SAM) §20050 states that elements of a satisfactory system of internal accounting and administrative control include a system of authorization and record-keeping procedures.

The assistant to the vice president for business and financial affairs stated that the campus was not aware of a requirement to document incident command functions and responsibilities within delegations of authority and job descriptions.

Internal control for disaster and contingency planning activities is compromised when delegations of authority and responsibilities in job descriptions are not fully documented.

#### **Recommendation 1**

We recommend that the campus formally document incident command responsibilities in delegations of authority and job descriptions.

#### **Campus Response**

We concur. The campus will document incident command responsibilities in delegations of authority and job descriptions by May 31, 2004.

### **FISCAL ADMINISTRATION**

Budgets were not prepared for disaster and contingency planning activities.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part I, §A4, dated December 23, 1994, indicates, in part, that at all levels of the standardized emergency management system there will be some functional activity related to managing resources in terms of directing and controlling, coordination, and resource inventorying.

Federal Emergency Management Agency, *Emergency Management Guide for Business & Industry*, §1, Step One on establishing a planning team, recommends developing an initial budget for expenses that may be necessary during the development of an emergency management plan.

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

The assistant to the vice president for business and financial affairs stated that there was no need to consolidate funding for disaster and contingency planning related activities.

Not preparing a budget for disaster and contingency planning activities increases the risk that goals will not be established and progress will not be monitored.

## **Recommendation 2**

We recommend that the campus prepare an operating budget for disaster and contingency planning activities to provide further direction to the achievement of goals and a means of measuring performance.

## **Campus Response**

Because the campus concurs with the objective that disaster and contingency planning activities must include achievement of goals and measurement of performance, the recommendation for a separate planning budget was carefully considered. The conclusion of the campus is that preparation of a separate budget is incompatible with the planning model elected by the campus, wherein disaster and contingency planning and execution are embedded within the responsibilities assigned to several different (expert) areas. That the campus model, designed to ensure collaboration and mutual responsibility, works well is validated by the fact that the audit report did not identify instances when budget practices caused failures in planning. Therefore, a separate budget for disaster and contingency planning has been determined to be unnecessary and will not be implemented.

# **EMERGENCY READINESS**

## **EMERGENCY PLAN**

Certain issues were noted with the campus emergency plan that required improvement.

We noted that:

- ▶ The plan did not address the threat and response to terrorism, concurrent absences for incident command personnel, and headcount procedures after an evacuation.
- ▶ Incident command personnel did not maintain an off-campus copy of the emergency plan.

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

- ▶ Maintenance and regular updating of the institutional emergency management system.
- ▶ Distribution of the plan and appropriate update materials to key employees and other significantly involved persons both on and off campus.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part I, §A4, dated December 23, 1994, indicates, in part, that at all levels of the standardized emergency management system there will be proper safeguards in place so all personnel can be accounted for at any time.

The public safety captain stated that a response to terrorism was in the process of being prepared, that the emergency plan addresses emergency staffing during and after business hours and identifies backup personnel, and that the campus was not aware of a requirement for off-campus copies of the emergency plan.

Outdated and inadequate distribution of the emergency plan increases the risk that the campus will not properly respond to disasters.

### **Recommendation 3**

We recommend that the campus update the emergency plan and strengthen controls over its distribution.

### **Campus Response**

We concur. The emergency plan will be updated by May 31, 2004.

## **MUTUAL AID AGREEMENTS**

Mutual aid agreements were not completed to address any activities and resources that might be needed in an emergency.

We noted that mutual aid agreements were drafted, however, not executed for:

- ▶ Temporary reassignment of procurement personnel, equipment, and other resources between other state universities.
- ▶ Meal service and food shipments between a campus auxiliary and an external vendor.
- ▶ Data and voice communication equipment and personnel with two University of California (UC) campuses.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus ensure that the management activities in support of emergency preparedness include determination, acquisition, and maintenance of facilities, equipment, and related supplies required for emergency preparedness.

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

SAM §20050 indicates that the existence of lines of organizational authority and responsibility not clearly articulated or nonexistent are indicative of a poorly maintained or vulnerable control system.

The director of procurement services stated that the systemwide mutual aid plan is under review by several campuses. The director of facilities services for Aztec Shops stated that the agreement for meal service and food shipments was pending review during the audit. The director of telecommunications and network services stated that the agreement with the two UC campuses was under review.

The absence of executed mutual aid agreements can contribute to confusion and inability of the campus to appropriately respond to emergencies.

#### **Recommendation 4**

We recommend that the campus finalize emergency management mutual aid arrangements with other entities for:

- a. Temporary reassignment of procurement personnel, equipment, and other resources between other state universities.
- b. Meal service and food shipments between a campus auxiliary and an external vendor.
- c. Data and voice communication equipment and personnel with two UC campuses.

#### **Campus Response**

We concur.

- a. The procurement mutual aid is a systemwide agreement and requires the approval of all CSU campuses and the chancellor's office. The CSU procurement and support services officers association is coordinating the review and approval of the mutual aid agreement. San Diego State University's procurement director has approved the draft and is waiting to receive notice as to when the agreement will be executed.
- b. The meal service and food shipment agreement between a campus auxiliary and an external vendor has been finalized and signed.
- c. Data and voice communication equipment and personnel with two UC campuses has been finalized and signed.

## **NON-IMMIGRANT STUDENTS**

The administration of information for non-immigrant students was in need of improvement.

Our review disclosed that:

- ▶ Written policies and procedures at the International Student Center had not been developed for monitoring concurrent enrollment for non-immigrant students at another school.
- ▶ Control duties at the American Language Institute for admitting students and reporting of information to Bureau of Citizenship and Immigration Services (BCIS) were not adequately segregated. We noted that the immigration/admissions advisor and assistant at the American Language Institute were both provided the ability to admit student applicants and certify eligibility status for non-immigrant students as designated school officials.

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*, §214.2 (f)(6)(iv), dated December 11, 2002, indicates that a student may be enrolled in two different BCIS-approved schools at one time as long as the combined enrollment amounts to a full time course of study.

SAM §20050 indicates that the elements of a satisfactory system of internal accounting and administrative controls include a system of record-keeping procedures and a plan of organization that provides segregation of duties.

The associate director of the international student center stated that written policies and procedures at the international student center are under development for monitoring concurrent enrollment for non-immigrant students. The associate dean for the college of extended studies stated that limited staffing precluded the separation of responsibilities for admitting students and reporting information to BCIS.

Failure to adequately control the reporting of information for non-immigrant students increases exposure to non-compliance with federal regulations.

### **Recommendation 5**

We recommend that the campus:

- a. Establish written compliance policies and procedures with respect to monitoring concurrent enrollment for non-immigrant students at other schools.
- b. Review the process for admitting students into the American Language Institute and reporting of information to BCIS and take action to appropriately segregate the duties or establish mitigating controls.

### **Campus Response**

We concur.

- a. Monitoring compliance policies and procedures with respect to concurrent enrollment for non-immigrant students at other schools have been added to the International Student Center SEVIS Handbook.
- b. The American Language Institute will review its current processes for admitting and reporting students in SEVIS. The results will be completed by April 30, 2004.

## **SELECT AGENTS AND TOXINS**

Policies and procedures were not in place for certain responsibilities associated with select agents and toxins.

We noted that:

- ▶ A draft version for policies and procedures on select agents and toxins dated September 2002 was awaiting approval.
- ▶ Procurement service personnel had not received training to identify select agents.
- ▶ Sufficient controls over approving and receiving select agents had not been established.

Code of Federal Regulations, Title 42, Part 1003, *Possession, Use, and Transfer of Select Agents and Toxins; Interim Final Rule*, dated December 13, 2002, provides a list of regulated agents and toxins along with a requirement for policies and procedures to ensure appropriate security.

The director for the center for human resources and environmental health and safety stated that policies and procedures for select agents and toxins are pending review and approval.

Not having policies and procedures in place for certain responsibilities associated with select agents and toxins increases the risk that misunderstandings and miscommunication will occur.

### **Recommendation 6**

We recommend that the campus:

- a. Finalize policies and procedures and distribute them to individuals involved with select agents and toxins at the campus.
- b. Ensure that a system of internal control is in place over select agents and toxins, which includes approval, receipt, documentation, and training.

### **Campus Response**

We concur.

- a. Policies and procedures will be finalized and distributed to individuals involved with select agents and toxins at the campus by May 31, 2004.
- b. A system of internal control will be in place over select agents and toxins by May 31, 2004.

## **EXERCISES AND TESTS**

The documentation for emergency exercise and test results did not cover response actions, application of the standardized emergency management system, modifications to plans and procedures, training needs, and recovery activities.

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 III, §II, 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.

The public safety captain stated that the initial emphasis was to train the building coordinators and emergency staff.

Inadequate documentation in emergency exercises and tests increases the risk of ineffective preparedness.

### **Recommendation 7**

We recommend that the campus properly document the results from emergency exercises and tests.

### **Campus Response**

We concur. The campus will develop an after-action report format, utilize it after each exercise, and include it within the Emergency Plan. This report format will be completed by May 31, 2004.

### **TRAINING FOR INCIDENT COMMAND PERSONNEL**

A program had not been developed to ensure campus incident command personnel were trained for a potential assignment during an emergency.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus ensure that the management activities in support of emergency preparedness include training of emergency personnel.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part II, §A3, dated December 23, 1994, requires that agencies ensure that their emergency response personnel maintain minimum training competencies pursuant to the approved SEMS' course of instruction.

The assistant to the vice president for business and financial affairs stated that certain campus emergency response personnel were trained; however, standards do not exist for the number of trained personnel.

Not maintaining an effective training plan increases the risk that incident command personnel will not complete emergency assignments.

### **Recommendation 8**

We recommend that the campus develop and document a training plan for incident command personnel to sufficiently understand and complete their responsibilities within the emergency plan.

### **Campus Response**

We concur. The campus will develop a training plan for incident command personnel by May 31, 2004.

## **BUSINESS CONTINUITY**

The campus did not have a sufficient business continuity plan in the event of a disaster or emergency.

We noted that the campus developed a plan to enable business operations to continue in the event of an extended outage of data processing services. However, the business continuity plan did not address the protection of non-electronic information assets in the event of a disaster to campus operations and the resumption of operations affecting the data following a disaster.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus to maintain an emergency management system which should become effective when a hazardous condition or natural disaster reaches or has the potential for reaching proportions beyond the capacity of routine operations.

Federal Emergency Management Agency, *Emergency Management Guide for Business & Industry*, §2, under *Records Preservation*, indicates that preserving vital records is essential to the quick restoration of operations and recommends establishing procedures for protecting and accessing vital records.

SAM §4843.1 requires each state agency to establish and maintain both an operational recovery plan and a plan to resume operations following a disaster.

The assistant to the vice president for business and financial affairs stated that the campus was not aware of a business continuity plan requirement for non-electronic information.

Without a sufficient business continuity plan, disaster recovery would be more difficult.

### **Recommendation 9**

We recommend that the campus establish business continuity plans encompassing protection of non-electronic information assets.

### **Campus Response**

The campus concurs that business continuity plans are good business practice and has such plans included in the disaster recovery plan maintained by University Computing Operations. The binder index will be clarified to more clearly reference these documents. The continuity plans will be redistributed for updating and the areas will be asked to address protection of vital records in those plans. Updates will be completed by May 31, 2004.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Stephen Weber	President
Cynthia Avery	Director, Student Life and Development
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 Management
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



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January 21, 2004

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UNIVERSITY AUDITOR

JAN 26 2004

THE CALIFORNIA STATE  
UNIVERSITY

Mr. Larry Mandel  
University Auditor  
The California State University  
401 Golden Shore, 4th Floor  
Long Beach, CA 90802

Dear Mr. Mandel:

The following is San Diego State University's response to Report Number 03-37, *Disaster and Contingency Planning*. For ease of reference, the report's recommendations have been included with our responses.

### **Recommendation 1**

We recommend that the campus formally document incident command responsibilities in delegations of authority and job descriptions.

### **Campus Response**

We concur. The campus will document incident command responsibilities in delegations of authority and job descriptions by May 31, 2004.

### **Recommendation 2**

We recommend that the campus prepare an operating budget for disaster and contingency planning activities to provide further direction to the achievement of goals and a means of measuring performance.

### **Campus Response**

Because the campus concurs with the objective that disaster and contingency planning activities must include achievement of goals and measurement of performance, the recommendation for a separate planning budget was carefully considered. The conclusion of the campus is that preparation of a separate budget is incompatible with the planning

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model elected by the campus, wherein disaster and contingency planning and execution are embedded within the responsibilities assigned to several different (expert) areas. That the campus model, designed to ensure collaboration and mutual responsibility, works well is validated by the fact that the audit report did not identify instances when budget practices caused failures in planning. Therefore, a separate budget for disaster and contingency planning has been determined to be unnecessary and will not be implemented.

### **Recommendation 3**

We recommend that the campus update the emergency plan and strengthen controls over its distribution.

### **Campus Response**

We concur. The emergency plan will be updated by May 31, 2004.

### **Recommendation 4**

We recommend that the campus finalize emergency management mutual aid arrangements with other entities for:

- a. Temporary reassignment of procurement personnel, equipment, and other resources between other state universities.
- b. Meal service and food shipments between a campus auxiliary and an external vendor.
- c. Data and voice communication equipment and personnel with two University of California campuses.

### **Campus Response**

We concur.

- a. The procurement mutual aid is a systemwide agreement and requires the approval of all CSU campuses and the Chancellor's Office. The California State University (CSU) Procurement and Support Services Officers Association is coordinating the review and approval of the mutual aid agreement. San Diego State University's

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Procurement Director has approved the draft and is waiting to receive notice as to when the agreement will be executed.

- b. The meal service and food shipment agreement between a campus auxiliary and an external vendor has been finalized and signed.
- c. Data and voice communication equipment and personnel with two University of California campuses has been finalized and signed.

### **Recommendation 5**

We recommend that the campus:

- a. Establish written compliance policies and procedures with respect to monitoring concurrent enrollment for non-immigrant students at other schools.
- b. Review the process for admitting students into the American Language Institute and reporting of information to BCIS and take action to appropriately segregate the duties or establish mitigating controls.

### **Campus Response**

We concur.

- a. Monitoring compliance policies and procedures with respect to concurrent enrollment for non-immigrant students at other schools have been added to the International Student Center SEVIS Handbook.
- b. The American Language Institute will review its current processes for admitting and reporting students in SEVIS. The results will be completed by April 30, 2004.

### **Recommendation 6**

We recommend that the campus:

Finalize policies and procedures and distribute them to individuals involved with select agents and toxins at the campus.

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- b. Ensure that a system of internal control is in place over select agents and toxins, which includes approval, receipt, documentation, and training.

### **Campus Response**

We concur.

- a. Policies and procedures will be finalized and distributed to individuals involved with select agents and toxins at the campus by May 31, 2004.
- b. A system of internal control will be in place over select agents and toxins by May 31, 2004.

### **Recommendation 7**

We recommend that the campus properly document the results from emergency exercises and tests.

### **Campus Response**

We concur. The campus will develop an after-action report format, utilize it after each exercise, and include it within the Emergency Plan. This report format will be completed by May 31, 2004.

### **Recommendation 8**

We recommend that the campus develop and document a training plan for incident command personnel to sufficiently understand and complete their responsibilities within the emergency plan.

### **Campus Response**

We concur. The campus will develop a training plan for incident command personnel by May 31, 2004.

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**Recommendation 9**

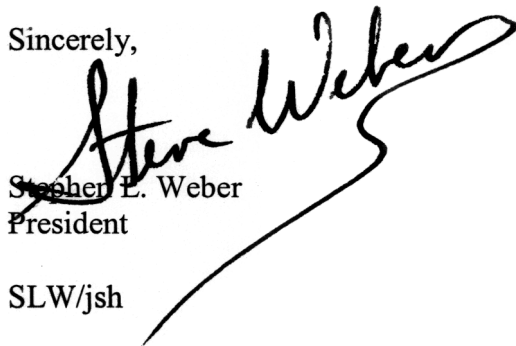
We recommend that the campus establish business continuity plans encompassing protection of non-electronic information assets.

**Campus Response**

The campus concurs that business continuity plans are good business practice and has such plans included in the disaster recovery plan maintained by University Computing Operations. The binder index will be clarified to more clearly reference these documents. The continuity plans will be redistributed for updating and the areas will be asked to address protection of vital records in those plans. Updates will be completed by May 31, 2004.

Documentation of policy and control changes will follow under separate cover.

Sincerely,



Stephen E. Weber  
President

SLW/jsh

c: Sally F. Roush, Vice President, Business Affairs  
William D. Boyd, Associate Vice President, Enrollment Support  
Ellene J. Gibbs, Associate Vice President, Financial Operations

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

BAKERSFIELD February 2, 2004

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

FRESNO

TO: Mr. Larry Mandel  
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed  
Chancellor

HUMBOL

SUBJECT: Draft Final Report Number 03-37 on *Disaster and Contingency Planning*, San Diego State University

LONG BEACH

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of February 2, 2004, I accept the response as submitted with the draft final report on *Disaster and Contingency Planning*, San Diego State University.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/bth

SACRAMENTO

Enclosure

SAN BERNARDINE

cc: Ms. Ellene J. Gibbs, Director, Business Information Management  
Dr. Stephen L. Weber, President

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS