

DISASTER AND CONTINGENCY PLANNING
CALIFORNIA POLYTECHNIC STATE UNIVERSITY,
SAN LUIS OBISPO

Report Number 03-39
February 11, 2004

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ABBREVIATIONS

Cal Poly	California Polytechnic State University
DCP	Disaster and Contingency Planning
DRII	Disaster Recovery Institute International
EO	Executive Order
EOC	Emergency Operations Center
ITS	Information Technology Services
SAM	State Administrative Manual
SEMS	Standardized Emergency Management System
SEVIS	Student and Exchange Visitor Information System

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 California Polytechnic State University, San Luis Obispo campus from July 14, 2003, through August 22, 2003, and audited the procedures in effect at that time.

In our opinion, the administration and management of DCP activities needed 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 [8]

Authority for certain disaster and contingency planning roles and activities was not always formalized. Except in one instance, incident command responsibilities were not documented in job descriptions. In addition, documentation could not be provided to show that the director of counseling and health services had reviewed and approved the medical disaster component of the campus emergency management plan.

EMERGENCY READINESS [9]

Certain issues were noted with campus emergency readiness that required improvement. A process was not in place to ensure that all required subordinate emergency plans were submitted, complete and consistent with the campus emergency management plan and the emergency management plan was not well communicated to major constituency groups. For example, only three subordinate emergency plans were available at the time of our review; the fiscal services and health center plans did not include all the required components; and the campus had not determined which specific areas were required to submit subordinate plans, specified due dates, or established a review process to ensure completeness and consistency with the campus emergency management plan. Training expectations and record keeping for emergency response team personnel were not adequate because the provided training only included a review of plan provisions and member roles upon assignment and annually thereafter, and certain other types of training were not well documented. In addition, the disposition of suggestions from emergency exercise and test results was not clear, and documentation of emergency exercise and test results pertaining to mutual aid agreements was incomplete because feedback from participating local jurisdictions was sometimes provided only verbally. Further, the campus did not have an extensive campuswide network of building marshals to assist in emergencies. The campus only had a pilot program of building marshals in the administration building, while housing had assigned head resident assistants with emergency responsibilities.

FACILITY ISSUES [15]

Testing of emergency generators did not ensure their readiness in the event of an emergency. With one exception, emergency generators had not been subjected to a needs analysis to ensure their ability to handle current power demands, and a system was not in place for timely notification of failed self-tests. In addition, the campus had not been properly inspecting and servicing fire sprinklers and standpipes. Campus building files included uncorrected fire marshal citations for non-compliance with code requirements involving the inspection and service of fire sprinklers and standpipes dating back to at least 1998.

BUSINESS CONTINUITY [18]

Although a business continuity plan had been drafted for the continuation of business operations in the event of an extended outage of data processing services and document imaging was used by certain departments, a comprehensive business continuity plan, which addressed business risks and impacts of unexpected disruptions and identified critical applications and vital records considered irreplaceable, had not been developed.

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 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 11th 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.

The Standardized Emergency Management System (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 California Polytechnic State University, San Luis Obispo, the associate vice president for administration 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.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

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

We found that with one exception, incident command responsibilities were not documented in job descriptions. In addition, although the director of counseling and health services reviewed the plan and participated in drills, there was no documentation to evidence his annual review and approval of the medical disaster component of the campus emergency management plan.

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.

Executive Order (EO) No. 814, *Policy on University Health Services*, dated April 4, 2002, requires that the student health center staff review the medical disaster component of the campus emergency plan annually.

The director of human resources stated that the job descriptions for the plan responders might not include specifics on disaster and contingency planning responsibilities because many of the positions were of a managerial/technical nature.

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:

- a. Incident command responsibilities in job descriptions.
- b. Annual review and approval of the campus medical disaster plan.

Campus Response

We concur.

- a. Section managers of the emergency operations center (EOC) group will be notified in writing that their duties in the EOC are part of their official job duties and will be instructed to include these duties in the next revision of their job description. This notification will be filed in their personnel file.
- b. The Emergency Preparedness Plan prepared by health and counseling services will be reviewed annually and include documentation that the director of counseling and health services has reviewed and approved the plan.

Anticipated Date of Completion: May 1, 2004

EMERGENCY READINESS

SUBORDINATE EMERGENCY PLANS

The campus did not have a process in place to ensure that all required subordinate emergency plans were submitted, complete, and consistent with the campus emergency management plan.

We noted that:

- ▶ Only three subordinate emergency plans were available at the time of our review. These plans covered fiscal services, the health center, and the library.
- ▶ The fiscal services and health center plans did not include all the required components, while library management had not approved the library plan.
- ▶ The campus had not determined which specific areas were required to submit subordinate plans, specified due dates, or established a review process to ensure completeness and consistency with the campus emergency management plan.

A memorandum dated May 19, 2003, from the campus vice president for administration and finance to vice presidents and deans states that division, college, department, and program level plans that coordinate personnel efforts and resource supplies with the campuswide emergency management plan are essential. This memo is consistent with the *Campus Emergency Management Plan*, revised February 2003, and further states that these plans should have the following basic elements:

- ▶ Roster of all personnel in the department that includes work and home telephone numbers, as well as cell phone numbers.
- ▶ List of emergency equipment, supplies, and resources including any agreements with vendors for service or equipment. Location of equipment should also be indicated.
- ▶ Primary objectives for the department during an emergency and how the department will achieve these objectives.
- ▶ Organizational structure that will be used during an emergency.
- ▶ Method for assembling and communicating with departmental personnel, including identification of key personnel who may be contacted if a department emergency team is required.
- ▶ Method of communicating with the campus emergency operations center.

The associate vice president for administration stated that the subordinate plans had only recently been requested and a formalized review process had not been established.

Incomplete planning increases the risk that the campus will not be able to properly respond to emergencies.

Recommendation 2

We recommend that the campus:

- a. Clearly define which areas need to submit subordinate plans and establish due dates to ensure that all required plans are completed in a timely manner.
- b. Establish a process to evaluate the plans and subsequent revisions for completeness and consistency with the campus emergency management plan.

Campus Response

We concur. The campus will define which areas need to submit subordinate plans and establish due dates. The EOC director will review and document that the plans and subsequent revisions are complete and consistent with the campus emergency management plan.

Anticipated Date of Completion: March 31, 2004

TRAINING FOR EMERGENCY PERSONNEL

Training expectations and record keeping for emergency response team personnel did not provide assurance that personnel were adequately trained.

Training provided for in the campus emergency management plan only included a review of plan provisions and member roles upon assignment and annually thereafter. In addition, interviews with several response team members disclosed that other types of training had occurred but had not been well documented.

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.

Title 19 §2446 requires state agencies to document training. Part II.A.3 of the *Standardized Emergency Management System (SEMS) Guidelines* provides approved curriculum and states that agencies using alternatives should be able to demonstrate that required competencies are being maintained.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part II.A.3, dated December 23, 1994, recommends that a SEMS training record keeping 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 should include copies of the training materials used such as instructor syllabus, lesson plans, student notebook, exercises, and tests.

The director of human resources stated that the campus does not maintain central training records in personnel files. She further stated that training record keeping was the responsibility of the respective departments.

Inadequately trained emergency responders could jeopardize the ability of the campus to properly respond to emergencies.

Recommendation 3

We recommend that the campus define more specific training expectations and establish procedures to maintain comprehensive training records.

Campus Response

We concur. The training materials, names of attendees, and date of training will be maintained by the EOC director.

Anticipated Date of Completion: March 31, 2004

BUILDING MARSHALS

The campus did not have an extensive campuswide network of building marshals to assist in emergencies.

We found that the campus only had a pilot program of building marshals in the administration building, while housing had assigned head resident assistants with emergency responsibilities.

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 associate vice president for administration stated that the campus wanted to evaluate the pilot in the administration building before establishing a campuswide network of building marshals.

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

Recommendation 4

We recommend that the campus establish an effective network of building marshals and provide them with adequate training.

Campus Response

We concur. The existing building coordinator program will be formalized in writing establishing protocol and procedures for building evacuation. Building coordinators will be provided program training.

Anticipated Date of Completion: September 30, 2004

PLAN COMMUNICATION

The emergency management plan was not well communicated to major constituency groups.

There were separate orientations for the major constituency groups on campus: new staff met with human relations usually within their first three days of employment, faculty orientations were performed by the campus academic personnel office, and the California Polytechnic State University (Cal Poly), San Luis Obispo traditional week of welcome for students took place the week before the fall quarter began. However, none of these three orientations included communication of emergency planning/readiness information. The only regularly scheduled communications of this subject were:

- ▶ Fire drills for students living in campus housing coordinated by the residential life staff, and student acknowledgement of emergency placards mounted on the doors of every room.
- ▶ Cal Poly San Luis Obispo Report items indicating a plan and where to get additional information.
- ▶ Annual distribution of the campus emergency management plans to vice presidents, deans, and directors.
- ▶ Annual presentations by the environmental health and safety manager to certain faculty through the office of research and graduate programs.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, establishes the responsibilities in support of an effective emergency management system including communication.

The associate vice president for administration stated that existing guidelines did not provide for mandatory inclusion of the emergency management plan in orientations.

Constituents that are unfamiliar with emergency procedures could cause unnecessary confusion and denigrate response capabilities.

Recommendation 5

We recommend that the campus provide information on emergency preparedness to constituency groups.

Campus Response

We concur. Emergency preparedness communications for constituency groups will be developed.

Anticipated Date of Completion: April 30, 2004

EXERCISES AND TESTS

Tests of the campus emergency management plan were not well documented.

Our review of documentation for emergency exercise and test results disclosed that:

- ▶ Although documentation for emergency exercise and test results included some feedback from participants on what should be changed, the disposition of these suggestions was not clear.
- ▶ Documentation of emergency exercise and test results pertaining to mutual aid agreements was incomplete because feedback from participating local jurisdictions was sometimes provided only verbally.

California Office of Emergency Services, *Standardized Emergency Management Systems Guidelines*, Part II, §A5, dated December 23, 1994, indicates that an exercise program coordinated with other agencies for multi-agency or multi-jurisdictional field exercises should be considered.

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.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the periodic testing of mutual aid agreements.

The associate vice president for administration stated that much of the analysis and response to tests was handled verbally and the campus was still negotiating some mutual aid agreements.

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

Recommendation 6

We recommend that the campus properly document:

- a. The results from emergency exercises and tests and the disposition of suggestions.
- b. Periodic tests of mutual aid agreements and feedback received from participants.

Campus Response

We concur. Emergency exercises will be documented along with the disposition of suggestions. Mutual aid action and any related feedback will be documented.

Anticipated Date of Completion: April 30, 2004

FACILITY ISSUES

EMERGENCY POWER

Testing of emergency generators did not ensure their readiness in the event of an emergency.

The campus had 18 emergency generators in service with an average age of 17 years. The oldest generator was put in service in 1969 and the newest in 2000, including the EOC generator that was put in service in 1984 before the EOC existed at that location. We noted that:

- ▶ With one exception, emergency generators had not been subjected to a needs analysis to ensure their ability to handle current power demands. Although the generators, including the EOC generator, were periodically tested under a dummy load based on the generator's capacity, such tests would not measure generator performance against current demands from the equipment they support.
- ▶ All of the generators had display panels which would indicate whether a self-test had failed. However, the panel displays were generally not visible without some effort to open gated enclosures and panel covers, and no other mechanisms were available to automatically alert campus personnel to self-test failures. The campus estimated that these sites were visited approximately once per quarter.

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 interim director for facility services stated that the maintenance and servicing of the emergency generators had been contracted out to include testing only under dummy loads and that it was not considered necessary to visit emergency generator sites any more frequently than once per quarter.

Testing of emergency generators that does not consider current needs and timely response to failed self-tests increases the risk of failure during an actual emergency.

Recommendation 7

We recommend that the campus:

- a. Subject the emergency generators to a needs analysis based on intended usage and load requirements.
- b. Consider installing a system that automatically reports failed self-tests or establish a manual monitoring system to ensure the timely detection of such failures.

Campus Response

We concur.

- a. Facility services will draft and submit a procedure for performing needs analysis of the emergency generators.

Anticipated Date of Completion: March 31, 2004

- b. Facility services will draft a Request for Proposal for competitive procurement for an automated system, and investigate the costs of such a system. We will also request a proposal from current testing and inspection contractor for manual observations. After receipt of both proposals, facility services will weigh the cost, benefit, and any regulatory requirements for such a process.

Anticipated Date of Completion: May 1, 2004

FIRE SUPPRESSION

The campus had not been properly inspecting and servicing fire sprinklers and standpipes.

We found uncorrected fire marshal citations in campus building files that reported non-compliance with code requirements for the inspection and service of fire sprinklers and standpipes dating back to at least 1998.

California Code of Regulations, Title 19 §904(a), states that all automatic fire extinguishing systems, including systems installed as an alternate to other building requirements, shall be serviced and maintained in accordance with the following frequencies. Local authorities may require more frequent service and additional procedures.

- ▶ Standpipe systems shall be maintained operable at all times and maintenance inspection shall be performed at least semi-annually.
- ▶ Standpipe systems shall be serviced at least every five years.
- ▶ Automatic fire sprinkler systems shall be maintained operable at all times and maintenance inspection shall be performed at least quarterly.
- ▶ Automatic fire sprinkler systems shall be serviced at least every five years.

The manager of environmental health and safety stated that the responsibility for fire sprinkler and standpipe inspection/servicing had been transferred to facility services. The interim director of facility services stated that they had a turnover in directors, and the actions needed to obtain a licensed contractor for the inspection/servicing of the fire sprinklers and standpipes were recently re-prioritized.

Lack of inspection and servicing of fire sprinklers and standpipes increases the risk that fires may not be suppressed because of equipment malfunction.

Recommendation 8

We recommend that the campus correct the fire marshal citations and establish procedures to properly inspect and service fire sprinklers and standpipes at prescribed intervals.

Campus Response

We concur. Currently facility services lacks the in-house resources to perform these tasks. We are preparing a bid document for a multi-year contract for testing, service, and inspection of all fire suppression systems. April 1, 2004, is the projected award of the contract.

Anticipated Date of Completion: May 1, 2004

BUSINESS CONTINUITY

The campus had not developed a comprehensive business continuity plan in the event of a disaster or emergency.

We noted that a business continuity plan had been drafted for the continuation of business operations in the event of an extended outage of computing services, and a document imaging system had been implemented, which was used by certain departments. However, the plan did not address business risks and impacts of unexpected disruptions and identify critical applications, vital records considered irreplaceable, and non-automated files such as personnel files in human resources. The only business continuity plans available were for information technology services, contracts and procurement services, study abroad, the library, and two auxiliary organizations.

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.

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 associate vice president for administration stated that they had initially concentrated on the most critical areas before addressing lower priorities.

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

Recommendation 9

We recommend that the campus identify all critical operational areas and assure that business continuity is addressed in each one.

Campus Response

We concur. The campus will prioritize key university operations essential for recovery after an event. A template will be developed to be used for the consistent development of the business continuity plans and to assure alignment with the emergency management plan.

Anticipated Date of Completion: September 30, 2004

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
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
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
Lawrence R. 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

CAL POLY

California Polytechnic State University
San Luis Obispo, CA 93407

Administration & Finance Division
(805) 756-2171 • Fax (805) 756-7560

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UNIVERSITY AUDITOR

MAR 22 2004

THE CALIFORNIA STATE
UNIVERSITY

March 15, 2004

Mr. Larry Mandel
University Auditor
Office of the University Auditor
The California State University
401 Golden Shore
Long Beach, CA 90802-4275

Subject: Audit Report Number 03-39, *Disaster and Contingency Planning* at
California Polytechnic State University, San Luis Obispo

Dear Larry:

Attached is the campus response to recommendations of Audit Report Number 03-39, *Disaster and Contingency Planning*. If you have questions regarding this document, please contact Vicki Stover, Associate Vice President for Administration, at 805-756-2171 or VStover@calpoly.edu.

Sincerely,



Lawrence Kelley
Vice President for Administration & Finance

cc: C. Morton
M. Bragg
M. Hunter
V. Stover

CALIFORNIA POLYTECHNIC STATE UNIVERSITY,
SAN LUIS OBISPO

DISASTER AND CONTINGENCY PLANNING
AUDIT REPORT NO. 03-39

GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus formally document:

- a. Incident command responsibilities in job descriptions.
- b. Annual review and approval of the campus medical disaster plan.

Campus Response

We concur.

Section Managers of the Emergency Operations Center Group will be notified in writing that their duties in the Emergency Operations center are part of their official job duties and will be instructed to include these duties in the next revision of their job description. This notification will be filed in their personnel file.

- b. The "Emergency preparedness Plan" prepared by Health and Counseling Services will be reviewed annually and include documentation that the Director of Counseling and Health Services has reviewed and approved the plan.

Anticipated Date of Completion: May 1, 2004

EMERGENCY READINESS

SUBORDINATE EMERGENCY PLANS

Recommendation 2

We recommend that the campus:

- a. Clearly define which areas need to submit subordinate plans and establish due dates to ensure that all required plans are completed in a timely manner.
- b. Establish a process to evaluate the plans and subsequent revisions for completeness and consistency with the campus emergency management plan.

Campus Response

We concur. The campus will define which areas need to submit subordinate plans and establish due dates. The EOC Director will review and document that the plans and subsequent revisions are complete and consistent with the campus emergency management plan.

Anticipated Date of Completion: March 31, 2004

TRAINING FOR EMERGENCY PERSONNEL

Recommendation 3

We recommend that the campus define more specific training expectations and establish procedures to maintain comprehensive training records.

Campus Response

We concur. The training materials, names of attendees, and date of training will be maintained by the EOC Director.

Anticipated Date of Completion: March 31, 2004

BUILDING MARSHALS

Recommendation 4

We recommend that the campus establish an effective network of building marshals and provide them with adequate training.

Campus Response

We concur. The existing building coordinator program will be formalized in writing establishing protocol and procedures for building evacuation. Building Coordinators will be provided program training.

Anticipated Date of Completion: September 30, 2004

PLAN COMMUNICATION

Recommendation 5

We recommend that the campus provide information on emergency preparedness to constituency groups.

Campus Response

We concur. Emergency preparedness communications for constituency groups will be developed.

Anticipated Date of Completion: April 30, 2004

EXERCISES AND TESTS

Recommendation 6

We recommend that the campus properly document:

- a. The results from emergency exercises and tests and the disposition of suggestions.
- b. Periodic tests of mutual aid agreements and feedback received from participants.

Campus Response

We concur. Emergency exercises will be documented along with the disposition of suggestions. Mutual aid action and any related feedback will be documented.

Anticipated Date of Completion: April 30, 2004

FACILITY ISSUES

EMERGENCY POWER

Recommendation 7

We recommend that the campus:

- a. Subject the emergency generators to a needs analysis based on intended usage and load requirements.
- b. Consider installing a system that automatically reports failed self-tests or establish a manual monitoring system to ensure the timely detection of such failures.

Campus Response

- a. We concur.

Facility Services will draft and submit a procedure for performing needs analysis of the emergency generators.

Anticipated Date of Completion: March 31, 2004

- b. We concur. Facility Services will draft a Request for Proposal for competitive procurement for an automated system, and investigate the costs of such a system. We will also request a proposal from current testing and inspection contractor for manual observations. After receipt of both proposals, Facility Services will weigh the cost, benefit, and any regulatory requirements for such a process.

Anticipated Date of Completion: May 1, 2004

FIRE SUPPRESSION

Recommendation 8

We recommend that the campus correct the fire marshal citations and establish procedures to properly inspect and service fire sprinklers and standpipes at prescribed intervals.

Campus Response

We concur. Currently Facility Services lacks the in-house resources to perform these tasks. We are preparing a bid document for a multi-year contract for testing, service, and inspection of all fire suppression systems. April 1, 2004 is the projected award of the contract.

Anticipated Date of Completion: May 1, 2004

BUSINESS CONTINUITY

Recommendation 9

We recommend that the campus identify all critical operational areas and assure that business continuity is addressed in each one.

Campus Response

We concur. The campus will prioritize key university operations essential for recovery after an event. A template will be developed to be used for the consistent development of the business continuity plans and to assure alignment with the emergency management plan.

Anticipated Date of Completion: September 30, 2004

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

April 21, 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 03-39 on *Disaster and Contingency Planning*, California Polytechnic State University, San Luis Obispo

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

In response to your memorandum of April 21, 2004, I accept the response as submitted with the draft final report on *Disaster and Contingency Planning*, California Polytechnic State University, San Luis Obispo.

NORTHRIDGE

POMONA

SACRAMENTO

CBR/bth

SAN BERNARDINO

Enclosure

SAN DIEGO

cc: Dr. Warren J. Baker, President
Mr. Lawrence R. Kelley, Vice President for Administration and Finance

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS