

DISASTER AND CONTINGENCY PLANNING

**CALIFORNIA STATE UNIVERSITY,
MONTEREY BAY**

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ABBREVIATIONS

BEC	Building Emergency Coordinator
CSU	California State University
CSUMB	California State University, Monterey Bay
DCP	Disaster and Contingency Planning
DRII	Disaster Recovery Institute International
EO	Executive Order
EOC	Emergency Operations Center
ERT	Emergency Response Team
OES	Office of Emergency 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 State University, Monterey Bay campus from July 21, 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 significantly improved to ensure appropriate 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]

Cabinet-level participation in the disaster contingency planning process and representation on the emergency response team needed improvement.

EMERGENCY READINESS [9]

The campus emergency plan needs to be updated to address such issues as sheltering-in, concurrent absences, building and systems prioritization and recently implemented terrorism measures; in some cases, emergency plan designees were not aware of the alternate location of the emergency operations center or the location of emergency plan documentation. The emergency executive position on the emergency response team was unfilled and backup personnel had not been assigned for the majority of positions. Further, the campus had not extensively tested the emergency plan in recent years and a formalized training program had not been developed for emergency response team personnel as less than half of team personnel had received any training during the past two years. Building emergency coordinators were not assigned to eight campus buildings, backups were not required for each coordinator position, records to evidence the performance of evacuation drills were incomplete and the campus had not requested a delegation of authority to register volunteer disaster service workers nor inventoried emergency response skills for such individuals within the campus community. Controls pertaining to the existence and use of select agents and toxins on campus were not formally documented; and purchasing and contracting agreements for certain post-emergency resources were not in place. In addition, formal policies and procedures over the administration of the federal Student and Exchange Visitor Information Program for non-immigrant students did not include formal written policies and procedures and duties were not adequately segregated as the same individual that approves admission of international students also certifies their eligibility as international students as a designated school official. Finally, orientations for new faculty, students, and employees did not formally address emergency preparedness.

FACILITIES ISSUES [19]

The emergency operations center was inadequately supplied and independent periodic inventories of campus emergency equipment were not performed. In addition, certain key areas on campus were without emergency power generators.

BUSINESS CONTINUITY [21]

In the event of a disaster or emergency, the campus did not have a business continuity plan to protect vital records.

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

INTRODUCTION

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 State University, Monterey Bay, the department of business and support services 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

Cabinet level management did not actively participate in disaster and contingency planning activities.

Minutes of executive level cabinet meetings indicated that emergency preparedness was only a topic for discussion once during the past two years. In addition, there was no cabinet-level representation on the emergency response team at the time of the audit as required by the campus emergency plan.

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

The Multi-Hazard Functional Plan that was formally adopted by the campus in July 1998 identifies an emergency operations executive position that is to be filled by the vice-president for administration.

The director of business and support services stated that emergency preparedness was discussed with the cabinet in the past; however, it had been a couple of years since the last briefing. He also stated that the lack of cabinet-level representation was due in part to changes within the organization.

Without appropriate cabinet level participation, the president cannot be assured that the campus is prepared to respond to disasters.

Recommendation 1

We recommend that the campus:

- a. Take appropriate measures to increase cabinet level participation in the disaster and contingency planning process.
- b. Assign appropriate cabinet level representation to the emergency response team.

Campus Response

The campus concurs with the recommendation. The California State University, Monterey Bay (CSUMB) cabinet will be briefed periodically on the status of campus disaster and contingency planning. Additionally, the position of vice president for administration and finance will serve as the emergency operations executive manager.

This will be completed by September 2004.

EMERGENCY READINESS

EMERGENCY PLAN

Certain aspects of the campus emergency plan required improvement.

We noted that:

- ▶ The plan was not currently administered in accordance with the Multi-Hazard Functional Plan that was formally adopted by the campus in July 1998. For example, certain roles on the emergency response team, and the individuals assigned to those roles, did not coincide with those specifically identified in the 1998 plan.
- ▶ Amendments and revisions to the emergency plan were not always subject to executive level review and approval.
- ▶ The plan did not address issues such as sheltering-in (housing personnel on a temporary basis), concurrent absences, or address vacancies or extended leaves.
- ▶ The plan did not prioritize which buildings or systems should be addressed or restored first.
- ▶ Although the original plan from 1998 acknowledged terrorist activity as a threat, no revisions had been made since that time to address recently implemented terrorism measures.
- ▶ Emergency response team functions were not addressed in job descriptions.
- ▶ Five of ten selected emergency plan designees acknowledged receiving documentation detailing their roles and responsibilities; however, the location of such documentation and how it would be accessed in the event of an emergency was uncertain to these individuals.
- ▶ Six of ten emergency plan designees interviewed were unaware of the location of the secondary emergency operations center (EOC).
- ▶ The satellite phone purchased for the campus president had been assigned to the manager of risk services.

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.

The California State University (CSU) *Report of the Ad Hoc Committee on Emergency Preparedness*, dated July 19, 1995, states that the campus emergency preparedness plan should be updated every three years.

The manager of risk services stated that the campus has developed significantly since 1998; thus, roles have been added and adjusted based on the campus' residential design, specific campus needs, and numerous organizational changes. He also stated that a revised plan was being developed which will reflect such changes and formalize other areas noted. He further stated that due to limitations with the satellite phone, it was assigned to him since he serves as EOC manager and has the ability to contact the campus president in the event of an emergency.

The absence of a current, updated, and adequately distributed emergency plan undermines the ability of the campus to properly respond to disasters.

Recommendation 2

We recommend that the campus update its emergency management plan and distribute the plan to emergency plan designees as soon as practical.

Campus Response

The campus concurs with the recommendation. The current plan will be revised and updated to incorporate additional information suggested during the audit. Once revised, the emergency management plan will be provided to the chancellor's office, CSUMB's emergency response team and the president.

This will be completed by September 2004.

POSITION DESIGNEES

The roster of designees in key emergency plan positions was incomplete.

We noted that:

- ▶ The emergency operations executive position was unfilled and not identified on the current roster.
- ▶ Backup personnel had not been assigned for 11 of the 16 individuals that filled the 13 positions on the campus emergency response team.

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.

The California Office of Emergency Services (OES) *Standardized Emergency Management System Guidelines*, Part I.B, dated December 23, 1994, states that the deputy incident commander should have the same qualifications as the incident commander. It further states that optional deputy positions for command, section, and branch levels provide backup support and are also used extensively on an inter-agency basis to improve coordination between multiple agencies or disciplines.

The manager of risk services stated that filling all primary and secondary positions has been difficult due to the lack of available and qualified staff.

The ability of the campus to activate the emergency management plan and effectively respond to emergencies is compromised if key primary and alternate plan positions are unfilled.

Recommendation 3

We recommend that the campus assign appropriate personnel to fill the vacant positions and establish procedures to ensure a full complement of designees in key plan positions.

Campus Response

The campus concurs with the recommendation. Vacant emergency response team (ERT) positions will be filled as quickly as possible with appropriate trained personnel. Backup designees for each ERT position will also be assigned and trained with appropriate personnel. The campus will develop a process with university human resources to identify when positions become vacant and to establish a process to replace vacant ERT positions.

This will be completed by September 2004.

BUILDING EMERGENCY EVACUATION

Controls to ensure evacuation from campus buildings needed improvement.

We noted that:

- ▶ Based on the April 2003 roster, there was no building emergency coordinator (BEC) assigned to eight campus buildings. In addition, certain larger buildings on campus were only assigned one BEC.
- ▶ Backups were not required for each designated BEC.

- ▶ One BEC shown on the April 2003 roster was no longer employed with the campus.
- ▶ One BEC was not listed on the campus e-mail system for security purposes.
- ▶ One individual understood her assignment as a BEC to be a one-year appointment.
- ▶ Records evidencing the performance and results of evacuation drills were incomplete and not formally maintained.

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 manager of risk services stated that employees in certain buildings often relocate over the summer, thus, BEC assignments at such facilities were often in flux.

Emergency responsiveness may be delayed without an adequately staffed and trained team of building emergency coordinators to lead emergency evacuations. In addition, the efficiency and result of evacuation drills cannot be adequately assessed when proper records are not maintained.

Recommendation 4

We recommend that the campus establish and maintain a complete network of trained building emergency coordinators for each campus building and keep appropriate records to evidence the performance and results of evacuation drills.

Campus Response

The campus concurs with the recommendation. A complete network of trained building emergency coordinators will be maintained for each building. A monthly report from university human resources will provide effective notification to the office of emergency preparedness when employees leave the university. The residence halls will be operated under the current system of utilizing paid residence hall directors and resident advisors. All building evacuation drills will be documented and maintained on a database to provide appropriate evidence of results, performance, and life-safety system evaluations.

This will be completed by September 2004.

TRAINING FOR EMERGENCY PERSONNEL

Training of emergency response team personnel was inadequate.

We noted that:

- ▶ Available training records indicated that only 10 of 19 individuals assigned to the emergency response team (including alternates) received any training during the last two years.
- ▶ A formalized training plan and program had not been developed, and individual training records were not maintained.

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 manager of risk services stated that a formalized training plan had been developed but had not been fully implemented.

Not maintaining an effective training plan increases the risk that emergency response team members will not be able to sufficiently fulfill their assigned duties and responsibilities.

Recommendation 5

We recommend that the campus implement a formalized training plan and program to ensure all designees have a complete understanding of their roles and responsibilities.

Campus Response

The campus concurs with the recommendation. Once a year a formalized training program for ERT members will be conducted with individual position ERT manuals. Training packets are reviewed with ERT members during in-service and EOC orientation. Duties are practiced through EOC desktop exercises to further grasp an understanding of ERT roles. All alternate designees will receive the same training opportunities. Records of all training programs will be maintained.

This will be completed by September 2004.

PLAN TESTING

The campus emergency management plan had not been extensively tested.

Although the EOC was activated in January 2003 due to a power outage, no campus-wide or desktop exercises or drills have been performed in recent years.

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.

The manager of risk services stated that the lack of emergency plan testing was due to in part to oversight.

Inadequate testing of the emergency management plan increases the possibility that it will not work when needed.

Recommendation 6

We recommend that the campus test the emergency plan by conducting emergency exercises on a periodic basis.

Campus Response

The campus concurs with the recommendation. Periodic desktop exercises will be conducted in the emergency operations center to test the campus emergency response plan. (The most recent was held on December 2, 2003). Additionally a campus-wide live mock earthquake exercise is scheduled for this year.

This will be completed by September 2004.

PLAN COMMUNICATION

Emergency preparedness was not formally communicated, such as through orientation sessions, with new faculty, students, and employees.

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 manager of risk services stated that the topic of emergency preparedness had been overlooked and was not formally incorporated into all campus orientation sessions.

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

Recommendation 7

We recommend that the campus include presentations of emergency preparedness to new faculty, students, and employees as soon as is practical after they arrive.

Campus Response

The campus concurs with the recommendation. Working with the departments of university human resources and student life, the campus will provide information during new faculty and staff orientations and for new students during orientation weeks in August and January. The campus will also provide emergency preparedness presentations to all residential life staff during fall and spring semester in-service training sessions.

This will be completed by September 2004.

DISASTER SERVICE WORKERS

The campus had not requested a delegation of authority from the California OES to register volunteer disaster service workers nor inventoried emergency response skills for such individuals within the campus community.

California Code of Regulations, Title 19 §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 Governor's OES, or a state agency granted authority to register disaster service pursuant to the California Emergency Services Act without pay or other consideration.

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.

The CSU *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 as well as staff for special assignments.

The director of business and support services stated that the campus was unaware of the arrangement with the California OES.

Failure to register and maintain an inventory of skills for emergency volunteer service workers limits the resources available to the campus in the event of a disaster.

Recommendation 8

We recommend that the campus request a delegation of authority from the California OES to register volunteer service workers and inventory emergency response skills of individuals within the campus community.

Campus Response

The campus concurs with the recommendation. Working with university human resources and the office of emergency preparedness, the campus will seek delegation of authority to register volunteer service workers. The campus will also inventory campus employees who would volunteer their services in the event of a disaster. The campus will use the California OES publication, "They Will Come," Post Disaster Volunteers and Local Governments, as a guiding document.

This will be completed by September 2004.

PURCHASING AND CONTRACTING AGREEMENTS

The campus did not have purchasing and contracting agreements for certain post-emergency resources. In addition, an executed copy of the 1997 agreement between the campus and the Red Cross could not be provided by the campus.

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 director of business and support services stated that in the event of a disaster, the campus would rely on its purchasing card, which has been approved for a higher dollar limit. The manager of risk services stated that the agreement with the Red Cross was never fully executed and that a new agreement is currently being developed.

The absence of purchasing and contracting agreements for off-campus emergency resources can contribute to the inability of the campus to respond timely to emergencies.

Recommendation 9

We recommend that the campus:

- a. Analyze current resource capabilities and make contractual agreements with vendors for critical post-emergency resources not in place.
- b. Continue with its efforts to develop and execute a new written agreement with the Red Cross.

Campus Response

The campus concurs with the recommendation. The purchasing and contracts office will analyze current resource capabilities and make contractual agreements with vendors for critical post-emergency resources. If appropriate, the campus will participate in the systemwide effort to provide

emergency procurement services. The campus will also continue its efforts to develop and fully execute a new agreement with the Monterey County Chapter of the American Red Cross to utilize the campus Otter Sports Complex as an emergency shelter.

This will be completed by September 2004.

SELECT AGENTS AND TOXINS

Controls pertaining to the use of select agents and toxins have not been formally documented.

We noted that:

- ▶ No documentation could be provided to evidence the campus' filing with the federal government or the due diligence it performed to determine the non-existence of any select agents and toxins on campus.
- ▶ Policies and procedures had not been developed which address the use of select agents and toxins on campus and ensure the proper review and approval for the acquisition of such materials in connection with grants and contracts.

State Administrative Manual (SAM) §20050 indicates that the elements of a satisfactory system of internal accounting and administrative controls include a system of record-keeping procedures and organization that provides segregation of duties and a system of record-keeping procedures. Code of Federal Regulations, Title 42, Part 1003, *Possession, Use, and Transfer of Select Agents and Toxins; Interim Final Rule*, dated December 13, 2002, requires academic institutions to develop and implement a plan establishing policies and procedures that ensure controls for select agents and toxins.

The director of environmental protection health and safety stated that a filing was submitted to the federal government; however, a campus copy of the filing could not be located. In addition, no documentation was created to evidence the non-existence of select agents and toxins on campus as that determination was made by way of a single phone call. She also stated that the campus has avoided the use of select agent and toxins, and as a result, policies and procedures relating to the monitoring and approval of such items have not been developed.

Insufficient oversight and control over select agents and toxins increase the risk of inappropriate acts and non-compliance with federal regulations.

Recommendation 10

We recommend that the campus develop and implement formal policies and procedures which ensure proper controls over select agents and toxins and address, among other things, the authorization, purchase, use, disposal, exchange, storage, and physical inventory of such materials.

Campus Response

The campus concurs with the recommendation. Working with the departments of environmental protection health and safety and contracts/grants, the campus will develop and implement formal procedures to ensure proper controls for authorization, purchase, use, disposal, exchange, storage, and physical inventory of select agents and toxins.

This will be completed by September 2004.

INTERNATIONAL STUDENTS

Controls over the admission of international (non-immigrant) students to the campus required improvement.

We noted that:

- ▶ The campus had not developed formal written procedures to ensure that international student information is updated in a timely manner and maintained in compliance with regulatory guidelines.
- ▶ A lack of segregation of duties existed in that the same individual that approved admission of international students also certified their eligibility (to attend the university in the capacity of a non-immigrant student) as international students as a designated school official.
- ▶ In one instance, the physical address listed for an international student was a post office box. In another instance, the address listed for an international student for Student and Exchange Visitor Information System (SEVIS) purposes was different from that shown on the campus student information system.

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

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*, §214.3 (g)(1) (iv), dated December 11, 2002, states that the school must maintain a physical location of the residence of the student and his or her dependents and provide such information to the service upon request. Once SEVIS is modified, in cases where the mailing and physical address are not the same,

the school will be required to report both the student's current mailing and current physical address in SEVIS.

The director of admissions and records stated that due to limited staff size and the small international student population on campus, certain policies and procedures, as well as internal controls, have not been fully developed.

Inadequate controls over the reporting of non-immigrant student information increase the risk of non-compliance with federal regulations.

Recommendation 11

We recommend that the campus:

- a. Develop formal policies and procedures to ensure that international (non-immigrant) student information is monitored and updated in a timely manner and maintained in compliance with federal regulations.
- b. Separate duties and responsibilities over the admission and certification of eligibility for international (non-immigrant) students or establish appropriate mitigating controls.

Campus Response

The campus concurs with the recommendation. Working with the department of admissions and records and international studies, the campus will develop formal procedures to ensure international (non-immigrant) student information is monitored, maintained, and updated in a timely manner to comply with federal regulations. Additionally, a separation of duties within admission and records staff will ensure separation of the admission and eligibility certification procedures.

This will be completed by September 2004.

FACILITIES ISSUES

EMERGENCY SUPPLIES

The EOC was inadequately supplied, while independent inventories of emergency supplies and equipment were not performed on a regular basis.

We noted that:

- ▶ Emergency supply containers were located at six different locations on campus, including the EOC, which were used to store trauma kits, tarps, duct tape, barrier tape, and emergency blankets. In certain locations, cots, stretchers, shovels, and axes were also available. The EOC

container, located in an outside storage closet, also contained light rescue and entry and removal tools. Additional supplies for handling hazardous materials, including fire extinguishers, were also available in a building nearby the EOC.

- ▶ The EOC lacked up-to-date building floor plans, building occupancy counts, and infrastructure layouts. In addition, supplies on hand did not include emergency items such as temporary shelter, radios, portable toilets, food and water, blankets, sanitary supplies, stretchers, cots, etc.
- ▶ Inventories of emergency supplies and equipment were not independently performed on a periodic basis.

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 CSU *Report of the Ad Hoc Committee on Emergency Preparedness*, dated July 19, 1995, provides a specific checklist of equipment and supplies that should be maintained in an EOC.

The manager of risk services stated that supplies on-hand in the EOC were purchased when the campus was smaller and have not been updated. He also stated that a project is underway to update building floor plans and to make infrastructure layouts available in the EOC.

Inadequate facilities, equipment, and related supplies denigrate the campus' ability to properly respond to emergencies.

Recommendation 12

We recommend that the campus:

- a. Evaluate the equipment and related supplies in the EOC and take appropriate measures to ensure they are sufficient to respond to an emergency.
- b. Perform and document periodic independent inventories of emergency equipment and supplies.

Campus Response

The campus concurs with the recommendation. Using the document "Report of the Ad Hoc Committee on Emergency Preparedness" July 1995, as a guide, the campus EOC will prepare a list of supplies to meet the building and personnel emergency response needs. Additionally, periodic inventories of campus site emergency equipment and supplies will be conducted.

This will be completed by September 2004.

EMERGENCY POWER GENERATORS

Certain key areas on campus were without emergency power generators.

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 director of facilities services and operations stated that when the buildings in question were renovated as part of the campus master plan, the design did not include emergency power generators.

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

Recommendation 13

We recommend that the campus conduct a costs/benefit analysis to evaluate the feasibility of installing additional emergency power generators at certain key areas on campus.

Campus Response

The campus concurs with the recommendation. Working with the office of design and construction, the campus will conduct a costs/benefit analysis to evaluate the feasibility of installing additional emergency power generators at various locations on campus.

This will be completed by September 2004.

BUSINESS CONTINUITY

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

We noted that a business continuity plan had been drafted which addresses the continuation of business operations in the event of an extended outage of data processing services. In addition, the campus implemented a document imaging system which is used by certain departments. However, a comprehensive business continuity plan which addresses business risks and impacts of unexpected disruptions and identifies critical applications, processes, and systems, had not been developed.

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 director of business and support services stated that the campus has begun the process of drafting a comprehensive business continuity plan.

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

Recommendation 14

We recommend that the campus establish business continuity plans encompassing protection of vital records.

Campus Response

The campus concurs with the recommendation. A campus-wide business continuity planning group has been organized and will develop a campus plan to protect vital records.

This will be completed by January 2005.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Peter P. Smith	President
Carl Andersen	Technical Services Specialist
Rachelle Bass	Administrative Support Coordinator
Valarie E. 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 UNIVERSITY
Monterey Bay
OFFICE OF THE PRESIDENT

MEMORANDUM

DATE: March 12, 2004

TO: Larry Mandel, University Auditor
CSU Office of the University Auditor

FROM: Dr. Peter Smith, President *PS*
California State University Monterey Bay

SUBJECT: Response to Recommendations
Disaster & Contingency Planning Audit
Report Number 03-40



Attached is the California State University Monterey Bay's response to Disaster & Contingency Planning Auditor Report Number 03-40.

The University concurs with the recommendations and has indicated the time frame to address each item.

DL/es
Attachment

CALIFORNIA STATE UNIVERSITY,
MONTEREY BAY

DISASTER AND CONTINGENCY PLANNING
AUDIT REPORT NO. 03-40

GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus:

Take appropriate measures to increase cabinet level participation in the disaster and contingency planning process.

- b. Assign appropriate cabinet level representation to the emergency response team.

Campus Response

The campus concurs with the recommendation. The CSUMB Cabinet will be briefed periodically on the status of campus disaster and contingency planning. Additionally, the position of Vice President for Administration & Finance will serve as the Emergency Operations Executive Manager. This will be completed by September 2004.

EMERGENCY READINESS

EMERGENCY PLAN

Recommendation 2

We recommend that the campus update its emergency management plan and distribute the plan to emergency plan designees as soon as practical.

Campus Response

The campus concurs with the recommendation. The current plan will be revised and updated to incorporate additional information suggested during the audit. Once revised the Emergency Management Plan will be provided to the Chancellor's Office, CSUMB's Emergency Response Team and the President. This will be completed by September 2004.

POSITION DESIGNEES

Recommendation 3

We recommend that the campus assign appropriate personnel to fill the vacant positions and establish procedures to ensure a full complement of designees in key plan positions.

Campus Response

The campus concurs with the recommendation. Vacant Emergency Response Team (ERT) positions will be filled as quickly as possible with appropriate trained personnel. Back up designees for each ERT position will also be assigned and trained with appropriate personnel. The campus will develop a process with University Human Resources to identify when positions become vacant and to establish a process to replace vacant ERT positions. This will be completed by September 2004.

BUILDING EMERGENCY EVACUATION

Recommendation 4

We recommend that the campus establish and maintain a complete network of trained building emergency coordinators for each campus building and keep appropriate records to evidence the performance and results of evacuation drills.

Campus Response

The campus concurs with the recommendation. A complete network of trained Building Emergency Coordinators will be maintained for each building. A monthly report from University Human Resources will provide effective notification to the Office of Emergency Preparedness when employees leave the university. The residence halls will be operated under the current system of utilizing paid Residence Hall Directors and Resident Advisors. All building evacuation drills will be documented and maintained on a database to provide appropriate evidence of results, performance and life safety system evaluations. This will be completed by September 2004.

TRAINING FOR EMERGENCY PERSONNEL

Recommendation 5

We recommend that the campus implement a formalized training plan and program to ensure all designees have a complete understanding of their roles and responsibilities.

Campus Response

The campus concurs with the recommendation. Once a year a formalized training program for Emergency Response Team (ERT) members will be conducted with individual position ERT manuals. Training packets are reviewed with ERT members during in-service and EOC orientation. Duties are practiced through EOC desktop exercises to further grasp an understanding of ERT roles. All alternate designees will receive the same training opportunities. Records of all training programs will be maintained. This will be completed by September 2004.

PLAN TESTING

Recommendation 6

We recommend that the campus test the emergency plan by conducting emergency exercises on a periodic basis.

Campus Response

The campus concurs with the recommendation. Periodic desktop exercises will be conducted in the Emergency Operations Center to test the campus Emergency Response Plan. (The most recent was held on 12/2/03). Additionally a campus wide live mock earthquake exercise is scheduled for this year. This will be completed by September 2004.

PLAN COMMUNICATION

Recommendation 7

We recommend that the campus include presentations of emergency preparedness to new faculty, students, and employees as soon as is practical after they arrive.

Campus Response

The campus concurs with the recommendation. Working with the departments of University Human Resources and Student Life, the campus will provide information during new faculty and staff orientations and for new students during Orientation Weeks in August and January. The campus will also provide emergency preparedness presentations to all Residential Life staff during Fall and Spring semester in-service training sessions. This will be completed by September 2004.

DISASTER SERVICE WORKERS

Recommendation 8

We recommend that the campus request a delegation of authority from the California OES to register volunteer service workers and inventory emergency response skills of individuals within the campus community.

Campus Response

The campus concurs with the recommendation. Working with University Human Resources and the office of Emergency Preparedness, the campus will seek delegation of authority to register volunteer service workers. The Campus will also inventory campus employees who would volunteer their services in the event of a disaster. The campus will use the California O.E.S. publication, "They Will Come", Post Disaster Volunteers and Local Governments as a guiding document. This will be completed by September 2004.

PURCHASING AND CONTRACTING AGREEMENTS

Recommendation 9

We recommend that the campus:

- a. Analyze current resource capabilities and make contractual agreements with vendors for critical post-emergency resources not in place.
- b. Continue with its efforts to develop and execute a new written agreement with the Red Cross.

Campus Response

The campus concurs with the recommendation. The Purchasing and Contracts Office will analyze current resource capabilities and make contractual agreements with vendors for critical post-emergency resources. If appropriate, the campus will participate in the system wide effort to provide emergency procurement services. The campus will also continue its efforts to develop and fully execute a new agreement with the Monterey County Chapter of the American Red Cross to utilize the campus Otter Sports Complex as an emergency shelter. This will be completed by September 2004.

SELECT AGENTS AND TOXINS

Recommendation 10

We recommend that the campus develop and implement formal policies and procedures which ensure proper controls over select agents and toxins and address, among other things, the authorization, purchase, use, disposal, exchange, storage, and physical inventory of such materials.

Campus Response

The campus concurs with the recommendation. Working with the Departments of Environmental Protection Health & Safety and Contracts/Grants, the campus will develop and implement formal procedures to ensure proper controls for authorization, purchase, use, disposal, exchange, storage and physical inventory of select agents and toxins. This will be completed by September 2004.

INTERNATIONAL STUDENTS

Recommendation 11

We recommend that the campus:

- a. Develop formal policies and procedures to ensure that international (non-immigrant) student information is monitored and updated in a timely manner and maintained in compliance with federal regulations.
- b. Separate duties and responsibilities over the admission and certification of eligibility for international (non-immigrant) students or establish appropriate mitigating controls.

Campus Response

The campus concurs with the recommendation. Working with the Department of Admissions & Records and International Studies the campus will develop formal procedures to ensure international (non-immigrant) student information is monitored, maintained and updated in a timely manner to comply with federal regulations. Additionally, a separation of duties within Admission & Records Staff will ensure separation of the admission and eligibility certification procedures. This will be completed by September 2004.

FACILITIES ISSUES**EMERGENCY SUPPLIES****Recommendation 12**

We recommend that the campus:

- a. Evaluate the equipment and related supplies in the EOC and take appropriate measures to ensure they are sufficient to respond to an emergency.
- b. Perform and document periodic independent inventories of emergency equipment and supplies.

Campus Response

The campus concurs with the recommendation. Using the document "Report of the Ad Hoc Committee on Emergency Preparedness" July 1995 as a guide, the campus EOC will prepare a list of supplies to meet the building and personnel emergency response needs. Additionally, periodic inventories of campus site emergency equipment and supplies will be conducted. This will be completed by September 2004.

EMERGENCY POWER GENERATORS**Recommendation 13**

We recommend that the campus conduct a costs/benefit analysis to evaluate the feasibility of installing additional emergency power generators at certain key areas on campus.

Campus Response

The campus concurs with the recommendation. Working with the Office of Design & Construction the campus will conduct a costs/benefit analysis to evaluate the feasibility of installing additional emergency power generators at various locations on campus. This will be completed by September 2004.

BUSINESS CONTINUITY

Recommendation 14

We recommend that the campus establish business continuity plans encompassing protection of vital records.

Campus Response

The campus concurs with the recommendation. A campus wide Business Continuity Planning Group has been organized and will develop a campus plan to protect vital records. This will be completed by January 2005.



 THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

April 14, 2004

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

FRESNO

FULLERTON

TO: Mr. Larry Mandel
University Auditor

HAYWARD

FROM: Charles B. Reed
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 03-40 on *Disaster and Contingency Planning*, California State University, Monterey Bay

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

In response to your memorandum of April 14, 2004, I accept the response as submitted with the draft final report on *Disaster and Contingency Planning*, California State University, Monterey Bay.

NORTHRIDGE

POMONA

SACRAMENTO

CBR/bth

SAN BERNARDINO

Enclosure

SAN DIEGO

cc: Dr. Peter P. Smith, President

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS