

DISASTER AND CONTINGENCY PLANNING

**CALIFORNIA STATE POLYTECHNIC
UNIVERSITY, POMONA**

**Report Number 03-42
January 9, 2004**

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ABBREVIATIONS

BCP(s)	Business Continuity Plan(s)
CSU	California State University
CSPUP	California State Polytechnic University, Pomona
DCP	Disaster and Contingency Planning
DRII	Disaster Recovery Institute International
EMS	Emergency Medical Services
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 Polytechnic University, Pomona campus from July 28, 2003, through August 29, 2003, and audited the procedures in effect at that time.

In our opinion, the administration and management of DCP activities were adequate to ensure a reasonable response and recovery in the event of a disaster.

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.

EMERGENCY READINESS [6]

Controls were not established to monitor distance learning and online course enrollments by international (non-immigrant) students placing these students in jeopardy of being out-of-status and subject to deportation.

FACILITY ISSUES [7]

The student health center did not have an emergency generator for backup power, which could lead to ineffectively treating those in need of medical care should a disastrous event occur.

BUSINESS CONTINUITY [7]

Certain areas did not have business continuity plans (BCPs), while others were in need of updating and/or testing. Undeveloped and/or untested BCPs contribute to unnecessary delays in business recovery.

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 State Polytechnic University (CSPUP), the university police department has overall responsibility for

DCP. CSPUP is one of the few California State University (CSU) campuses with a full-time position dedicated to emergency services coordination.

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

EMERGENCY READINESS

Controls were not established to monitor distance learning and online course enrollments by international (non-immigrant) students.

Code of Federal Regulations, Title 8, Parts 103, 214, 248, and 274a, *Retention and Reporting of Information for F, J, and M Nonimmigrant; Student and Exchange Visitor Information System (SEVIS); Final Rule*, dated December 11, 2002, states that international students are restricted to one distance education or online class or three credits per semester towards his or her full course of study requirements.

The coordinator of international student and scholar services was unaware that the software application used for reporting international student status information to SEVIS was not configured to track distance learning and online course enrollments.

Failure to monitor international student enrollment in distance learning and online courses places the student in jeopardy of being out-of-status and subject to deportation.

Recommendation 1

We recommend that the campus establish controls to monitor international (non-immigrant) student enrollment in distance learning and online courses.

Campus Response

We concur with the recommendation.

The campus is completing the establishment of controls to monitor international student enrollment in distance learning and online courses. This is accomplished by:

- a. The implementation of PeopleSoft Student at the campus for all current student data, slated for April 2004.
- b. The use of the PeopleSoft PASS system to provide alerts when changes are made that could affect a student's visa status and report, when necessary, those changes to SEVIS.

Timeline: July 1, 2004

FACILITY ISSUES

The student health center did not have an emergency generator for backup power.

The Accreditation Association for Ambulatory Health Care, of which the campus is a member, requires alternate power adequate for the protection of life and safety of patients and staff.

The interim director of the student health center stated that a cost-benefit study of installing a backup generator indicated that the costs outweighed the benefits received and no further action was taken.

The student health center may not be able to effectively treat those injuries most in need of medical care should a power failure occur.

Recommendation 2

We recommend that the campus acquire an emergency power generator for the student health center.

Campus Response

We concur with the recommendation.

While we agree with the merits of the recommendation, the current financial and budget situation of the campus is such that there are other mission critical expenditures that supersede this need. The campus is not in a position to fund this sizable investment until after the difficult 2004-05 budget year.

In the interim, the University accepts the risk associated with a potential power failure in the health center. This is a reasonable risk to assume given the non-critical and non-invasive nature of most procedures performed. When needed and in an emergency, patients are transported by professional EMS providers and transferred to the nearest acute facility.

Timeline: Reevaluate equipment investment after 2004-05

BUSINESS CONTINUITY

Certain areas did not have business continuity plans (BCPs), while others were in need of updating and/or testing.

Three departments did not have written BCPs. Additionally, the BCP for the division of instructional and information technology needed updating. Also, there was limited testing of BCPs at the campus.

We found that:

- ▶ Admissions and outreach, disabled student services, and human resources had no written BCPs.
- ▶ The BCP for instructional and information technology was last updated December 2001.
- ▶ Of the seven departments with written BCPs, only instruction and information technology had tested its plan.

Title 5 §41302 delegates authority to the campus president to effect any regulations, procedures, and other measures deemed necessary or appropriate to meet an emergency, safeguard persons and property, and maintain educational activities. Sound business practice mandates comprehensive planning that anticipates needs and establishes a foundation for rehearsing support activities.

The director of human resources, the director of disabled student services, and the coordinator of instructional and graduate admissions stated that their operations were automated and were heavily dependent on the division of instructional and information technology. Therefore, they neither considered other alternatives nor developed written plans.

Without written, updated, and tested BCPs, disaster recovery may be delayed and business resumption more difficult.

Recommendation 3

We recommend that the campus establish procedures to ensure that written BCPs are prepared for campus departments whose functions are critical to the operation of the university.

Campus Response

We concur with the recommendation.

The university will identify a narrowed list of departments with functions that are critical to the operation of the university. These selected departments will prepare written BCPs to be submitted to the emergency services coordinator.

Timeline: June 9, 2004

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
J. Michael Ortiz	President
Zainab Al-Shabibi	Associate Registrar for Academic Record Services
Daniel Anseltnine	Coordinator, Instructional and Graduate Admissions
Laura Bouamrane	International Student Advisor
George Bradshaw	Director, Admissions and Outreach
Randy Burger	Coordinator, International Student Center
Robert Charles	Network Technician, Cal Poly English Language Institute
Stephanie Doda	Executive Director, Instructional and Information Technology and Telecommunications
Patricia L. Farris	Vice President, Administrative Affairs
Fred Henderson	Director, Disabled Student Services
Charles Holt	Director, Parking and Transportation Services
Don Johnson	Manager, Mechanical Services, Facilities Management
Darwin Labordo	Associate Vice President, Finance and Administrative Services
Linda Lichthart	Interim Director, Cal Poly English Language Institute
Gerald Lipson	Chief of Police
George Lwin	Director, Facilities Management
Debbi McFall	Emergency Services Coordinator
Judy Mitchell	Coordinator, International Student and Scholar Services
Ann Overman-Scott	Director, Human Resources
David Patterson	Director, Environmental Health and Safety
Art Perez	Assistant Director, University Housing
Sharon Reiter	Director, Risk Management Services Staff Development and Training
Harold Schleifer	Dean, Library
Phyllis Seifert	Assistant Director, Children's Center
Kay Vierra	Interim Director, Student Health Center
Marilyn Wilkerson	Manager, Logistical and Recycling Services, Facilities Management



Office of the Vice President
for Administrative Affairs

February 5, 2004



Mr. Larry Mandel, University Auditor
Office of the Auditor
The California State University
400 Golden Shore, Suite 210
Long Beach, CA 90802

Dear Mr. Mandel:

**Subject: Campus Response to Recommendations
Disaster and Contingency Planning Audit Report 03-42**

Enclosed is California State Polytechnic's campus response to Disaster and Contingency Planning Audit Report 03-42. We appreciate the effort you and your staff have made to indicate areas where our procedures or internal controls could be strengthened. We have taken the necessary actions to address the report's recommendations.

Please direct questions concerning the response to Darwin Labordo, Associate Vice President of Finance and Administrative Services at 909-869-2008 or dlabordo@csupomona.edu.

Sincerely,

Patricia L. Farris,
Vice President, Administrative Affairs

CC J. Michael Ortiz, President
Darwin Labordo, Associate Vice President, Finance and Administrative Services

Enclosure

CALIFORNIA STATE POLYTECHNIC UNIVERSITY,
POMONA

DISASTER AND CONTINGENCY PLANNING
AUDIT REPORT NO. 03-42

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THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

March 4, 2004

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

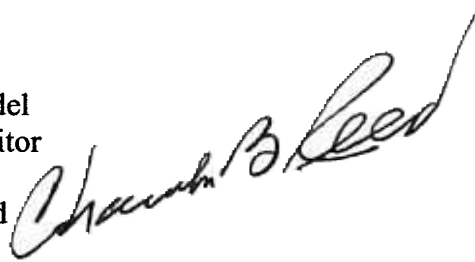
FRESNO

FULLERTON

TO: Mr. Larry Mandel
University Auditor

HAYWARD

FROM: Charles B. Reed
Chancellor



HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 03-42 on *Disaster and Contingency Planning*, California State Polytechnic University, Pomona

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

In response to your memorandum of March 4, 2004, I accept the response as submitted with the draft final report on *Disaster and Contingency Planning*, California State Polytechnic University, Pomona.

NORTHRIDGE

POMONA

SACRAMENTO

CBR/amd

SAN BERNARDINO

Enclosure

SAN DIEGO

cc: Dr. J. Michael Ortiz, President
Ms. Patricia L. Farris, Vice President, Administrative Affairs

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS