

**DISASTER AND CONTINGENCY PLANNING**

**CALIFORNIA STATE UNIVERSITY,  
SACRAMENTO**

**Report Number 03-44  
March 12, 2004**

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## **ABBREVIATIONS**

BEC	Building Emergency Coordinator
CCE	College of Continuing Education
CETTS	Centralized Employee Training Tracking System
CSU	California State University
DCP	Disaster and Contingency Planning
DRII	Disaster Recovery Institute International
DSO	Designated School Official
EH&S	Environmental Health and Safety
ELI	English Language Institute
EO	Executive Order
EOC	Emergency Operations Center
MEA	Master Enabling Agreement
OES	Office of Emergency Services
OGE	Office of Global Education
SAM	State Administrative Manual
SEMS	Standardized Emergency Management System
SEVIS	Student and Exchange Visitors Information System
SHC	Student Health Center
USCIS	United States Citizenship and Immigration Services

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## **EXECUTIVE SUMMARY**

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

We visited the California State University, Sacramento from November 17, 2003, through December 18, 2003, and audited the procedures in effect at that time.

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

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

### **EMERGENCY READINESS [8]**

The campus emergency plan needs to be updated to address such issues as conflicts in emergency responder assignments and sheltering-in-place. In some cases, emergency plan designees were not aware of the alternate location of the emergency operations center (EOC). Alternates were not assigned, and in certain instances, training records were not available for emergency response personnel. Further, 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, and arrangements with vendors for post-emergency resources were not documented in writing. Controls over building evacuation required improvement as secondary building contacts were not assigned to several campus buildings, single individuals served as primary contacts for multiple buildings, evacuation plans were not tested on a regular basis, and minimal supplies were not always maintained by building emergency personnel. In addition, controls pertaining to the acquisition and use of select agents and toxins on campus were not formally documented; 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 approved admission of international students certified, or could certify, their eligibility as international students as a designated school official.

### **FACILITIES ISSUES [17]**

The EOC was inadequately supplied, and one key area on campus was without an emergency power generator. In addition, automatic sprinkler deficiencies noted during a five-year inspection were not corrected in a timely manner.

## **BUSINESS CONTINUITY [19]**

In the event of a disaster or emergency, the campus did not have sufficient business continuity plans to address vital records and all critical processes.

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## INTRODUCTION

### **BACKGROUND**

Government Code §8680.3 defines **disaster** to mean:

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

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

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

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

Since the September 11<sup>th</sup> terrorist attacks, there have been a number of federal initiatives affecting colleges and universities including controls over international students and registration requirements surrounding select agents and toxins. The federal Department of Homeland Security has implemented a new system called Student and Exchange Visitor Information System (SEVIS) to record and monitor information about international students. Other federal agencies including Health and Human Services and the Center for Disease Control have also issued regulations.

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

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

The Office of Emergency Services, in coordination with all interested state agencies with designated response roles in the state emergency plan and interested local emergency management agencies shall

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INTRODUCTION

jointly establish by regulation a standardized emergency management system for use by all emergency response agencies.

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

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



### **PURPOSE**

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

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

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

## **SCOPE AND METHODOLOGY**

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

Our study and evaluation were conducted in accordance with the *Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. Industry-

wide standards were also considered. The audit review period was July 1, 2001, to date. At California State University, Sacramento, the public safety department has overall responsibility for DCP.

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

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

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# OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

## EMERGENCY READINESS

### EMERGENCY PLAN

Certain aspects of the campus emergency management plan required improvement.

We noted that:

- ▶ The plan did not incorporate sheltering-in-place when evacuation is inappropriate.
- ▶ Several Emergency Operations Center (EOC) designees were also assigned as building emergency coordinators or primary or secondary building contacts, which could result in a conflict in the event of an emergency.
- ▶ Eight of ten selected EOC designees were unaware of the location of the backup EOC.
- ▶ Cellular phone and pager numbers for EOC designees were not listed on the current roster.

Executive Order (EO) No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus to ensure that the management activities in support of emergency preparedness include maintenance and regular updating of the institutional emergency management system, and the distribution of the plan and appropriate update materials to key employees and other significantly involved persons both on and off campus.

The director of public safety stated that sheltering-in-place and the location of the backup EOC have been addressed by the campus, but they have not yet completed incorporating the changes into the emergency plan. He further stated that cellular phone and pager numbers were available through other sources, including the university police dispatch center. He also stated that due to the large number of buildings on campus, it was reasonable to expect some crossover between EOC designees and building emergency coordinators (BECs).

The absence of an updated emergency plan may affect the ability of the campus to properly respond to disasters.

### Recommendation 1

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

### **Campus Response**

We concur. By August 31, 2004, the campus will update and strengthen the emergency management plan to assure that the campus can respond appropriately and efficiently to disasters. The plan will be communicated to all affected campus personnel.

### **POSITION DESIGNEES**

The roster of EOC designees did not include alternates. In addition, emergency preparedness responsibilities were not addressed in job descriptions for EOC personnel.

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 director of public safety stated that since EOC designees serve as generalists, they were expected to fill any role and responsibility assigned until appropriate personnel arrive, and that the use of alternates as well as adding emergency preparedness responsibilities to job descriptions was not a component of the model plan that was utilized.

The ability of the campus to activate the emergency management plan and effectively respond to emergencies may be compromised if alternates are not assigned.

### **Recommendation 2**

We recommend that the campus:

- a. Designate alternates/backups for all EOC designees.
- b. Document emergency preparedness responsibilities in job descriptions.

### **Campus Response**

We concur. By August 31, 2004, the campus will complete the following:

- a. The campus will assign to the EOC designees the responsibility to identify alternates/backups for their positions in the EOC. Names and contact information of the alternates/backups will be provided to the EOC operations director.
- b. The campus will develop an emergency preparedness responsibility letter to inform all EOC designees of their duties and responsibilities under the Disaster Preparedness Program.

## **BUILDING EMERGENCY EVACUATION**

Controls to ensure proper evacuation from campus buildings needed improvement.

We noted that:

- ▶ Secondary building contacts had not been assigned for several buildings.
- ▶ In certain instances, a single person served as the primary contact for multiple buildings.
- ▶ In one instance, the individual designated as the BEC was not currently employed with the campus.
- ▶ Evacuation procedures had not been prepared for the Alumni Center or Capital Public Radio, an auxiliary organization currently located off campus.
- ▶ Seven of ten selected building emergency contacts indicated that their evacuation plans had not been tested.
- ▶ Five of ten selected building emergency contacts did not maintain the campus-recommended minimal supplies of a radio, flashlight, blankets, and basic first aid kit.

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 director of public safety stated that each BEC was responsible for appointing their own primary and secondary contacts and for ensuring the testing of evacuation plans and the acquisition of needed supplies. He further stated that some individuals were assigned to multiple buildings due to the proximity and size of the buildings. Additionally, he stated that oversight of the BEC program would increase once the vacant EOC coordinator position was filled.

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

### **Recommendation 3**

We recommend that the campus:

- a. Maintain a complete and current network of trained building emergency personnel for each campus building.

- b. Implement evacuation procedures for the Alumni Center and Capital Public Radio.
- c. Ensure that all building evacuation plans are periodically tested.
- d. Ensure that adequate emergency supplies are maintained by all building emergency personnel.

### **Campus Response**

We concur. By August 31, 2004, the campus will complete the following:

- a. The network of trained building emergency personnel for each campus building will be updated and circulated.
- b. Public safety will assist the Alumni Center and Capital Public Radio with the development of evacuation procedures that meet current specifications.
- c. The campus will verify that all evacuation plans have been tested.
- d. The campus will redistribute lists of recommended emergency supplies to remind building emergency coordinators to review and replenish supplies. Building emergency coordinators are responsible to obtain safety supplies, as deemed appropriate and necessary.

### **TRAINING FOR EMERGENCY PERSONNEL**

The campus could not provide records of emergency training for ten individuals that served as either EOC designees or BECs. In addition, only 10 of 22 EOC designees attended the EOC exercise conducted in October 2002.

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 (OES), *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 public safety stated that the lack of emergency training histories for certain individuals was likely due to the incorporation of a new training tracking system or the individuals not signing in at the training.

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 4**

We recommend that the campus ensure emergency response personnel receive required training and that proper record keeping of such training is maintained.

#### **Campus Response**

We concur. By August 31, 2004, the university will develop a process to accurately document the ongoing training and the attendance of all emergency response personnel. The university will continue to document training information in the Centralized Employee Training Tracking System (CETTS).

### **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 California State University (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 public safety stated that the campus had considered the use of volunteer service workers but had not yet begun the process of obtaining a delegation of authority from the appropriate agency. He further stated that emergency response skills had not been inventoried due to attention given to other workload priorities.

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 5**

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**

We concur. By August 31, 2004, the campus will complete the following:

- a. The campus will request a delegation of authority from the California OES to register volunteer workers.
- b. The campus will distribute a document to obtain information needed to create an emergency response skills list for individuals within the campus community.

### **SELECT AGENTS AND TOXINS**

The process for the acquisition and use of select agents and toxins on campus should be further defined.

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 a plan of organization that provides segregation of duties.

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 health and safety (EH&S) stated that the presence of select agents and toxins on campus was not considered an issue based on the type of research the campus is involved in as well as the existence of oversight controls such as the EH&S committee.

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

#### **Recommendation 6**

We recommend that the campus develop and implement formal policies and procedures that address the acquisition and use of select agents and toxins on campus.

#### **Campus Response**

We concur. By July 31, 2004, the campus will revise the chemical hygiene plan to address the acquisition and use of select agents and toxins on campus. A list of select agents will be included in the plan. This revision to the plan will be communicated to all affected employees.

### **INTERNATIONAL STUDENTS**

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

We noted that:

- ▶ The English Language Institute (ELI) in the College of Continuing Education (CCE) had not documented written policies and procedures with regards to the processing of international student information.
- ▶ Control duties at the ELI for admitting students and reporting of information to United States Citizenship and Immigration Services (USCIS) were not adequately segregated. We noted that the program coordinator admitted student applicants and, as a designated school official, certified eligibility status for non-immigrant students.
- ▶ Control duties at the Office of Global Education (OGE) for admitting students and reporting of information to USCIS were not adequately segregated. The international admissions coordinator admitted student applicants and, as a designated school official, had the ability to certify eligibility status for non-immigrant students.

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

The CCE international programs manager stated that policies and procedures were in the process of being developed and that segregating duties was difficult due to staffing constraints. The OGE coordinator for international students/programs stated that although the international admissions coordinator admitted student applicants and was a designated school official, she did not certify students for non-immigrant status.

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

#### **Recommendation 7**

We recommend that the campus:

- a. Document 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 approved by the campus chief financial officer.

#### **Campus Response**

- a. We concur. As of March 31, 2004, the CCE implemented policies and procedures regarding the processing of international student information. Additionally, CCE revised their listing of designated school officials (DSO) in order to strengthen segregation of duties controls. The coordinator for the English Language Institute is no longer assigned as a DSO.
- b. We concur. As of March 15, 2004, the office of global education removed the coordinator of international admissions and the assistant from the list of authorized Student and Exchange Visitors Information System (SEVIS) officials. These employees can no longer access the SEVIS database and are therefore unable to generate SEVIS admission documents.

### **PURCHASING AND CONTRACTING AGREEMENTS**

Arrangements with vendors for post-emergency resources were not in writing.

We found that the campus had established a list of vendors that could be called upon for post-emergency resources; however, these arrangements were not supported by written agreements.

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 support services stated that the campus has opted not to execute written agreements, as they may not be honored in the event of an emergency crisis.

The absence of written agreements increases the potential for confusion and the inability of the campus to effectively respond to emergencies.

### **Recommendation 8**

We recommend that campus arrangements with vendors for post-emergency resources be formalized in writing.

### **Campus Response**

We concur. To fulfill its post-emergency resource needs, the campus will utilize the CSU Master Enabling Agreement (MEA) with James Lee Witt Associates for Disaster Mitigation, Response, and Recovery Services (M010187). By August 31, 2004, the director of support services will advise procurement services and the EOC operations director of this planned approach, and a copy of the MEA will be on file in procurement services.

## **FACILITIES ISSUES**

### **EMERGENCY SUPPLIES**

Supplies available in the EOC were inadequate.

We noted that the EOC lacked infrastructure layouts and hazardous materials inventories, and that emergency supplies on hand did not include such items as first aid supplies, food and water, portable shelter, sanitary supplies, extra clothing, gloves, hard hats, etc.

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 director of public safety stated that the campus has upgraded emergency supplies and equipment and will continue to do so after reviewing the needs and availability of supplies and equipment.

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

### **Recommendation 9**

We recommend that the campus evaluate the equipment and related supplies in the EOC and take appropriate measures to ensure they are sufficient to respond to an emergency.

### **Campus Response**

We concur. By June 30, 2004, the campus will evaluate the equipment and supplies located in the EOC, and ensure that sufficient supplies are maintained to respond to emergencies and disasters.

### **EMERGENCY POWER GENERATORS**

An emergency power generator was not available at one key location on 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 associate vice president of facilities management stated that a portable generator would be provided in the event of an emergency.

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

### **Recommendation 10**

We recommend that the campus conduct a cost-benefit analysis to evaluate the feasibility of installing an additional emergency power generator.

### **Campus Response**

We concur. As of March 16, 2004, facilities management completed a cost-benefit analysis regarding the installation of a power generator at the Student Health Center (SHC). Due to budget constraints, facilities management decided to use an existing portable generator that will become available at the conclusion of a campus construction project. To ensure adequate safety measures, the portable generator will be stored at the Facilities Corporation Yard, approximately 100 feet away from the SHC.

### **EQUIPMENT MAINTENANCE**

Deficiencies noted during the June 2002 five-year inspection of the automatic sprinkler systems at five campus locations were not corrected until December 2003.

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.

Title 19 §904.1 states that the building or system owner shall insure immediate correction of any deficiencies noted during the maintenance inspection.

The director of facilities and utilities stated that due to other issues, the deficiencies noted in the inspection report were inadvertently overlooked until they were brought to the campus' attention during the audit.

There is a risk that equipment may fail or perform ineffectively when deficiencies are not corrected in a timely manner.

### **Recommendation 11**

We recommend that the campus implement appropriate procedures to ensure that future deficiencies are addressed in a timely manner.

### **Campus Response**

We concur. As of March 10, 2004, facilities management implemented revised procedures to ensure that these types of deficiencies receive first priority within the work order scheduling process.

## **BUSINESS CONTINUITY**

The campus did not have a sufficient business continuity plan to address all critical processes.

We noted that while the campus had developed a plan to enable business operations to continue in the event of an extended outage of data processing services, the plan did not include development of manual operating and recovery procedures. Also, the business continuity plan did not address the protection of non-electronic information assets in the event of a disaster to campus operations and the resumption of operations affecting the data following a disaster.

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

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 audit services stated that business continuity guidelines were distributed to the campus in February 2004. She further stated that while a campus-wide policy addressing non-electronic information assets did not exist, various campus units had implemented measures regarding the protection of these assets.

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

### **Recommendation 12**

We recommend that the campus establish:

- a. Written manual operating and recovery procedures to assist business units with operations during an extended outage of data processing services.
- b. Business continuity plans encompassing protection of vital records and all critical processes.

### **Campus Response**

We concur. By September 30, 2004, the campus will develop manual operating and recovery procedures designed for use during an extended outage of data processing services. Additionally, the campus will identify those departments with functions that are critical to the operation of the university. These departments will prepare written business continuity plans.

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## APPENDIX A: PERSONNEL CONTACTED

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



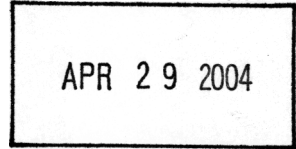
**CALIFORNIA STATE UNIVERSITY, SACRAMENTO**

OFFICE OF THE VICE PRESIDENT FOR ADMINISTRATION

April 28, 2004

Larry Mandel  
University Auditor  
The California State University  
401 Golden Shore  
Long Beach, CA 90802-4210

RECEIVED  
UNIVERSITY AUDITOR



THE CALIFORNIA STATE  
UNIVERSITY

Subject: Campus Response to Recommendations of Audit Report #03-44  
CSU, Sacramento – Disaster and Contingency Planning

Dear Mr. Mandel: *Larry*

We submit the attached document as our response to the recommendations of the audit. The campus is committed to addressing and resolving the issues identified in the audit report.

If you have any questions or require additional information, please contact Kathi McCoy, Director of Auditing Services, at 916 278-7439.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Del Biaggio".

Edward C. Del Biaggio  
Vice President for Administration

Attachment

- c: M. Altier
- K. Barnett
- R. Brown
- A. Gonzalez
- K. McCoy
- A. Tom
- S. Uplinger

## DISASTER AND CONTINGENCY PLANNING

### CALIFORNIA STATE UNIVERSITY, SACRAMENTO

Report Number 03-44  
March 12, 2004

## EMERGENCY READINESS

### EMERGENCY PLAN

#### Recommendation 1

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

#### Campus Response

We concur. By August 31, 2004, the campus will update and strengthen the Emergency Management Plan to assure that the campus can respond appropriately and efficiently to disasters. The Plan will be communicated to all affected campus personnel.

### POSITION DESIGNEES

#### Recommendation 2

We recommend that the campus:

- a. Designate alternates/backups for all EOC designees.
- b. Document emergency preparedness responsibilities in job descriptions.

#### Campus Response

We concur. By August 31, 2004, the campus will complete the following:

- a. The campus will assign to the Emergency Operation Center designees the responsibility to identify alternates/backups for their positions in the EOC. Names and contact information of the alternates/backups will be provided to the EOC operations director.
- b. The campus will develop an emergency preparedness responsibility letter to inform all Emergency Operation Center designees of their duties and responsibilities under the Disaster Preparedness Program.

## **BUILDING EMERGENCY EVACUATION**

### **Recommendation 3**

We recommend that the campus:

- a. Maintain a complete and current network of trained building emergency personnel for each campus building.
- b. Implement evacuation procedures for the Alumni Center and Capital Public Radio.
- c. Ensure that all building evacuation plans are periodically tested.
- d. Ensure that adequate emergency supplies are maintained by all building emergency personnel.

### **Campus Response**

We concur. By August 31, 2004, the campus will complete the following:

- a. The network of trained building emergency personnel for each campus building will be updated and circulated.
- b. Public Safety will assist the Alumni Center and Capital Public Radio with the development of evacuation procedures that meet current specifications.
- c. The campus will verify that all evacuation plans have been tested.
- d. The campus will redistribute lists of recommended emergency supplies to remind building emergency coordinators to review and replenish supplies. Building emergency coordinators are responsible to obtain safety supplies, as deemed appropriate and necessary.

## **TRAINING FOR EMERGENCY PERSONNEL**

### **Recommendation 4**

We recommend that the campus ensure emergency response personnel receive required training and that proper record keeping of such training is maintained.

### **Campus Response**

We concur. By August 31, 2004, the University will develop a process to accurately document the on-going training and the attendance of all emergency response personnel. The University will continue to document training information in the Centralized Employee Training Tracking System (CETTS).

## DISASTER SERVICE WORKERS

### Recommendation 5

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

We concur. By August 31, 2004, the campus will complete the following:

- a. The campus will request a Delegation of Authority from the California Office of Emergency Services to register volunteer workers.
- b. The campus will distribute a document to obtain information needed to create an emergency response skills list for individuals within the campus community.

## SELECT AGENTS AND TOXINS

### Recommendation 6

We recommend that the campus develop and implement formal policies and procedures that address the acquisition and use of select agents and toxins on campus.

### Campus Response

We concur. By July 31, 2004, the campus will revise the Chemical Hygiene Plan to address the acquisition and use of select agents and toxins on campus. A list of select agents will be included in the Plan. This revision to the Plan will be communicated to all affected employees.

## INTERNATIONAL STUDENTS

### Recommendation 7

We recommend that the campus:

- a. Document 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 approved by the campus chief financial officer.

### Campus Response

- a. We concur. As of March 31, 2004, the College of Continuing Education (CCE) implemented policies and procedures regarding the processing of international student information. Additionally, CCE revised their listing of Designated School Officials (DSO) in order to

strengthen segregation of duties controls. The Coordinator for the English Language Institute is no longer assigned as a DSO.

- b. We concur. As of March 15, 2004, the Office of Global Education removed the Coordinator of International Admissions and the assistant from the list of authorized SEVIS officials. These employees can no longer access the SEVIS database and are therefore unable to generate SEVIS admission documents.

## **PURCHASING AND CONTRACTING AGREEMENTS**

### **Recommendation 8**

We recommend that campus arrangements with vendors for post-emergency resources be formalized in writing.

### **Campus Response**

We concur. To fulfill its post-emergency resource needs, the campus will utilize the CSU Master Enabling Agreement (MEA) with James Lee Witt Associates for Disaster Mitigation, Response, and Recovery Services (M010187). By August 31, 2004, the Director of Support Services will advise Procurement Services and the EOC operations director of this planned approach, and a copy of the MEA will be on file in Procurement Services.

## **FACILITIES ISSUES**

### **EMERGENCY SUPPLIES**

#### **Recommendation 9**

We recommend that the campus evaluate the equipment and related supplies in the EOC and take appropriate measures to ensure they are sufficient to respond to an emergency.

#### **Campus Response**

We concur. By June 30, 2004, the campus will evaluate the equipment and supplies located in the Emergency Operation Center, and ensure that sufficient supplies are maintained to respond to emergencies and disasters.

### **EMERGENCY POWER GENERATORS**

#### **Recommendation 10**

We recommend that the campus conduct a cost-benefit analysis to evaluate the feasibility of installing an additional emergency power generator.

#### **Campus Response**

We concur. As of March 16, 2004, Facilities Management completed a cost-benefit analysis regarding the installation of a power generator at the Student Health Center (SHC). Due to budget

constraints, Facilities Management decided to use an existing portable generator that will become available at the conclusion of a campus construction project. To ensure adequate safety measures, the portable generator will be stored at the Facilities Corporation Yard, approximately 100 feet away from the SHC.

## **EQUIPMENT MAINTENANCE**

### **Recommendation 11**

We recommend that the campus implement appropriate procedures to ensure that future deficiencies are addressed in a timely manner.

### **Campus Response**

We concur. As of March 10, 2004, Facilities Management implemented revised procedures to ensure that these types of deficiencies receive first priority within the work order scheduling process.

## **BUSINESS CONTINUITY**

### **Recommendation 12**

We recommend that the campus establish:

- a. Written manual operating and recovery procedures to assist business units with operations during an extended outage of data processing services.
- b. Business continuity plans encompassing protection of vital records and all critical processes.

### **Campus Response**

We concur. By September 30, 2004, the campus will develop manual operating and recovery procedures designed for use during an extended outage of data processing services. Additionally, the campus will identify those departments with functions that are critical to the operation of the University. These departments will prepare written business continuity plans.

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

KERSFIELD

CHANNEL ISLANDS

May 19, 2004

CHICO

DOMINGUEZ HILLS

**MEMORANDUM**

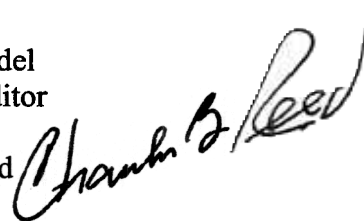
FRESNO

FULLERTON

TO: Mr. Larry Mandel  
University Auditor

HAYWARD

HUMBOLDT

FROM: Charles B. Reed  
Chancellor


LONG BEACH

SUBJECT: Draft Final Report Number 03-44 on *Disaster and Contingency Planning*, California State University, Sacramento

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

In response to your memorandum of May 19, 2004, I accept the response as submitted with the draft final report on *Disaster and Contingency Planning*, California State University, Sacramento.

NORTHRIDGE

POMONA

SACRAMENTO

CBR/bth

SAN BERNARDINO

Enclosure

SAN DIEGO

cc: Dr. Alexander Gonzalez, President  
Ms. Kathi McCoy, Manager, Auditing Services

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS