

DISASTER AND EMERGENCY PREPAREDNESS
CALIFORNIA STATE POLYTECHNIC UNIVERSITY,
POMONA

Report Number 06-38
October 31, 2006

Members, Committee on Audit

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CONTENTS

Executive Summary	1
Introduction.....	2
Background	2
Purpose.....	4
Scope and Methodology	5

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

General Environment	6
Emergency Management Plan	7
Communications and Training.....	8
Testing and Drills.....	9

APPENDICES

APPENDIX A:	Personnel Contacted
APPENDIX B:	Campus Response
APPENDIX C:	Chancellor's Acceptance

ABBREVIATIONS

CFO	Chief Financial Officer
CSU	California State University
DEP	Disaster and Emergency Preparedness
DRII	Disaster Recovery Institute International
EO	Executive Order
EOC	Emergency Operations Center
GC	Government Code
OES	(California) Office of Emergency Services
SEMS	Standardized Emergency Management System
SWEPT	Systemwide Emergency Preparedness Taskforce

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2005, the Board of Trustees, at its January 2006 meeting, directed that *Disaster and Emergency Preparedness* be reviewed. Similar audits of Disaster and Contingency Planning were conducted in 2003.

We visited the California State Polytechnic University, Pomona campus from July 17, 2006, through August 18, 2006, and audited the procedures in effect at that time.

In our opinion, internal administrative and operational controls governing disaster and emergency preparedness were, for the most part, effective. However, budgeting for disaster and emergency planning activities, availability of the entire emergency management plan, documentation of emergency training for new hires, and testing of existing business continuity plans needed improvement.

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

GENERAL ENVIRONMENT [6]

The campus was unable to provide documentation showing budgets were prepared for disaster and emergency planning activities.

EMERGENCY MANAGEMENT PLAN [7]

The entire emergency operations plan was not available to emergency team members in a variety of formats. Although hard copies of the emergency plan had been communicated to the campus broadly and various portions of the plan were available on the campus web site, an alternate format of the complete plan (i.e., CD copy, web version, etc.) was not available, which might limit its availability in the event of an emergency.

COMMUNICATIONS AND TRAINING [8]

Documentation to support overview emergency management plan training for new hires needed improvement. The campus was unable to provide sufficient documentation to support emergency management plan overview training for new hires, including type of training, dates of training, and names of individuals trained, and evidence of a course syllabus or an agenda showing topics covered in the training.

TESTING AND DRILLS [9]

Although the campus had business continuity plans in various critical areas, none of the plans had been tested. Additionally, five of the seven plans had not been reviewed within the last 12 months.

INTRODUCTION

BACKGROUND

The National Safety Council (www.nsc.org) has provided guidance showing that disasters and emergencies are inevitable. These events include personal injuries, fires, explosions, chemical spills, toxic gas releases, natural disasters such as earthquakes, tornadoes, floods, and epidemics, and man-made disasters such as terrorist activities and riots. Anticipating emergencies and planning for an appropriate response can greatly lessen the extent of injuries and health concerns. Emergency preparedness can also limit damage to property, equipment, and materials. Experience tells us that when disasters and emergencies occur, the emergency response based on emergency preparedness and crisis training programs, will significantly affect the extent of damages and injuries sustained. The president of each of the 23 California State University (CSU) campuses has been delegated the responsibility for the implementation and maintenance of an emergency management system program.

There is no single definition of what constitutes a disaster. A disaster can develop quickly, hitting full-force, with little or no warning. Other times, a disaster can loom on the horizon for weeks until it becomes large enough to be a threat. Government Code (GC) §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.

Executive Order 921, *California State University Emergency Management Program*, dated November 21, 2004, requires maintenance of an emergency management system on each campus that will be activated when a hazardous condition or natural disaster reaches or has the potential for reaching proportions beyond the capacity of routine operations. The campus shall write each emergency plan in accordance with and as described in SEMS regulations developed by the California Office of Emergency Services (OES). Additionally, the campuses shall support the Systemwide Emergency Preparedness Taskforce (SWEPT) assigned oversight responsibility for CSU systemwide emergency management. SWEPT is a multi-discipline committee charged with improving communication between police chiefs, emergency coordinators, risk managers, and environmental health and occupational safety directors. It proposes and establishes mechanisms/systems for coordinating a response to emergencies; and studies and proposes solutions to systemwide issues such as emergency communications, mutual assistance protocols, and training. Further, business continuity planning is an integral part of a comprehensive emergency management model, and it is recommended that each campus form a Business Continuity Planning Committee.

After the initial emergency response, restoration of business (“business continuity”) is of paramount importance. Two sources of industry guidance on standards and terminology are *Glossary of Terms* from the Disaster Recovery Institute International (DRII), and *Business Continuity: Best Practices* as defined by the Business Continuity Institute. The DRII *Glossary of Terms* describes business continuity as “the ability of an organization to ensure continuity of service and support for its customers and to maintain its viability before, after, and during an event.” In *Best Practices*, a disaster recovery plan is defined as “a plan to resume a specific essential operation, function, or process of an enterprise.”

Business continuity is frequently considered a broader term than emergency preparedness. The goal of emergency preparedness is to address the immediate impacts of the disaster and to respond as needed to bring the emergency to closure. Business continuity is a continuing cycle of preparation that includes the broader perspectives of disaster, response, recovery, mitigation, risk reduction, prevention, and preparedness, as depicted below:



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

The OES, 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 SEMS for use by all emergency response agencies.

SEMS is the system required by GC §8607(a) for managing response to multi-agency and multi-jurisdiction emergencies in California. As a result of the 1991 East Bay Hills fire in Oakland, Senate Bill 1841 was passed and made effective January 1, 1993. The intent of this law is to improve the

coordination of state and local emergency response in California, and it implemented SEMS. SEMS regulations took effect in September 1994. 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 (management), operations, planning/intelligence, logistics, and finance/administration. All CSU campuses are required to formally adopt and implement SEMS.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Disaster and Emergency Preparedness* (DEP) activity and to determine the adequacy of controls that 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:

- ▶ Administration of DEP incorporates a defined mission, stated goals and objectives, and clear lines of organizational authority and responsibility; and is adequately funded.
- ▶ Plans and procedures address general and campus specific incidents; include recordkeeping systems for effective planning, administration, and reporting; maximize DEP resources; and are adequately communicated to emergency management personnel.
- ▶ An emergency operations center (EOC) provisioned with sufficient equipment, supplies, and other critical resources exists; and a roster of resources for materials and services that may be needed in an emergency situation is maintained.
- ▶ The emergency management plan is compliant with SEMS, including the use of the modular incident command system organization methodology and incident action plans; inclusive of an effective building marshal program for evacuation; and reviewed/updated at a minimum every year.
- ▶ The emergency management plan has been adequately communicated to the campus community, a roster of emergency management personnel is annually communicated to the chancellor's office, and support is provided to the SWEPT.
- ▶ Emergency management activities are effectively coordinated with appropriate city, county, operational area, state, federal, and private agencies; and include adequate mutual aid and assistance agreements.
- ▶ Specialized and/or general training has been provided to the emergency management team, building marshals, and all employees.

- ▶ Emergency plan testing, drills, and/or evacuations are adequately planned, conducted, and documented; and include periodic testing of mutual aid and assistance agreements.
- ▶ Generators, communications devices, and other equipment and supplies are functional, tested currently, and the related responsibility is appropriately assigned.
- ▶ The campus has a business continuity plan and if that plan is tested.

SCOPE AND METHODOLOGY

The proposed scope of the audit, as presented in Attachment B, Audit Item 2 of the January 31 through February 1, 2006, meeting of the Committee on Audit, stated that DEP includes review of compliance with Trustee policy and systemwide directives, contingency and disaster recovery planning, backup communications, building safety and emergency egress including provisions for individuals with disabilities, the extent of plan testing, and relationships with state and federal emergency management agencies. DEP includes program and facility readiness and resource planning for actions related to natural and man-made disasters and the recovery therefrom.

Our study and evaluation were conducted in accordance with the *International 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 Trustees policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect from January 2005 through March 2006. In instances wherein it was necessary to review annualized data, fiscal year 2005/06 was the primary period reviewed.

We focused primarily upon the internal administrative, compliance, and operational controls over the campuswide emergency operations plan and related management activities. Specifically, we reviewed and tested:

- ▶ The emergency management organization.
- ▶ Emergency management and business continuity plans.
- ▶ Emergency management plan guidelines, policies, procedures, and recordkeeping.
- ▶ The building marshal program, emergency action plans, and the campus emergency hotline.
- ▶ The EOC, emergency equipment, and related emergency supplies.
- ▶ Coordination with other agencies and mutual aid and assistance agreements.
- ▶ Funding and budgetary controls for emergency management activities.
- ▶ Communication of the emergency management plan.
- ▶ Training for emergency management activities.
- ▶ Evacuation drills and emergency management and business continuity plan testing.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

The campus was unable to provide documentation showing budgets were prepared for disaster and emergency planning activities.

Standardized Emergency Management System (SEMS) Guidelines Part I, §4, *Resources Management*, dated December 23, 1994, states, in part, that at all SEMS levels, there will be some functional activity related to managing resources in terms of directing and controlling, coordination, and resource inventorying.

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

Executive Order (EO) 921, *California State University Emergency Management Program*, dated November 12, 2004, states that each president shall ensure determination, acquisition, and maintenance of facilities, equipment, and related supplies required for emergency management activities.

The associate vice president of administrative affairs/associate chief financial officer (CFO) stated that the campus did have various budgeted items specifically for emergency preparedness located in various cost centers including that of the emergency services coordinator; however, the campus had not included campus emergency preparedness as part of the formalized budgeting process.

Failure to prepare adequate budget documentation for disaster and emergency planning activities increases the risk that emergency management activities will not be adequately funded.

Recommendation 1

We recommend that the campus require the emergency planning team committee to prepare a budget request for emergency management activities needs and submit the information to the vice president of administrative affairs/CFO annually.

Campus Response

We concur. The emergency planning team committee will prepare a budget request for emergency management activities needs and submit the information to the vice president of administrative affairs annually.

Timeline: June 2007

EMERGENCY MANAGEMENT PLAN

The entire emergency operations plan was not available to emergency team members in a variety of formats.

Our review of emergency plan communications showed that hard copies of the emergency operations plan had been communicated to the campus broadly and various portions of the plan were available on the campus web site. However, an alternate format of the complete plan (i.e., CD copy, web version, etc.) was not available, which might limit its availability in the event of an emergency.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that the campus should communicate the emergency plan to the campus community in a variety of methods and on a continuous basis through public education such as web posting of the plan or through other mechanisms for regular dissemination of hazard planning.

Government Code (GC) §13402 states that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions.

The emergency services coordinator stated that the campus had the emergency plan available to its emergency staff members in hard copy form at various locations and on the Internet, and stated her belief that this was sufficient dissemination at the time.

Failure to make the emergency plan available to emergency team members in a variety of formats limits the campus' ability to effectively respond to emergencies.

Recommendation 2

We recommend that the campus develop and maintain an alternate version of its entire emergency operations plan for distribution to all emergency planning team members.

Campus Response

We concur. We will develop and maintain an alternate version of our entire emergency operations plan for distribution to all emergency planning team members.

Timeline: February 2007

COMMUNICATIONS AND TRAINING

Documentation to support overview emergency management plan training for new hires needed improvement.

The campus was unable to provide sufficient documentation to support emergency management plan overview training for new hires, including type of training, dates of training, and names of individuals trained, and evidence of a course syllabus or an agenda showing topics covered in the training.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that the campus community is to be trained on the SEMS compliant plan to include, at a minimum, overview training of every employee within one year of employment. Training attendance records shall be kept for a minimum of seven years.

GC §13401 states that each state agency must maintain effective systems of administrative control as an integral part of its management practices.

The director of human resources stated that the need to track the employee orientation process had been overlooked due to reduced staffing levels in human resources and because the orientation process was handled by both the human resources and payroll departments.

Failure to provide emergency management plan overview training for new hires increases the likelihood that emergency response would be inadequate.

Recommendation 3

We recommend that the campus ensure that documentation to support overview emergency management plan training for new hires is developed and maintained on file.

Campus Response

We concur. The human resources department will develop and maintain documentation to support overview emergency management plan training for new hires.

Timeline: February 2007

TESTING AND DRILLS

Business continuity plans had not been tested.

Our review disclosed that the campus had departmental plans for facilities management, risk management, instructional and information technology, graphic communications, Bronco Copy 'N Mail, procurement and support services, and distribution services. However, we found that the plans had not been tested. Additionally, five of the plans had not been reviewed within the last 12 months.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that each campus shall develop a business continuity plan. Further, almost all business continuity plans contain certain common elements including testing and auditing the plans to determine the effectiveness of the overall business continuity and incident recovery program. This includes a review and documentation of test results and lessons learned. The review should occur annually, with testing occurring every two years at a minimum.

The emergency services coordinator stated that the campus had focused on compiling departmental business continuity plans and had not performed specific testing at this stage.

Inadequate testing of the business continuity plans increases the risk of ineffective preparedness and unavailability of essential services.

Recommendation 4

We recommend that the campus develop and exercise test plans sufficient to ensure the effectiveness of campus business continuity activities, including a review and documentation of test results and lessons learned.

Campus Response

We concur. We will develop and exercise test plans including a review and documentation of test results and lessons learned.

Timeline: June 2007

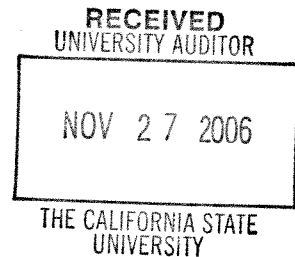
APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
J. Michael Ortiz	President
Edwin Barnes	Interim Vice President, Administrative Affairs/ Interim Chief Financial Officer (CFO)
Janet Cain	Analyst, Administrative Affairs
Patricia Farris	Vice President, Administrative Affairs/CFO (At time of review)
Douglas Freer	Vice President, Student Affairs
Ron Fremont	Associate Vice President, Public Affairs
Regenia Griffin	Manager, Employee Services
Michael Guerin	Chief of Police and Director of Public Safety, University Police
Kathy Harper	Secretary, Finance and Administrative Services
Darwin Labordo	Associate Vice President, Administrative Affairs/Associate CFO
Mary Martinez	Manager, Diversity, Human Resources and Employee Services
Debbi McFall	Emergency Services Coordinator, University Police
Denton Mosier	Director, Instructional and Information Technology Support
Paul Nath	Facilities Worker, Facilities Management
Ann Overman-Scott	Director, Human Resources
Daryl Patton	Director of Internal Audit
Sharon Reiter	Executive Director, Administrative Affairs
Megan Stang	Director, University Housing Services



Office of the Vice President
for Administrative Affairs

November 22, 2006



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: Status Report to Recommendations of
Disaster and Emergency Preparedness Audit Report 06-38**

Enclosed is California State Polytechnic's status report to the Disaster and Emergency Preparedness Audit Report 06-38. We appreciate the effort you and your staff have made to indicate areas where our procedures or internal controls could be strengthened.

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,

Edwin A. Barnes, III, Interim Vice President
Administrative Affairs

Cc: J. Michael Ortiz, President
Douglas Freer, Vice President, Student Affairs
Darwin Labordo, Associate Vice President, Finance & Administrative Services
Debbie McFall, Emergency Service Coordinator
Daryl Patton, University Auditor

Enclosure

**DISASTER AND EMERGENCY PREPAREDNESS
CALIFORNIA STATE POLYTECHNIC UNIVERSITY,
POMONA**

**Report Number 06-38
October 31, 2006**

GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus require the emergency planning team committee to prepare a budget request for emergency management activities needs and submit the information to the vice president of administrative affairs/CFO annually.

Campus Response

We concur. The emergency planning team committee will prepare a budget request for emergency management activities needs and submit the information to the Vice President of Administrative Affairs annually.

Timeline: June 2007

EMERGENCY MANAGEMENT PLAN

Recommendation 2

We recommend that the campus develop and maintain an alternate version of its entire emergency operations plan for distribution to all emergency planning team members.

Campus Response

We concur. We will develop and maintain an alternate version of our entire emergency operations plan for distribution to all emergency planning team members.

Timeline: February 2007

COMMUNICATIONS AND TRAINING

Recommendation 3

We recommend that the campus ensure that documentation to support overview emergency management plan training for new hires is developed and maintained on file.

Campus Response

We concur. The Human Resources department will develop and maintain documentation to support overview emergency management plan training for new hires.

Timeline: February 2007

TESTING AND DRILLS

Recommendation 4

We recommend that the campus develop and exercise test plans sufficient to ensure the effectiveness of campus business continuity activities, including a review and documentation of test results and lessons learned.

Campus Response

We concur. We will develop and exercise test plans including a review and documentation of test results and lessons learned.

Timeline: June 2007


THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

December 6, 2006

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

EAST BAY

FRESNO

TO: Mr. Larry Mandel
University Auditor

FULLERTON

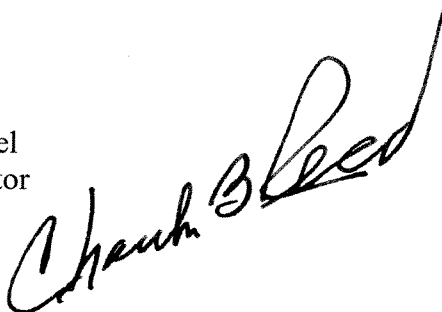
FROM: Charles B. Reed
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report Number 06-38 on *Disaster and Emergency Preparedness*, California State Polytechnic University, Pomona

LOS ANGELES



MARITIME ACADEMY

In response to your memorandum of December 6, 2006, I accept the response as submitted with the draft final report on *Disaster and Emergency Preparedness*, California State Polytechnic University, Pomona.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/jt

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Dr. Edwin A. Barnes, Interim Vice President, Administrative Affairs and
Interim Chief Financial Officer
Dr. J. Michael Ortiz, President

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS