October 12, 2016

Dr. Jeffrey D. Armstrong, President
California Polytechnic State University, San Luis Obispo
One Grand Avenue
San Luis Obispo, CA 93407

Dear Dr. Armstrong:

Subject: Audit Report 16-44, Emergency Management,
California Polytechnic State University, San Luis Obispo

We have completed an audit of Emergency Management as part of our 2016 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors’ International Standards for the Professional Practice of Internal Auditing.

I have reviewed the management response and have concluded that it appropriately addresses our recommendations. The management response has been incorporated into the final audit report, which has been posted to the Office of Audit and Advisory Services’ website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,

Larry Mandel
Vice Chancellor and Chief Audit Officer
c: Timothy P. White, Chancellor
EMERGENCY MANAGEMENT

California Polytechnic State University, San Luis Obispo

Audit Report 16-44
September 20, 2016
EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of administrative and operational controls for emergency management and to ensure compliance with relevant governmental regulations; Trustee policy; Office of the Chancellor directives; campus procedures; and where appropriate, federal guidance and industry-accepted standards.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, a few specific control weaknesses were noted; generally, however, controls were adequate, appropriate, and effective to provide reasonable assurance that risks were being managed and objectives were met.

The campus recently strengthened its emergency management program by restructuring the department, hiring a new emergency management director, and implementing a new strategic plan for emergency management. However, we found that components of the existing campus emergency management program still needed to be updated and documentation needed to be improved. Specifically, we found that the campus building coordinator program was not comprehensive, new employees did not always complete emergency preparedness training, and documentation to show that simulated emergency incidents and exercises had been performed was generally not available prior to April 2016.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.
OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. BUILDING COORDINATOR PROGRAM

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The campus building coordinator program needed improvement.

Although the campus had a building coordinator program in place, we found that:

- Not all buildings on campus had assigned building coordinators, and the list of building coordinators on the campus emergency preparedness website was outdated.
- Building coordinators were not provided with annual training.
- The results of evacuation drills were not documented in after-action reports.

Maintaining an effective building coordinator program provides assurance that there is adequate coverage of campus buildings, evacuation drills are performed, and, in the event of an emergency, building evacuations are performed in a safe and orderly manner.

RECOMMENDATION

We recommend that the campus:

a. Assign building coordinators for all buildings on campus and post the updated list of floor wardens to the campus emergency preparedness website.

b. Provide annual training to building coordinators, and document receipt of this training.

c. Document the results of evacuation drills in after-action reports.

MANAGEMENT RESPONSE

We concur. We will be implementing a newly developed building coordinator program that assigns building coordinators for all buildings, provides annual training to building coordinators, and documents the results of evacuation drills through after-action reports by December 2016.

2. NEW-HIRE TRAINING

| OBSERVATION |

New employees at the campus and the Cal Poly Corporation did not always complete emergency preparedness training.
We found that although the campus required new employees to complete online emergency preparedness training, not all employees completed the training. Automated email reminders were sent from the online system to the employees, but there was no other method of follow-up or escalation to encourage compliance with training requirements.

We also found that the Cal Poly Corporation did not provide emergency preparedness training to new employees.

Provision of emergency preparedness training to new employees assures that employees are aware of emergency and evacuation procedures, increases safety, and allows for an adequate response in the event of an emergency.

RECOMMENDATION

We recommend that the campus and the Cal Poly Corporation:

a. Create a process to follow up on non-completion of training for campus employees and escalate issues of non-compliance to appropriate campus management.

b. Provide emergency preparedness training to new Cal Poly Corporation employees.

MANAGEMENT RESPONSE

We concur. We will be creating a process to follow up on non-completion of training for campus employees that allows for escalation of issues of non-compliance to appropriate campus management and incorporates emergency preparedness training to new Cal Poly Corporation employees by March 2017.

3. EMERGENCY EXERCISES

OBSERVATION

The campus could not provide documentation showing that simulated emergency incidents and exercises were performed according to schedules established in systemwide policy prior to the restructuring of the emergency management program in April 2016.

Completing and documenting simulated emergency incidents and exercises strengthens the campus’ ability to effectively respond in the event of an emergency and provides assurance that lessons learned and deficiencies noted while conducting emergency exercises are recognized and corrected.

RECOMMENDATION

We recommend that the campus perform and document simulated emergency incidents and exercises according to schedules established in systemwide policy.
MANAGEMENT RESPONSE

We concur. As of March 2016, we have implemented a comprehensive training and exercises program that includes the development of formal after-action reports for all campus emergency exercises.
GENERAL INFORMATION

BACKGROUND

The California State University (CSU) consists of 23 campuses, with approximately 474,600 students and more than 49,000 faculty and staff. Each campus is responsible for the safety and general welfare of all members of the campus community. Because emergencies and disasters can occur with little to no warning and encompass a wide range of events, including earthquakes, fires, active-shooter situations, pandemics, protests or riots, and other natural and manmade disasters, it is critical that campuses plan ahead so that when emergencies happen, an appropriate response can be coordinated. The president of each CSU campus has been delegated responsibility for the implementation and maintenance of the campus emergency management program.

The Federal Emergency Management Agency (FEMA) is the federal agency that leads the country in preparing for, preventing, responding to, and recovering from disasters. FEMA emphasizes the use of hazard mitigation planning to reduce the loss of life and property due to natural and other hazard risks and publishes a number of emergency planning guides, including *Building a Disaster Resistant University* and the *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education*. The Department of Education (DOE) and the National Fire Protection Agency (NFPA) have also developed relevant federal guidance for emergency management programs.

On February 28, 2003, the president of the United States issued Homeland Security Presidential Directive 5, *Management of Domestic Incidents*, which directed that the National Incident Management System (NIMS) be developed. NIMS provides a common approach to managing incidents that allows government departments and agencies, nongovernmental organizations, and the private sector to work together. NIMS requires the use of a standard organizational framework, the Incident Command System (ICS), for incident response. Federal departments and agencies, as well as state, local, and tribal governments, are required to fully comply with NIMS and adopt ICS to receive federal preparedness funding and grants.

The cornerstone of California’s emergency response system is the Standardized Emergency Management System (SEMS), which state agencies are required by law to use when responding to emergencies involving multiple jurisdictions or agencies. Key components of SEMS, codified in Government Code §8607, include the use of ICS, multiagency coordination, mutual aid, and defined operational areas. SEMS was developed as a result of the 1991 East Bay Hills fire in Oakland, which drew attention to the need for better coordination among emergency services responders.

As a result of federal and state regulations, all CSU campuses are required to incorporate NIMS, SEMS, and ICS into their emergency management program. Executive Order (EO) 1056, *California State University Emergency Management Program*, defines the key components of an effective campus emergency management program. At the systemwide level, the Office of Risk Management (ORM) has administrative oversight and programmatic responsibility for the emergency management function and coordinates the Emergency Coordinators working group, an advisory body for CSU systemwide emergency management. In 2014, ORM commissioned an outside consultant to review campus emergency management plans.
At California Polytechnic State University, San Luis Obispo (Cal Poly), the mission of the department of emergency management is to support students, faculty, and staff as they work together to build, sustain, and improve the university’s capability to prepare for, respond to, recover from, and mitigate all hazards. The department head, the director of emergency management and business continuity, reports to the chief of police in the division of administration and finance. The department is responsible for reviewing and updating the campus emergency plan and for developing and providing emergency training and exercises to the emergency management team, and shares joint responsibility with the department of environmental health and safety for the building coordinator program. In addition, the department works to engage the whole community and is currently working on implementing a campus disaster preparedness council consisting of senior executives and a campus disaster preparedness committee consisting of campus department heads and managers.

SCOPE

We visited the Cal Poly campus from July 25, 2016, through August 26, 2016. Our audit and evaluation included the audit tests we considered necessary in determining whether administrative and operational controls are in place and operative. The audit focused on procedures in effect from January 1, 2014, through August 26, 2016.

Specifically, we reviewed and tested:

- Emergency management administration and organization, including clear lines of organizational authority and responsibility, and current and comprehensive policies and procedures.
- The emergency operations plan and event-specific annexes, including integration of SEMS, NIMS, and ICS components, and considerations for special populations on campus such as international students, students and personnel with limited English proficiency, and people with access and functional needs.
- The emergency operations center, emergency equipment, and related emergency supplies and resources.
- Coordination with other agencies, including mutual aid and assistance.
- The effectiveness of the building marshal or similar program and evacuation procedures and drills.
- Emergency management training for new hires and emergency management team members.
- Testing and drills for emergency communication systems and emergency incidents, and the preparation of appropriate after-action reports.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.
Our testing and methodology, which was designed to provide a review of key administrative and operational controls, included interviews, walkthroughs, and detailed testing on certain aspects of the campus emergency operations program. Our review was limited to gaining reasonable assurance that essential elements of the campus emergency management program were in place and did not examine all aspects of the program.

CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and guidance; CSU Board of Trustee policies; Office of the Chancellor policies, letters, and directives; campus procedures; and other sound administrative practices. This audit was conducted in conformance with the Institute of Internal Auditors’ International Standards for the Professional Practice of Internal Auditing.

This review emphasized, but was not limited to, compliance with:

- EO 943, *University Health Services*
- EO 1056, *California State University Emergency Management Program*
- Coded memorandum Human Resources 2004-10, *Mutual Aid*
- 20 United States Code §1092(f), *Higher Education Opportunity Act*
- Code of Federal Regulations Title 29, Part 1910, *Occupational Safety and Health Standards*
- Government Code §8607
- Government Code §13402 and §13403
- Cal Poly *Multi-Hazard Preparedness Plan*

AUDIT TEAM

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