

EMERGENCY PREPAREDNESS
CALIFORNIA STATE UNIVERSITY,
STANISLAUS

Audit Report 09-50
November 23, 2009

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ABBREVIATIONS

CalEMA	California Emergency Management Agency
CSU	California State University
DHS	(Federal) Department of Homeland Security
EO	Executive Order
EOC	Emergency Operations Center(s)
EOP	Emergency Operations Plan
EP	Emergency Preparedness
FEMA	Federal Emergency Management Agency
ICS	Incident Command System
NIMS	National Incident Management System
OES	(California) Office of Emergency Services
SEMS	Standardized Emergency Management System
SHC	Student Health Center

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2008, the Board of Trustees, at its January 2009 meeting, directed that *Emergency Preparedness* be reviewed. Similar audits of Disaster and Emergency Preparedness were conducted in 2006.

We visited the California State University, Stanislaus campus from July 20, 2009, through September 4, 2009, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on emergency preparedness controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls for emergency preparedness in effect as of September 4, 2009, taken as a whole, were sufficient to meet the objectives stated below.

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.

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 MANAGEMENT PROGRAM [6]

The campus roster of emergency resources was not updated or complete. In addition, the emergency operations plan did not include coverage of the Stockton satellite campus, nor was there a separate written plan for this site.

COMMUNICATIONS AND TRAINING [7]

Emergency preparedness overview training for new hires was inadequate. Specialized training (SEMS, NIMS, and ICS) for building marshals/monitors needed improvement. Emergency plans for the campus and the student health center (SHC) did not include provision for the training and assignment of SHC staff in disasters/emergencies that may require medical services.

TESTING AND DRILLS [9]

Documentation of campus emergency communications testing needed improvement.

INTRODUCTION

BACKGROUND

Emergency preparedness is the multihazard approach to preparing for emergencies and disasters of a wide variety. 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 program.

In many instances, emergency preparedness is the foresight to plan for disasters such as earthquakes, floods, fires, and man-made disasters (the most common emergency situations in California). 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 §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.

The Federal Emergency Management Agency (FEMA) describes emergency preparedness as multi-hazard mitigation planning and states that mitigation plans form the foundation for a community's long-term strategy to reduce disaster losses and break the cycle of disaster damage, reconstruction, and repeated damage. The planning process is as important as the plan itself. It creates a framework for risk-based decision making to reduce damages to lives, property, and the economy from future disasters. Hazard mitigation is sustained action taken to reduce or eliminate long-term risk to people and their property from hazards. State, Indian Tribal, and local governments are required to develop a hazard mitigation plan as a condition for receiving certain types of non-emergency disaster assistance and FEMA funds available for mitigation plan development and mitigation projects.

The California State Office of Emergency Services (OES), in coordination with all interested state agencies with designated response roles in the state emergency plan and interested local emergency management agencies, established by regulation a SEMS for use by all emergency response agencies.

SEMS is the system required by Government Code §8607(a) for managing response to multiagency and multijurisdictional 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 (ICS) functions: command (management), operations, planning/intelligence, logistics, and finance/administration. As a result of OES and SEMS Regulations, all CSU campuses are required to formally adopt and implement SEMS.

In 2004, the federal Department of Homeland Security (DHS) developed the National Incident Management System (NIMS) under Presidential Directive HSPD-5, *Management of Domestic Incidents*. NIMS was designed to improve the national readiness to respond to not only terrorist events but all types of disasters. NIMS is similar to California's SEMS. This similarity is most evident in the NIMS version of the ICS and adoption of the concept of mutual aid. The final version of NIMS was released on March 1, 2004. To fully implement NIMS, DHS created NIMS integration procedures and decided to phase in NIMS over time. As a result of these efforts, all federal departments and agencies, as well as state, local, and tribal governments, are required to be fully compliant with NIMS in order to apply for federal emergency preparedness assistance.

In late 2008, the California Emergency Management Agency (CalEMA) was formed to combine both OES and the California Department of Homeland Security. The goal of the CalEMA is to identify methods and guidance to assist all levels of emergency management in California to meet the requirements of NIMS while maintaining compliance with SEMS.

Executive Order 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires the implementation and maintenance of an emergency management system on each campus that will be activated when an event has the potential for reaching proportions beyond the capacity of routine operations. Each campus plan must be compliant with SEMS, NIMS, and the SEMS/NIMS ICS. In 2006, to be flexible in responding to health-related emergencies, the CSU implemented pandemic influenza preparedness and response plans across all campuses, and those plans were reviewed in the 2006 Disaster and Emergency Preparedness audits. In 2008, as a response to nationwide concerns for campus security, the CSU implemented active shooter drills and training systemwide, and those activities continue throughout the year as detailed procedures and standards evolve.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Emergency Preparedness* (EP) 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 audit objective, specific goals included determining whether:

- ▶ Administration of EP incorporates a defined mission, stated goals and objectives, and clear lines of organizational authority and responsibility, and is adequately funded.
- ▶ Initiatives and investments are underway to improve EP and to maximize EP resources; risks specific to the campus have been identified; and policies and procedures are current, comprehensive, and sufficient to support campus EP.
- ▶ An adequate emergency operations center (EOC) exists; sufficient equipment, supplies, and other critical resources are properly provisioned; and the campus is fully prepared for emergencies.
- ▶ The emergency plan is compliant with SEMS and NIMS and clearly identifies who has authority and responsibility for emergencies and incidents; the emergency organization is sufficient to ensure that campus command/incident command techniques provide command and control when emergency incidents occur; and effective building marshal and volunteer programs have been established.
- ▶ Emergency resources are available; emergency plans have been updated appropriately; and any related/subordinate plans are integrated with the campus emergency plan.
- ▶ Incidents are mitigated timely; lessons learned are evaluated; appropriate after-action reports are prepared; and the campus has sufficient plans for mitigation of any facilities deficiencies.
- ▶ The emergency plan has been adequately communicated to the campus community; the campus is compliant with required communications with the chancellor's office and with emergency management agencies; and grants for emergency communications and operations are adequately managed and tracked.
- ▶ Sufficient training has been provided to new employees, emergency management staff, and building marshals; the finance function has been integrated into the emergency response activities; and specialized training has been provided in the areas of SEMS, NIMS, and incident command systems for the student health center, building marshals, and for disaster service worker program volunteers.
- ▶ The campus has plans for, and adequately administers, testing and drills for emergency incidents, emergency communications, evacuations, active shooter situations, and mutual aid; and written incident action plans follow SEMS/NIMS guidelines.
- ▶ Generators, communications devices, and other equipment and supplies are functional and tested frequently, and the related responsibility is appropriately assigned.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment B, Audit Agenda Item 2 of the January 27 and 28, 2009, meeting of the Committee on Audit stated that emergency preparedness includes review of compliance with the National Incident Management System, 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 training and testing; and relationships with state and federal emergency management agencies.

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 Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect from January 1, 2007, through September 4, 2009. In instances wherein it was necessary to review annualized data, calendar years 2007 and 2008 were the periods reviewed.

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

- ▶ The emergency management organization.
- ▶ Emergency management plan and event-specific annexes.
- ▶ 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, including mutual aid and assistance.
- ▶ Funding and budgetary controls for emergency management activities.
- ▶ Communication of the emergency management plan.
- ▶ Training for emergency management activities.
- ▶ Evacuation drills and emergency plan testing.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

EMERGENCY MANAGEMENT PROGRAM

ROSTER OF EMERGENCY RESOURCES

The campus roster of emergency resources was not updated or complete.

We found that the campus roster of emergency resources was not dated, did not include all items detailed in Executive Order (EO) 1013, and had not been updated at least annually.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires that each campus develop a roster of campus resources and contracts for materials and services that may be needed in an emergency situation including equipment, emergency power, communications, food and water, and satellite and other mobile phone numbers and update at least annually or as needed. The “updated as of date” should appear on each roster.

The chief of police stated that the campus believed the format of the emergency resources lists was compliant with EO 1013.

Failure to update and complete the campus roster of emergency resources annually increases the risk that delays in locating critical resources could occur during an emergency.

Recommendation 1

We recommend that the campus update its roster of resources and include all items detailed in EO 1013.

Campus Response

We concur and will prepare a database of emergency resources with a hard-copy binder by February 26, 2010.

STOCKTON CAMPUS

The emergency operations plan (EOP) did not include coverage of the Stockton satellite campus, nor was there a separate written plan for this site.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires that each campus develop a campus emergency plan. On an annual basis or more frequently as needed, the plan should be reviewed, updated, and distributed to the emergency management team members and others as identified by the campus.

The chief of police stated that although not specifically articulated, the campus assumed the EOP was applicable to both the main campus and the satellite campus.

The absence of an emergency plan for the Stockton campus limits the campus' ability to effectively respond to emergencies and imposes an undue risk of loss and/or injury to the campus community.

Recommendation 2

We recommend that the campus include the Stockton satellite campus in the EOP or create a separate written plan for it.

Campus Response

We concur and will include written plans for the Stockton satellite campus in the EOP by March 30, 2010.

COMMUNICATIONS AND TRAINING

NEW HIRE EMERGENCY OVERVIEW TRAINING

Emergency preparedness overview training for new hires was inadequate.

Training records reviewed from January 2007 through June 2008 revealed that:

- ▶ Five of eleven new staff hires tested did not receive emergency preparedness overview training during orientation or within the first year of employment.
- ▶ Ten newly hired faculty members tested did not receive emergency preparedness overview training during orientation or within the first year of employment.
- ▶ There were no written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should train the campus community on the SEMS, NIMS, and ICS compliant campus plan to include, at a minimum, overview training of every employee within one year of employment. The EO further states that training records for all campus training shall be kept for a minimum of seven years.

The director of human resources stated that emergency preparedness overview training is part of the new employee orientation; however, attendance at the orientation had not been mandatory for staff. The associate vice president of faculty affairs stated that new faculty emergency preparedness overview training had not been formalized and needed further development.

Failure to provide emergency preparedness overview training for new hires increases the risk that emergency response would be inadequate.

Recommendation 3

We recommend that the campus:

- a. Provide emergency preparedness overview training to all staff and faculty new hires during orientation or within the first year of employment.
- b. Develop written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

Campus Response

We concur and will:

- a. Work with human resources to develop written procedures to address the requirement for emergency preparedness overview training for all newly hired employees by June 30, 2010.
- b. Implement online emergency preparedness overview training, records retention, and tracking for all new employees by June 30, 2010.

SPECIALIZED TRAINING

Specialized training (SEMS, NIMS, and ICS) for building marshals/monitors needed improvement.

We found that specialized training attendance requirements had not been established for building marshals/monitors. Additionally, we tested 10 of 78 building marshals/monitors and noted that five had not received specialized training designed for building marshals/monitors.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should train campus community on the SEMS, NIMS, and ICS compliant campus plan to include, at a minimum specialized training annually for employees designated either as building coordinator or building floor marshal, EOC team member, or member of the campus emergency management team. Specialized training includes, but is not limited to, SEMS, NIMS, ICS, and crisis response. Training records for all campus training shall be kept for a minimum of seven years.

The chief of police stated that the campus has not made attendance at specialized training mandatory.

Failure to require specialized training attendance for building marshals/monitors, and train all building marshals/monitors, increases the risk that emergency response would be inadequate.

Recommendation 4

We recommend that the campus establish specialized training attendance requirements for building marshals/monitors and ensure that training is completed.

Campus Response

We concur and will work with human resources to establish specialized training attendance requirements for building marshals/monitors including ensuring that training is completed annually by June 30, 2010.

STUDENT HEALTH CENTER EMERGENCY PLAN

Emergency plans for the campus and the student health center (SHC) did not include provision for the training and assignment of SHC staff in disasters/emergencies that may require medical services.

EO 943, *Policy on University Health Services*, dated April 28, 2005, states that campus emergency plans should include provision for the training and assignment of SHC staff in disasters that may require emergency medical services. The SHC staff should review medical disaster plans of the campus emergency plan annually.

The chief of police stated that documentation of this provision was not included in the EOP or the SHC policy due to an oversight.

Failure to address the requirement for training and assignment of SHC staff in emergencies that may require medical services increases the risk that SHC emergency response would be inadequate.

Recommendation 5

We recommend that the campus update both the campus and SHC emergency plans to include provision for the training and assignment of SHC staff in disasters/emergencies that may require medical services.

Campus Response

We concur and will update the campus and SHC emergency plans to include provision for the training and assignment of SHC staff in emergencies by April 30, 2010.

TESTING AND DRILLS

Documentation of campus emergency communications testing needed improvement.

Our review of emergency communications revealed that the campus had not documented the periodic testing of emergency communications accomplished during campus drills and exercises.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states, in part, that the emergency program should ensure that management activities are accomplished in support of the campus emergency program to include testing of simulated emergency incidents and emergency communications.

The chief of police stated that a campus procedure did not exist for testing and documenting emergency communications.

Failure to document emergency communications testing increases the risk that test results would not be reviewed, and consequently emergency preparedness would be inadequate.

Recommendation 6

We recommend that the campus document its periodic testing of emergency communications.

Campus Response

We concur and will document testing of emergency communications including an electronic database for records maintenance by March 30, 2010.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Hamid Shirvani	President
Cliff Bailey	Director of Facilities Support Services
Jean Grech Conde	Director of Student Housing
Russell Giambelluca	Vice President, Business and Finance
Suzanne Green	Interim Vice President, Business and Finance
Elizabeth Hodge	Dispatcher, University Police Department (UPD)
Steven Jaureguy	Chief of Police, UPD
Mary Kobayashi-Lee	Director, Human Resources
Kellie Marshall	Health and Safety Specialist
Amy Metcalf	Communications Center Supervisor, UPD
Kristin Olsen	Assistant Vice President, Communications and Public Affairs
Amy Thomas	Assistant Director, Environmental Health and Occupational Safety
Reggie Thompson	Operations Lieutenant, UPD
Ted Wendt	Associate Vice President, Faculty Affairs
Bruce Wilbur, MD	Medical Chief of Staff, Student Health Center

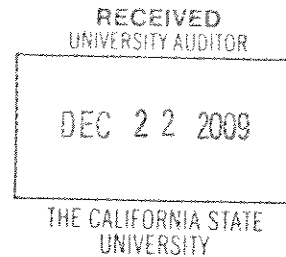


CALIFORNIA STATE UNIVERSITY STANISLAUS

VICE PRESIDENT FOR BUSINESS AND FINANCE

December 18, 2009

Larry Mandel, University Auditor
Office of the Chancellor
401 Golden Shore
Long Beach, CA 90802-4210



Dear Larry,

Attached please find the campus response to the *Emergency Preparedness Incomplete Draft Audit Report (09-50)*. As requested, an electronic copy was emailed to Anne Marie Douglas.

We look forward to receiving direction for our next step in this process.

Sincerely,


Russell Giambelluca
Vice President of Business and Finance

Cc: President Hamid Shirvani

Attachment

**EMERGENCY PREPAREDNESS
CALIFORNIA STATE UNIVERSITY,
STANISLAUS**

Audit Report 09-50

EMERGENCY MANAGEMENT PROGRAM

ROSTER OF EMERGENCY RESOURCES

Recommendation 1

We recommend that the campus update its roster of resources and include all items detailed in EO 1013.

Campus Response

We concur and will prepare a database of emergency resources with a hard-copy binder by February 26, 2010.

STOCKTON CAMPUS

Recommendation 2

We recommend that the campus include the Stockton satellite campus in the EOP or create a separate written plan for it.

Campus Response

We concur and will include written plans for the Stockton satellite campus in the EOP by March 30, 2010.

COMMUNICATIONS AND TRAINING

NEW HIRE EMERGENCY OVERVIEW TRAINING

Recommendation 3

We recommend that the campus:

- a. Provide emergency preparedness overview training to all staff and faculty new hires during orientation or within the first year of employment.
- b. Develop written procedures to address emergency preparedness overview training for all newly hired staff and faculty, including the completion and retention of required training documentation.

Campus Response

We concur and will: a) Work with Human Resources to develop written procedures to address the requirement for emergency preparedness overview training for all newly hired employees, and; b) Implement online emergency preparedness overview training, records retention and tracking for all new employees by June 30, 2010.

SPECIALIZED TRAINING

Recommendation 4

We recommend that the campus establish specialized training attendance requirements for building marshals/monitors and ensure that training is completed.

Campus Response

We concur and will work with Human Resources to establish specialized training attendance requirements for building marshals/monitors including ensuring that training is completed annually by June 30, 2010.

STUDENT HEALTH CENTER EMERGENCY PLAN

Recommendation 5

We recommend that the campus update both the campus and SHC emergency plans to include provision for the training and assignment of SHC staff in disasters/emergencies that may require medical services.

Campus Response

We concur and will update the campus and SHC emergency plans to include provision for the training and assignment of SHC staff in emergencies by April 30, 2010.

TESTING AND DRILLS

Recommendation 6

We recommend that the campus document its periodic testing of emergency communications.

Campus Response

We concur and will document testing of emergency communications including a electronic database for records maintenance by March 30, 2010.



THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

January 22, 2010

CHANNEL ISLANDS

CHICO

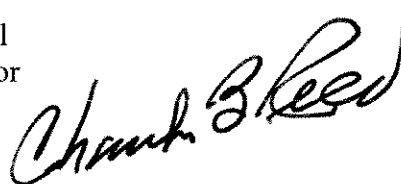
MEMORANDUM

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FROM: Charles B. Reed
Chancellor


FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-50 on *Emergency Preparedness*,
California State University, Stanislaus

LONG BEACH

LOS ANGELES

In response to your memorandum of January 22, 2010, I accept the response as submitted with the draft final report on *Emergency Preparedness*, California State University, Stanislaus.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS