

**EMERGENCY PREPAREDNESS**  
**CALIFORNIA STATE UNIVERSITY,**  
**FULLERTON**

**Audit Report 09-51**  
**December 3, 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)
EMP	Emergency Management 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
UPD	University Police Department

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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 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, Fullerton campus from August 17, 2009, through September 10, 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 10, 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 emergency management plan was not reviewed or updated on an annual basis. This is a repeat finding from the prior Disaster and Contingency Planning audit performed in 2004.

### **COMMUNICATIONS AND TRAINING [7]**

Emergency preparedness overview training for new hires was not always completed.

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## 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](http://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 10, 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.

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## **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

### **EMERGENCY MANAGEMENT PROGRAM**

The campus emergency management plan (EMP) was not reviewed or updated on an annual basis. This is a repeat finding from the prior Disaster and Contingency Planning audit performed in 2004.

We noted that:

- ▶ Part one of the EMP had not been updated or reviewed since March 24, 2003. Specifically, Section 1.7, *Administrative Practices*, states that the EMP is “to be developed.” The prior audit also noted that this section was to be developed. In addition, the preface and table of contents of the EMP still referred to parts two and three as “under revision” and the campus profile had not changed since 2004.
- ▶ Part three of the EMP has not been updated or reviewed since March 2, 2004.

Executive Order (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 parts one and three of the campus emergency management plan, which are based on facts that do not change much from one year to the next, had been reviewed on an annual basis, but tracking of these reviews had not been fully documented.

Failure to maintain an updated EMP increases the risk that emergency responders will not be fully aware of important revisions to the plan, consequently increasing the risk of inadequate response to emergencies.

#### **Recommendation 1**

We recommend that the campus update the EMP annually and sufficiently distribute it to EMP team members and others identified by the campus.

#### **Campus Response**

We concur. The campus will develop and implement procedures by February 15, 2010, to ensure the EMP is annually reviewed, updates are made as necessary, and any updates are distributed to EMP team members.

## COMMUNICATIONS AND TRAINING

Emergency preparedness overview training for new hires was not always completed.

We reviewed the emergency preparedness overview training records for a sample of 25 employees hired between January 1, 2007, and May 31, 2008. The campus could not provide documentation demonstrating that 16 of the 25 employees attended the emergency training.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses must 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 associate vice president for administration and finance stated that human resources schedules all new employees to receive emergency preparedness training as part of the campus orientation process. He added that new employees did not consistently attend this training, however, and follow-up in rescheduling this training was somewhat intermittent.

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

### Recommendation 2

We recommend that the campus:

- a. Ensure that new hires attend emergency preparedness overview training.
- b. Ensure that emergency preparedness overview training is provided to all employees who did not complete the training between January 1, 2007, and May 31, 2008.

### Campus Response

We concur. The campus will develop and implement revised procedures by April 1, 2010, to ensure new hires and employees who did not complete the training between January 1, 2007, and May 31, 2008, attend emergency preparedness overview training.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Milton A. Gordon	President
Bill Barrett	Associate Vice President for Administration and Finance
Richard Boucher	Chief Staff Physician, Student Health and Counseling Center
Debbie Ellis	Administrative Services Supervisor, University Police Department (UPD)
William Hagan	Vice President of Administration
Bahram Hatefi	Director of Internal Audit
Justin Hendee	Emergency Management Coordinator
Judi King	Chief of Police, UPD
Don Landers	Operations Lieutenant, UPD
Ut Le	Lead Automobile and Equipment Mechanic, Facilities Management
Pam McLaren	Internal Communication Director
Victor Rojas, Jr.	Project Manager, Special Projects
Willem Van der Pol	Director, Physical Plant
Coleen Wilkins	Environmental Health and Safety Officer
May Wong	Director, Accounts Payable



# CALIFORNIA STATE UNIVERSITY, FULLERTON

Office of the President

P.O. Box 6810, Fullerton, CA 92834/6810 / T 657-278-3456 / F 657-278-2649

**DATE:** January 11, 2010

**TO:** Larry Mandel  
University Auditor

**FROM:** Milton A. Gordon  
President *MAG*

RECEIVED  
UNIVERSITY AUDITOR

JAN 12 2010

THE CALIFORNIA STATE  
UNIVERSITY

**SUBJECT:** Response for Emergency Preparedness Audit Report 09-51

I am pleased to forward California State University, Fullerton's official response to the two recommendations in the Emergency Preparedness Audit Report 09-51.

Once again, we would like to thank the University Auditor and his staff for conducting the audit in a professional manner and identifying meaningful ways to improve operational and administrative controls for emergency preparedness in compliance with state and CSU guidelines.

The Campus Auditor, Bahram Hatefi, will also forward the responses to you electronically for your convenience. Should you have questions, please contact Bahram at 714-278-7299 or [bhatefi@fullerton.edu](mailto:bhatefi@fullerton.edu).

## Attachments

cc: Bill Barrett, Associate Vice President, Administration & Finance  
Naomi Goodwin, Assistant Vice President, Administration & Finance  
Willie Hagan, Vice President, Administration & Finance CFO  
Bahram Hatefi, Director of CSUF Internal Audit

**EMERGENCY PREPAREDNESS**  
**CALIFORNIA STATE UNIVERSITY,**  
**FULLERTON**

**Audit Report 09-51**

**EMERGENCY MANAGEMENT PROGRAM**

**Recommendation 1**

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**Campus Response**

We concur. The campus will develop and implement procedures by February 15, 2010 to ensure the EMP is annually reviewed, updates are made as necessary, and any updates are distributed to EMP team members.

**COMMUNICATIONS AND TRAINING**

**Recommendation 2**

We recommend that the campus:

- a. Ensure that new hires attend emergency preparedness overview training.
- b. Ensure that emergency preparedness overview training is provided to all employees who did not complete the training between January 1, 2007 and May 31, 2008.

**Campus Response**

We concur. The campus will develop and implement revised procedures by April 1, 2010 to ensure new hires and employees who did not complete the training between January 1, 2007 and May 31, 2008 attend emergency preparedness overview training.

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

A handwritten signature in black ink that reads "Charles B. Reed".

FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-51 on *Emergency Preparedness*,  
California State University, Fullerton

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, Fullerton.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS