

EMERGENCY PREPAREDNESS
CALIFORNIA STATE UNIVERSITY,
CHICO

Audit Report 09-52
January 7, 2010

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ABBREVIATIONS

CalEMA	California Emergency Management Agency
CSU	California State University
DEP	Department Emergency Plans
DHS	(Federal) Department of Homeland Security
EH&S	Environmental Health & Safety
EO	Executive Order
EOC	Emergency Operations Center
EP	Emergency Preparedness
EPMP	Emergency Preparedness and Management Plan
FEMA	Federal Emergency Management Agency
FMS	Facilities and Management Services
ICS	Incident Command System
NIMS	National Incident Management System
OES	(California) Office of Emergency Services
ORM	Office of Risk Management
SEMS	Standardized Emergency Management System
UPD	University Police Department

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, Chico campus from August 24, 2009, through October 2, 2009, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant risk exposures if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: program administration, emergency management program, communications and testing, and testing and drills. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls for emergency preparedness in effect as of June 26, 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.

PROGRAM ADMINISTRATION [7]

The campus emergency preparedness and management plan and organization needed revision. The primary emergency operations center was not a dedicated area, and it lacked storage space for emergency supplies and equipment.

EMERGENCY MANAGEMENT PROGRAM [9]

Department building marshals and evacuation coordinators were not assigned to all campus buildings. The campus roster of emergency resources was not accurate or complete. Additionally, the administration of departmental emergency plans needed improvement.

COMMUNICATIONS AND TRAINING [11]

The campus emergency website was difficult to locate, the roster of essential emergency management team personnel was not current or complete, emergency preparedness training for new hires was not always completed, and specialized training (SEMS, NIMS, and ICS) for emergency team personnel was not always completed.

TESTING AND DRILLS [14]

The campus did not formally document the inclusion of special populations in evacuation exercises.

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 Regulation, 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 Trustees 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 30, 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

PROGRAM ADMINISTRATION

EMERGENCY PLAN AND ORGANIZATION

The campus emergency preparedness and management plan (EPMP) and organization needed revision.

We found that:

- ▶ Although the EPMP contained a position description and duties for an emergency operations center (EOC) coordinator, the position was not included in the current EOC organizational chart. The campus did not have a dedicated EOC coordinator on staff. Instead, the chief of police served as acting EOC director and EOC coordinator.
- ▶ The current EOC organizational chart did not agree with the EPMP organizational chart displayed in both Appendix A and in Appendix 2 of the EPMP.

Executive Order (EO) 1013, *CSU Emergency Management Plan*, dated August 7, 2007, states that each campus is delegated the responsibility for the implementation and maintenance of an emergency management program on campus and for developing a campus 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. Furthermore, EO 1013 states that the campus should designate a primary and secondary person with responsibility for campus-wide emergency management. Such persons shall be referred to as the campus emergency coordinator or emergency manager.

The chief of police stated that the campus did not have an EOC coordinator due to recent financial resource restrictions. He also stated that the current EOC organizational chart did not agree with the organizational charts shown in the EPMP due to clerical errors.

Failure to assign a dedicated emergency coordinator increases the risk that emergency management duties would not be accomplished timely and jeopardizes emergency preparedness. Furthermore, failure to formally approve the emergency plan, and align it with the emergency organizational chart increases the risk that emergency team members would not always be aware of their assignments in an emergency.

Recommendation 1

We recommend that the campus reevaluate its emergency organization, make appropriate assignments, and update both the EPMP and the EOC verbiage and organizational charts accordingly.

Campus Response

We concur. The campus will reevaluate and update both the emergency management plan and EOC organizational chart, and will make appropriate assignments by April 2010.

EMERGENCY OPERATIONS CENTER

The primary EOC was not a dedicated area.

We found that the university police department (UPD) was also used as the EOC. The EOC was shared with other campus operations, and no storage space was available within the EOC for emergency supplies and equipment, although emergency supplies were stored in an alternate location.

The U.S. Department of Education *Action Guide for Emergency Management at Institutions of Higher Education*, dated January 2009, states that the EOC serves as a centralized management center for emergency operations. The EOC should be located in an area of the facility not likely to be involved in an incident. An alternate EOC should be designated in the event that the primary location cannot be used. Ideally, the EOC is a dedicated area equipped with communications equipment, reference materials, activity logs, and all the tools necessary to respond quickly and appropriately to an emergency.

EO 1013, *CSU Emergency Management Plan*, dated August 7, 2007 states that the campus should establish and equip a functional campus EOC consistent with Standardized Emergency Management System, National Incident Management System, and Incident Command System guidelines and maintain a campus (emergency) roster of resources that includes food and water, with the update/revision date appearing on the roster.

The chief of police stated that space was unavailable for a dedicated EOC or for equipment storage at the EOC at the time of audit.

Failure to maintain a dedicated EOC with storage space for emergency supplies and equipment increases the risk of inadequate response to emergencies.

Recommendation 2

We recommend that the campus ensure that the EOC is adequate to fully support emergency operations.

Campus Response

We concur. The campus will reevaluate the location of our primary and secondary EOC locations as well as storage of equipment and adequate inventory of supplies that include food and water. This finding will be cleared by June 2010.

EMERGENCY MANAGEMENT PROGRAM

ASSIGNMENT OF BUILDING MARSHALS AND EVACUATION COORDINATORS

Department building marshals and evacuation coordinators were not assigned to all campus buildings.

We found that building marshals and/or evacuation coordinators were not assigned to 19 of the 37 occupied buildings on campus.

The Federal Emergency Management Agency (FEMA), *Emergency Management Guide for Business and Industry*, dated October 1993, states that during evacuation planning, institutions should establish a clear chain of command and identify personnel with the authority to order an evacuation. They should designate “evacuation wardens” to assist others in an evacuation and account for personnel. Institutions should establish specific evacuation procedures. They should establish a system for accounting for personnel, consider employees’ transportation needs for communitywide evacuations, and establish procedures for assisting persons with disabilities and those who do not speak English.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should conduct periodic campus building evacuation drills, at least annually.

The chief of police stated that at the time of audit, the campus was reviewing building marshal and evacuation coordinator assignments using a risk-based approach. He also stated, however, that the review of emergency assignments was a large task and it was not yet completed.

Failure to appropriately assign building marshals and evacuation coordinators to campus buildings increases the risk of inadequate evacuations during emergencies.

Recommendation 3

We recommend that the campus expedite its review of building marshal and evacuation coordinator assignments using a risk-based approach, and make appropriate staff assignments.

Campus Response

We concur. The campus will do a thorough review of the floor evacuation coordinator assignments and will have all appropriate assignments in place by May 2010.

ROSTER OF EMERGENCY RESOURCES

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

The roster included equipment and supplies in various facilities and management services (FMS) warehouse locations. Based on our review of the roster, we noted that:

- ▶ The campus could not find six of ten items on the FMS roster.
- ▶ The campus could not identify the locations of FMS roster items.

- ▶ The roster did not include a plan for emergency food and water.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007 requires that each campus develop a roster of campus resources and contract 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 chief of police stated that the campus actually had in stock all items on the roster, but FMS staff simply was not aware of the locations of certain items on the roster. He further stated that the omission of item locations from the roster was a clerical oversight. Additionally, the chief of police stated that a food and water memorandum of understanding was being negotiated between the campus and Associated Students; however, it was not completed at the time of this audit.

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

Recommendation 4

We recommend that the campus update its roster of emergency resources at least annually and include a plan for food and water in the event of an emergency.

Campus Response

We concur. The campus will update their roster of emergency resources that will include a plan for food and water in the case of an emergency. The list of resources and plan for annual review will be completed by April 2010.

ADMINISTRATION OF DEPARTMENTAL EMERGENCY PLANS

Administration of departmental emergency plans needed improvement.

We found that:

- ▶ Some departments lacked written emergency plans although these are required by the campus-wide plan, and the campus had not developed a single compilation of all available plans.
- ▶ The campus had not performed a risk assessment of buildings and departments that needed their own emergency plans as a supplement to the campus-wide emergency plan.

The California State University, Chico *Emergency Preparedness and Management Plan*, dated July 2009, states that department emergency plans (DEP) are an integral part of the overall (campus-wide) emergency plan. Departments and colleges throughout the university need to develop their own DEPs for practical reasons. The DEP should address preparedness measures and emergency response. The DEP is a way for the department to plan for potential emergencies, small accidents,

citywide disasters, power outages, hazardous chemical spills, fires, a civil disturbance, or an earthquake.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires that each campus develop a campus-wide emergency plan.

The chief of police stated that the campus had not written a DEP for every department due to uncertainty as to the need for these plans in addition to the campus-wide EPMP. He also stated that the campus did not complete a risk assessment of the need for DEPs due to time constraints.

Failure to prepare appropriate plans increases the risk that the campus would not be adequately prepared in the event of an emergency.

Recommendation 5

We recommend that the campus perform a risk assessment of the need for DEPs in addition to the campus-wide EPMP, and implement the results of the risk assessment.

Campus Response

We concur. The campus will perform a risk assessment of all buildings on campus to determine the needs of department-specific emergency plans. The campus will implement the results of the assessment by June 2010.

COMMUNICATIONS AND TRAINING

EMERGENCY WEBSITE

The campus emergency website was difficult to locate.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should continually communicate the emergency plan to the campus community in a variety of methods through public education (e.g., web-posting of the plan, except for active shooter/terrorist responses plans) or other mechanisms for dissemination of hazard planning materials.

The chief of police stated that the emergency management staff was not aware that the campus emergency plan website was difficult to find.

Failure to provide a direct link to the campus emergency plan website increases the risk of delays in locating information and inadequate or untimely response to emergencies.

Recommendation 6

We recommend that the campus place a direct link to the emergency plan website on the campus homepage.

Campus Response

We concur. The campus will place a direct link to the emergency preparedness website homepage by June 2010.

EMERGENCY PERSONNEL ROSTER

The roster of essential emergency management team personnel was not current or complete.

The roster that was reported to the California State University (CSU) Office of Risk Management (ORM) in December 2008 did not include a designated backup for the emergency executive, a key emergency team member. Further, we noted that as of the date of audit, organizational changes on campus would require an updated reporting of emergency management team personnel to the CSU ORM.

EO 1013, *California State University Emergency Management Plan*, dated August 7, 2007, states that once a year by December 1 or more frequently as needed, the campus will provide the systemwide ORM at the chancellor's office a roster of emergency management team personnel essential to the operation of the campus emergency management program, and their designated backups.

The chief of police stated that the campus did not submit a current and complete roster to the ORM because of an oversight.

Failure to provide contact information for the designated backup of key emergency team members, and updates reflecting organizational changes, increases the risk of communications delays during a significant emergency incident.

Recommendation 7

We recommend that the campus provide the ORM with a complete and current roster of emergency management team personnel.

Campus Response

We concur. The campus will provide the ORM with a complete and current roster of emergency management team personnel at the minimum on an annual basis, or more frequently as needed. This will be completed by April 2010.

NEW HIRE EMERGENCY PREPAREDNESS TRAINING

Emergency preparedness training for new hires was not always completed.

Training records for active employees hired between July 1, 2007, and June 30, 2008 revealed that:

- ▶ Five of 25 staff new hires tested had not received emergency preparedness training during orientation or within the first year of employment.
- ▶ The campus was unable to provide a list of faculty new hires or any information about their emergency preparedness training.
- ▶ The campus lacked written procedures on emergency preparedness training for 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 chief of police stated that the campus had difficulties with tracking new hire training, as well as limited staff to complete the training and tracking. He also stated that faculty affairs did not respond to the request for new hire training data. He further stated that the campus did not have written procedures for new hire training.

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

Recommendation 8

We recommend that the campus:

- a. Provide emergency preparedness overview training to all staff and faculty 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. The campus will develop new written procedures related to emergency preparedness overview training to all staff and faculty. This training will occur during new employee orientation or within the first year of employment. We will also establish a plan for the retention of required training documents. These procedures and plans will be completed no later than June 2010.

SPECIALIZED TRAINING

Specialized training (SEMS, NIMS, and ICS) for emergency team personnel was not always completed.

We found that the campus did not maintain documentation to support the completion of specialized emergency preparedness training for EOC personnel, building marshals, and evacuation coordinators. Specifically, the campus was unable to provide adequate documentation to support SEMS, NIMS, or ICS training for 11 of 20 emergency team members selected for review.

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, 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. The EO further states that training records for all campus training shall be kept for a minimum of seven years.

The chief of police stated that the campus had difficulties tracking specialized emergency preparedness training due to limited personnel resources and turnover.

Failure to maintain documentation of specialized emergency preparedness training for emergency team personnel increases the risk that emergency response would be inadequate.

Recommendation 9

We recommend that the campus maintain documentation for a minimum of seven years to support required specialized emergency preparedness training for emergency team personnel.

Campus Response

We concur. The campus will develop a plan for the retention of specialized emergency preparedness training for emergency team personnel. This implementation will be completed by June 2010.

TESTING AND DRILLS

The campus did not formally document the inclusion of special populations in evacuation exercises.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, states that campuses should conduct testing of simulated emergency incidents, including the periodic testing of campus building evacuation drills, and they should be conducted at least annually or more frequently as needed.

The U.S. Department of Education *Action Guide for Emergency Management at Institutions of Higher Education*, dated January 2009, states that emergency management plans must be based on a

comprehensive design, while also providing for staff, students, faculty, and visitors with special needs. Every aspect of an emergency plan also should incorporate provisions for vulnerable populations, who can have a wide range of needs, including language barriers, disabilities, or other special conditions. Thus, any procedures, products, and protocols created to prevent, prepare, respond, and recover from an emergency must accommodate people with various levels of cognitive ability, knowledge, physical capabilities and life experience.

The chief of police stated that although the campus emergency management staff believed representatives of special populations were included in evacuations, formal recordkeeping of such activities was not maintained on file.

Failure to document special populations in evacuation exercises increases the risk of litigation and the risk that both emergency responders and special populations would not be sufficiently trained to respond to drills and emergencies.

Recommendation 10

We recommend that the campus document the inclusion of special populations in evacuation exercises.

Campus Response

We concur. The campus will incorporate provisions for special populations into the campus emergency plan and in the training of EOC personnel. This will be implemented by June 2010.

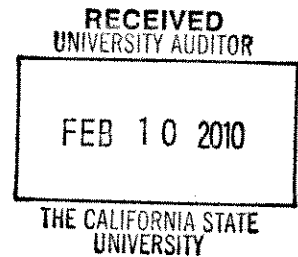
APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Paul J. Zingg	President
Teresa Arnold	Executive Assistant, Business and Finance
Corinne Beck	Detective, University Police Department (UPD)
Gregory Black	Community Service Officer, UPD
Deborah Furgason	Administrative Support Coordinator, UPD
Robyn Hearne	Lieutenant, UPD
Lorraine Hoffman	Vice President, Business and Finance
Christine Holt	Nursing Coordinator, Student Health Center
Hemlata Jhaveri	Associate Director, University Housing and Food Service
Brian Mohs	Safety Coordinator, Environmental Health and Safety (EH&S)
Warren Moser	Lead Automotive Mechanic, Facilities Management and Services (FMS)
James Nelson	Information Technology Consultant, Business Information Systems
Neil Nunn	Associate Director, FMS
Sandy Parsons-Ellis	Director, Disability Support Services
Marvin Pratt	Assistant Director, EH&S
Kathleen Purvis	Library Student Personnel and Building Manager, Information Resources
Eric Reichel	Chief of Police, UPD
Matthew Thomas	Associate Professor, Political Science Department
Michael Thorpe	Risk Manager, Business and Finance
Kenneth Sator	Director, EH&S
Joe Wills	Director, Public Affairs and Publications

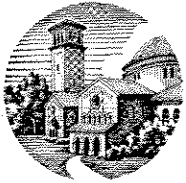
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January 29, 2010



Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802-4210



Dear Mr. Mandel:

Enclosed is California State University, Chico's response to the CSU Emergency Preparedness Audit Report 09-52. We appreciate the time and assistance your office has invested in the review of our procedures. We welcome the report's recommendations and will take the actions necessary to address them.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Lorraine B. Hoffman
Vice President for Business and Finance

cc: Paul J. Zingg
Eric Reichel

EMERGENCY PREPAREDNESS
CALIFORNIA STATE UNIVERSITY,
CHICO

Audit Report 09-52

PROGRAM ADMINISTRATION

EMERGENCY PLAN AND ORGANIZATION

Recommendation 1

We recommend that the campus reevaluate its emergency organization, make appropriate assignments, and update both the EPMP and the EOC verbiage and organization charts accordingly.

Campus Response

We concur. The campus will reevaluate and update both the Emergency Management Plan and EOC organizational chart, and we will make appropriate assignments by April, 2010.

EMERGENCY OPERATIONS CENTER

Recommendation 2

We recommend that the campus ensure that the EOC is adequate to fully support emergency operations.

Campus Response

We concur. The campus will reevaluate the location of our primary and secondary EOC location as well as storage of equipment and adequate inventory of supplies that include food and water. This finding will be cleared by June, 2010.

EMERGENCY MANAGEMENT PROGRAM

ASSIGNMENT OF BUILDING MARSHALS AND EVACUATION COORDINATORS

Recommendation 3

We recommend that the campus expedite its review of building marshal and evacuation coordinator assignments using a risk-based approach, and make appropriate staff assignments.

Campus Response

We concur. The campus will do a thorough review of the Floor Evacuation Coordinator assignments and will have all appropriate assignments in place by May, 2010.

ROSTER OF EMERGENCY RESOURCES

Recommendation 4

We recommend that the campus update its roster of emergency resources at least annually and include a plan for food and water in the event of an emergency.

Campus Response

We concur. The campus will update their roster of emergency resources that will include a plan for food and water in the case of an emergency. The list of resources and plan for annual review will be completed by April, 2010.

ADMINISTRATION OF DEPARTMENTAL EMERGENCY PLANS

Recommendation 5

We recommend that the campus perform a risk assessment of the need for DEPs in addition to the campus-wide EPMP, and implement the results of the risk assessment.

Campus Response

We concur. The campus will perform a risk assessment of all buildings on campus to determine the needs of department specific emergency plans. The campus will implement the results of the assessment by June, 2010.

COMMUNICATIONS AND TRAINING

EMERGENCY WEBSITE

Recommendation 6

We recommend that the campus place a direct link to the emergency plan website on the campus homepage.

Campus Response

We concur. The campus will place a direct link to the emergency preparedness website homepage by June, 2010.

EMERGENCY PERSONNEL ROSTER

Recommendation 7

We recommend that the campus provide the ORM with a complete and current roster of emergency management team personnel.

Campus Response

We concur. The campus will provide the ORM with a complete and current roster of emergency management team personnel at the minimum on an annual basis, or more frequently as needed. This will be completed by April, 2010.

NEW HIRE EMERGENCY PREPAREDNESS TRAINING

Recommendation 8

We recommend that the campus:

- a. Provide emergency preparedness overview training to all staff and faculty 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. The campus will develop new written procedures related to emergency preparedness overview training to all staff and faculty. This training will occur during new employee orientation, or within the first year of employment. We will also establish a plan for the retention of required training documents. These procedures and plans will be completed no later than June 30, 2010.

SPECIALIZED TRAINING

Recommendation 9

We recommend that the campus maintain documentation for a minimum of seven years to support required specialized emergency preparedness training for emergency team personnel.

Campus Response

We concur. The campus will develop a plan for the retention of specialized emergency preparedness training for emergency team personnel. This implementation will be completed by June, 2010.

TESTING AND DRILLS

Recommendation 10

We recommend that the campus document the inclusion of special populations in evacuation exercises.

Campus Response

We concur. The campus will incorporate into the campus Emergency Plan and training of EOC personnel provisions for special populations. This will be implemented by **June, 2010**.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR



BAKERSFIELD

March 5, 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 09-52 on *Emergency Preparedness*,
California State University, Chico

LONG BEACH

LOS ANGELES

In response to your memorandum of March 5, 2010, I accept the response as submitted with the draft final report on *Emergency Preparedness*, California State University, Chico.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS