EMERGENCY PREPAREDNESS

CALIFORNIA STATE UNIVERSITY,
EAST BAY

Audit Report 09-53
February 2, 2010

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ABBREVIATIONS

AAR After Action Report
CalEMA California Emergency Management Agency
CSU California State University
DHS (Federal) Department of Homeland Security
EH&S Environmental Health & Safety
EO Executive Order
EOC Emergency Operations Center
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
ORM Office of Risk Management
SEMS Standardized Emergency Management System
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, East Bay campus from August 25, 2009, through October 1, 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 October 1, 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 emergency operations center (EOC) was inadequate.

EMERGENCY MANAGEMENT PROGRAM [8]

The campus had not fully reviewed, updated, and distributed its emergency operations plan on an annual basis. Additionally, the campus roster of emergency supplies was not current. The campus web-based listing of building safety coordinators and building safety assistants was outdated. This is a repeat finding from the Occupational Health and Safety audit performed in 2007.

COMMUNICATIONS AND TRAINING [10]

Emergency preparedness training for new hires was not always completed. The campus did not submit an updated roster of essential emergency management team personnel to the California State University Office of Risk Management in a timely manner. Additionally, specialized training (SEMS, NIMS, and ICS) and supporting documentation for emergency operations center emergency team members needed improvement.
TESTING AND DRILLS [13]

Testing and documentation of simulated emergency incidents 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 October 1, 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

The emergency operations center (EOC) was inadequate.

We found that:

- The EOC was not a dedicated or secure area, as it was shared with other campus operations.
- The EOC lacked many recommended items, such as communications equipment, a current copy of the emergency operations plan and EOC procedures, forms, and a list of EOC personnel.


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 is not usable. 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.

The chief of police stated that the EOC was recently relocated due to on-campus construction, and as a result, the current shared location was not equipped and stocked according to recommendations. She further stated that a permanent location for the EOC had not yet been designated.

Failure to maintain a functional, secure, and dedicated EOC increases the risk of inadequate response to emergencies.

**Recommendation 1**

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

**Campus Response**

We concur. The university has assigned a dedicated, secure location for the EOC. The location is adequate to fully support emergency operations. We are currently in the process of equipping the center with the necessary emergency documents, forms, and communications equipment to ensure complete functionality; the EOC will be equipped and functional prior to December 1, 2010. The former non-dedicated site serves as our alternate EOC.
EMERGENCY MANAGEMENT PROGRAM

EMERGENCY PLAN UPDATES AND DISTRIBUTION

The campus had not fully reviewed, updated, and distributed its emergency operations plan (EOP) on an annual basis.

We found that:

- The most recent EOP (2008) did not include the full date of completion for comparative purposes, nor did it include evidence of review and approval. Portions of the plan were outdated. Additionally, the EOP was incomplete, as some sections were left blank.

- The campus maintained an outdated (2006) draft version of the EOP on its website, and also maintained outdated (2006 and older) versions of the EOP in the EOC.

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 updates to the EOP were ongoing, but insufficient records and changes in emergency personnel made it difficult to determine how frequently staff reviewed, updated, approved, and distributed it. She also stated that, for the same reasons, it was difficult to determine why the campus had posted outdated copies to the website and maintained outdated copies in the EOC.

Failure to maintain an updated EOP 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 2**

We recommend that the campus review and update the EOP at least annually to ensure that the information is current, accurate, and complete.

**Campus Response**

We concur. The university is currently in the process of reviewing and updating the EOP with a planned completion/distribution date of April 30, 2010. In addition, an updated copy of the EOP will be posted on the university website and secured in the EOC at that time. Thereafter, the plan shall be reviewed, updated, and distributed prior to December 1, annually.
ROSTER OF EMERGENCY RESOURCES

The campus roster of emergency supplies was not current.

We found that:

- The Student Health Services roster of medical supplies was dated September 2007.
- The Environmental Health & Safety (EH&S) roster of supplies and equipment was dated October 2005.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires that each campus should 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 director of EH&S stated that due to the closure of the student hub building, the campus moved the supplies to a temporary storage area. She added that EH&S was awaiting clean up of the area so it could organize and inventory the supplies. She further stated that EH&S performed an inventory assessment of emergency supplies and equipment in November 2008 before moving the supplies; however, adequate records to document the inventory were not maintained.

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

**Recommendation 3**

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

**Campus Response**

We concur. The campus is currently in the process of updating its roster of emergency resources. The inventory will be complete by July 1, 2010. Thereafter, an annual inventory, including all items detailed in EO 1013, of emergency resources will be completed prior to June 30, annually.

BUILDING SAFETY ASSISTANT PROGRAM

The campus web-based listing of building safety coordinators and building safety assistants was outdated. This is a repeat finding from the Occupational Health and Safety audit performed in 2007.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires each campus to continually communicate the emergency plan to the campus community in a variety of methods through public education, such as web-posting, or other mechanisms for dissemination of emergency planning materials.
The director of EH&S stated that the web-based listing was not updated as a result of staffing changes. She further stated that although the list was updated in February 2009, a current revision was necessary.

Outdated building safety coordinator and building safety assistant listings increase the risk of communication failures during a disaster or other emergency.

**Recommendation 4**

We recommend that the campus develop and implement a procedure to frequently update its web-based listing of building safety coordinators and building safety assistants.

**Campus Response**

We concur. The campus web-based listing of building safety coordinators and assistants has been updated; the most recent, updated list was disseminated October 1, 2009. Henceforth, the list will be updated and posted to the web by the last day of each academic quarter.

**COMMUNICATIONS AND TRAINING**

**NEW HIRE EMERGENCY PREPAREDNESS TRAINING**

Emergency preparedness training for new hires was not always completed.

We reviewed emergency preparedness training records for 30 employees hired from January 1, 2007, through August 24, 2008, and found that the campus had not provided 18 of 30 new hires with emergency preparedness training within the first year of employment.

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 director of EH&S stated that during orientation, all new employees were instructed to complete online emergency preparedness training in the ClarityNet training system. However, new employees did not consistently complete the training, and the campus lacked a follow-up system to ensure that all new employees fulfilled the 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 5

We recommend that the campus:

a. Ensure that it provides emergency preparedness training to all newly hired employees who did not complete the training between January 1, 2007, and August 24, 2008, and all new hires since.

b. Develop written procedures to address emergency preparedness training for all newly hired employees, and a follow-up system to track completion of the training.

Campus Response

We concur. The university will ensure that all newly hired employees (hired post January 1, 2007) who did not complete the emergency preparedness training will receive the required training by September 1, 2010. In addition, written procedures that address emergency preparedness training for all newly hired personnel will be completed by December 1, 2010. An annual audit of emergency preparedness training for newly hired employees will be completed prior to December 1, annually. The procedures for ensuring emergency preparedness training for newly hired employees will be incorporated into the university’s EOP.

EMERGENCY PERSONNEL ROSTER

The campus did not submit an updated roster of essential emergency management team personnel to the California State University Office of Risk Management (ORM) in a timely manner.

We found that campus records were not sufficient to determine the last submission date, and the roster currently on file included outdated information for two key emergency management team positions.

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, campuses provide the systemwide ORM at the chancellor’s office a roster of emergency management team personnel, as well as their designated backup, essential to the operation of the campus emergency management program such as: the president, the emergency executive, the EOC director, the emergency manager/emergency coordinator, and the public information officer. The roster shall include name and office and emergency telephone numbers, including satellite phone numbers. These lists will be kept confidential and used only in emergencies.

The director of EH&S stated that as a result of staffing changes, the responsibility for submitting an updated emergency personnel roster to the ORM was not assigned, and the last submission date could not be determined.

Failure to submit current rosters of essential emergency management team personnel in a timely manner increases the risk of communications delays during a significant emergency incident.
Recommendation 6

We recommend that the campus provide the ORM with a current roster of emergency management team personnel, and ensure that updates are provided by December 1 of each year.

Campus Response

We concur. The university will forward an updated roster of essential emergency management team personnel to ORM by March 31, 2010. Thereafter, an updated roster will be forwarded, annually, by December 1.

SPECIALIZED TRAINING

Specialized training (SEMS, NIMS, and ICS) and supporting documentation for EOC emergency team members needed improvement.

We found that:

- The campus did not provide specialized training to all emergency team members. We reviewed available training records for eight EOC emergency team members. We noted that the campus had not provided five of the eight with specialized training. We also noted that the campus did not always maintain training records.

- The campus lacked written procedures for emergency preparedness specialized training of emergency team members.

EO 1013, California State University Emergency Management Program, dated August 7, 2007, instructs campuses to provide annual specialized training of 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.

The chief of police stated that some emergency personnel had completed specialized training, but the campus did not retain all the training records. She also stated that other emergency personnel simply had not yet completed training, and the campus had not yet developed a formal training policy for emergency personnel.

Failure to provide and document specialized emergency preparedness training for emergency team members increases the risk that some of these individuals will not complete the necessary training and emergency team response will be inadequate.

Recommendation 7

We recommend that the campus:

a. Provide specialized training in emergency preparedness to EOC team members.
b. Develop written emergency preparedness specialized training procedures for the EOC team members. These procedures should include a process for retaining training documentation.

**Campus Response**

We concur. The university shall ensure the provision of specialized emergency preparedness training (SEMS, NIMS, and ICS) for EOC team members, to occur prior to December 1, 2010. Beginning January 2011, the university shall ensure biannual specialized emergency preparedness training for EOC team members. A campus emergency operations coordinator will ensure the maintenance of training records for a minimum of seven years. Specialized, written emergency preparedness training procedures for EOC team members will be developed by July 1, 2010, and incorporated as a part of the EOP.

**TESTING AND DRILLS**

Testing and documentation of simulated emergency incidents needed improvement.

We found that:

- The campus could not demonstrate that simulated emergency incidents testing occurred regularly and included the Concord satellite campus.
- We were unable to verify that the campus conducted any evacuation drills in 2008 or tabletop exercises in 2007.

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 chief of police and the director of EH&S stated that the campus did not maintain a log to track simulated exercises and drills over time. The director of EH&S further stated that, with the exception of the active shooter drill held in 2008, lack of sufficient records and changes in emergency personnel made it difficult to determine if simulated exercises and drills included all significant areas of the campus and occurred as often as required.

Failure to conduct simulated emergency drills and include all areas of the campus increases the risk that members of the campus community would not be sufficiently trained to respond to emergencies.

**Recommendation 8**

We recommend that the campus conduct the required simulated emergency incident testing, and ensure that it maintains adequate documentation to demonstrate that tests included all significant areas of the campus.
Campus Response

We concur. The campus will conduct at least one simulated emergency incident, including a campus building evacuation drill, on the Hayward and Concord campuses prior to December 1, 2010; and thereafter, prior to December 1st, annually. An after action report (AAR) shall be completed after each incident; the AAR shall be retained by the emergency operations coordinator for a minimum of seven years.
## APPENDIX A:
PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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</thead>
<tbody>
<tr>
<td>Mohammad Qayoumi</td>
<td>President</td>
</tr>
<tr>
<td>Shawn Bibb</td>
<td>Vice President, Administration and Finance/Chief Financial Officer</td>
</tr>
<tr>
<td>Cathleen Coulman</td>
<td>Executive Director, Student Health Services</td>
</tr>
<tr>
<td>Astrid Davis</td>
<td>Executive Assistant to the Vice President, Administration and Finance/Chief Financial Officer</td>
</tr>
<tr>
<td>Jan Giovannini-Hill</td>
<td>Work Study Coordinator, Enrollment Development and Management</td>
</tr>
<tr>
<td>Janeith Glenn-Davis</td>
<td>Chief of Police, University Police Department</td>
</tr>
<tr>
<td>James Hodges</td>
<td>Lieutenant, University Police Department</td>
</tr>
<tr>
<td>Kim Huggett</td>
<td>Director, Office of Government and Community Relations, University Advancement</td>
</tr>
<tr>
<td>Nyassa Love</td>
<td>Associate Vice President of Business and Financial Services</td>
</tr>
<tr>
<td>Lyann Luu</td>
<td>Environmental Health and Safety Officer, Environmental Health and Safety</td>
</tr>
<tr>
<td>Regina Metoyer</td>
<td>Director, Housing and Residential Life</td>
</tr>
<tr>
<td>Rita Peth</td>
<td>Director, Procurement and Support Services</td>
</tr>
<tr>
<td>Donna Placzek</td>
<td>Director, Environmental Health &amp; Safety</td>
</tr>
<tr>
<td>Michael Tadevich</td>
<td>Assistant Director, Facilities Management Trades/Engineering Manager</td>
</tr>
<tr>
<td>Stephen Yip</td>
<td>Instructional Technical Services Coordinator, College Technology Services</td>
</tr>
<tr>
<td>Jim Zavagno</td>
<td>Director, Planning Design and Construction/University Planner, Facilities Management and Planning</td>
</tr>
</tbody>
</table>
March 3, 2010

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore
Long Beach, CA 90802

RE: Campus Responses to Recommendations: Audit Report Number 09-53
Emergency Preparedness, California State University, East Bay

Dear Mr. Mandel,

Enclosed is our response to the recommendations in Audit Report Number 09-53, Emergency Preparedness Audit, at California State University, East Bay.

Upon acceptance of our response, we will follow up with your office, providing supporting documentation for each recommendation.

Please let us know if you have any questions or need additional information.

Sincerely,

Shawn Bibb
Vice President, Administration & Finance, CFO

SB/ad

c: Mohammad H. Qayoumi, President
    Janeith Glenn-Davis, Director, University Police Department
PROGRAM ADMINISTRATION

Recommendation 1

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

Campus Response

We concur.

The University has assigned a dedicated, secure location for the EOC. The location (LI 2150) is adequate to fully support emergency operations. We are currently in the process of equipping the Center with the necessary emergency documents, forms, and communications equipment to ensure complete functionality; the EOC will be equipped and functional prior to December 1, 2010. The former non-dedicated site (VBT 136) serves as our alternate EOC.

EMERGENCY MANAGEMENT PROGRAM

EMERGENCY PLAN UPDATES AND DISTRIBUTION

Recommendation 2

We recommend that the campus review and update the EOP at least annually to ensure that the information is current, accurate, and complete.

Campus Response

We concur.

The University is currently in the process of reviewing and updating the EOP with a planned completion/distribution date of April 30, 2010. In addition, an updated copy of the EOP will be posted on the University website and secured in the EOC at that time. Thereafter, the plan shall be reviewed, updated, and distributed prior to December 1, annually.

ROSTER OF EMERGENCY RESOURCES

Recommendation 3

We recommend that the campus update its roster of emergency resources at least annually and include all items detailed in EO 1013.
Campus Response

We concur.

The campus is currently in the process of updating its roster of emergency resources. The inventory will be complete by July 1, 2010. Thereafter, an annual inventory, including all items detailed in EO 1013, of emergency resources will be completed prior to June 30, annually.

BUILDING SAFETY ASSISTANT PROGRAM

Recommendation 4

We recommend that the campus develop and implement a procedure to frequently update its web-based listing of building safety coordinators and building safety assistants.

Campus Response

We concur.

The campus web-based listing of building safety coordinators and assistants has been updated; the most recent, updated list was disseminated October 1, 2009. Henceforth, the list will be updated and posted to the web by the last day of each academic Quarter.

COMMUNICATIONS AND TRAINING

NEW HIRE EMERGENCY PREPAREDNESS TRAINING

Recommendation 5

We recommend that the campus:

a. Ensure that it provides emergency preparedness training to all newly hired employees who did not complete the training between January 1, 2007, and August 24, 2008, and all new hires since.

b. Develop written procedures to address emergency preparedness training for all newly hired employees, and a follow-up system to track completion of the training.

Campus Response

We concur.

The University will ensure that all newly-hired employees (hired post January 1, 2007) who did not complete the emergency preparedness training will receive the required training by September 1, 2010. In addition, written procedures that address emergency preparedness training for all newly hired personnel will be completed by December 1, 2010. An annual audit of emergency preparedness training for newly-hired employees will be completed prior to December 1, annually. The procedures for ensuring emergency preparedness training for newly-hired employees will be incorporated into the University’s EOP.
EMERGENCY PERSONNEL ROSTER

Recommendation 6

We recommend that the campus provide the ORM with a current roster of emergency management team personnel, and ensure that updates are provided by December 1 of each year.

Campus Response

We concur.

The University will forward an updated roster of essential emergency management team personnel to ORM by March 31, 2010. Thereafter, an updated roster will be forwarded, annually, by December 1.

SPECIALIZED TRAINING

Recommendation 7

We recommend that the campus:

a. Provide specialized training in emergency preparedness to EOC team members.

b. Develop written emergency preparedness specialized training procedures for the EOC team members. These procedures should include a process for retaining training documentation.

Campus Response

We concur.

The University shall ensure the provision of specialized emergency preparedness training (SEMS, NIMS, and ICS) for EOC team members, to occur prior to December 1, 2010. Beginning January, 2011, the University shall ensure bi-annual specialized emergency preparedness training for EOC team members. A campus emergency operations coordinator will ensure the maintenance of training records for a minimum of 7 years. Specialized, written emergency preparedness training procedures for EOC team members will be developed by July 1, 2010, and incorporated as a part of the EOP.

TESTING AND DRILLS

Recommendation 8

We recommend that the campus conduct the required simulated emergency incident testing, and ensure that it maintains adequate documentation to demonstrate that tests included all significant areas of the campus.

Campus Response

We concur.

The campus will conduct at least one simulated emergency incident, including a campus building evacuation drill, on the Hayward and Concord campuses prior to December 1, 2010; and thereafter,
prior to December 1st, annually. An after action report (AAR) shall be completed after each incident; the AAR shall be retained by the Emergency Operations coordinator for a minimum of seven (7) years.
March 29, 2010

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Charles B. Reed
      Chancellor

SUBJECT: Draft Final Report 09-53 on Emergency Preparedness,
         California State University, East Bay

In response to your memorandum of March 29, 2010, I accept the response as
submitted with the draft final report on Emergency Preparedness, California
State University, East Bay.

CBR/amd