

**POLICE SERVICES**  
**CALIFORNIA STATE UNIVERSITY,**  
**SAN BERNARDINO**

**Audit Report 08-25**  
**August 11, 2008**

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## **ABBREVIATIONS**

CALEA	Commission on Accreditation for Law Enforcement Agencies
CBA	Collective Bargaining Agreement
CLETS	California Law Enforcement Telecommunications System
CPR	Cardiopulmonary Resuscitation
CSU	California State University
CSUSB	California State University, San Bernardino
EMP	Emergency Management Plan
EMS	Emergency Medical Services
EO	Executive Order
GC	Government Code
HR	Human Resources
MOU	Memorandum of Understanding
POST	Commission on Peace Officer Standards and Training
RCSO	Riverside County Sheriff's Office
RIMS	Records Information Management System
SAM	State Administrative Manual
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 2005, the Board of Trustees, at its January 2008 meeting, directed that *Police Services* be reviewed. *Police Services* was last audited in 2000.

We visited the California State University, San Bernardino (CSUSB) campus from February 18, 2008, through April 17, 2008, 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 police services 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 of police services in effect as of April 17, 2008, 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 [8]**

Written policies and procedures had not been fully developed, reviewed, updated, and communicated for the university police department (UPD), and administration over the distribution of the UPD policy and procedures manual needed improvement. Specifically, the majority of UPD general orders had not been formally reviewed and approved by the university police chief in over five years and guidelines for updating the general orders were not established. Written policies and procedures were not developed for UPD fiscal administration, voice communication recordings, and compliance with Megan's Law requirements for offender registration on campus. Further, the campus emergency plan and procedures were not current or complete and access controls over the Records Information Management System and the California Law Enforcement Telecommunications System needed improvement. Vehicle home storage permits were not on file for two UPD vehicles that were regularly driven home by the university police chief and the lieutenant.

### **POLICE ACTIVITIES AND CRIME REPORTING [12]**

Major incident reporting procedures were not complete. The campus did not always maintain written evidence of initial, interim, or final major incident reporting to the chancellor's office. In addition, the CSUSB *Standardized Emergency Management System Handbook* and the UPD general orders for major incident reporting did not always agree; minor variations with systemwide human resources policies were

noted. Further, a memorandum of understanding was not finalized for support services provided to the CSUSB Palm Desert campus by the Riverside County Sheriff's Office.

### **PERSONNEL ADMINISTRATION, TRAINING, AND CERTIFICATIONS [14]**

None of the UPD officers received first aid and cardiopulmonary resuscitation refresher training on schedule for over two years.

### **EVIDENCE, WEAPONS, AND EQUIPMENT [15]**

Administration of ammunition inventory, special equipment, and weapons qualifications needed improvement. The ammunition stored in the department armory was not always listed accurately on the UPD weapons and ammunition inventory listing and one of three pepper-ball guns stored in the armory was not included on the listing at all. In addition, inventory records were not adjusted when ammunition was distributed to UPD officers for practice and did not indicate the receiver of the ammunition; evidence of ammunition purchasing activity in recent years was not readily available; and in 2006 and 2007, three and four respective officers did not meet their quarterly weapons qualification requirements.

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## INTRODUCTION

### **BACKGROUND**

The California State University (CSU) Public Safety Program was developed in 1974, commencing with a two-year pilot project on the CSU Northridge campus. A systemwide committee subsequently forwarded recommendations regarding a “public safety approach” for CSU campuses to the chancellor. The chancellor’s Council of Presidents endorsed the recommendations as an appropriate program for the CSU, and thereafter, necessary actions were taken to bring the program to fruition. In 2007, the CSU campus police departments were renamed from public safety to police services to emphasize the service aspect of the campus police departments, and campuses have been adjusting their organizations accordingly.

The CSU residence population has increased greatly over the years, and the problems associated with this growth have been similar to those experienced by small municipal police departments. Sexual assaults, alcohol, drugs, and vandalism increased; and legislation mandated more involvement by university police officers in the investigation and prevention of crimes, as well as care for the victims. As a result, CSU police services departments created policing programs and preventive patrols to deter crime. The growth of on-campus housing also increased the complexity of emergency planning. Furthermore, parking structures were built on campuses, and an increase in auto burglaries and theft necessitated the need for increased patrols.

The Crime Awareness and Campus Security Act of 1989 became Title 2 of Public Law 101-542, The Student Right-to-Know and Campus Security Act of 1990. President George Bush signed the act into law on November 8, 1990. The act amended Section 485 of the Higher Education Act of 1965 by adding campus crime statistics and security policy disclosure provisions for colleges and universities. This law (now known as the Jeanne Clery Act) applies to all institutions of higher education, both public and private, which participate in any federal student aid programs and requires schools to publicly disclose three years of campus crime statistics and basic security policies. In 1992, the *Campus Sexual Assault Victims’ Bill of Rights* was incorporated into the Jeanne Clery Act. In 1998, the Jeanne Clery Act was amended to expand the scope of campus crime statistic reporting, ensure crime statistics were reported in accordance with the Federal Bureau of Investigation’s Uniform Crime Reporting program, and require the maintenance of a public police log of all reported crimes as well as a policy to issue timely warnings when a crime, reportable in the annual statistics, is known to the school and poses an ongoing threat to the campus. The law was most recently amended in 2000 to require schools, beginning in 2003, to notify the campus community about where public “Megan’s Law” information about registered sex offenders on campus could be obtained.

In California, the Kristen Smart Campus Safety Act of 1998 was signed into law on August 11, 1998. This act requires California colleges to promulgate rules requiring each of their respective campuses to enter into written agreements with local law enforcement agencies, which will: (1) designate which law enforcement agency has operational responsibility for the investigation of violent crimes occurring on campus and (2) delineate the specific boundaries of each agency’s operational responsibility.

In recent years (and in response to increased training standards from the Commission on Peace Officer Standards and Training (POST), legislatures, and governmental agencies), campus administrators have worked to upgrade the quality of university police services. This has included, but was not limited to, the development of uniform standards for vehicles, equipment, training, emergency preparedness, and critical response units; semiannual meetings of campus police chiefs; and close interaction with Systemwide Human Resources and the Office of Risk Management at the chancellor's office. In April 2001, the chancellor's office issued Executive Order 787, modifying the CSU Public Safety Policy Manual that was required by agreement between the Board of Trustees of the CSU and the Statewide University Police Association. The CSU Police Departments' Systemwide Operational Guidelines were developed and issued by the Systemwide Police Advisory Committee in 2002, and revised in November 2007, with the intent of providing detailed guidance to support the broad and general coverage provided by the Public Safety Policy Manual. Additionally, CSU Los Angeles, CSU Fullerton, and San Francisco State University received accreditation by the Commission on Accreditation for Law Enforcement Agencies (CALEA); and most recently, the International Association of Campus Law Enforcement Agencies accredited San Francisco State University and CSU Northridge. Sonoma State University anticipates CALEA accreditation in 2009. Lastly, in 2007, administrative and risk management responsibilities for systemwide police services were reassigned from Systemwide Human Resources to the Office of Risk Management.

Throughout this report, we will refer to the program as police services. The titles of the departments assigned responsibility for managing CSU campus public safety and parking operations include, among others, the department of public safety, police and parking services, and the university police department.

## **PURPOSE**

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of police services, police activities, and law enforcement, and to determine the adequacy of controls over parking revenues and citations, and crime reporting.

Within the overall audit objective, specific goals included determining whether:

- ▶ Administration and management of the police services program provide an effective internal control environment, clear lines of organizational authority and responsibility, current and comprehensive policies and procedures, and self-evaluation techniques to measure program and management effectiveness.
- ▶ Staffing and scheduling provide appropriate coverage, effective use of overtime and compliance with the collective bargaining agreement (CBA).
- ▶ Police services participation in campus emergency management and the CSU Critical Response Unit are clearly defined, training is provided, and a designated emergency operations center exists.
- ▶ Access to the police services office and automated systems is adequately controlled and limited to authorized persons, data backup procedures are in place, and physical security over system hardware is adequate.
- ▶ Budgeting procedures adequately address police services funding and expenditure, and budget monitoring procedures ensure effective accounting and management control.
- ▶ Chargebacks and POST reimbursements, miscellaneous revenues, and petty cash are adequately controlled, and grants are administered in accordance with grant requirements.
- ▶ The dispatch function is properly controlled, and daily activity logs/records are comprehensive and permit measurement of the effectiveness and efficiency of police operations.
- ▶ Police activities are adequately documented, and access to police services records, investigative files, and criminal offender record information is sufficiently restricted and safeguarded.
- ▶ Crime reporting procedures are well controlled and in accordance with federal and state regulations, and relationships with outside agencies comply with the Kristen Smart Campus Security Act of 1998.
- ▶ Campus safety plan, Megan's Law compliance, and crime awareness programs are in place and in accordance with federal and state regulations.

- ▶ Hiring, certification, and training policies comply with POST, performance evaluation administration is consistent and timely, stipends and compensatory time off are administered in compliance with the CBA, and internal investigations are handled in accordance with state regulations, CSU policy, and the CBA.
- ▶ Crime scene evidence, weapons, and other police services equipment are properly handled, accounted for, and safeguarded, and weapon issuance and use comply with state regulations and CSU policy.
- ▶ Parking revenues are adequately controlled, properly accounted for, and used in accordance with CSU policy and state regulations, and parking citation issuance, processing, and administration are adequately controlled and in accordance with the California Vehicle Code.

## **SCOPE AND METHODOLOGY**

The proposed scope of audit, as presented in Attachment B, Agenda Item 2 of the January 22-23, 2008, meeting of the Committee on Audit, stated that *Public Safety* (now *Police Services*) includes primarily police activities and law enforcement including parking program administration and enforcement, and crime reporting. Potential impacts include lack of, out-of-date, or undistributed policies and procedures; underdeveloped or unused measures for self-evaluation and improvement; poor or undefined relationships with external agencies; inefficient use of physical assets or human resources; non-compliance with state-mandated standards and training requirements; unauthorized use of law enforcement data; inadequate crime reporting; lack of control or poor maintenance over sensitive or special equipment; excessive costs; lost parking fine revenue; inadequate control or supervision over activities having safety or liability considerations; and poor adjudication of internal investigations or personnel complaints.

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 whether 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 April 17, 2008, along with limited testing of calendar year 2005 and 2006 records.

We focused primarily upon the internal administrative, compliance, and operational controls provided by the CSU police department's systemwide operational guidelines, campus policies and general orders, and chancellor's office executive orders, and related management activities on campuses, although we also relied on external laws and regulations as well. Most of our work involved the direct interface with police services and parking functions reporting to police services.

Specifically, we reviewed and tested:

- ▶ Procedures for communicating systemwide/campus specific policies, rules, and regulations.
- ▶ Staffing, scheduling, and internal investigation procedures.
- ▶ Fiscal procedures for budgeting, chargebacks, POST reimbursements, grants, stipends, and expenses.
- ▶ Dispatch operations, field reporting requirements, and case monitoring procedures.
- ▶ Procedures for maintaining and securing public safety records, files, and information.
- ▶ Procedures for accumulating and reporting crime statistics.
- ▶ Hiring, certification, and training compliance.
- ▶ Procedures for controlling evidence, weapons, and other public safety equipment.
- ▶ Procedures for controlling and processing parking revenues, parking citations, and parking funds.
- ▶ Data security, disaster recovery, and backup procedures.
- ▶ Disaster preparedness operational procedures if the function reports to police services.

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# OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

## PROGRAM ADMINISTRATION

### POLICIES AND PROCEDURES

Written policies and procedures had not been fully developed, reviewed, updated, and communicated for the university police department (UPD), and administration over the distribution of the UPD policy and procedures manual needed improvement.

We noted that:

- ▶ Although certain policies were under review at the time of the audit, a majority of UPD general orders had not been formally reviewed and approved by the university police chief in over five years and guidelines for updating the general orders were not established.
- ▶ Written policies and procedures were not developed for the following areas:
  - UPD fiscal administration, including budgeting and expenditure monitoring, administration and handling of grant funds, chargebacks, miscellaneous revenues, petty cash, and handling of Commission on Peace Officer Standards and Training (POST) reimbursements.
  - Voice communication recordings, including the changing and storage of tapes, the retention period, and the safekeeping of tapes.
  - Compliance with Megan's Law requirements for offender registration on campus.
- ▶ Written acknowledgement was not consistently obtained to document receipt of the UPD policy and procedures manual. Our review disclosed that written acknowledgement was not on file for four of the 12 officers examined.

Government Code (GC) §13402 states that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions.

GC §13403 states that the elements of a satisfactory system of internal accounting and administrative control shall include an effective system of internal review.

State Administrative Manual (SAM) §20050 calls for the establishment and maintenance of internal accounting and administrative controls. Each system an entity maintains to regulate and guide operations should be documented with documented through flowcharts, narratives, desk procedures, and organizational charts. Furthermore, it states that policy and procedural or operational manuals that are either not currently maintained or are non-existent could be indicative of a poorly maintained or vulnerable control system.

The Unit 8 Statewide University Police Association, *Collective Bargaining Agreement*, dated July 18, 2006, states that the California State University (CSU) shall maintain its public safety policy manual, subject to revision by the CSU. Such policy manual shall be distributed to all employees.

The chief of police stated that these conditions occurred because written guidelines were not in place to direct university police staff to conduct annual reviews of general orders and to document completion of each review, and because the UPD was unaware of the requirements for such guidelines.

Written policies and procedures that are not complete, current, and accurate increase the risk of non-compliance with government and CSU requirements and the potential for weaknesses in the internal control environment.

### **Recommendation 1**

We recommend that the campus:

- a. Develop and implement policy and procedures for reviewing and updating general orders.
- b. Develop policies and procedures for UPD fiscal administration including budgeting and expenditure monitoring, administration and handling of grant funds, chargebacks, miscellaneous revenues, petty cash, and handling of POST reimbursements; voice communication recordings; and Megan's Law offender registration requirements on campus.
- c. Distribute UPD policies and procedures to all staff and maintain signed acknowledgments for receipt of such policies.

### **Campus Response**

The university concurs with the recommendation and will incorporate identified business functions into revised UPD general orders. A process has been established to ensure that general orders are reviewed every two years. The process to ensure timely distribution of general orders to all staff members has been strengthened.

Completion date: November 2008

## **CAMPUS EMERGENCY PLAN**

The campus emergency management plan (EMP) and procedures were not current or complete.

We noted that:

- ▶ The EMP document was effective as of November 2004; however, there was no evidence of a full review and approval of the plan within the last year. Certain sections of the document such as the chain of command were current, while other sections such as communication and

evacuation were outdated. We also noted that the communication policy and the building evacuation team contact list were dated March 2004 and April 2005, respectively, and the section on major incident reporting was not fully updated to coincide with CSU directive HR 2005-19.

- ▶ The EMP did not include guidelines for designating area marshals, building marshals, and floor marshals.
- ▶ Six of ten area marshal positions were vacant and, as of January 2008, building marshals were not assigned to five campus buildings.

Executive Order (EO) 1013, *CSU Emergency Management Plan*, dated September 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.

The chief of police stated that recent turnover in university police management and the emergency operations center coordinator position delayed completion of the revision of the campus EMP.

Failure to maintain a current and complete EMP that includes, but is not limited to, the designation of area marshals and building marshal coverage of all campus buildings increases the risk of inadequate response to emergencies.

## **Recommendation 2**

We recommend that the campus:

- a. Update the campus emergency plan to ensure that it is current, accurate, and complete, and include building marshal, area marshal, and floor marshal guidelines in the updated plan.
- b. Reevaluate assignment of area and building marshals to ensure appropriate appointment of personnel and coverage of necessary buildings.

## **Campus Response**

The university concurs with the recommendation and will revise outdated sections of the campus emergency plan. A process will be established to ensure annual review of the emergency plan, as well as to ensure timely assignment and training of area and building marshals.

Completion date: November 2008

## **AUTOMATED SYSTEMS ACCESS CONTROLS**

Access controls over the Records Information Management System (RIMS) and the California Law Enforcement Telecommunications System (CLETS) needed improvement.

We noted that access controls over the RIMS and CLETS included neither an adequate password character length (complexity) nor the requirement to change the passwords at any given interval. In addition, we noted no procedure or requirement for system time-out after a period of inactivity.

The California State Information Security Office, *Information Security Program Guide for State Agencies*, dated October 2007, states that best practices for access control are for the administrator to establish password standards such as minimum length requirements with a combination of characters and numbers, and appropriate periodic password aging in order to prevent unauthorized disclosure of the agency's information assets. Additionally, the administrator should restrict connection time to appropriate business hours, and initiate automatic logout or protected screen savers by the system after a specific period of inactivity.

The chief of police stated that system time-outs were not implemented on dispatcher computers because this practice would compromise the 24/7 dispatch operation, as well as the safety of officers in the field and the campus community. He also stated that department staff was unaware of the best practices for access control identified in the *Information Security Program Guide for State Agencies* dated October 2007.

Inadequate data security controls increases the risk that sensitive data will be breached and that regulatory sanctions for the release of such information could be applied.

### **Recommendation 3**

We recommend that the campus develop and implement data security policies and procedures for RIMS and CLETS to ensure that password complexity is adequate, passwords are changed at predetermined intervals, and the need for system time-outs after periods of inactivity is evaluated and applied when necessary.

### **Campus Response**

The university concurs with the recommendation and has obtained new software from RIMS, which will allow required update of passwords at predetermined intervals. All department computers have been reprogrammed to allow system time-outs after specified periods of inactivity, requiring users to log onto the system with an assigned password.

Completion date: September 2008

## **VEHICLE HOME STORAGE PERMITS**

Vehicle home storage permits were not on file for two UPD vehicles that were regularly driven home by the university police chief and the lieutenant.

SAM §4109 states that storage of state-owned mobile equipment at an employee's residence on a regular basis requires an approved Vehicle Home Storage Request/Permit, STD. 377 be on file with the employee's department and that an annual renewal of STD. 377 is required.

The chief of police stated that new management employees in UPD were unaware that SAM Section 4109 is applicable to university police vehicles.

Failure to maintain vehicle home storage permits on file can potentially limit the campus' defense in vehicle liability actions and insurance coverage issues due to lack of approval for vehicle usage outside of the workplace.

### **Recommendation 4**

We recommend that the campus maintain properly approved vehicle home storage permits for vehicles that are regularly driven home by campus employees.

### **Campus Response**

The university concurs with the recommendation and will ensure that required vehicle home storage permits are on file. A process has been established to ensure compliance with state requirements.

Completion date: September 2008

## **POLICE ACTIVITIES AND CRIME REPORTING**

### **MAJOR INCIDENT REPORTING**

Major incident reporting procedures were not complete.

We noted that the campus did not always maintain written evidence of initial, interim, or final major incident reporting to the chancellor's office. In addition, the California State University, San Bernardino (CSUSB) *Standardized Emergency Management System (SEMS) Handbook* and the UPD general orders for major incident reporting did not always agree; minor variations with systemwide human resources policies were noted.

CSU directive HR 2005-19, *Major Incident Reporting Requirements*, dated April 20, 2005, states that CSU presidents or their campus police chiefs (includes public safety directors) are to report all serious and/or fatal injuries and emergency incidents to the offices of the General Counsel and Risk Management at the chancellor's office and that campus police will notify the systemwide CSU police

coordinator of major incidents by telephone or e-mail, as appropriate. The directive also states that if the incident is ongoing, telephone or e-mail reports should be provided periodically, as needed, and that the final report of major incident should be in writing and mailed or faxed to the CSU police coordinator.

CSUSB *SEMS Handbook* states that as soon as possible after a major incident has occurred, the president is required to notify the chancellor and the director of Public Affairs at the chancellor's office and that the notification needs to include the scope of the disaster, description, and the total number of serious or fatal injuries. Additionally, the chief of police is required to notify the CSU police coordinator.

The vice president of administration and finance stated that the campus verbally reported significant incidents to the chancellor's office; however, a process was not established to ensure that all of the specified major incidents identified in CSU directive HR 2005-19 were reported in writing.

Failure to report all major incidents in writing to appropriate parties at the chancellor's office limits awareness and increases the potential that the overall response to certain major incidents could be inadequate.

#### **Recommendation 5**

We recommend that the campus revise and implement its major incident reporting procedures to ensure that all specified major incidents identified in CSU directive HR 2005-19 are reported in writing to the appropriate parties at the chancellor's office.

#### **Campus Response**

The university concurs with the recommendation and will establish processes to ensure compliance with major incident reporting requirements.

Completion date: November 2008

### **WRITTEN AGREEMENTS WITH LAW ENFORCEMENT AGENCIES**

A memorandum of understanding was not finalized for support services provided to the CSUSB Palm Desert campus by the Riverside County Sheriff's Office (RCSO).

Education Code §67381 states that local law enforcement agencies shall enter into written agreements with campus law enforcement agencies if there are colleges or university campuses located in the jurisdictions of the local law enforcement agencies. The Education Code further states that each written agreement shall designate which law enforcement agency shall have operational responsibility for the investigation of each Part 1 violent crime and delineate the specific geographical boundaries of each agency's operational responsibility, including maps as necessary.

The chief of police stated that the agreement with the RCSO was drafted, delivered, and pending approval by the Palm Desert City Council.

Failure to finalize and implement campus agreements with outside law enforcement agencies increases the risk that the anticipated assistance and response may not be adequate to meet campus needs.

**Recommendation 6**

We recommend that the campus finalize the memorandum of understanding (MOU) with the RCSO for assistance at the CSUSB Palm Desert campus and establish procedures to ensure that such agreements are kept current.

**Campus Response**

The university concurs with the recommendation and will expedite the completion of the MOU with the RCSO.

Completion date: November 2008

**PERSONNEL ADMINISTRATION, TRAINING, AND CERTIFICATIONS**

None of the UPD officers received first aid and cardiopulmonary resuscitation (CPR) refresher training on schedule for over two years.

California Penal Code §13518 states that every police officer, except those whose duties are primarily clerical or administrative, shall meet the training standards prescribed by the Emergency Medical Services (EMS) authority for the administration of first aid and CPR. Additionally, satisfactory completion of refresher training or appropriate testing in CPR and other first aid as prescribed by the EMS authority shall also be required.

The chief of police stated that the method of monitoring of first aid and CPR training was inefficient and in the future, the RIMS system would be utilized to monitor and schedule required refresher training.

Failure to maintain current first aid and CPR training and certifications increases the risk that response to certain emergencies could be inadequate.

**Recommendation 7**

We recommend that the campus provide the necessary first aid and CPR refresher training and implement procedures to ensure that such training is performed timely.

### **Campus Response**

The university concurs with the recommendation. All pending first aid and CPR training has been completed. A process is in place to monitor and ensure completion of training in a timely manner.

Completion date: September 2008

## **EVIDENCE, WEAPONS, AND EQUIPMENT**

Administration of ammunition inventory, special equipment, and weapons qualifications needed improvement.

We noted that:

- ▶ Ammunition stored in the department armory was not always listed accurately on the UPD weapons and ammunition inventory listing. In addition, one of three pepper-ball guns stored in the armory was not included on the listing.
- ▶ Inventory records were not adjusted when ammunition was distributed to UPD officers for practice. In addition, the records did not indicate the receiver of the ammunition.
- ▶ Evidence of ammunition purchasing activity in recent years was not readily available.
- ▶ In 2006 and 2007, three and four officers, respectively, did not meet their quarterly weapons qualification requirements.

SAM §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and recordkeeping procedures adequate to provide effective control over assets.

EO 756, *Authorized Weapons, Weapons Training and Use of Weapons in California State University Police Departments*, dated September 21, 2000, states that campus presidents and police chiefs will ensure that CSU peace officers shall not use an individual weapon until they have completed the required training and are fully qualified in the use of that weapon. Qualified campus peace officers who are armed shall receive semi-annual training in the legal and operational aspects of firearms and shall complete the requirements to remain qualified on each weapon they use.

CSUSB *Police Services General Order 3-2*, dated September 2004, requires that each officer shall demonstrate their proficiency in the care and use of department approved duty firearms at least quarterly.

The chief of police stated that processes for monitoring the distribution of ammunition inventory were not formally documented in writing.

Failure to maintain ammunition and weapons inventory records increases the risk of loss, misplacement, or misuse, and failure to ensure quarterly weapons qualifications increases the risk that officers would not be fully qualified to respond to incidents.

**Recommendation 8**

We recommend that the campus:

- a. Develop, implement, and maintain an ammunition inventory ledger showing purchases, issues, and current stock of ammunition.
- b. Ensure that the all weapons issued to officers or stored in the armory are listed on the weapons inventory listing, and that the weapons inventory listing is updated with each new purchase, issuance, or disposal.
- c. Perform monitoring to ensure that all UPD officers fulfill their quarterly weapons qualification requirements.

**Campus Response**

The university concurs with the recommendation. All inventory for weapons and ammunition is documented through UPD's RIMS. The system maintains current inventory and distribution of weapons and inventory. The process to ensure staff's diligent monitoring of inventory has been strengthened.

Completion date: September 2008

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## **APPENDIX A: PERSONNEL CONTACTED**

<u>Name</u>	<u>Title</u>
Albert K. Karnig	President
Karen Abbey	Property Coordinator, Property Management
Virginia Ashton	Administrative Support Coordinator, University Police Department (UPD)
Jimmy Brown	Chief of Police, UPD
David DeMauro	Vice President, Administration and Finance
Walter Duncan	Lieutenant, UPD
Le Andre Fields	Sergeant, UPD
Scott Kovach	Support Services Supervisor, UPD
James Olinger	Information Technology Consultant, Administration and Finance
Linda Pella-Hartley	Executive Assistant, Administration and Finance
Samuel Sarmiento	Sergeant, UPD
Robert Tiberi	Disaster Preparedness Coordinator, UPD
Dale West	Assistant Vice President, Human Resources

State of California

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San Bernardino, California 92407-2397

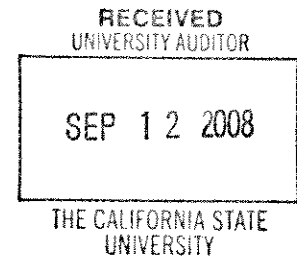
**MEMORANDUM**

DATE : September 12, 2008

TO : Larry Mandel  
University Auditor  
The California State University

FROM : David DeMauro, Vice President  
for Administration and Finance

SUBJECT: **Campus Reesponses**  
*Police Services Audit Report No. 08-25*  
**California State University, San Bernardino**



Enclosed please find campus responses for the recently completed Police Services Audit at California State University, San Bernardino.

c: Jimmie Brown, Chief, University Police  
Walter Duncan, Lieutenant, University Police

**POLICE SERVICES**  
**CALIFORNIA STATE UNIVERSITY,**  
**SAN BERNARDINO**

**Audit Report 08-25**

**PROGRAM ADMINISTRATION**

**POLICIES AND PROCEDURES**

**Recommendation 1**

We recommend that the campus:

- a. Develop and implement policy and procedures for reviewing and updating general orders.
- b. Develop policies and procedures for UPD fiscal administration including budgeting and expenditure monitoring, administration and handling of grant funds, chargebacks, miscellaneous revenues, petty cash, and handling of POST reimbursements; voice communication recordings; and Megan's Law offender registration requirements on campus.
- c. Distribute UPD policies and procedures to all staff and maintain signed acknowledgments for receipt of such policies.

**Campus Response**

The university concurs with the recommendation and will incorporate identified business functions into revised UPD General Orders. A process has been established to ensure that General Orders are reviewed every two years. The process to ensure timely distribution of General Orders to all staff members has been strengthened. Completion date: November 2008.

**CAMPUS EMERGENCY PLAN**

**Recommendation 2**

We recommend that the campus:

- a. Update the campus emergency plan to ensure that it is current, accurate, and complete, and include building marshal, area marshal, and floor marshal guidelines in the updated plan.
- b. Reevaluate assignment of area and building marshals to ensure appropriate appointment of personnel and coverage of necessary buildings.

### **Campus Response**

The university concurs with the recommendation and will revise outdated sections of the campus emergency plan. A process will be established to ensure annual review of the emergency plan, as well as to ensure timely assignment and training of area and building marshals. Completion date: November 2008.

## **AUTOMATED SYSTEMS ACCESS CONTROLS**

### **Recommendation 3**

We recommend that the campus develop and implement data security policies and procedures for RIMS and CLETS to ensure that password complexity is adequate, passwords are changed at predetermined intervals, and the need for system time-outs after periods of inactivity is evaluated and applied when necessary.

### **Campus Response**

The university concurs with the recommendation and has obtained new software from RIMS which will allow required update of passwords at predetermined intervals. All department computers have been reprogrammed to allow system timeout after specified periods of inactivity, requiring users to log onto the system with assigned password. Completion date: September 2008.

## **VEHICLE HOME STORAGE PERMITS**

### **Recommendation 4**

We recommend that the campus maintain properly approved vehicle home storage permits for vehicles that are regularly driven home by campus employees.

### **Campus Response**

The university concurs with the recommendation and will ensure that required vehicle home storage permits are on file. A process has been established to ensure compliance with state requirements. Completion date: September 2008.

## **POLICE ACTIVITIES AND CRIME REPORTING**

### **MAJOR INCIDENT REPORTING**

#### **Recommendation 5**

We recommend that the campus revise and implement its major incident reporting procedures to ensure that all specified major incidents identified in CSU directive HR 2005-19 are reported in writing to the appropriate parties at the chancellor's office.

### **Campus Response**

The university concurs with the recommendation and will establish processes to ensure compliance with major incident reporting requirements. Completion date: November 2008.

## **WRITTEN AGREEMENTS WITH LAW ENFORCEMENT AGENCIES**

### **Recommendation 6**

We recommend that the campus finalize the memorandum of understanding (MOU) with the RCSO for assistance at the CSUSB Palm Desert campus and establish procedures to ensure that such agreements are kept current.

### **Campus Response**

The university concurs with the recommendation and will expedite the completion of the MOU with the Riverside Sheriff's Office. Completion date: November 2008.

## **PERSONNEL ADMINISTRATION, TRAINING, AND CERTIFICATIONS**

### **Recommendation 7**

We recommend that the campus provide the necessary first aid and CPR refresher training and implement procedures to ensure that such training is performed timely.

### **Campus Response**

The university concurs with the recommendation. All pending first aid and CPR training has been completed. A process is in place to monitor and ensure completion of training in a timely manner. Completion date: September 2008.

## **EVIDENCE, WEAPONS, AND EQUIPMENT**

### **Recommendation 8**

We recommend that the campus:

- a. Develop, implement, and maintain an ammunition inventory ledger showing purchases, issues, and current stock of ammunition.
- b. Ensure that the all weapons issued to officers or stored in the armory are listed on the weapons inventory listing, and that the weapons inventory listing is updated with each new purchase, issuance, or disposal.
- c. Perform monitoring to ensure that all UPD officers fulfill their quarterly weapons qualification requirements.

**Campus Response**

The university concurs with the recommendation. All inventory for weapons and ammunition is documented through UPD's RIMS system. The system maintains current inventory and distribution of weapons and inventory. The process to ensure staff's diligent monitoring of inventory has been strengthened. Completion date: September 2008.

  
**THE CALIFORNIA STATE UNIVERSITY**  
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

October 7, 2008

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

EAST BAY

FRESNO

TO: Mr. Larry Mandel  
University Auditor

FULLERTON

FROM: Charles B. Reed  
Chancellor



HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report 08-25 on *Police Services*,  
California State University, San Bernardino

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of October 7, 2008, I accept the response as submitted with the draft final report on *Police Services*, California State University, San Bernardino.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/jt

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Mr. David DeMauro, Vice President, Administration and Finance  
Dr. Albert K. Karnig, President

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS