

POLICE SERVICES
CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 08-26
August 20, 2008

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ABBREVIATIONS

ARMS	Automated Records Management System
CALEA	Commission on Accreditation for Law Enforcement Agencies
CBA	Collective Bargaining Agreement
CLETS	California Law Enforcement Telecommunications System
CSU	California State University
CSUDH	California State University, Dominguez Hills
EO	Executive Order
EMP	Emergency Management Plan
LASD	Los Angeles County Sheriff's Department
POST	Commission on Peace Officer Standards and Training
SAM	State Administrative Manual
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 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, Dominguez Hills campus from April 22, 2008, through May 16, 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 May 16, 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]

The emergency management plan provided on the campus website neither had been updated since September 2006 nor was there evidence of formal review and approval since then. This is a repeat finding from the Disaster and Emergency Preparedness audit dated November 14, 2006. In addition, a home storage permit was not on file for a police vehicle that was regularly driven home by the chief. Access to campus facility keys was not adequately controlled, and system access controls over the Automated Records Management System (ARMS) and the California Law Enforcement Telecommunications System were in need of improvement. Lastly, because an ARMS data recorder had been broken for an unknown amount of time, and the date of last backup could not be verified, and the ARMS backup tapes were not sent off-site for storage, overall compliance to existing backup procedures could not be verified.

EVIDENCE, WEAPONS, AND EQUIPMENT [12]

Confiscated and found weapons had not been disposed of within the required time limitations. In addition, administration of weapons qualifications, ammunition inventory, and related recordkeeping procedures needed improvement. Weapons qualification requirements were not being met. Ammunition inventory records were not maintained and purchases and distribution were not tracked and documented.

Further, the campus could not provide supporting documentation for the chief's approval of off-duty weapons.

PARKING PROGRAM [15]

Reconciling procedures for citation and parking decal revenue needed improvement. The parking services bureau did not reconcile citation revenues collected by the outside agency to outstanding parking citations to ensure that all funds were properly received. Parking decal revenue reconciliations were neither performed timely nor provided to the parking services bureau for their review. Lastly, parking permit dispenser funds ready for deposit were transferred from parking service employees to the main cashier's office without use of transfer receipts.

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.

INTRODUCTION

- ▶ 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 22, 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.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PROGRAM ADMINISTRATION

CAMPUS EMERGENCY PLAN

The emergency management plan (EMP) provided on the campus website neither had been updated since September 2006 nor was there evidence of formal review and approval since then. This is a repeat finding from our Disaster and Emergency Preparedness audit dated November 14, 2006.

Executive Order (EO) 1013, *California State University 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 director of risk management, environmental health and occupational safety stated that the EMP was in the process of being updated but the plan had not been formally approved.

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

Recommendation 1

We recommend that the campus update the campus EMP to ensure that it is current, accurate, and complete.

Campus Response

We concur. The campus has updated the EMP and assures that it is current, accurate, complete, and posted on the web.

Corrective action has been completed.

VEHICLE HOME STORAGE PERMITS

A police services vehicle was regularly driven home by the police chief without a home storage permit on file.

State Administrative Manual (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 form, STD. 377, be on file with the employee's department. Annual renewal of STD. 377 is required.

The university police chief stated that she was unaware of the requirement to complete form STD. 377 because the campus has a form to document the use of the vehicle.

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 2

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

Campus Response

We concur. The campus has completed an approved vehicle home storage permit for the vehicle driven home by the university police chief and plans to maintain properly approved vehicle home storage permits for vehicles that are regularly driven home by campus employees.

Corrective action has been completed.

ACCESS TO KEYS

Access to campus facility keys was not adequately controlled.

At the time of our audit, the university police department (UPD) stored miscellaneous keys to campus facilities inside a small, locked metal key box that could be accessed by sworn police personnel for emergency purposes. All sworn police personnel carried a key to the metal key box. The key box was located on top of a filing cabinet in a common area of the police department facility. We noted that the UPD did not maintain a log of persons who accessed the key box, and tracking of key usage could therefore not be verified or attributed to any individual at any given date or time.

SAM §20050 states that the elements of a satisfactory system of accounting and administrative control shall include, in part, a plan that limits access to state assets to authorized personnel who require these assets in the performance of assigned duties.

The university police chief stated that it would not be practical to issue each officer a set of these keys since the keys are only accessed on occasion, and due to the nature of the keys stored in the box, security is not a concern.

Inadequate control over access to campus facility keys increases campus exposure to loss from inappropriate acts.

Recommendation 3

We recommend that the campus relocate the miscellaneous campus facility keys to a more secured area and maintain a log showing who accessed and returned the keys, including date and time of each activity.

Campus Response

We concur. The campus has relocated the locked metal box with miscellaneous campus facility keys to the dispatch area and is maintaining a log to document who accessed and returned the keys, including date and time of each activity.

Corrective action has been completed.

AUTOMATED SYSTEMS ACCESS CONTROLS

Automated systems access and security controls needed improvement.

We found that:

- ▶ Access controls over the Automated Records Management System (ARMS) and California Law Enforcement Telecommunications System (CLETS) did not include an adequate password character length. Minimum password length requirements, with a combination of characters and numbers for passwords, were not established. Additionally, periodic password aging changes were not required.
- ▶ On May 2, 2008, the police department's ARMS data recorder had been broken for an unknown amount of time; the date of the last backup performed was unknown. Additionally, the ARMS backup tapes were not sent off-site for storage, therefore the overall compliance to the backup procedures could not be verified.

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.

SAM §20050 states that the elements of a satisfactory system of accounting and administrative control shall include, in part, a plan that limits access to state assets to authorized personnel who require these assets in the performance of assigned duties. Further, internal accounting controls comprise the methods and procedures directly associated with safeguarding assets.

California State University, Dominguez Hills (CSUDH) Department Order 5-1, *Records Administration*, establishes procedures for weekly ARMS data backup.

The university police chief stated that she was unaware of password requirements for the campus managed ARMS system, and since CLETS is an outside system the campus does not maintain the security requirements of this system. Additionally, she stated that recordkeeping for ARMS backups had not been maintained due to failure to follow written procedures.

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, and failure to validate and confirm backup of sensitive data increases the risk that the data will be unrecoverable should a loss occur.

Recommendation 4

We recommend that the campus:

- a. Develop and implement data security policies and procedures for ARMS and CLETS to ensure that data security is effective and the potential for the release of sensitive data is minimized.
- b. Repair the ARMS data recorder and maintain a log of ARMS backup tapes sent for off-site storage.

Campus Response

We concur.

- a. The campus has implemented a new ARMS login password policy that requires users to change their passwords every 180 days, and to be a minimum length made up of a combination of letters, numbers, and/or characters. The CLETS access terminal protocols are handled by the Los Angeles County Sheriff's Department (LASD) and since the CSUDH police department does not have any control over their login procedures, the campus will contact LASD to inquire about updating the controls.
- b. The broken DAT drive has been repaired and is operational. A policy is in place to ensure the server is backed up on a weekly basis and sent to an off-site storage by the information technology department.

Corrective action has been completed for a and b.

EVIDENCE, WEAPONS, AND EQUIPMENT

EVIDENCE

Confiscated and found weapons had not been disposed of within the required time limitations.

Our testing showed that 21 items related to ten closed cases had not been disposed of in a timely manner. The cases were dated between 1994 and 2008. Additionally, local procedures for the chain of custody and the disposal and destruction of evidence had not been established.

The International Association of Campus Law Enforcement Administrators Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 23, states, in part, that final disposition of found, recovered, and evidentiary property should be accomplished within six months after legal requirements have been satisfied.

California Penal Code §12032 states, in part, that, notwithstanding any provision of law or of any local ordinance to the contrary, when any firearm is in the possession of any officer of the California State University (CSU), and the firearm is an exhibit filed in any criminal action or proceeding which is no longer needed or is unclaimed or abandoned property, which has been in the possession of the officer for at least 180 days, the firearm shall be sold or destroyed, as provided for in Penal Code §12028.

CSU, *Police Departments Systemwide Operational Guidelines, Chapter 7*, dated November 2007, states that the operational guidelines are intended to provide standardized guidelines for the management of the property and evidence system and the processing of property and evidence. It is a generalized guideline and, as such, each CSU police chief must establish specific campus procedures for their departments that are in compliance with the systemwide guidelines.

The university police chief stated that due to the lack of an evidence technician, evidence and confiscated weapons were not purged on a regular basis. She further stated that policy and procedures for chain of custody and the disposal and destruction of evidence had not been implemented.

Inadequate controls over evidence increase the risk of unacceptable evidence at trial, untimely return of property to its rightful owners, inefficient use of evidence storage facilities, and non-compliance with confiscated weapons requirements.

Recommendation 5

We recommend that the campus:

- a. Review the status of the subject confiscated weapons and take appropriate disposal actions as provided for in the Penal Code.

- b. Strengthen existing practices to ensure that evidence is consistently monitored and disposed of timely.
- c. Develop and implement local procedures for the chain of custody, and for the disposal and destruction of evidence.

Campus Response

We concur.

- a. The campus will review the status of the subject confiscated weapons and will take appropriate disposal actions as provided for in the Penal Code.

Expected completion date: March 2009

- b. The campus will review and update current policy and practices regarding evidence monitoring and disposal and retrain department personnel.

Expected completion date: March 2009

- c. The campus is in process of documenting, developing, and implementing improved local procedures for chain of custody and for the disposal and destruction of evidence.

Expected completion date: June 2009

AMMUNITION AND WEAPONS

Administration of weapons qualifications, ammunition inventory, and related recordkeeping procedures needed improvement.

We noted that:

- ▶ Weapons qualification requirements were not being met. The chief of police had supporting documentation reflecting her qualification for March 2008; however, she did not have any supporting documentation for prior years. Additionally, two of the four CSUDH retired officers had not qualified on an annual basis.
- ▶ The campus did not have supporting documentation for the chief's approval of off-duty weapons.
- ▶ A physical inventory of ammunitions was performed on March 9, 2008, however prior to and since then a physical inventory had not been performed; inventory records were not maintained and purchases and distribution were not tracked and documented.

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 semiannual training in the legal and operational aspects of firearms and shall complete the requirements to remain qualified on each weapon they use.

California Penal Code §12027, part (a) (3) states that an honorably retired peace officer who is listed in subdivision (c) of Section 830.5 and authorized to carry concealed firearms by this subdivision shall meet the training requirements of Section 832 and shall qualify with the firearm at least annually. The individual retired peace officer shall be responsible for maintaining his or her eligibility to carry a concealed firearm.

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.

The university police chief stated that she was unaware of the requirement to complete a physical inventory of ammunition. Additionally, she stated that the annual qualification for the two retired officers was an oversight and her qualification was due to lack of supporting documentation. The university police chief also stated that she was unaware of the requirement for documentation for the chief's approval of off-duty weapons.

Failure to maintain ammunition and weapons inventory records increases the risk of loss, misplacement, or misuse, and failure to ensure required weapons qualifications increases the risk that officers would not be fully qualified to respond to incidents. Additionally, failure to obtain and document the chief's approval of off-duty weapons increases the potential for liability arising from potential use of unapproved weapons by UPD officers.

Recommendation 6

We recommend that the campus:

- a. Establish procedures to ensure that all active officers and retirees meet the required weapons qualification requirements.
- b. Ensure that the appropriate approvals of off-duty weapons are completed, documented, and maintained on file.
- c. Perform a physical inventory count of ammunition on a regular basis and develop, implement, and maintain an ammunition inventory ledger showing purchases, issues, and current stock of ammunition.

Campus Response

We concur.

- a. The campus has implemented policies and procedures to ensure that all active officers and retirees meet the required weapons qualification requirements.
- b. The campus has implemented policies and procedures to ensure that appropriate approvals of off-duty weapons are completed, documented, and maintained on file.
- c. The campus has implemented policies and procedures to ensure that physical inventory count of ammunition is conducted on a regular basis, and that an ammunition inventory ledger showing purchases, issues, and current stock of ammunition is maintained by the range master.

Corrective action has been completed for a, b, and c.

PARKING PROGRAM

Reconciling procedures for citation and parking decal revenue needed improvement.

We noted that:

- ▶ The parking services bureau did not reconcile citation revenues collected by an outside agency, the Phoenix Group, to outstanding parking citations to ensure that all funds were properly received.
- ▶ Main cashiering performed reconciliations of parking decal revenue to decals sold on a quarterly basis, but not on a monthly basis as required by policy. Additionally, the quarterly reconciliations were not provided to the parking services bureau for their review.
- ▶ Parking permit dispenser funds ready for deposit were transferred from parking service employees to the main cashier's office without use of transfer receipts.

State University Administrative Manual §3821 requires that the chief business officer shall establish control procedures to ensure that all monies due are collected, safeguarded, deposited, reconciled, remitted, and invested in a timely manner.

SAM §7901 states that the accuracy of an agency's accounting records may be proved partially by making certain reconciliations and verifications. Further, all reconciliations will be prepared monthly within 30 days of the preceding month, with the exception of property reconciliations.

SAM §7920 states that each agency is responsible to complete any reconciliation necessary to safeguard state assets and ensure reliable financial data.

SAM §8021 states that a separate series of transfer receipts will be used to localize accountability for cash or negotiable instruments to a specific employee from the time of receipt to its deposit.

SAM §20050 requires a system of recordkeeping procedures adequate to provide effective accounting control over revenues and expenditures.

The parking administrator stated that reconciliations of citation revenue, review of decal revenue by parking services, and transfer of receipts were not performed due to lack of written procedures. The director of accounting services stated that the cashier's office found it to be more beneficial to reconcile the parking decal revenue by semester for comparison purposes, and that even though parking services was not provided the reconciliations, they have access to their parking revenue reports.

Inadequate control over revenue reconciliation increases the risk that errors or misappropriations will go undetected, and inadequate control over cash receipts increases campus exposure to loss from inappropriate acts.

Recommendation 7

We recommend that the campus develop procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected.

Campus Response

We concur. The campus will develop procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected, and assess if additional personnel is needed to accomplish this task.

Expected completion date: March 2009

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Mildred García	President
Mark Cartwright	Parking Administrator, Parking Services
Lisa Chavez	Director, Accounting Services (At time of review)
Robert Gill	Director, Risk Management, Environmental Health Occupational Safety
Dovie Harness	Cashier Coordinator Analyst, Supervisor/Cashier's Office
Susie Mirasol	Assistant to Chief of Police, University Police
Lorena Raymundo-Yusuf	Manager, Accounting Services
William Reddick	Dispatcher, University Police
Mary Ann Rodriguez	Vice President, Administration and Finance
Amparo Sahagun	Administrative Support Coordinator, Parking Services
Daniel Salazar	Dispatcher, University Police
Susan Sloan	Chief, University Police
Tonya Staab	Sergeant, University Police
Karen Wall	Associate Vice President , Administration and Finance
Suzanne Wallace	Division Fiscal Officer, Office of the Vice President for Student Affairs
George Whitehouse	Sergeant, University Police
Bennie Williams	Sergeant Detective, University Police
Emmit Williams	Director, Contracts Administrator, Procurement, Contract, Logistical and Support Services

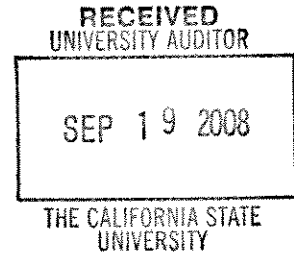


California State University
Dominguez Hills

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September 17, 2008

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



Dear Mr. Mandel:

Enclosed, please find California State University, Dominguez Hills' responses to the Police Services Audit 08-26, dated August 20, 2008. The campus is committed to addressing and resolving the issues identified in the audit report.

If you have any questions or would like additional information, please contact me.

Sincerely,

MARodriguez

Mary Ann Rodriguez
Vice President, Administration and Finance

c: Mildred García, President
Boice Bowman, Vice President, Student Affairs
Susan Sloan, Chief, University Police
Karen Wall, Associate Vice President, Administration and Finance

POLICE SERVICES
CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 08-26

PROGRAM ADMINISTRATION

CAMPUS EMERGENCY PLAN

Recommendation 1

We recommend that the campus update the campus EMP to ensure that it is current, accurate, and complete.

Campus Response

We concur.

The campus has updated the emergency management plan (EMP) and assures that it is current, accurate, complete, and posted on the web.

Corrective action has been completed.

VEHICLE HOME STORAGE PERMITS

Recommendation 2

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

Campus Response

We concur.

The campus has completed an approved vehicle home storage permit for the vehicle driven home by the university police chief and plans to maintain properly approved vehicle home storage permits for vehicles that are regularly driven home by campus employees.

Corrective action has been completed.

ACCESS TO KEYS

Recommendation 3

We recommend that the campus relocate the miscellaneous campus facility keys to a more secured area and maintain a log showing who accessed and returned the keys, including date and time of each activity.

Campus Response

We concur.

The campus has relocated the locked metal box with miscellaneous campus facility keys to the dispatch area and is maintaining a log to document who accessed and returned the keys, including date and time of each activity.

Corrective action has been completed.

AUTOMATED SYSTEMS ACCESS CONTROLS

Recommendation 4

We recommend that the campus:

- a. Develop and implement data security policies and procedures for ARMS and CLETS to ensure that data security is effective and the potential for the release of sensitive data is minimized.
- b. Repair the ARMS data recorder and maintain a log of ARMS backup tapes sent for off-site storage.

Campus Response

We concur.

- a. The campus has implemented a new ARMS login password policy that requires users to change their passwords every 180 days, and to be a minimum length made up of a combination of letters, numbers, and/or characters.

The CLETES/JDIC access terminal protocols are handled by the Los Angeles County Sheriff Department and since the CSUDH Police Department does not have any control over their login procedures, the campus will contact LASD to inquire about updating the controls.

- b. The broken DAT drive has been repaired and is operational. A policy is in place to ensure the server is backed up on a weekly basis and sent to an off site storage by the Information Technology Department.

Corrective action has been completed for a & b.

EVIDENCE, WEAPONS, AND EQUIPMENT

EVIDENCE

Recommendation 5

We recommend that the campus:

- a. Review the status of the subject confiscated weapons and take appropriate disposal actions as provided for in the Penal Code.
- b. Strengthen existing practices to ensure that evidence is consistently monitored and disposed of timely.
- c. Develop and implement local procedures for the chain of custody, and for the disposal and destruction of evidence.

Campus Response

We concur.

- a. The campus will review the status of the subject confiscated weapons and will take appropriate disposal actions as provided for in the Penal Code.
- b. The campus will review and update current policy and practices regarding evidence monitoring and disposal and re-train department personnel.
- c. The campus is in process of documenting, developing and implementing improved local procedures for chain of custody and for the disposal and destruction of evidence.

Expected completion date: a) March 2009, b) March 2009, c) June 2009.

AMMUNITION AND WEAPONS

Recommendation 6

We recommend that the campus:

- a. Establish procedures to ensure that all active officers and retirees meet the required weapons qualification requirements.
- b. Ensure that the appropriate approvals of off-duty weapons are completed, documented, and maintained on file.
- c. Perform a physical inventory count of ammunition on a regular basis and develop, implement, and maintain an ammunition inventory ledger showing purchases, issues, and current stock of ammunition.

Campus Response

We concur.

- a. The campus has implemented policies and procedures to ensure that all active officers and retirees meet the required weapons qualification requirements.
- b. The campus has implemented policies and procedures to ensure that appropriate approvals of off-duty weapons are completed, documented, and maintained on file.
- c. The campus has implemented policies and procedures to ensure that physical inventory count of ammunition is conducted on a regular basis, and that an ammunition inventory ledger showing purchases, issues, and current stock of ammunition is maintained by the range master.

Corrective action has been completed.

PARKING PROGRAM

Recommendation 7

We recommend that the campus develop procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected.

Campus Response

We concur.

The campus will develop procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected, and assess if additional personnel is needed to accomplish this task.

Expected completion date: March 2009


THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

October 7, 2008

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

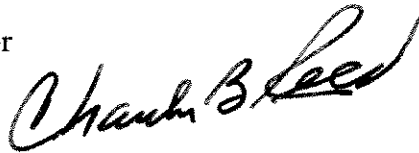
EAST BAY

FRESNO

TO: Mr. Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Report 08-26 on *Police Services*,
California State University, Dominguez Hills

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, Dominguez Hills.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/jt

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Dr. Mildred García, President

SAN DIEGO

Ms. Karen J. Wall, Associate Vice President, Administration and Finance

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS