

**POLICE SERVICES**  
**CALIFORNIA STATE UNIVERSITY,**  
**CHANNEL ISLANDS**

**Audit Report 08-29**  
**November 5, 2008**

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**BOARD OF TRUSTEES**  
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## **ABBREVIATIONS**

CALEA	Commission on Accreditation for Law Enforcement Agencies
CBA	Collective Bargaining Agreement
CSU	California State University
DOE	Department of Education
EMP	Emergency Management Plan
POST	Commission on Peace Officer Standards and Training
SAM	State Administrative Manual
TPS	Transportation and Parking Services
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, Channel Islands campus from August 11, 2008, through September 19, 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 September 19, 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 [7]**

Campus emergency management plan (EMP) and procedures were not fully current. The EMP provided on the university police department (UPD) website did not show an effective date and there was no evidence of a full review and approval of the plan within the last year. Written acknowledgement was not obtained from employees to document receipt of the UPD policy and procedures manual. Further, monthly travel log forms, STD. 273, were not on file for police vehicles.

### **POLICE ACTIVITIES AND CRIME REPORTING [9]**

Crime statistics reporting was not consistent. A reconciliation of crime statistics reporting disclosed discrepancies between the campus website crime reports and the Department of Education website reports in the categories of criminal offenses and special category arrests for two of the three reporting years reviewed.

### **EVIDENCE, WEAPONS, AND EQUIPMENT [10]**

Audits of evidence were not performed per UPD policy requirements. Administration of ammunition inventory and related recordkeeping procedures needed improvement. Ammunition inventory records were not current, and purchases and distribution were not tracked and documented.

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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.

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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 the August 11, 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**

#### **CAMPUS EMERGENCY PLAN**

Campus emergency management plan (EMP) and procedures were not fully current.

We noted that the campus EMP provided on the university police department (UPD) website did not show an effective date. In addition, there was no evidence of a full review and approval of the plan within the last year and, as such, we had no assurance that the plan was current, accurate, and complete.

Executive Order 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 chief of police stated that the department overlooked the need to perform a full review, and to include the date of review on the campus emergency plan.

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

#### **Campus Response**

We concur and will review, update, and distribute the campus' EMP by January 30, 2009.

### **DISTRIBUTION OF POLICY AND PROCEDURES MANUAL**

Written acknowledgement was not obtained from each employee to document receipt of the UPD policy and procedures manual.

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 UPD omitted documenting in writing receipt of the policy and procedures manual, which was reviewed by all officers during new employee training.

Failure to proactively obtain written acknowledgement for the receipt and review of the policy manual increases the risk that the UPD employees will not be sufficiently trained in critical areas of the public safety policy manual.

**Recommendation 2**

We recommend that the campus obtain written acknowledgement from each employee documenting receipt of the UPD policy and procedures manual.

**Campus Response**

We concur and will obtain written acknowledgement from each employee documenting receipt of the UPD policy and procedures manual by January 30, 2009.

**VEHICLE TRAVEL LOG FORMS**

Monthly travel log forms, STD. 273, were not on file for police vehicles. However, the campus did maintain its own vehicle mileage record for UPD vehicles.

State Administrative Manual (SAM) §4107 states that agencies/departments will maintain a Monthly Travel Log Form, STD. 273, on all state-owned passenger mobile equipment except for motorcycles, trucks over 3/4 ton, and heavy equipment.

The chief of police stated that the UPD was unaware of the requirement to complete and maintain state form STD. 273.

Failure to maintain monthly travel log forms on file for UPD vehicles can potentially limit the campus' defense in vehicle liability actions and insurance coverage issues.

**Recommendation 3**

We recommend that the campus complete monthly travel logs (STD. 273) for state-owned vehicles utilized in UPD activities.

**Campus Response**

We concur and will institute a procedure to record appropriate data on monthly travel log forms (STD. 273) by January 30, 2009.

## **POLICE ACTIVITIES AND CRIME REPORTING**

Crime statistics reporting was not consistent.

Our review of crime statistics reporting showed that crime statistics were reported to the Department of Education (DOE) on its website and on the campus website in accordance with applicable laws. However, our reconciliation of statistics disclosed discrepancies between the two. In the category of criminal offenses, we noted eight quantitative statistical reporting differences for 2004 and three reporting differences for 2005 when the campus report and the DOE report were compared. Additionally, in the category of special category arrests, we noted one quantitative statistical reporting difference per year for 2004 and six reporting differences for 2005.

20 United States Code §1092(f) Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act states in part that participating institutions shall collect campus crime statistics and distribute them to all current students and employees and any applicant for enrollment or employment upon request, and on an annual basis shall submit to the secretary (of education) a copy of the statistics.

The chief of police stated that the statistics variances between the DOE and the campus website were due to a misunderstanding in reporting techniques and procedures.

Failure to accurately report crime statistics both on the campus webpage and on the DOE webpage increases the potential for inadequate reporting to citizens, students, and other interested parties, and could result in fines and penalties from the DOE.

### **Recommendation 4**

We recommend that the campus immediately correct any inaccurate statistical reporting on the campus or to the DOE, and implement a procedure to perform an annual reconciliation of campus and DOE webpage statistics to the source data.

### **Campus Response**

We concur and will correct the statistical reporting information on the campus' webpage and implement a procedure to perform an annual reconciliation of campus and DOE webpage statistics to the source data by January 30, 2009.

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

### **EVIDENCE RECORDKEEPING**

Audits of evidence were not performed per UPD policy requirements.

CSU, Channel Islands Police Department *General Order 6-2* states, in part, that the evidence custodian will do an audit of in-custody property every six months, a mandatory audit will be conducted when there is a change of evidence custodian, the chief of police or his/her designee will make periodic audits of items stored in the evidence room, and unannounced inspections of the evidence storage areas shall be conducted as directed by the chief of police.

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.

The chief of police stated that the UPD overlooked the requirement to perform evidence audits every six months due to the low volume of evidence stored in the department.

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 perform evidence audits as required by UPD policy.

#### **Campus Response**

We concur and will complete an in-custody audit of all held property by January 30, 2009.

### **AMMUNITION RECORDKEEPING**

Administration of ammunition inventory and related recordkeeping procedures needed improvement.

A physical inventory of ammunitions was performed on December 16, 2007. However, since then, a physical inventory had not been performed, inventory records were not maintained, and purchases and distribution were not tracked and documented. Consequently, the existing inventory record did not reflect the actual ammunition stock on hand at the time of audit.

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 chief of police stated that the UPD was unaware of the requirement to maintain current ammunition inventory records.

Failure to maintain ammunition inventory records increases the risk of loss, misplacement, or misuse.

**Recommendation 6**

We recommend that the campus 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 and will complete a physical inventory count of ammunition and develop and implement an ammunition inventory ledger by January 30, 2009.

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## **APPENDIX A: PERSONNEL CONTACTED**

<b><u>Name</u></b>	<b><u>Title</u></b>
Richard R. Rush	President
Shawn Bartlett	Corporal, University Police Department (UPD)
Joanne Coville	Vice President, Finance and Administration
Jeff Cowgill	Sergeant, UPD
Tracey Dunn	Executive Assistant to the Chief, UPD
Deanne Ellison	Customer Service Manager, Transportation and Parking Services (TPS)
Kevin Medley	Officer, UPD
Colleen Mitchell	Business Services Analyst, TPS
Michael Morris	Lieutenant, UPD
Ray Porras	Director, TPS
John Reid	Chief of Police and Director of Public Safety, UPD
Al Rice	Sergeant, UPD
Lynn Rice	Dispatcher, UPD



Division of Finance and Administration

December 15, 2008

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DEC 15 2008  
THE CALIFORNIA STATE  
UNIVERSITY

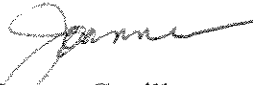
Mr. Larry Mandel  
University Auditor  
401 Golden Shore, 4<sup>th</sup> Floor  
Long Beach, CA 90802-4200

Dear Larry:

On behalf of President Rush, I am submitting the campus response to the recommendations of Audit Report 08-29, Police Services, at California State University Channel Islands. This response has also been forwarded via email to [adouglas@calstate.edu](mailto:adouglas@calstate.edu).

Please contact me for additional information and follow up.

Very truly yours,

  
Joanne Coville  
Vice President for Finance  
and Administration

JC/rt  
Enclosure

cc: Richard R. Rush, President  
John Reid, Chief of Police

**POLICE SERVICES**  
**CALIFORNIA STATE UNIVERSITY,**  
**CHANNEL ISLANDS**

**Audit Report 08-29**

**PROGRAM ADMINISTRATION**

**CAMPUS EMERGENCY PLAN**

**Recommendation 1**

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

**Campus Response**

We concur and will review, update, and distribute the campus' Emergency Management Plan by January 30, 2009.

**DISTRIBUTION OF POLICY AND PROCEDURES MANUAL**

**Recommendation 2**

We recommend that the campus obtain written acknowledgement from each employee documenting receipt of the UPD policy and procedures manual.

**Campus Response**

We concur and will obtain written acknowledgement from each employee documenting receipt of the UPD policy and procedures manual by January 30, 2009.

**VEHICLE TRAVEL LOG FORMS**

**Recommendation 3**

We recommend that the campus complete monthly travel logs (STD. 273) for state-owned vehicles utilized in UPD activities.

**Campus Response**

We concur and will institute a procedure to record appropriate data on monthly travel log forms (STD. 273) by January 30, 2009.

## **POLICE ACTIVITIES AND CRIME REPORTING**

### **Recommendation 4**

We recommend that the campus immediately correct any inaccurate statistical reporting on the campus or to the DOE, and implement a procedure to perform an annual reconciliation of campus and DOE webpage statistics to the source data.

### **Campus Response**

We concur and will correct the statistical reporting information on the campus' webpage and implement a procedure to perform an annual reconciliation of campus and DOE webpage statistics to the source data by January 30, 2009.

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

### **EVIDENCE RECORDKEEPING**

#### **Recommendation 5**

We recommend that the campus perform evidence audits as required by UPD policy.

#### **Campus Response**

We concur and will complete an in-custody audit of all held property by January 30, 2009.

### **AMMUNITION RECORDKEEPING**

#### **Recommendation 6**

We recommend that the campus 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 and will complete a physical inventory count of ammunition and develop and implement an ammunition inventory ledger by January 30, 2009.

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

BAKERSFIELD

January 26, 2009

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

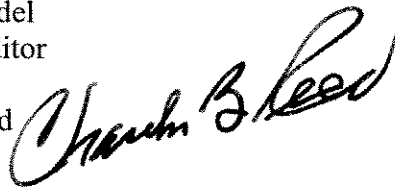
DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel  
University Auditor

FRESNO

FROM: Charles B. Reed  
Chancellor



FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 08-29 on *Police Services*,  
California State University, Channel Islands

LONG BEACH

LOS ANGELES

In response to your memorandum of January 26, 2009, I accept the response as submitted with the draft final report on *Police Services*, California State University, Channel Islands.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/jt

POMONA

Enclosure

SACRAMENTO

cc: Ms. Joanne M. Coville, Vice President, Finance and Administration  
Dr. Richard R. Rush, President

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS