POLICE SERVICES

CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 12-60
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ABBREVIATIONS

ARMS  Automated Response Management System
CLETS  California Law Enforcement Telecommunications Systems
CSU   California State University
CSUDH California State University, Dominguez Hills
EO    Executive Order
ICSUAM Integrated California State University Administrative Manual
OUA   Office of the University Auditor
POST Commission on Peace Officer Standards and Training
PS    Police Services
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 (OUA) during the last quarter of 2011, the Board of Trustees at its January 2012 meeting directed that Police Services be reviewed. The OUA had previously reviewed Police Services in 2008.

We visited the California State University, Dominguez Hills campus from September 24, 2012, through October 19, 2012, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant errors and irregularities if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: general policies and procedures, systems access and physical security, and weapons and ammunition controls. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls for police services activities in effect as of October 19, 2012, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report.

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.

GENERAL ENVIRONMENT [7]

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy, and the campus did not always comply with systemwide requirements. For example, the firearms policy did not include information on the tracking of ammunition purchases and inventory procedures, ammunition purchases and distribution were not tracked or documented, and ammunition inventory records were not maintained. This is a repeat finding from the prior Police Services audit.

SYSTEM ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION [9]

Administration of UPD information systems needed improvement. For example, ARMS data backups were not encrypted. This is a repeat finding from the prior Information Security audit. In addition, the campus did not have formal procedures addressing the physical security of UPD offices, and some terminated employees continued to have access to the facilities.
FISCAL ADMINISTRATION [12]

Recovery of UPD costs for special events needed improvement. For example, the campus did not have procedures regarding the time frame in which special events and chancellor’s office cost reimbursements should be created. In addition, the UPD had not developed formal accounting procedures for the collection of miscellaneous receipts.

MAJOR INCIDENTS AND CRIME REPORTING [16]

The campus Clery report did not disclose all required elements regarding immediate emergency response and evacuation procedures, and the campus did not always report crimes defined as major incidents to the chancellor’s office.

WEAPONS AND AMMUNITION CONTROLS [17]

UPD weapons policies needed updating, and presidential approval for the use of non-standard weapons was not documented. For example, the UPD firearms policies stated that qualifications for duty weapons were required to be performed quarterly; however, weapons qualification training was only offered twice in 2011 and three times in 2010 and 2012. In addition, four of ten sworn officers reviewed did not attend all weapons qualification sessions.
INTRODUCTION

BACKGROUND

The California State University (CSU) Public Safety Program began in 1974 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, and public safety departments were established on all CSU campuses. In 2007, those departments were renamed “police services” to emphasize the service aspect, and since then, 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 municipalities. Sexual assaults, alcohol use, drug abuse, and vandalism have increased, and legislation has mandated more involvement by university police officers in the investigation and prevention of crimes, as well as the care of the victims. As a result, CSU police services departments have created policing programs and preventive patrols to deter crime. Also, the growth of on-campus housing has increased the complexity of emergency planning, and parking structures built on campuses have sparked an increase in auto burglaries and theft and have 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. 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, that participate in any federal student aid programs and requires schools to publicly disclose basic security policies and three years of campus crime statistics.

In 1992, the Campus Sexual Assault Victims’ Bill of Rights was incorporated into the Jeanne Clery Act. Then, in 1998, the act was amended to expand the scope of campus crime statistic reporting, to ensure crime statistics are reported in accordance with the Federal Bureau of Investigation’s Uniform Crime Reporting program, and to require the maintenance of a public police log of all reported crimes. It also requires each campus to maintain a policy that mandates the issuance of timely warnings when a crime, reportable in the annual statistics, is known to the school and poses an ongoing threat to the campus. The Higher Education Opportunity Act of 2008 reauthorized the Higher Education Act of 1965 and provided additional campus reporting requirements, such as the relationship of campus security personnel with state and local police, emergency response and evacuation procedures, and missing person procedures.

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 that designate which law enforcement agency has operational responsibility for the investigation of violent crimes occurring on campus. It also requires campuses to delineate the specific boundaries of each agency’s operational responsibility.

Recent budget cuts in higher education in California have resulted in increased student protests and demonstrations at the CSU and other California educational institutions. It remains a challenge to balance freedom of speech and assembly with the maintenance of order, and there has been increased scrutiny by the public and the legislature regarding the management of these events, especially in the use of force.
In recent years, in response to increased training standards from the Commission on Peace Officer Standards and Training (POST) and governmental agencies, campus administrators have worked to upgrade the quality of university police services, and five CSU campuses are currently accredited by international accreditation agencies. CSU Los Angeles, CSU Fullerton, CSU San Marcos, and San Francisco State University have received accreditation from the Commission on Accreditation for Law Enforcement Agencies, and San Francisco State University and CSU Northridge have received accreditation from the International Association of Campus Law Enforcement Agencies.

At the systemwide level, policies have been developed to create uniform standards for vehicles, equipment, training, emergency preparedness, and critical response units, as well as semiannual meetings of campus police chiefs. In April 2001, the chancellor’s office issued Executive Order (EO) 787, modifying the CSU Public Safety Policy Manual that was required by agreement between the CSU Board of Trustees and the Statewide University Police Association. In 2007, administrative and risk management responsibilities for systemwide police services were reassigned from Systemwide Human Resources to the Office of Risk Management.

In 2010, in response to the recommendations of the 2008 Police Services Systemwide Audit, a systemwide chief law enforcement officer position was created. Responsibilities of the chief law enforcement officer include oversight over compliance issues in police services and emergency management, such as developing policies and procedures addressing systemwide police services, emergency preparedness, critical incident response, and chancellor’s office security issues. The position reports to the assistant vice chancellor of risk management and public safety.

In addition, EO 1046, Police and Public Safety Police Guidelines, and additional police services technical letters were implemented in 2010 to further define systemwide policies and expectations for campus police departments. These policies require campuses to maintain event management and crowd control procedures, as well as use-of-force guidelines and procedures, to ensure that management of protests and demonstrations is adequately and consistently controlled throughout the CSU system.

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

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of police services and law enforcement, and to determine the adequacy of controls over related processes to ensure compliance with relevant government regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

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

- Administration and management of the police services (PS) 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.

- 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.

- Security and retention of departmental records are adequate.

- Staffing and scheduling provide appropriate coverage, effective use of overtime, and compliance with collective bargaining agreements.

- Hiring, certification, and training of police services employees is in accordance with POST standards, state regulations, and CSU policy.

- Citizen complaints and internal investigations are handled in compliance with state and federal regulations, CSU policy, and collective bargaining agreements.

- Budgeting processes adequately address police services funding and expenditures, and budget monitoring processes ensure effective accounting and management control.

- POST reimbursements, PS expenditures, and cost recovery for services and events are adequately controlled.

- Processes and policies exist for managing and reporting major incidents in accordance with state and federal regulations and CSU policy.

- 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.

- Weapons are appropriately authorized, and weapons and ammunition are properly handled, accounted for, and safeguarded.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment A, Audit Agenda Item 2 of the January 24 and 25, 2012, meeting of the Committee on Audit stated that Police Services includes compliance with federal, state, and local rules and regulations, systemwide directives, and campus policies and procedures. Proposed audit scope would include review of campus policies and procedures; compliance with state-mandated standards and training requirements; timely and appropriate response to incidents, including appropriate policies and training governing the use of force; controls over sensitive or special equipment; accurate crime reporting; appropriate adjudication of internal investigations or personnel complaints; and access to law enforcement data.

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 Board of Trustee policies and Office of the Chancellor and campus policies, letters, and directives. The audit focused on procedures in effect from January 1, 2010, through October 19, 2012.

We focused primarily on the internal administrative, compliance, and operations controls over PS activities. Specifically, we reviewed and tested:

- Procedures for communicating systemwide and campus-specific policies, rules, and regulations.
- Staffing, scheduling, and internal investigation procedures.
- Fiscal procedures for budgeting, chargebacks, POST reimbursements, and expenses.
- 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 weapons and ammunition.
- Data security, disaster recovery, and backup procedures.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy, and the campus did not always comply with systemwide requirements.

We found that:

- The UPD policy manual did not include specific policies on event management and crowd control or crime prevention activities.
- Campus and UPD information security policies did not include information security practices for approving additions, changes, and termination of system access rights or for reviewing existing account-holder access rights for the Automated Response Management System (ARMS).
- The Clery reporting policy did not include expectations for the reconciliation of crime statistics data with Clery statistics, chancellor’s office reporting, and Uniform Crime Reporting regulations.
- The active shooter/incident response policy did not include expectations for conducting annual active shooter training exercises, and annual active shooter training was not being performed.
- The UPD use-of-force training policies did not address annual training requirements.
- The UPD firearms policy did not include information on the tracking of ammunition purchases and inventory procedures. In addition, ammunition purchases and distribution were not tracked or documented, and ammunition inventory records were not maintained. This is a repeat finding from the prior Police Services audit.

Technical Letter Police Services (PS) 2010-01, California State University Police Services Policies and Manual Maintenance Requirements, dated July 26, 2010, states, in part, that each campus police department shall implement and maintain operational policies and procedures in the following areas: event management and crowd control; mitigating campus crime and encouraging crime prevention deterrence activities; information security of police data, access to terminals, computer-aided dispatch/record management systems, Department of Justice terminals, data backup and storage procedures in accordance with best practices doctrines to include but not be limited to password complexity, intervals, and off-site storage; reconciliation of crime statistics data and consistency of data with the Jeanne Clery statistics, the Chancellor’s Criminal Statistics Report, and the Uniform Crime Reporting regulations; and an active shooter/incident policy that includes expectations for conducting periodic, but not less than annual, active shooter training exercises, classroom instruction, table top exercises, and other applicable training methods; and procedures for tracking ammunition purchases, inventory, distribution, and use.

Integrated California State University Administrative Manual (ICSUAM) §8060.0, Access Control, effective April 19, 2010, states that campuses must have a documented process for provisioning
approved additions, changes, and terminations of access rights and reviewing access of existing account holders. It further states that appropriate campus managers and data owners must review, at least annually, user access rights to information assets containing protected data, and the results of the review must be documented.

20 United States Congress §1092(f), *Disclosure of Campus Security Policy and Campus Crime Statistics*, states that campuses shall have current policies regarding immediate emergency response and evacuation procedures, including the use of electronic and cellular communication, which policies shall include procedures to publicize emergency response and evacuation procedures on an annual basis in a manner designed to reach students and staff, and test emergency response and evacuation procedures on an annual basis.

Technical Letter PS 2010-02, *CSU Police Services Minimum Training Requirements*, dated July 26, 2010, states that police chiefs shall establish an annual training program to ensure compliance with department operational policies and California State University (CSU) mandates in policies dealing with use of force.

Technical Letter PS 2010-07, *Major Incident Reporting Requirements*, dated July 28, 2010, states, in part, that campus police chiefs are to notify the systemwide chief law enforcement officer of major incidents by telephone or email, as appropriate. A major incident is any incident involving the campus and its students, faculty, or staff that may be newsworthy or potentially sensitive and includes serious crimes such as homicide, rape, robbery, assault, burglary, arson, bombs, riots and disturbances.

The chief of police stated that in March 2012, the UPD worked in conjunction with Lexipol to develop a policy manual specific to the California State University Dominguez Hills’ (CSUDH) Police Department, but further work is needed to incorporate into the new policy manual mandates found in chancellor’s office technical letters and executive orders.

Incomplete written policies and procedures 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. Update UPD policies and procedures to incorporate all information required by systemwide policy.

b. Ensure that annual active shooter training is performed per updated campus policies.

c. Ensure that ammunition purchases and distribution are tracked and documented and that ammunition inventory records are maintained per updated campus policies.
Campus Response

We concur.

a. The UPD policy manual will be updated to incorporate all information required by systemwide policy.
   
   Expected completion date: February 2013

b. The campus conducted an active shooter tabletop exercise on November 30, 2012, and will ensure that the requirement to conduct annual active shooter training will be included in the policy manual.
   
   Corrective action has been completed.

c. The campus will ensure that ammunition purchases and distribution are tracked and documented and that ammunition inventory records are maintained per updated campus policies.
   
   Expected completion date: February 2013

SYSTEMS ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION

SYSTEM ACCESS

Administration of UPD information systems needed improvement.

We found that:

- The semiannual review of ARMS users was not documented.
- The ARMS contained protected data, but ARMS data backups were not encrypted. This is a repeat finding from the prior Information Security audit.
- Systems to recover the ARMS server in the event of a disaster were not in place.
- Confidentiality agreements for California Law Enforcement Telecommunication System (CLETS) users were not always renewed on a biennial basis.

ICSUAM §8060.0, Access Control, effective April 19, 2010, states that campuses must have a documented process for provisioning approved additions, changes, and terminations of access rights and reviewing access of existing account holders. It further states that appropriate campus managers and data owners must review, at least annually, user access rights to information assets containing protected data, and the results of the review must be documented.
Technical Letter PS 2010-01, *CSU Police Services Policies and Manual Maintenance Requirements*, dated July 26, 2010, states that campus police departments shall implement and maintain operational policies and procedures in the following areas: information security of police data, access to terminals, computer-aided dispatch/record management systems, Department of Justice terminals, and data backup and storage procedures in accordance with best-practices doctrines to include, but not be limited to, password complexity, intervals, and off-site storage.

The California State Information Security Office, *Information Security Program Guide for State Agencies*, dated April 2008, states that best practices for data backup are to establish procedures to implement an agreed backup policy and strategy, including the extent (e.g., full or differential/incremental), frequency, off-site storage, testing, physical and environmental protection, restoration, and encryption. In addition, a plan should be documented to maintain, restore, and recover operations to ensure availability of information at the required level and time frame following a disruption, failure of critical systems, or disaster.

State of California Department of Justice, *CLETS Policies, Practices and Procedures*, revised October 2008, states that it is required that each employee/volunteer sign an employee statement form prior to operating or having access to CLETS terminals, equipment, or information. It is recommended that each employee/volunteer sign an employee statement form on a biennial basis.

The chief of police stated that due to a lack of UPD policies concerning system access, data backup encryption, and disaster recovery, maintenance of the ARMS was not always adequate. He also stated that due to a change in staff responsible for monitoring confidentiality agreements, the forms were not updated as required.

Failure to document reviews of system users and encrypt data backups increases the risk of inappropriate access to systems and misuse of sensitive data; failure to install systems to recover data in the event of a disaster increases the risk of loss of data; and failure to renew confidentiality agreements in a timely manner increases the risk that confidential criminal record information will be misused.

**Recommendation 2**

We recommend that the campus:

a. Document the semiannual review of ARMS users.

b. Encrypt ARMS data backups.

c. Install systems to recover the ARMS server in the event of a disaster.

d. Renew confidentiality agreements for CLETS users every two years.

**Campus Response**

We concur.

a. The campus will document the semiannual review of ARMS users.
Expected completion date: February 2013

b. The campus information technology department is in the process of obtaining the required license for the encryption program and will begin the encryption of all ARMS data backups.

Expected completion date: February 2013

c. The ARMS server data is being backed up daily and sent to a secure off-site location and is available in the event of a disaster.

Corrective action has been completed.

d. The campus will ensure confidentiality statements are renewed every two years for CLETS users.

Expected completion date: February 2013

**PHYSICAL ACCESS**

The campus did not have formal procedures addressing the physical security of UPD offices, and some terminated employees continued to have access to the facilities.

Specifically, we found that:

- Policies and procedures had not been developed to address the periodic review and monitoring of individuals with physical access to the UPD offices.

- The list of individuals with access to the UPD offices was outdated and included two terminated employees whose access had been removed.

- Two terminated UPD employees still had access to UPD offices, and one terminated UPD employee had not turned in a set of campus facilities master keys.

State Administrative Manual (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.

State of California Department of Justice, *CLETS Policies, Practices and Procedures*, revised October 2008, states that reasonable measures shall be taken to locate terminals and equipment in an area with adequate physical security to provide protection from vandalism or sabotage and to preclude access to CLETS-provided information by anyone other than authorized personnel. This includes unauthorized viewing or access to computer terminals, access devices, or stored/printed data at all times.

The chief of police stated that the failure to remove access to the UPD offices from employees immediately upon separation from employment and maintain an accurate listing of individuals with access was due to insufficient policies and procedures and reliance on informal processes.
Inadequate control over access to UPD offices and campus facilities increases campus exposure to loss from inappropriate acts.

**Recommendation 3**

We recommend that the campus:

a. Develop policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices.

b. Maintain an updated list of individuals with access to the UPD offices.

c. Remove access to the UPD offices and collect master keys from terminated UPD employees.

**Campus Response**

We concur.

a. The campus will develop policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices.

   Expected completion date: February 2013

b. The campus will maintain an updated list of individuals with access to the UPD offices and ensure a periodic review is conducted.

   Expected completion date: February 2013

d. The campus will continue to remove access to the UPD offices and collect master keys from terminated UPD employees.

   Expected completion date: February 2013

**FISCAL ADMINISTRATION**

**COST RECOVERY**

Recovery of UPD costs for special events needed improvement.

We found that:

- The campus did not have procedures regarding the time frame in which special-event and chancellor’s office cost-reimbursement billings should be created.
The cost recovery account in which special event revenues and expenditures were recorded was not reviewed or reconciled to ensure the accuracy of amounts in the account, and UPD did not receive verification from accounting services that requested UPD cost-recovery billings had been processed.

The signature card for the Live Scan University Police trust fund had not been updated to reflect the new chief of police.

SAM §8776 states that invoices shall be sent to the debtor as soon as practical and within 30 days after the event giving rise to the accounts receivable.

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

SAM §20050 states that elements of a satisfactory system of internal accounting and administrative controls include a system of authorization and recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The chief of police stated that cost recovery expenses were not recovered in a timely manner, and the failure to review and reconcile the cost recovery account was due to a lack of formal procedures. He also stated that the signature card was not updated to reflect the current authorized individuals due to oversight.

Inadequate control over recovery of costs for UPD work at special events increases the risk of inaccurate, incomplete, and late reimbursements to the UPD and reduces funds available for law enforcement activities.

**Recommendation 4**

We recommend that the campus:

a. Develop procedures regarding the time frame in which special event and chancellor’s office cost-reimbursement billings should be created.

b. Implement a periodic review or reconciliation of the cost recovery account where special event revenues and expenditures are recorded to ensure the accuracy of amounts in the account, including verification from accounting services that requested UPD cost-recovery billings have been processed.

c. Update the signature card for the LiveScan University Police trust fund to reflect the new chief of police.
Campus Response

We concur.

a. The campus has developed procedures regarding the time frame in which special event and chancellor’s office cost-reimbursement billings should be created.

Corrective action has been completed.

b. The campus has implemented a periodic review and reconciliation of the cost recovery account where special event revenues and expenditures are recorded to ensure the accuracy of amounts in the account, including verification from accounting services that requested UPD cost-recovery billings have been processed.

Corrective action has been completed.

c. The campus has updated the signature card for the LiveScan University Police trust fund to reflect the new chief of police.

Corrective action has been completed.

MISCELLANEOUS RECEIPTS

The UPD had not developed formal procedures for the collection of miscellaneous receipts.

We found that:

› Checks were accepted at the UPD offices, rather than at an official cash collection point, and a log of checks received was not maintained.

› Segregation of duties did not always exist among the individuals responsible for receiving and depositing checks. One individual often received miscellaneous checks and deposited them to the cashier’s office without a secondary review.

› The UPD did not perform periodic reconciliations of receipts to the UPD deposit account.

ICSUAM §3012.03, *Acceptance of Cash and Cash Equivalents*, effective April 1, 2011, states that the chief financial officer of each campus or his/her delegate will designate and authorize official campus cash collection points. Cash and cash equivalents will only be accepted at official cash collection points. Further, an official CSU cash receipt should be recorded for each collection. A collection not recorded on cash register or point of sale equipment, including mailed payments, can be recorded on a valid pre-numbered, multiple-part cash receipt or a mailed payments log. The receipts must be used sequentially. Receipt stock shall be kept secured, inventoried, and regularly reviewed to prevent and detect alteration. The mailed payments log should be reviewed and reconciled periodically.
ICSUAM §3102.02, *Segregation of Cash Handling Duties*, effective April 1, 2011, states that separation of duties must be maintained when cash is received, and no single person should have complete control. The person collecting cash, issuing cash receipts, and preparing the departmental deposit must be someone other than the person performing the monthly review of the general ledger, the person maintaining accounts receivable records, or the person following up on collectibles.

The chief of police stated that UPD only accepts checks for copies of crime/traffic reports when checks are received via U.S. mail with the request for a crime/traffic report, and that he was unaware of the specific requirements related to the receipt of miscellaneous checks.

Inadequate controls over receiving, depositing, and reconciling miscellaneous receipts increases campus exposure to loss from inappropriate acts.

**Recommendation 5**

We recommend that the campus:

a. Direct miscellaneous receipts to an official cash collection point.

b. Develop appropriate check-handling procedures, including logging of checks received and proper segregation of duties.

c. Periodically reconcile miscellaneous receipts to the UPD deposit account.

**Campus Response**

We concur.

a. The campus has assigned a person to be responsible for directing miscellaneous receipts to an official cash collection point.

   Corrective action has been completed.

b. The campus has developed appropriate check-handling procedures, including logging of checks received and proper segregation of duties.

   Corrective action has been completed.

c. The campus will periodically reconcile miscellaneous receipts to the UPD deposit account.

   Expected completion date: February 2013
MAJOR INCIDENTS AND CRIME REPORTING

The campus Clery report did not disclose all required elements regarding immediate emergency response and evacuation procedures, and the campus did not always report crimes defined as major incidents to the chancellor’s office.

20 United States Congress §1092(f), Disclosure of Campus Security Policy and Campus Crime Statistics, states that campuses shall have current policies regarding immediate emergency response and evacuation procedures, including the use of electronic and cellular communication, which policies shall include procedures to publicize emergency response and evacuation procedures on an annual basis in a manner designed to reach students and staff, and test emergency response and evacuation procedures on an annual basis.

Technical Letter PS 2010-07, Major Incident Reporting Requirements, dated July 28, 2010, states, in part, that campus police chiefs are to notify the systemwide chief law enforcement officer of major incidents by telephone or email, as appropriate. A major incident is any incident involving the campus and its students, faculty, or staff that may be newsworthy or potentially sensitive and includes serious crimes such as homicide, rape, robbery, assault, burglary, arson, bombs, riots, and disturbances.

The chief of police stated that the CSU Dominguez Hills (CSUDH) police department recognizes the importance of Clery compliance, and has focused much attention on ensuring that systems for emergency notifications are in place and that security policies, as well as crime statistics, are disseminated and made available to the public; however, due to an oversight, the existing emergency notifications policy was not posted into the campus’ Clery website, and a major incident log was not submitted to the chancellor’s office for specified crimes that occurred during sporting events at the Home Depot Center stadium.

Failure to disclose all required elements in the Clery report increases the risk of non-compliance with government regulations and the risk that campus constituents will be unaware of what actions to take in an emergency; and failure to report major incidents to the chancellor’s office increases the risk of non-compliance with CSU policy and the risk that appropriate CSU officials will be unaware of potentially sensitive situations.

Recommendation 6

We recommend that the campus disclose emergency response and evacuation procedures in the campus Clery report and report all crimes defined as major incidents to the chancellor’s office.

Campus Response

We concur. The campus will disclose emergency response and evacuation procedures in the campus Clery report and report all crimes defined as major incidents to the chancellor’s office.

Expected completion date: February 2013
WEAPONS AND AMMUNITION CONTROLS

UPD weapons policies needed updating, and presidential approval for the use of non-standard weapons was not documented.

We found that:

- Policy 312, Firearms, stated that qualifications for duty weapons were required to be performed quarterly; however, weapons qualification training was only offered twice in 2011 and three times in 2010 and 2012. In addition, four of ten sworn officers reviewed did not attend all weapons qualification sessions.

- Policy 312, Firearms, stated that qualifications for off-duty weapons were to be performed semi-annually; however, three of ten sworn officers did not attend the qualifications at least semi-annually.

- Policy 432, Patrol Rifles, stated that qualifications for patrol rifles were to be performed quarterly; however, rifle qualification training was only offered twice in 2011 and three times in 2010 and 2012. In addition, four of ten sworn officers did not attend all rifle qualifications sessions.

- UPD weapons policies did not address the timing for shotgun and beanbag shotgun qualifications and inspections.

- Presidential authorization for the use of shotguns, rifles, beanbag shotguns, and pepper spray on the campus was not documented for the period under audit.

Prior to our visit, the campus provided evidence that the presidential authorization for the use of shotguns, rifles, beanbag shotguns, and pepper spray on the campus had been executed and documented by the campus president on September 7, 2012.

CSUDH UPD Policy 312, Firearms, states that all sworn personnel are required to qualify quarterly with their duty weapon and semi-annually with their off-duty weapon and secondary weapon on an approved range course. It further states that officers will successfully qualify with authorized off-duty weapons prior to carrying them, and thereafter once every six months.

CSUDH UPD Policy 432, Patrol Rifles, states that officers shall successfully complete quarterly training and qualification.

Collective Bargaining Agreement State University Police Association, Unit 8, Article 10.6 states, in part, that the following equipment, when authorized by the president, shall be available in each police department: aerosol pepper spray and holder, shotgun, rifle, and taser.

The chief of police stated that CSU police officers are only required to qualify with their duty weapon semi-annually, and that all CSUDH police officers met this minimum requirement. He further stated that the UPD had established a goal of quarterly qualification with duty weapons; however,
insufficient personnel and deployment issues prohibited the UPD from attaining this goal. He also stated that due to an oversight, the policy manual did not address the timing for how often the shotgun and beanbag shotgun qualifications and inspections needed to occur. He also stated that the police department followed the required process for weapons authorization, and that he was unaware of whether prior UPD staff and command had obtained and documented presidential approval as required.

Failure to maintain current policies and procedures relating to weapons qualification and inspection requirements, failure to ensure weapons qualifications are completed, and failure to document presidential approval for weapons used on campus increases the risk that officers will not be fully qualified to respond to incidents, increases the possibility that weapons will not be properly maintained and will not function correctly in emergency situations, and increases the potential for liability arising from use of such weapons.

**Recommendation 7**

We recommend that the campus update campus weapons policies in the areas of duty and off-duty weapons qualifications, rifle and shotgun qualifications, and inspections to be consistent with campus practices.

**Campus Response**

We concur. The campus has updated the campus weapons policies in the areas of duty and off-duty weapons qualifications, rifle and shotgun qualifications, and inspections to be consistent with campus practices.

Corrective action has been completed.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Willie J. Hagan</td>
<td>Interim President</td>
</tr>
<tr>
<td>Emelda Becerra</td>
<td>Manager, Budget, Planning and Administration</td>
</tr>
<tr>
<td>Ronald Bergmann</td>
<td>Associate Vice President, Information Technology</td>
</tr>
<tr>
<td>Ben Boish</td>
<td>Manager, Compensation and Training, Human Resources Management</td>
</tr>
<tr>
<td>Brian Cummins</td>
<td>Manager, Benefits and Workers Compensation, Human Resources Management</td>
</tr>
<tr>
<td>Augustin Faustino</td>
<td>Coordinator, Human Resources</td>
</tr>
<tr>
<td>David Hall</td>
<td>Police Lieutenant, Police Department</td>
</tr>
<tr>
<td>Michael Kinoshita</td>
<td>Detective, Police Department</td>
</tr>
<tr>
<td>Danny Lujan</td>
<td>Director of Infrastructure, Network, Telecommunications and Help Desk Services</td>
</tr>
<tr>
<td>Paul Marsh</td>
<td>Lead Locksmith, Physical Plant</td>
</tr>
<tr>
<td>Homaira Masoud</td>
<td>Budget Manager, Budget, Planning and Administration</td>
</tr>
<tr>
<td>Susie Mirasol</td>
<td>Assistant to the Chief of Police, Police Department</td>
</tr>
<tr>
<td>Juan Perez</td>
<td>Police Officer, Police Department</td>
</tr>
<tr>
<td>Lorena Raymundo-Yusuf</td>
<td>Manager, Accounting Services</td>
</tr>
<tr>
<td>William Reddick</td>
<td>Dispatcher, Police Department</td>
</tr>
<tr>
<td>Mary Ann Rodriguez</td>
<td>Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Tonya Stabb</td>
<td>Sergeant, Police Department</td>
</tr>
<tr>
<td>Elcee Teng</td>
<td>Payroll Manager, Payroll Services</td>
</tr>
<tr>
<td>Carlos Velez</td>
<td>Chief of Police, Police Department</td>
</tr>
<tr>
<td>Karen Wall</td>
<td>Associate Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Kenneth Whitehouse</td>
<td>Sergeant, Police Department</td>
</tr>
</tbody>
</table>
January 31, 2013

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 Report 12-60, dated January 3, 2013. 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,

Mary Ann Rodriguez
Vice President, Administration and Finance

Enclosure (1)

c: Willie Hagan, Interim President
Karen Wall, Associate Vice President, Administration and Finance
GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus:

a. Update UPD policies and procedures to incorporate all information required by systemwide policy.

b. Ensure that annual active shooter training is performed per updated campus policies.

c. Ensure that ammunition purchases and distribution are tracked and documented and that ammunition inventory records are maintained per updated campus policies.

Campus Response

We concur.

a. The UPD policy manual will be updated to incorporate all information required by systemwide policy.

   Expected completion date: February 2013

b. The campus conducted an Active Shooter tabletop exercise on November 30, 2012, and will ensure that the requirement to conduct annual Active Shooter training will be included in the policy manual.

   Corrective action has been completed.

c. The campus will ensure that ammunition purchases and distribution are tracked and documented and that ammunition inventory records are maintained per updated campus policies.

   Expected completion date: February 2013
SYSTEMS ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION

SYSTEM ACCESS

Recommendation 2

We recommend that the campus:

a. Document the semiannual review of ARMS users.
b. Encrypt ARMS data backups.
c. Install systems to recover the ARMS server in the event of a disaster.
d. Renew confidentiality agreements for CLETS users every two years.

Campus Response

We concur.

a. The campus will document the semiannual review of ARMS users.

   Expected completion date: February 2013

b. The campus information technology department is in the process of obtaining the required license for the encryption program and will begin the encryption of all ARMS data backups.

   Expected completion date: February 2013

c. The ARMS server data is being backed up daily and sent to a secure offsite location, and is available in the event of a disaster.

   Corrective action has been completed.

d. The campus will ensure confidentiality statements are renewed every two years for CLETS users.

   Expected completion date: February 2013

PHYSICAL ACCESS

Recommendation 3

We recommend that the campus:

a. Develop policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices.

b. Maintain an updated list of individuals with access to the UPD offices.

c. Remove access to the UPD offices and collect master keys from terminated UPD employees.
Campus Response

We concur.

a. The campus will develop policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices.
   
   Expected completion date: February 2013

b. The campus will maintain an updated list of individuals with access to the UPD offices and ensure a periodic review is conducted.
   
   Expected completion date: February 2013

d. The campus will continue to remove access to the UPD offices and collect master keys from terminated UPD employees.
   
   Expected completion date: February 2013

FISCAL ADMINISTRATION

COST RECOVERY

Recommendation 4

We recommend that the campus:

a. Develop procedures regarding the time frame in which special event and chancellor’s office cost-reimbursement billings should be created.

b. Implement a periodic review or reconciliation of the cost recovery account where special event revenues and expenditures are recorded to ensure the accuracy of amounts in the account, including verification from accounting services that requested UPD cost-recovery billings have been processed.

c. Update the signature card for the LiveScan University Police trust fund to reflect the new chief of police.

Campus Response

We concur.

a. The campus has developed procedures regarding the time frame in which special event and chancellor’s office cost-reimbursement billings should be created.

   Corrective action has been completed.
b. The campus has implemented a periodic review and reconciliation of the cost recovery account where special event revenues and expenditures are recorded to ensure the accuracy of amounts in the account, including verification from accounting services that requested UPD cost-recovery billings have been processed.

Corrective action has been completed.

c. The campus has updated the signature card for the LiveScan University Police trust fund to reflect the new chief of police.

Corrective action has been completed.

**MISCELLANEOUS RECEIPTS**

**Recommendation 5**

We recommend that the campus:

a. Direct miscellaneous receipts to an official cash collection point.

b. Develop appropriate check-handling procedures, including logging of checks received and proper segregation of duties.

c. Periodically reconcile miscellaneous receipts to the UPD deposit account.

**Campus Response**

We concur.

a. The campus has assigned a person to be responsible for directing miscellaneous receipts to an official cash collection point.

Corrective action has been completed.

b. The campus has developed appropriate check-handling procedures, including logging of checks received and proper segregation of duties.

Corrective action has been completed.

c. The campus will periodically reconcile miscellaneous receipts to the UPD deposit account.

Expected completion date: February 2013

**MAJOR INCIDENTS AND CRIME REPORTING**

**Recommendation 6**

We recommend that the campus disclose emergency response and evacuation procedures in the campus Clery report and report all crimes defined as major incidents to the chancellor’s office.
Campus Response

We concur. The campus will disclose emergency response and evacuation procedures in the campus Clery report and report all crimes defined as major incidents to the chancellor's office.

Expected completion date: February 2013

WEAPONS AND AMMUNITION CONTROLS

Recommendation 7

We recommend that the campus update campus weapons policies in the areas of duty and off-duty weapons qualifications, rifle and shotgun qualifications, and inspections to be consistent with campus practices.

Campus Response

We concur. The campus has updated the campus weapons policies in the areas of duty and off-duty weapons qualifications, rifle and shotgun qualifications, and inspections to be consistent with campus practices.

Corrective action has been completed.
February 15, 2013

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Timothy P. White
       Chancellor

SUBJECT: Draft Final Report 12-60 on Police Services,
         California State University, Dominguez Hills

In response to your memorandum of February 15, 2013, I accept the response as submitted with the draft final report on Police Services, California State University, Dominguez Hills.

TPW/amd