POLICE SERVICES
SAN DIEGO STATE UNIVERSITY

Audit Report 12-63
March 8, 2013

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ABBREVIATIONS

CBA  Collective Bargaining Agreement
CSA  Campus Security Authority
CSU  California State University
EO   Executive Order
OUA  Office of the University Auditor
POST Commission on Peace Officer Standards and Training
PS   Police Services
SDSU San Diego State University
SUPA Statewide University Police Association
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 San Diego State University campus from November 27, 2012, through January 17, 2013, and audited the procedures in effect at that time.

In our opinion, the fiscal, operational and administrative controls for police services in effect as of January 17, 2013, 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]

The systemwide public safety policy manual was not distributed to department employees, and University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy.

PERSONNEL ADMINISTRATION AND TRAINING [8]

Training was not always completed as required, and documentation of training records was not always maintained.

FISCAL ADMINISTRATION [9]

The campus did not always request full reimbursement for attendance at California Commission on Peace Officer Standards and Training courses.

MAJOR INCIDENTS AND CRIME REPORTING [10]

The campus did not always report crimes defined as major incidents to the chancellor's office. Additionally, the campus did not include crime statistics for one remote location, the Coastal Waters Laboratory, in its Clery report. Further, the campus did not maintain or periodically review a list of Campus Security Authorities (CSAs) identified by campus divisions.
WEAPONS AND AMMUNITION CONTROLS [12]

Administration of duty, off-duty, and non-standard weapons needed improvement. Specifically, presidential approval for the use of non-standard weapons was not documented, and inspection and maintenance of weapons was not documented. Additionally, UPD weapons policies for rifles and retired officer concealed weapons endorsements needed updating.
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 January 17, 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

COMMUNICATION OF POLICIES

The systemwide public safety policy manual was not distributed to department employees.

Collective Bargaining Agreement (CBA), Statewide University Police Association (SUPA), Unit 8, Article 8.2 states, in part, that the California State University (CSU) shall maintain a systemwide public safety policy manual that shall be distributed to all employees.

The director of auxiliary services, public safety, stated that the Lexipol policy manual incorporated the systemwide police services policy manual, and therefore, it seemed redundant to also distribute the systemwide policy manual.

Failure to provide employees with policies and procedures increases the risk that employees will be unaware of rights and responsibilities.

Recommendation 1

We recommend that the campus distribute the systemwide public safety policy manual to department employees.

Campus Response

We concur. The systemwide policy manual has been distributed to all patrol personnel during fieldwork. A copy has also been placed on Public Safety’s server for general access.

POLICIES AND PROCEDURES

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy.

We found that:

- The active shooter policy did not include expectations for conducting annual active shooter training exercises.
- 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 firearms policy did not address the tracking of ammunition purchases and inventory procedures.
The UPD manual did not include specific policies for crime prevention activities.

Technical Letter Police Services (PS) 2010-01, *CSU 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: procedures for tracking ammunition purchases, inventory, distribution, and use; 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; policy and procedures for mitigating campus crime and encouraging crime prevention deterrence activities; 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.

The chief of police stated that the department followed Executive Order (EO) 1046, which required annual active shooter training, and, therefore, he did not recognize the need for an additional policy at the campus level. He further stated that Clery statistics are reconciled even though the process is not addressed in campus policy, and failure to reference the tracking of ammunition purchases and inventory procedures in the firearms policy was due to oversight. He also stated that crime prevention programs were in place and documented in various locations, such as the police department website and the annual safety and security report, and therefore, a written campus policy on crime prevention activities was not deemed necessary.

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 2**

We recommend that the campus update UPD policies and procedures to incorporate all information required by systemwide policy.

**Campus Response**

We concur. Public Safety will update its policies and procedures to incorporate all systemwide policy information by April 30, 2013.

**PERSONNEL ADMINISTRATION AND TRAINING**

Training was not always completed as required, and documentation of training records was not always maintained.

We reviewed training records for calendar years 2010, 2011, and 2012 and found that:

- Shotgun qualifications were not conducted in 2011.

- There was no documentation showing evidence that officers received training on the department’s use-of-force policy in 2012.
San Diego State University (SDSU) UPD Policy 433, *Shotgun Policy*, states that shotgun qualifications will be held at least annually.

SDSU UPD Policy 312, *Firearms and Qualification*, states that at least annually, all personnel carrying a firearm will receive training on the department use-of-force policy.

The director of auxiliary services, public safety stated that shotgun training was not conducted in 2011 because the two authorized range dates for the year to be used to qualify all personnel on new rifles. She further stated that training on the use-of-force policy was conducted but not documented due to oversight.

Failure to provide required training increases the risk that officers will not be fully qualified to respond to incidents and increases the potential for liability arising from use of weapons.

**Recommendation 3**

We recommend that the campus:

a. Conduct shotgun qualifications as required.

b. Maintain documentation showing evidence that officers have received training on the UPD’s use-of-force policy.

**Campus Response**

We concur.

a. Processes will be established to ensure that shotgun qualifications training will be conducted as required. This will be completed by June 30, 2013.

b. Processes will be established to ensure that documentation is maintained to support that officers have received use-of-force policy training. This will be completed by June 30, 2013.

**FISCAL ADMINISTRATION**

The campus did not always request full reimbursement for attendance at California Commission on Peace Officer Standards and Training (POST) training courses.

We found that the department practice was to request reimbursement for up to 40 hours of training; however, as of July 1, 2011, POST allowed reimbursement for up to 80 hours of training.

Integrated California State University Administrative Manual §3131.01, *General Accounting*, dated January 1, 2012, states that it is the policy of the CSU that collection efforts be pursued on debts and accounts receivable balances that are valid and past due.
POST Bulletin 2011-09, Retroactive Increase in Mileage/Subsistence for Training Reimbursement Requests and an Increase to an 80-hour Cap on Reimbursable Training, dated June 28, 2011, states, in part, that effective July 1, 2011, the 40-hour cap on reimbursable training per officer, per fiscal year, was increased to an 80-hour cap.

The director of auxiliary services, public safety, stated that the department was unaware of the increase in allowable reimbursement hours for eligible POST training courses.

Failure to adequately administer POST training reimbursements increases the risk that reimbursements will not be received and the availability of UPD training funds will be reduced.

Recommendation 4
We recommend that the campus request full reimbursement for attendance at POST training courses.

Campus Response
We concur. Public Safety has reviewed its POST records and has submitted full reimbursement requests for applicable training courses.

MAJOR INCIDENTS AND CRIME REPORTING

CHANCELLOR’S OFFICE REPORTING

The campus did not always report crimes defined as major incidents to the chancellor’s office.

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 final report of a major incident should be in writing and mailed or faxed to the systemwide chief law enforcement officer at the CSU Office of the Chancellor.

The chief of police stated that the department previously sent media logs to the chancellor’s office to satisfy the major incident reporting requirements. He further stated that the campus was told to discontinue sending the notices until further clarification was provided, given the frequency and extensiveness of the reporting.

Failure to report major incidents to the chancellor’s office increases the risk of non-compliance with CSU policy and increases the risk that CSU officials will be unaware of potentially sensitive situations.
**Recommendation 5**

We recommend that the campus report all crimes defined as major incidents to the chancellor’s office.

**Campus Response**

We concur. Public Safety has strengthened its process to ensure that all major incidents are reported to the chancellor’s office.

**CLERY REPORT**

The campus did not include crime statistics for one remote location, the Coastal Waters Laboratory, in its Clery report.

20 United States Congress §1092(f), *Disclosure of Campus Security Policy and Campus Crime Statistics*, states that campuses shall collect and report statistics concerning the occurrence on campus, in or on non-campus buildings or property, and on public property, certain criminal offenses reported to campus security authorities or local police agencies.

The chief of police stated that the failure to include the Coastal Waters Laboratory in the Clery report was due to oversight.

Failure to disclose all required elements in the Clery report increases the risk of non-compliance with government regulations.

**Recommendation 6**

We recommend that the campus include crime statistics for the Coastal Waters Laboratory in its Clery report.

**Campus Response**

We concur. The next Clery report, due October 1, 2013, will include Coastal Waters Laboratory crime statistics.

**CAMPUS SECURITY AUTHORITIES**

The campus did not maintain or periodically review a list of Campus Security Authorities (CSAs) identified by campus divisions.

We found that the UPD annually asked four individuals to identify their divisions’ CSAs and inform them of their Clery reporting responsibilities. However, a listing of the identified CSAs from each division was not available so that reviewers could ensure that it was complete.
Department of Education Handbook for Campus Safety and Security Reporting, Chapter 4, dated February 2011, states that the role of CSAs is vital to the law and recommends that campuses designate an individual or office to coordinate and oversee CSAs, including identification of the institution’s CSAs and ensuring that all crime reports from CSAs are accounted for. It further states that the Clery Act requires institutions to identify individuals and organizations that meet the definition of a CSA and that campuses should ensure that the CSA list be kept current so that any individuals or organizations that fit the definition of a CSA are not omitted.

State Administrative Manual §20050 states that elements of a satisfactory system of internal accounting and administrative controls shall include an effective system of internal review.

The associate vice president for administration stated that the university annually requested that the division vice presidents to identify and notify those individuals within their divisions who met the definition of a CSA. She further stated her belief that this practice was adequate because the divisions were in the best position to identify the CSAs, given their knowledge of specific job responsibilities.

Failure to monitor a list of CSAs increases the risk that all CSAs will not be identified and may result in underreporting of the crimes required to be disclosed in Clery reporting.

**Recommendation 7**

We recommend that the campus maintain and periodically review a list of CSAs identified by campus divisions.

**Campus Response**

We concur. The campus will maintain and periodically review the divisional list of CSAs. This process will be established by August 30, 2013.

**WEAPONS AND AMMUNITION CONTROLS**

**DUTY, OFF-DUTY, AND NON-STANDARD WEAPONS**

Administration of duty, off-duty, and non-standard weapons needed improvement.

We found that:

- Presidential approval for the use of non-standard weapons such as rifles, shotguns, Tasers, pepper ball, and pepper spray was not documented.

- There was no documentation demonstrating that duty and off-duty weapons, rifles, shotguns, and control devices were inspected and maintained per department requirements.
CBA, SUPA, 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.

SDSU UPD Policy 312, Firearms and Qualification, states that the armorer has the responsibility of making periodic inspection, at least once a year, of all duty weapons.

SDSU UPD Policy 432, Patrol Rifles, states that the rangemaster will inspect and service each patrol rifle on a monthly basis.

SDSU UPD Policy 433, Shotgun Policy, states that, on a monthly basis, the rangemaster and/or supervisor will disassemble, clean, and visually check each shotgun used in the patrol vehicles.

SDSU UPD Policy 308, Control Devices and Techniques, states that every control device will be periodically inspected by the rangemaster or designated instructor, and the inspection shall be documented.

The associate vice president for administration stated that the lack of a delegation letter for non-standard weapons was due to administrative oversight. The captain, public safety stated that although weapons were inspected and maintained as required, the need to document these activities was not recognized due to oversight.

Failure to document presidential approval and required inspections and maintenance for weapons used on campus increases the potential for liability arising from the use of such weapons.

**Recommendation 8**

We recommend that the campus:

a. Obtain the president’s written approval for the use of non-standard weapons.

b. Document inspections and maintenance of duty and off-duty weapons, rifles, shotguns, and control devices.

**Campus Response**

We concur. The campus will:

a. Obtain the president’s written approval for the use of non-standard weapons by June 30, 2013.

WEAPONS POLICIES

UPD weapons policies needed updating.

We found that:

- Policy 432, *Patrol Rifles*, stated that officers were required to complete quarterly training and qualification for the use of rifles; however, the campus practice was to perform the rifle qualifications semiannually.

- Policy 220, *Retired Officer CCW Endorsements*, stated that concealed weapons endorsement for retired officers must be updated at least annually; however, campus practice was to require these renewals every five years.

SDSU UPD Policy 432, *Patrol Rifles*, states that officers shall be required to successfully complete quarterly training and qualification conducted by a certified patrol rifle instructor.

SDSU UPD Policy 220, *Retired Officer CCW Endorsements*, states that concealed weapons endorsements must be renewed (not more than one year).

The director of auxiliary services stated that public safety was only authorized for two qualifying live fire range days a year. She further stated that the policy on retired officer concealed weapons endorsements was unclear and appeared to refer to federal, rather than California, law.

Failure to maintain current policies and procedures relating to weapons requirements increases the risk that officers will not be fully qualified to respond to incidents and increases the potential for liability arising from the use of such weapons.

**Recommendation 9**

We recommend that the campus update weapons policies in the areas of rifle qualifications and concealed weapons endorsements.

**Campus Response**

We concur. Public Safety will update its weapons policies by April 30, 2013.
### APPENDIX A: PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Elliot Hirshman</td>
<td>President</td>
</tr>
<tr>
<td>Micki Binnall</td>
<td>Access Control Systems Coordinator, Public Safety</td>
</tr>
<tr>
<td>John Browning</td>
<td>Chief of Police, Public Safety</td>
</tr>
<tr>
<td>Valerie Carter</td>
<td>Director, Audit and Tax</td>
</tr>
<tr>
<td>Sabrina Cota</td>
<td>Records Supervisor, Public Safety</td>
</tr>
<tr>
<td>Nancy Demich</td>
<td>Assistant to the Vice President for Emergency Planning and Special Projects, Business and Financial Affairs</td>
</tr>
<tr>
<td>Vincent Dequito</td>
<td>Detective, Public Safety</td>
</tr>
<tr>
<td>Shawndalyn Duncan</td>
<td>Lead Dispatcher, Public Safety</td>
</tr>
<tr>
<td>Michael Frawley</td>
<td>Lieutenant, Public Safety</td>
</tr>
<tr>
<td>Chanin Harrison</td>
<td>Budget Manager, Public Safety</td>
</tr>
<tr>
<td>Lorretta Leavitt</td>
<td>Associate Vice President, Financial Operations</td>
</tr>
<tr>
<td>Joshua Mays</td>
<td>Lieutenant, Public Safety</td>
</tr>
<tr>
<td>Jessica Rentto</td>
<td>Associate Vice President, Administration</td>
</tr>
<tr>
<td>Deborah Richeson</td>
<td>Director of Auxiliary Services, Public Safety</td>
</tr>
<tr>
<td>Sally Roush</td>
<td>Vice President, Business and Financial Affairs</td>
</tr>
<tr>
<td>Lamine Secka</td>
<td>Captain, Public Safety</td>
</tr>
</tbody>
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April 16, 2013

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

Dear Mr. Mandel:

Attached is San Diego State University’s response to Audit Report 12-63, Police Services. Documentation of policy and control changes will follow under separate cover.

Should you have any questions or require additional information, please contact Valerie Carter, Audit and Tax Director, at 619-594-5901.

Sincerely,

[Signature]

Sally F. Roush
Vice President, Business and Financial Affairs

Attachment

c: Elliot Hirshman, President
   John Browning, Chief of Police, Public Safety
   Jessica Rentto, Associate Vice President, Administration
   Lorretta Leavitt, Associate Vice President, Financial Operations
   Valerie Carter, Director, Audit and Tax
GENERAL ENVIRONMENT

COMMUNICATION OF POLICIES

Recommendation 1

We recommend that the campus distribute the systemwide public safety policy manual to department employees.

Campus Response

We concur. The systemwide policy manual has been distributed to all patrol personnel during fieldwork. A copy has also been placed on Public Safety’s server for general access.

POLICIES AND PROCEDURES

Recommendation 2

We recommend that the campus update UPD policies and procedures to incorporate all information required by systemwide policy.

Campus Response

We concur. Public Safety will update its policies and procedures to incorporate all systemwide policy information by April 30, 2013.

PERSONNEL ADMINISTRATION AND TRAINING

Recommendation 3

We recommend that the campus:

a. Conduct shotgun qualifications as required.

b. Maintain documentation showing evidence that officers have received training on the UPD’s use-of-force policy.
Campus Response

a. We concur. Processes will be established to ensure that shotgun qualifications training will be conducted as required. This will be completed by June 30, 2013.

b. We concur. Processes will be established to ensure that documentation is maintained to support that officers have received use-of-force policy training. This will be completed by June 30, 2013.

FISCAL ADMINISTRATION

Recommendation 4

We recommend that the campus request full reimbursement for attendance at POST training courses.

Campus Response

We concur. Public Safety has reviewed its POST records and has submitted full reimbursement requests for applicable training courses.

MAJOR INCIDENTS AND CRIME REPORTING

CHANCELLOR’S OFFICE REPORTING

Recommendation 5

We recommend that the campus report all crimes defined as major incidents to the chancellor’s office.

Campus Response

We concur. Public Safety has strengthened its process to ensure that all major incidents are reported to the chancellor’s office.

CLERY REPORT

Recommendation 6

We recommend that the campus include crime statistics for the Coastal Waters Laboratory in its Clery report.

Campus Response

We concur. The next Clery report, due October 1, 2013, will include Coastal Waters Laboratory crime statistics.
CAMPUS SECURITY AUTHORITIES

Recommendation 7

We recommend that the campus maintain and periodically review a list of CSAs identified by campus divisions.

Campus Response

We concur. The campus will maintain and periodically review the divisional list of CSAs. This process will be established by August 30, 2013.

WEAPONS AND AMMUNITION CONTROLS

DUTY, OFF-DUTY, AND NON-STANDARD WEAPONS

Recommendation 8

We recommend that the campus:

a. Obtain the president’s written approval for the use of non-standard weapons.

b. Document inspections and maintenance of duty and off-duty weapons, rifles, shotguns, and control devices.

Campus Response

We concur. The campus will:

a. Obtain the president’s written approval for the use of non-standard weapons by June 30, 2013.


WEAPONS POLICIES

Recommendation 9

We recommend that the campus update weapons policies in the areas of rifle qualifications and concealed weapons endorsements.

Campus Response

We concur. Public Safety will update its weapons policies by April 30, 2013.
May 13, 2013

MEMORANDUM

TO: Mr. Larry Mandel
   University Auditor

FROM: Timothy P. White
       Chancellor

SUBJECT: Draft Final Report 12-63 on Police Services,
         San Diego State University

In response to your memorandum of May 13, 2013, I accept the response as submitted with the draft final report on Police Services, San Diego State University.

TPW/amd