

PUBLIC SAFETY

**CALIFORNIA STATE UNIVERSITY,
MONTEREY BAY**

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ABBREVIATIONS

ARMS	Automated Records Management System
BA	Business Affairs – Office of the Chancellor
BOT	Board of Trustees
BP	Budget Planning – Office of the Chancellor
CBA	Collective Bargaining Agreement
CCR	California Code of Regulations
CLETS	California Law Enforcement Telecommunications System
COPS	Community Oriented Policing Services
CORI	Criminal Offender Record Information
CPR	Cardiopulmonary Resuscitation
CRU	Critical Response Unit
CSO	Community Service Officer
CSU	California State University
CSUMB	California State University, Monterey Bay
CTO	Compensatory Time Off
EMS	Emergency Medical Services
EO	Executive Order
IACLEA	International Association of Campus Law Enforcement Administrators
POST	Commission on Peace Officer Standards & Training
PS	Public Safety
SAM	State Administrative Manual
SUPA	Statewide University Police Association
TAPS	Transportation and Parking Services
UCR	Uniform Crime Reporting
UPD	University Police Department
VCCA	Violent Crime Control and Law Enforcement Act

INTRODUCTION

PURPOSE

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of Public Safety (PS) 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 PS program provide an effective internal control environment, clear lines of authority and responsibility, 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);
- ▶ PS participation in campus disaster planning and the CSU Critical Response Unit (CRU) is clearly defined and communicated, and includes appropriate training;
- ▶ budgeting procedures adequately address PS funding and include procedures to monitor budget versus actual expenses;
- ▶ chargebacks and Peace Officer Standards and Training (POST) reimbursements are adequately controlled and properly valued; 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 PS 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;
- ▶ hiring, certification, and training policies comply with POST, performance evaluation administration is consistent and timely, stipends and CTO 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 PS equipment are properly handled, accounted for, and safeguarded; and weapon issuance and use comply with state regulations and CSU policy; and
- ▶ 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 Vehicle Code.

SCOPE AND METHODOLOGY

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. June 1999 to date was the primary period of review.

Our primary focus involved the internal administrative, compliance and operational controls over policing activities, crime reporting and parking operations. Specifically, we reviewed and tested:

- ▶ procedures for communicating systemwide/campus specific policies, rules and regulations;
- ▶ staffing, scheduling and internal investigation procedures;
- ▶ budgeting procedures, chargeback and stipend processing, POST reimbursements, and the management of grants;
- ▶ 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; and
- ▶ data security, disaster recover and backup procedures.

BACKGROUND

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 1999, the Board of Trustees, at its January 2000 meeting, directed that *Public Safety* be reviewed.

The proposed scope of such audits, as presented in Attachment B, Agenda Item 3 of the January 25-26, 2000 meeting of the Committee on Audit, stated that *Public Safety* includes primarily police activities and law enforcement including parking/citations and crime reporting. The proposed audit scope would include the reliability and integrity of information; compliance with laws, policies, plans, procedures and regulations; the safeguarding of assets; the economical and efficient use of resources; and the accomplishment of objectives and goals. *Public Safety* was previously audited in 1992.

The California State University Public Safety Program was developed in 1974, commencing with a two-year pilot project on the 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 then Chancellor Dumke issued a directive in 1977 stating that the necessary actions should be taken to bring the program to fruition.

Throughout the 1980’s, the CSU residence population greatly increased, and the problems associated with this growth were 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, public safety departments created policing programs and preventive patrols to deter crime. The growth of on-campus housing also increased the complexity of emergency planning. 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 II 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 statistic 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 3 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 further amended to expand the scope of campus crime statistic reporting, ensure campus crime statistics are reported in accordance with the FBI’s Uniform Crime Reporting (UCR) 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.

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 the 1990’s, Campus Police Administrators, complying with increased training standards from the Commission on Peace Officer Standards and Training (POST), increased legislation and governmental reporting, crime trends and sophistication, and the need to upgrade and continue the professionalism of Campus Police Agency response, collectively tried to upgrade Campus Public Safety departments to Professional Police departments. This included uniform standards, vehicles, equipment, training, emergency preparedness, the development of Critical Response Units (CRU), semi-annual meetings between Police Chiefs, working closely within the Chancellor’s Human Resources Division, collective bargaining, and updating inadequate polices.

Additionally, the Violent Crime Control and Law Enforcement Act of 1994 (VCCA), which authorized grants to law enforcement agencies to add community policing officers to the streets and advance community policing, was signed into law on September 13, 1994 and lead to the creation of the Community Oriented Policing Services (COPS) Office. The measure authorized \$8.8 billion over six years for grants to policing agencies to add 100,000 community-policing officers to the nation’s streets.

Several CSU campuses have received COPS grants, and the CSU Police departments are committed to community policing.

The CSU parking program is a self-supported program financed through the collection parking fees, fines and forfeitures. Historically, parking fees were remitted to the Dormitory Revenue Fund – Parking to meet the covenants of bond resolutions. These bonds were retired as of July 1, 1995, and the program was decentralized to campuses as part of the Chancellor's initiative to improve the alignment of responsibility and authority for university programs. Campuses now have a greater role in planning and managing parking resources and must develop local strategies to deal with their parking needs, which could include the issuance of new debt. However, debt issuance remains under the direct authority and approval of the trustees, with campuses individually responsible for the repayments relating to specific projects. The Office of Financing and Treasury coordinates the issuance of parking bonds. In the absence of outstanding bonds and related covenants, two statutes govern the permitted uses of parking revenue funds: Education Code §89701 and §89701.5.

Throughout this report, we will refer to the program as Public Safety (PS). At California State University, Monterey Bay (CSUMB), the University Police department (UPD) manages the PS program. CSUMB parking operations are managed by Transportation and Parking Services (TAPS), which reports to the UPD.

OPINION

We visited the California State University, Monterey Bay campus from May 1, 2000, through June 2, 2000, and audited the procedures in effect at that time.

In our opinion, University Police department (UPD) operations were adequate to meet campus law enforcement needs, ensure compliance with crime reporting disclosures, and operate a viable parking program. However, administrative and accounting activities were less than satisfactory, and our review disclosed certain conditions that would result in errors and irregularities if not corrected. Specifically, the campus did not maintain adequate control over the following areas: chargebacks for services provided to special events and auxiliary enterprises, grant administration and accounting, parking citation processing, evidence and confiscated weapons, and UPD equipment.

These conditions, along with other weaknesses, are described in the executive summary and in the body of the report.

EXECUTIVE SUMMARY

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

PUBLIC SAFETY FISCAL ADMINISTRATION [9]

CHARGEBACK CONTROLS [9]

Procedures regarding reimbursement (chargebacks) to the University Police department (UPD) for security and parking services provided to special events and campus auxiliary enterprises were unsatisfactory. Adequate controls over chargebacks ensure accurate, complete, and timely reimbursements, and increase the funds available for law enforcement activities.

GRANT ADMINISTRATION [11]

Procedures regarding grant administration and accounting were unsatisfactory. Maintaining grants awarded to the University Police Department in state accounts and adequate internal controls ensure appropriate management of state funds, compliance with state and federal policy, and maximize interest earned.

POST TRAINING REIMBURSEMENTS [12]

Controls over reimbursements from the Commission on Peace Officer Standards and Training (POST) were not adequate. Adequate controls over POST reimbursements reduce the risk that misappropriation of funds will not be detected, ensure receipt of all reimbursements, and increase the availability of training funds.

CHANGE FUND [13]

A change fund had been established without proper authorization. Cash accountability is enforced when change funds are properly authorized and subject to periodic independent cash counts.

FEE APPROVALS [14]

Miscellaneous University Police department (UPD) fees were not always properly approved. Appropriate authorization of all fee actions ensures fees are proper.

PARKING PROGRAM [15]

CITATION PROCESSING OVERSIGHT [15]

Oversight procedures had not been established for parking citation processing. Formalized oversight procedures ensure complete and accurate vendor billing, efficient citation processing and compliance with the vendor agreement, and may result in increased citation revenue.

SEGREGATION OF DUTIES [16]

A proper segregation of duties was not maintained over parking monies received at the Transportation and Parking Services office. Adequate segregation of duties reduces the risk that funds will be misused.

CITATION CANCELLATION REVIEW [16]

Parking citation cancellations were not always properly reviewed. Proper supervisory review of citation cancellations ensures that citation cancellations are proper and comply with internal department procedures.

EVIDENCE, WEAPONS, AND EQUIPMENT CONTROLS [17]

EVIDENCE AND CONFISCATED WEAPONS [17]

Evidence and confiscated weapons were not adequately controlled. Adequate controls over these items ensure the acceptability of evidence at trial, timely return of property to rightful owners, and compliance with confiscated weapons requirements.

EQUIPMENT [19]

Controls and record keeping for University Police department (UPD) equipment needed improvement. Adequate internal controls and accountability over UPD equipment reduce the risk of stolen assets and ensure that officers are properly equipped.

AMMUNITION INVENTORY [20]

Inventory records were not maintained for ammunition. Maintenance of ammunition inventory records reduces the risk that lost or stolen ammunition will not be detected.

WEAPONS TRAINING [21]

No evidence could be provided to show that training in the legal and operational aspects of firearms was being performed. Performance of this training reduces the risks of improper firearm use and non-compliance with CSU policy.

PUBLIC SAFETY PROGRAM ADMINISTRATION [22]

POLICIES AND PROCEDURES [22]

Written policies and procedures had not been fully developed for the University Police department (UPD), and controls over the distribution and maintenance of the UPD policies and procedures manual needed improvement. Maintenance of a comprehensive policies and procedures manual and controlled distribution reduce misunderstandings of the constraints and expectations regarding the performance of duties and functions.

KEY AND BADGE CONTROLS [23]

Key and badge access controls for the Public Safety (PS) building did not provide adequate security. Adequate access controls ensure the confidentiality of data and reduce the risk of unauthorized access to PS facilities and equipment.

COMMUNICATIONS DISPATCH AGREEMENT [24]

The Emergency Communications Dispatch Agreement between the County of Monterey and the California State University, Monterey Bay was not current. Maintenance of a current written agreement reduces misunderstandings and inconsistencies between contract language and the intentions of the contracting parties.

COMMUNITY SERVICE OFFICERS [25]

Community service officer (CSO) background checks were not consistently performed, and training records were not adequately maintained. Adequate background checks and training ensure CSO competency and safety.

POLICE ACTIVITIES AND CRIME REPORTING [26]

REPORT REVIEW FORMS [26]

Report review forms did not always include evidence of supervisory review. Adequate supervisory review reduces the risk of errors and nonperformance of required follow-up.

BACKGROUND CHECKS [27]

Background checks had not been performed for three information technology administrators responsible for the maintenance of the public safety server. Performing background checks for these individuals ensures compliance with state regulations.

USER ACCESS [27]

Access controls over the Automated Records Management System (ARMS) needed to be improved. Appropriate configurations of system security software prevent unauthorized access to campus systems and confidential data.

PERSONNEL ADMINISTRATION AND TRAINING [28]

Police officer first aid and cardiopulmonary resuscitation (CPR) training certifications could not be located by the campus for four police officers. Maintenance of current certifications ensures compliance with state regulations and increases the ability of police officers to administer life saving aid.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PUBLIC SAFETY FISCAL ADMINISTRATION

CHARGEBACK CONTROLS

Procedures regarding reimbursement (chargebacks) to the University Police department (UPD) for security and parking services provided to special events and campus auxiliary enterprises were unsatisfactory.

We noted that:

- ▶ Formalized written procedures had not been established for special event payroll processing and event sponsor billing to ensure that chargebacks are processed in a timely and accurate manner for all services provided to special events and corresponding reimbursements are received.
- ▶ Current labor rates were not being used, and stipends were not included in the overtime rate calculation. In addition, although the chargebacks were to non-general operations, employee benefits were not included, as required.
- ▶ Overhead was not being applied to chargebacks.
- ▶ Supporting documentation was not intact for four of the 16 billings reviewed. As a result, we were unable to validate the billing amounts. In addition, one billing was processed two months late and another five months late. We also noted that an auto repair reimbursement was erroneously posted to the event billing account.
- ▶ Auxiliary enterprises (i.e., Housing and the CSUMB Foundation) were not being charged for UPD services provided to their respective areas on campus.

SAM §8752 indicates that state policy is for departments to recover full costs whenever goods or services are provided to others.

SAM §8740 establishes the formula for determining hourly rates including staff benefits for the billing of services of employees paid on a monthly basis.

CSU directive HR/SA 98-08, *Overtime and POST Certification and Special Assignment Stipends*, dated June 5, 1998, states that stipend payments are to be included in the calculation of overtime effective with the June 1998 pay period.

CSU directive BA 83-30, *Policy on Chargeable Services to Self-Supporting Operations*, dated December 28, 1983, states that funds provided from the general fund may be used to provide support for ancillary operations if there is recovery of the cost of such support. In the absence of specific CSU policy, recovery for the cost of support shall include the incremental costs of providing the support. Support provided should be in accordance with appropriate written agreements that include the basis and rationale for the valuation. *Executive Order No.753, Allocation of Costs to Auxiliary Enterprises, effective July 28, 2000, superseded this directive.*

Executive Order No. 753, *Allocation of Costs to Auxiliary Enterprises*, dated July 28, 2000, states that auxiliary enterprises shall be charged the allowable direct costs plus an allocable portion of indirect costs associated with facilities, goods, and services provided by the University funded from the General Fund. Cost allocations shall be determined in accordance with a written cost allocation plan approved annually by the campus chief financial officer.

SAM §20003 states that a satisfactory system of internal accounting and administrative control shall include a system of record keeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The chief of police stated that campus administration instructed the department to limit chargebacks.

Inadequate controls over chargebacks increase the risk of inaccurate, incomplete, and untimely reimbursement to the department and reduce funds available for department operations.

Recommendation 1

We recommend that the campus:

- a. establish formalized procedures for special event payroll processing and event sponsor billing to ensure chargebacks are processed in a timely and accurate manner for all services provided to special events, and corresponding reimbursements are received;
- b. establish procedures to ensure that current labor rates are used, overtime calculations include stipends, and chargebacks to non-general fund operations include benefits;
- c. develop a definable UPD overhead rate and apply that rate to all special event billings; and
- d. determine the amount of UPD services provided to campus auxiliary enterprises and include the services in the annual written cost allocation plan to ensure that the UPD is fully reimbursed for services provided.

Campus Response

We concur. The campus will review and establish formalized procedures for special event payroll processing and event sponsor billing to ensure chargebacks are processed in a timely and accurate manner for all services provided by UPD. This will be accomplished by June 30, 2001.

The campus is currently completing a study with KPMG of administrative areas on campus which should be processing chargebacks for special, extra, or non-state services, provided. Included in the study recommendations will be all the elements that should be contained in an overhead rate. At the same time, KPMG is completing a study by March 31, 2001, to determine the portion paid of the annual contribution from the CSUMB Foundation to the campus that represents actual reimbursement for services provided by the campus to the Foundation. With the completion of these two studies, the use of UPD services by the auxiliary enterprises will be calculated, and direct charges for these services, including labor rates and benefits, will be invoiced or attributed appropriately to the allocation of the annual contribution. This calculation will be completed and forwarded to the University Auditor's Office by April 30, 2001.

GRANT ADMINISTRATION

Procedures regarding grant administration and accounting were unsatisfactory.

Two COPS grants, COPS Universal Hiring and COPS MORE '96 awards totaling \$225,000 and \$89,403, respectively, were awarded to the California State University, Monterey Bay (CSUMB) University Police department (UPD) by the U.S. Department of Justice. Our review of these grants disclosed that:

- ▶ Grant funds awarded to the UPD were inappropriately deposited and managed in the CSUMB Foundation.
- ▶ As of May 31, 2000, the Foundation account statement for the COPS Universal Hiring grant indicated that due to irregular billings by the campus accounting department to the Foundation, the general fund had not been reimbursed \$112,500.
- ▶ As of April 30, 2000, the Foundation account statement for the COPS MORE '96 grant indicated that due to accounting and administration errors, \$14,516 of matching funds had not been processed by the campus.
- ▶ Adequate documentation was not readily available to ensure compliance with the grant requirements. For example, documentation was not available to support the total amount of the grant including extensions, the officers hired based on each grant, and reviews to indicate compliance with grant requirements.

Education Code §89721 states, in part, that notwithstanding any other provision of law to the contrary, advance payment for anticipated expenditures or encumbrances in connection with federal grants or contracts shall be deposited into and maintained in local trust accounts or in trust accounts in accordance with §16305 through §16305.7 of the Government Code, or in the California State University Trust Fund.

Government Code §16305.2 states that all money in the possession of or collected by any state agency or department is subject to the provisions of §16305.3 through §16305.7, inclusive and is hereafter referred to as state money.

SAM §20003 states that a satisfactory system of internal accounting and administrative control shall include segregation of duties appropriate for proper safeguarding of assets and a system of record keeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The director of accounting indicated that CSUMB policy required the administration of all grants by CSU Monterey Bay Foundation. The grants accountant indicated that, in the beginning, she would remind the campus to bill the Foundation but discontinued doing so during the grant period.

Not maintaining grants awarded to the UPD in state accounts and inadequate internal controls increase the risks of inappropriate management of state funds, non-compliance with state and federal policy, and loss of interest.

Recommendation 2

We recommend that the campus:

- a. renegotiate the award of the UPD grants to the CSUMB Foundation or transfer the management of the grants to the campus and maintain the grants in state accounts;
- b. reimburse the general fund for the COPS Universal Hiring grant expenditures and process the matching funds for the COPS MORE '96 grant; and
- c. establish formalized procedures to ensure the proper administration and accounting of UPD federal grants.

Campus Response

We concur. The COPS University Hiring grants awarded to the campus have expired and the campus no longer receives federal funds for this grant. The campus continues to enforce the policy that grants will flow through and be administered by the Foundation, and any future grant funds for the UPD will be applied for, awarded through, and administered by the Foundation. The University Police Department will be formally notified in writing, of the established procedure and policy by March 31, 2001.

A copy of the memorandum of agreement between the campus and Foundation will be forwarded to the University Auditor's Office by March 31, 2001. Through the allocation of the annual contribution, the general fund has already been appropriately reimbursed for the COPS Universal Hiring grant expenditures.

POST TRAINING REIMBURSEMENTS

Controls over reimbursements from the Commission on Peace Officer Standards and Training (POST) were not adequate.

We noted that:

- ▶ An adequate segregation of duties was not maintained over POST monies since one individual received POST reimbursement checks, deposited the checks to the Cashier's Office, and maintained POST training records.
- ▶ POST training participation was not tracked to ensure that all reimbursements were received in a timely manner. In at least one instance, no reimbursement request form was submitted to POST even though the course was reimbursable.

SAM §20003 states that a satisfactory system of internal accounting and administrative control shall include segregation of duties appropriate for proper safeguarding of assets, a system of internal

review, and record keeping procedures adequate to provide effective control over assets, liabilities, revenues, and expenditures.

The chief of police stated that the prior record keeping process was not adequate and that due to limited staff segregation of duties was not always possible.

Inadequate controls over POST training reimbursements increase the risks that misappropriation of funds will not be detected and reimbursements will not be received, and reduce the availability of UPD training funds.

Recommendation 3

We recommend that the campus establish formalized procedures to control, monitor and reconcile POST training reimbursements to training records and ensure a proper segregation of duties.

Campus Response

We concur. The campus has established written procedures to control, monitor, and reconcile POST training reimbursements. The procedures will be contained in a Department General Order to be issued by April 30, 2001.

CHANGE FUND

A change fund had been established without proper authorization.

Transportation and Parking Services (TAPS) had a \$125 change fund. However, no records were available to show that the fund had been properly authorized. We were told by the police sergeant acting as the auxiliary services coordinator that the fund had been created from parking permit cash receipts. Because the fund had not been authorized by the campus accounting department, it was not subject to periodic independent counts.

SAM §8111.2 states that an employee other than the custodian of the change or petty cash fund will count it in accordance with the schedule within this SAM section and report the count to the Accounting Officer. Based on the size of the TAPS change fund, the count should be performed annually.

SAM §20003 states that a satisfactory system of internal accounting and administrative control includes a plan of authorization and record keeping procedures adequate to provide effective accounting controls over assets, liabilities, revenues, and expenditures.

The police sergeant acting as the auxiliary services coordinator indicated that he was unaware of the requirements for establishing a change fund.

Internal controls over assets are compromised when cash accountability is not enforced, and change funds are established without appropriate authorization.

Recommendation 4

We recommend that the accounting office approve the parking office change fund, record the fund in campus accounting records, and subject the fund to periodic independent cash counts.

Campus Response

We concur. The change fund for Transportation and Parking Services (TAPS) has been formally established with the accounting office. The fund will be subject to periodic audit. This process has been initially implemented and will be fully established by April 1, 2001.

FEE APPROVALS

Miscellaneous University Police department (UPD) fees were not always properly approved.

Our review disclosed that two new fees (i.e., mechanical ticket and vehicle release) had been established without approval from the Chancellor, and one fee (for police reports) had been modified without campus president approval.

Standing Orders of the CSU Board of Trustees (BOT), Chapter III §6 (f), state that subject to overall direction of the BOT, the Chancellor is authorized to establish fees, and the campus president is authorized to increase, decrease, or abolish campus fees where all applicable requirements of the law and the applicable provisions of any revenue bond indenture which may be outstanding have been observed.

The chief of police stated that these miscellaneous fees did not occur very often.

Improper fees could be assessed if the required authorization is not obtained.

Recommendation 5

We recommend that the campus obtain appropriate approval for the mechanical ticket, vehicle release, and police report fees; and establish procedures to ensure that fee actions are properly approved in the future.

Campus Response

We concur. The campus will request formal approval through the Chancellor's Office to establish fees, in accordance with the Standing Orders of The Board of Trustees, for signing off mechanical violation citations and vehicle releases. The campus President was notified of the change in fees charged for report copying. Additionally, Department General Order F-5 (Forms Control) will be revised to reflect the procedures for establishing new fees. It will be issued April 30, 2001.

PARKING PROGRAM

CITATION PROCESSING OVERSIGHT

Oversight procedures had not been established for parking citation processing.

The campus used Enforcement Technology, Inc. for parking citation processing. However, we found that procedures had not been developed to control, monitor and reconcile parking citation processing to ensure that citations are processed as intended and in accordance with the vendor agreement. In addition, the vendor was billing a monthly minimum charge of \$150 instead of \$100 as stipulated in the contract with the vendor.

SAM §20003 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 record keeping procedures adequate to provide effective control over assets, liabilities, revenues, and expenditures. The elements are expected to provide internal checks and balances.

The police sergeant acting as the auxiliary services coordinator stated that the lack of procedures and billing discrepancies were management oversights. However, the vendor was immediately notified of the discrepancies to ensure credit for past overcharges and accurate future billings.

The lack of formalized oversight procedures increase the risks of incomplete and erroneous vendor billings, inaccurate and inefficient citation processing, and non-compliance with the vendor agreement, which could result in lost citation revenue and increased citation processing costs.

Recommendation 6

We recommend that the campus establish formalized procedures to:

- a. control, monitor and reconcile parking citation processing; and
- b. verify citation processing billings to ensure that the system is operating as intended and billings comply with the vendor agreement.

Campus Response

We concur. All statements from the citation processing company are now being examined to ensure that billing complies with the vendor agreement. Additional computer software and hardware is needed for TAPS to monitor and reconcile parking citation processing with the vendor. This will be accomplished by June 30, 2001.

SEGREGATION OF DUTIES

A proper segregation of duties was not maintained over parking monies received at the Transportation and Parking Services (TAPS) office.

One individual in the TAPS office was responsible for reconciling the cash receipts to the cash register tape, preparing the cash deposits to the cashier's office, and verifying the financial records to ensure that proper credit is received without supervisory review.

SAM §8032.3 requires that the person supervising the person depositing cash to verify that receipts have been deposited intact.

SAM §8080 and §20003 require a level of duty segregation that assures resources will be safeguarded against waste, loss, and misuse.

The police sergeant acting as the auxiliary services coordinator stated that because of the small number of people working in TAPS, it was difficult to establish proper segregation of duties.

Inadequate segregation of duties increases the risk that funds will be misused.

Recommendation 7

We recommend that the campus establish procedures to ensure a proper segregation of duties in handling parking funds.

Campus Response

We concur. All parking funds ready for deposit will require verification by a manager prior to the deposit being made. This was implemented on December 1, 2000.

CITATION CANCELLATION REVIEW

Parking citation cancellations were not always properly reviewed.

We found that four of five cancelled moving citations lacked supervisory review.

Public safety department internal procedures, although not in writing, require the supervisory review of all moving and parking citation cancellations.

The chief of police stated that the lack of supervisory review was a management oversight.

Lack of supervisory review of citation cancellations increases the risks of improperly cancelled citations and noncompliance with internal department procedures.

Recommendation 8

We recommend that the campus establish formalized procedures for the cancellation of parking and moving citations.

Campus Response

We concur. All moving citations to be cancelled will be accompanied by a citation cancellation form signed by a supervisor (corporal or above). As a safeguard, any cancelled citations not accompanied by the appropriate signature will be routed to the police lieutenant by the records specialist. This will be accomplished by March 31, 2001.

All parking citations to be cancelled will be accompanied by a citation cancellation form signed by a supervisor or manager. As a safeguard, any cancelled citations not accompanied by the appropriate signature will be routed by the parking assistant to the TAPS Administrator. This will be accomplished by March 31, 2001.

EVIDENCE, WEAPONS, AND EQUIPMENT CONTROLS

EVIDENCE AND CONFISCATED WEAPONS

Evidence and confiscated weapons were not adequately controlled.

We noted that:

- ▶ Five confiscated weapons were found for cases that were closed in 1997.
- ▶ A review of 25 items in evidence disclosed problems in eight (32%) instances. Six items could not be located in the evidence room, and the records for the other two items did not indicate their disposition.

- ▶ Records of confiscated weapons were not always updated in the Automated Records Management System (ARMS). Our review of ARMS records and confiscated weapons showed:
 - two weapons identified as in evidence even though they had been destroyed;
 - one weapon identified as destroyed even though it still existed;
 - one weapon as in evidence although it had been released per the case file; and
 - a duplicate entry for one confiscated weapon.

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

Penal Code §12028 states, in part, that a weapon, in the month of July, next succeeding, or sooner, if necessary to conserve local resources including space and utilization of personnel who maintain files and security of those weapons, shall be destroyed so that it can no longer be used as such a weapon except upon the certificate of a judge of a court of record, or of the district attorney of the county, that the retention of it is necessary or proper to the ends of justice.

SAM §20003 states that a satisfactory system of internal administrative control shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions. Further, the nonexistence of policy and procedural or operational manuals is a danger signal of a vulnerable control system.

The IACLEA Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 22, states that the agency should establish written guidelines and procedures for collecting, processing, and preserving of physical evidence in the field as well as documenting the transfer of custody of physical evidence.

The IACLEA Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 23, states that the agency should establish written procedures for receiving all in-custody and evidentiary property into agency control. The Manual further states that records should reflect the status of all property held by the agency, and final disposition of found, recovered, and evidentiary property should be accomplished within six months after legal requirements have been satisfied.

The records specialist stated that due to workload and of the amount of manual entry required, the ARMS records could not be updated regularly.

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

Recommendation 9

We recommend that the campus:

- a. strengthen procedures for the collecting, processing, preserving and disposition of evidence; chain of custody; and record maintenance in the ARMS; and
- b. review the status of the five confiscated weapons and take appropriate actions as provided in the Penal Code.

Campus Response

We concur. The campus has hired a Community Service Specialist on February 7, 2001 to administer the operation of the property room. This individual will start training the week of February 19, 2001. A complete audit of the property room will be conducted and all weapons and property that can be legally disposed of will be completed by May 1, 2001.

EQUIPMENT

Controls and record keeping for University Police department (UPD) equipment needed improvement.

We noted that:

- ▶ Written acknowledgement was not consistently obtained to document the receipt of equipment issued to the officers.
- ▶ Automated Records Management System (ARMS) records regarding equipment issued to officers were not up to date and indicated that several articles of equipment required by the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and the Statewide University Police Association (SUPA) had not been issued to the officers.
- ▶ Four of fifteen items selected from campus property records for the UPD could not be located. In addition, four other equipment items had been moved to different locations within the department without proper notification to the property clerk.

Article 10 of the SUPA CBA, for July 1, 1998 through June 30, 2001, requires that the CSU provide each employee with certain equipment for employee safety.

SAM §20003 states that the elements of a satisfactory system of internal accounting and administrative control includes a system of authorization and record keeping procedures adequate to provide effective accounting control over assets, liabilities, revenue, and expenditures.

The police sergeant stated that this was a management oversight.

Internal controls are compromised and the risk of loss and inadequately equipped officers increase when accountability is not maintained over UPD equipment.

Recommendation 10

We recommend that the campus:

- a. develop comprehensive records of all equipment issued to police officers; and
- b. strengthen procedures to ensure that property records are accurate and property survey reports are prepared as required.

Campus Response

We concur. All department equipment issued to individual officers will be listed in the record management system (ARMS). All equipment will be issued by or with the knowledge of the police lieutenant. Officer records will be internally audited every six months for accuracy. This will be accomplished by March 31, 2001.

Campus property assigned to the UPD will not be moved without notifying the property clerk. An annual internal property inventory will be completed and provided to the property clerk. This will be accomplished by June 30, 2001.

AMMUNITION INVENTORY

Inventory records were not maintained for ammunition.

SAM §20003 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 record keeping procedures adequate to provide effective control over assets.

The police sergeant acting as the range master stated that he was aware that the ammunition inventory records were not precise; however, he added that ammunition was under strict controls.

Inadequate controls and record keeping increase the risk that lost or stolen ammunition will not be detected.

Recommendation 11

We recommend that the campus keep current inventory records for ammunition.

Campus Response

We concur. A formalized inventory is now being maintained by the Department range master. The range master will sign for all ammunition purchases and maintain an inventory log. Inventory records will be reviewed by the Operations Lieutenant on a quarterly basis. The written process will be provided by March 31, 2001.

WEAPONS TRAINING

No evidence could be provided to show that training in the legal and operational aspects of firearms was being performed.

Records were not maintained to indicate when the training was performed and who attended. Executive Order No. 228, *Campus Peace Officer Firearms Policy for the CSU and Colleges*, dated October 28, 1975, states that peace officers who are armed shall periodically receive training in the legal, moral and operational aspects of firearms. *Executive Order No. 756, Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, dated September 21, 2000, *superseded this directive*.

CSU directive, BA 77-5, *Implementation of Executive Order No. 228: Campus Peace Officer Firearms Policy for the CSU and Colleges*, dated February 23, 1977, states, in part, that legal and moral training regarding firearms must be accomplished at least semi-annually. *Executive Order No. 756, Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, dated September 21, 2000, *superseded this directive*.

Executive Order No. 756, *Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, dated September 21, 2000, states, in part, that qualified campus Peace Officers who are armed shall receive semiannual training in the legal and operational aspect of firearms and shall complete the requirements to remain qualified on each weapon they use.

The chief of police stated that the department was not aware of the cited regulations.

Not performing training in the legal and operational aspects of firearms increases the risks of improper firearm use and non-compliance with the CSU policy.

Recommendation 12

We recommend that the campus establish procedures to conduct training in the legal and operational aspects of firearms on a semi-annual basis and maintain records of the training dates and attendance.

Campus Response

We concur. The Department range master will, during the second quarterly firearms qualification, include a classroom course on the legal aspects of firearms. Established process will be provided by March 31, 2001.

PUBLIC SAFETY PROGRAM ADMINISTRATION

POLICIES AND PROCEDURES

Written policies and procedures had not been fully developed for the University Police department (UPD), and controls over the distribution and maintenance of the UPD policies and procedures manual needed improvement.

We noted that:

- ▶ Written policies and procedures were not developed for the following areas:
 - Chain of command
 - Department goals and objectives
 - Monitoring the number and status of open cases assigned to the investigator
 - Self-evaluation

- ▶ Written acknowledgement was not obtained to document receipt of the UPD policies and procedures manual. Our review of files for police officers disclosed that written acknowledgement was not on file.

SAM §20003 states that a satisfactory system of internal administrative control shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions. Further, the nonexistence of policy and procedural or operational manuals is a danger signal of a vulnerable control system.

The IACLEA Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 4, states that the agency should establish a formal written directives system to provide employees with a clear understanding of the constraints and expectations relating to the performance of their duties. This formal written directives system should include, in part, procedures for indexing, purging, updating, and revising directives. The Manual further states that the agency should establish a written directive for command protocol.

The IACLEA Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 5 also states that an agency should establish a written directive that requires the formulation and annual updating of written goals and objectives for the agency and for each organizational component within the agency. Established goals and objectives are to be made available to all affected personnel. Further, an agency should have a system for evaluating the progress made toward the attainment of goals and objectives.

The chief of police stated that the organizational chart shows the chain of command and that goals and objectives are established at an individual level as part of the performance evaluation. He further stated that in 1999 the San Jose State University Institutional Research department performed a

customer satisfaction survey of the UPD; however, no comparative analysis was completed to evaluate the performance of the department in comparison to other departments within the system. The chief of police acknowledged the need for self-evaluation surveys and added that these were planned in the near future. The records specialist indicated that the monitoring of the number and status of open cases assigned to the investigator could not be performed due to limitations of the Automated Records Management System (ARMS) program.

Failure to maintain a comprehensive policies and procedures manual and acknowledgement of manual distribution can result in internal controls being compromised and misunderstandings of the constraints and expectations relating to the performance of duties and functions.

Recommendation 13

We recommend that the campus:

- a. develop and distribute formalized policies and procedures for the areas identified above; and
- b. strengthen procedures over the distribution and maintenance of the UPD policies and procedures manual.

Campus Response

We concur. The Department Rules and Regulations as well as the General Orders Manual is being expanded to include procedures for purging, updating, and revising directives. In addition to the existing organizational chart, a written command protocol will be added. The Department now requires all Department employees to acknowledge the receipt of any issued directives. The Customer Satisfaction Survey conducted in 1999 was received with comparative analysis to other CSU campuses. The Department has submitted a request to P.O.S.T. to fund a Team Building Workshop. The purpose of the workshop will be to set short and long-term goals using the survey as part of the planning process. This workshop should be completed by August 2001.

The tracking of investigated cases is now being done on our Automated Records Management System (ARMS).

KEY AND BADGE CONTROLS

Key and badge access controls for the Public Safety (PS) building did not provide adequate security.

We noted that:

- ▶ Numerous individuals from other departments (12 from Facilities Services, 7 from Telecommunications and 7 from Workstation Group) had badge access to the PS building.
- ▶ A master key to the campus assigned to the community service officers (CSO) group was lost and accountability could not be established due to lack of sign out procedures.

- ▶ The key to the supply cabinet where the parking citations and permits were kept was maintained in a parking assistant's desk drawer that was unlocked during the day.

SAM §20003 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, a plan that limits access to assets to authorized personnel who require these assets in the performance of their assigned duties.

The chief of police stated that the lack of procedures was a management oversight. The lead locksmith indicated that individuals from other departments needed occasional access to the building.

Not maintaining adequate control over badge access and master keys increases the risk of unauthorized disclosure of confidential data and access to PS equipment.

Recommendation 14

We recommend that the campus:

- a. review and modify badge access to the PS building to ensure adequate safeguards and controls over confidential data are in place;
- b. establish sign out procedures over the usage of master keys to ensure accountability; and
- c. secure the key to the supply cabinet containing parking citations and permits.

Campus Response

We concur. The master access list was reviewed and only those individuals with required access remain on the list. Since the audit, all master keys have been transferred to the Facilities Services, and Operations Department. The key to the supply cabinet containing parking citations and permits is now in the personal possession of the parking assistant.

COMMUNICATIONS DISPATCH AGREEMENT

The Emergency Communications Dispatch Agreement between the County of Monterey and the California State University, Monterey Bay (CSUMB) was not current.

Although the County of Monterey was providing the services as stipulated by the agreement, the term of the agreement was through June 30, 1996.

SAM §20003 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an established system of practices to be followed in performance of duties and functions.

The chief of police stated that there were no problems with the agreement, the services were being provided as agreed to, and the question of updating the agreement had not been considered.

Failure to maintain a current written agreement can result in misunderstandings and inconsistencies between existing contract language and the intentions of both the campus and management personnel in the County of Monterey.

Recommendation 15

We recommend that the campus update the Emergency Communications Dispatch Agreement between the County of Monterey and CSUMB.

Campus Response

We concur. The Department is in the final development stages of a new dispatch contract with the County of Monterey. The contract should be completed by April 30, 2001.

COMMUNITY SERVICE OFFICERS

Community service officer (CSO) background checks were not consistently performed, and training records were not adequately maintained.

We noted that:

- ▶ Background checks for student assistants hired as CSO's were not consistently performed. Our review of 16 student assistants disclosed that background checks were not performed in 6 instances.
- ▶ Because CSO's may need to contact a police officer by radio in emergency situations, training is provided to them to ensure that these situations are handled professionally. However, our review of 17 CSO training records disclosed that records for six CSO's either did not indicate when radio communication training was provided, or this documentation could not be located by the campus.

SAM §20003 states that a satisfactory system of internal administrative control shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions.

University Police department (UPD) procedures require that all CSO's be properly trained in radio communication.

The police sergeant acting as the auxiliary services coordinator stated that failure to consistently perform background checks was an oversight. He also added that the previous CSO supervisors were negligent in completing the training records.

Inadequate background checks and training can result in internal controls being compromised and may jeopardize the safety of the CSOs and the public.

Recommendation 16

We recommend that the campus perform background checks on all student assistants and establish procedures to ensure that radio communication training is provided to all student assistants and is properly documented.

Campus Response

We concur. All current Community Service Officers (CSOs) now have completed background checks. All future CSOs will have completed background checks. Documentation of radio communication training will be completed by February 28, 2001.

POLICE ACTIVITIES AND CRIME REPORTING

REPORT REVIEW FORMS

Report review forms did not always include evidence of supervisory review.

Our review of 25 case files disclosed that the reviewing officer did not complete and sign a report review form (DPS-90 form) in three instances as required by University Police department (UPD) procedures.

UPD procedures require that the reviewing officer complete and sign a report review form (DPS-90 form), which contains instructions and routing for case follow-up, if required.

The IACLEA Manual, Standards for Campus Law Enforcement, Public Safety, and Security Agencies, Chapter 21, requires supervisory review to ensure that the assignment has been satisfactorily completed and reported consistent with the field reporting system.

The records specialist stated that in urgent situations, she would sometimes complete the DPS-90 form if a form had not been forwarded to her with the case file.

Lack of properly approved report review forms increases the risk of errors and nonperformance of required follow-up.

Recommendation 17

We recommend that the campus enforce procedures for completion and approval of report review forms to ensure the proper routing of case files.

Campus Response

We concur. All police reports shall include a completed, signed report review form by the reviewing officer. If the records specialist receives an approved report without a completed, signed report review form, the report will be returned to a supervisor or police manager. This process has been implemented and documentation will follow by March 31, 2001.

BACKGROUND CHECKS

Background checks had not been performed for three information technology administrators responsible for the maintenance of the public safety server.

CCR Title 11, Chapter 7, Article 1 §707 requires that record checks be conducted on all personnel who have access to the computer system, its terminals, or the stored criminal offender record information.

The chief of police indicated that server maintenance responsibilities had recently changed and that background checks had not been performed due to staff turnover.

Failure to perform background checks for individuals who have access to confidential public safety information subjects the campus to increased liability as it results in non-compliance with state regulations.

Recommendation 18

We recommend that procedures be strengthened to ensure that background checks are completed for all information technology administrators before they are provided access to the public safety server.

Campus Response

We concur. Background checks are complete on all individuals with access to the public safety server. If other employees are going to be granted access, a background check will be completed prior to access being given.

USER ACCESS

Access controls over the Automated Records Management System (ARMS) needed to be improved.

We noted that:

- ▶ passwords did not meet minimum guidelines (UPD server passwords were only three characters and the ARMS application password was one character);
- ▶ password expiration was set at longer than the recommended period; and
- ▶ users were not logged off after a specified period of nonuse.

Current practices for password management require a minimum length of password characters, and log off users after a predetermined time (see Department of Defense Password Management Guideline, a.k.a. Greenbook). Additionally, Control Objectives for Information Technology (COBIT) and Federal Information Processing Standards Publication 112 (FIPS112) also recommend guidelines to be established for an appropriate minimum password length and an appropriate and enforced frequency of password changes. Furthermore, SAM §20003 and §4840 require, in part, that there be a plan that limits access to State agency assets to authorized personnel who require these assets in the performance of their assigned duties.

The facility systems coordinator indicated that he had not received any directives regarding the set up of user data access profiles.

Inadequate configurations of system security software could allow unauthorized users to gain access to UPD systems and confidential data.

Recommendation 19

We recommend that the campus:

- a. increase the password character requirement and implement/shorten periodic password changes; and
- b. log off users after a specified period of nonuse.

Campus Response

We concur. The public safety server will require a minimum password length of six characters, have an idle disconnect time of 12 hours and have a password expiration date of 90 days. The record management software (ARMS) now has a password expiration date of 90 days. It does not have a minimum password length, but policy now requires the password to be at least six characters. Since ARMS can only be accessed through the public safety server, the idle disconnect time of the server applies to ARMS. This process will be accomplished by March 31, 2001.

PERSONNEL ADMINISTRATION AND TRAINING

Police officer first aid and cardiopulmonary resuscitation (CPR) training certifications could not be located by the campus for four police officers.

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

The training sergeant indicated that three officers recently graduated from the academy and completed the required first aid training at the academy although they did not have a certificate. He

went on to state that the other officer joined the department from another agency and his records were probably kept at that agency.

Not maintaining current certification in CPR and first aid increases the risk of non-compliance with state regulations and reduces the ability of police officers to administer life saving aid when required.

Recommendation 20

We recommend that the campus obtain current certification in CPR and first aid for the four police officers as specified by the Penal Code and establish procedures to maintain the certifications in personnel files.

Campus Response

We concur. The Department has now trained one officer who has recently certified all sworn officers in First Aid and AED (Automated Electronic Defibrillation). The training sergeant has established new procedures to ensure all certifications are current and on file. The written procedures will be accomplished by March 31, 2001.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Peter P. Smith	President
Robin Acosta	Administrative Analyst
Andrea Arredondo	Parking Assistant
Debra Barbe	Budget Specialist, Transportation and Parking Services
Steve DeClue	Parking Officer
Dino Latino	Emergency Operations Center Director
Barbara Lawson	Vice President for Administration and Finance
Earl Lawson	Sergeant
Joe Maltby	Chief of Police
Jay McTaggart	Lieutenant
Maria Pantoja	Associate Vice President for Administrative Services
Ron Pearce	Locksmith
Resty Prospero	Director of Accounting
Tim Riggs	Lead Locksmith
Monica Rodriguez	Grants Accountant, CSUMB Foundation
James Sanderson	Facility Systems Coordinator
Dolores Hermosillo Sherry	Budget Manager
Mike Stephan	Police Officer
Renee Viray	Records Specialist
Jeramy Young	Sergeant



CALIFORNIA STATE UNIVERSITY MONTEREY BAY

100 Campus Center Seaside, California 93955-8001

RECEIVED
FEB 21 2001
UNIVERSITY OF CALIFORNIA

February 19, 2001

Mr. Larry Mandel
University Auditor
The California State University
400 Golden Shore
Long Beach, CA 90802-4270

Dear Mr. Mandel: *Larry*

Please find enclosed California State University, Monterey Bay's response to the Public Safety Audit Number 00-39. The campus is committed to addressing the specific recommendations contained in the audit report. Documentation supporting correction action taken to date will be forwarded under separate cover.

Please feel free to contact me if you should have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Lawson".

Barbara Lawson
Vice President of Administration and Finance

Attachment

cc: Peter Smith, President
Maria Pantoja, AVP, Administrative Services
Joe Maltby, Chief of Police
Jay McTaggart, Lieutenant

CALIFORNIA STATE UNIVERSITY, MONTEREY BAY
PUBLIC SAFETY
Audit Report Number 00-39

As requested, we have reviewed and prepared responses to recommendations in the Public Safety Audit Report 00-39. The following are the campus responses to the report.

Recommendation 1

“We recommend that the campus:

- a. establish formalized procedures for special event payroll processing and event sponsor billing to ensure chargebacks are processed in a timely and accurate manner for all services provided to special events, and corresponding reimbursements are received;
- b. establish procedures to ensure that current labor rates are used, overtime calculations include stipends, and chargebacks to non-general fund operations include benefits;
- c. develop a definable UPD overhead rate and apply that rate to all special event billings; and
- d. determine the amount of UPD services provided to campus auxiliary enterprises and include the services in the annual written cost allocation plan to ensure that the UPD is fully reimbursed for services provided.”

Campus Response

We concur. The campus will review and establish formalized procedures for special event payroll processing and event sponsor billing to ensure chargebacks are processed in a timely and accurate manner for all services provided by UPD. This will be accomplished by June 30, 2001

The campus is currently completing a study with KPMG of administrative areas on campus which should be processing chargebacks for special, extra, or non-state services, provided. Included in the study recommendations will be all the elements that should be contained in an overhead rate. At the same time, KPMG is completing a study by March 31, 2001, to determine the portion paid of the annual contribution from the CSUMB Foundation to the campus that represents actual reimbursement for services provided by the campus to the Foundation. With the completion of these two studies, the use of UPD services by the auxiliary enterprises will be calculated, and direct charges for these services, including labor rates and benefits, will be invoiced or attributed appropriately to the allocation of the annual contribution. This calculation will be completed and forwarded to the University Auditor's Office by April 30, 2001.

Recommendation 2

“We recommend that the campus:

- a. renegotiate the award of the UPD grants to the CSUMB Foundation or transfer the management of the grants to the campus and maintain the grants in state accounts;
- b. reimburse the general fund for the COPS Universal Hiring grant expenditures and process the matching funds for the COPS MORE '96 grant; and establish formalized

procedures to ensure the proper administration and accounting of UPD federal grants.”

Campus Response

We concur. The COPS University Hiring grants awarded to the campus have expired and the campus no longer receives federal funds for this grant. The campus continues to enforce the policy that grants will flow through and be administered by the Foundation, and any future grant funds for the UPD will be applied for, awarded through, and administered by the Foundation. The University Police Department will be formally notified in writing, of the established procedure and policy by March 31, 2001.

A copy of the memorandum of agreement between the campus and Foundation will be forwarded to the University Auditor's Office by March 31, 2001. Through the allocation of the annual contribution, the general fund has already been appropriately reimbursed for the COPS Universal Hiring grant expenditures.

Recommendation 3

“We recommend that the campus establish formalized procedures to control, monitor and reconcile POST training reimbursements to training records and ensure a proper segregation of duties.”

Campus Response

We concur. The campus has established written procedures to control, monitor, and reconcile POST training reimbursements. The procedures will be contained in a Department General Order to be issued by April 30, 2001.

Recommendation 4

“We recommend that the accounting office approve the parking office change fund, record the fund in campus accounting records, and subject the fund to periodic independent cash counts.”

Campus Response

We concur. The change fund for Transportation and Parking Services (TAPS) has been formally established with the accounting office. The fund will be subject to periodic audit. This process has been initially implemented and will fully established by April 1, 2001.

Recommendation 5

“We recommend that the campus obtain appropriate approval for the mechanical ticket, vehicle release, and police report fees; and establish procedures to ensure that fee actions are properly approved in the future.”

Campus Response

We concur. The campus will request formal approval through the Chancellor's Office to establish fees, in accordance with the Standing Orders of The Board of Trustees, for signing off mechanical violation citations and vehicle releases. The campus President was notified of the change in fees charged for report copying. Additionally, Department General Order F-5 (Forms Control) will be revised to reflect the procedures for establishing new fees. It will be issued April 30, 2001.

Recommendation 6

"We recommend that the campus establish formalized procedures to:

- a. control, monitor and reconcile parking citation processing; and
- b. verify citation processing billings to ensure that the system is operating as intended and billings comply with the vendor agreement."

Campus Response

We concur. All statements from the citation processing company are now being examined to ensure that billing complies with the vendor agreement. Additional computer software and hardware is needed for TAPS to monitor and reconcile parking citation processing with the vendor. This will be accomplished by June 30, 2001.

Recommendation 7

"We recommend that the campus establish procedures to ensure a proper segregation of duties in handling parking funds."

Campus Response

We concur. All parking funds ready for deposit will require verification by a manager prior to the deposit being made. This was implemented on December 1, 2000.

Recommendation 8

"We recommend that the campus establish formalized procedures for the cancellation of parking and moving citations."

Campus Response

We concur. All moving citations to be cancelled will be accompanied by a citation cancellation form signed by a supervisor (corporal or above). As a safeguard, any cancelled citations not accompanied by the appropriate signature will be routed to the police lieutenant by the records specialist. This will be accomplished by March 31, 2001. All parking citations to be cancelled will be accompanied by a citation cancellation form signed by a supervisor or manager. As a safeguard, any cancelled citations not accompanied by the appropriate signature will be routed by the parking assistant to the TAPS Administrator. This will be accomplished by March 31, 2001.

Recommendation 9

"We recommend that the campus:

- a. strengthen procedures for the collecting, processing, preserving and disposition of evidence; chain of custody; and record maintenance in the ARMS; and
- b. review the status of the five confiscated weapons and take appropriate actions as provided in the Penal Code."

Campus Response

We concur. The campus has hired a Community Service Specialist on 2/07/01 to administer the operation of the property room. This individual will start training the week of Feb. 19, 2001. A complete audit of the property room will be conducted and all weapons and property that can be legally disposed of will be completed by May 1, 2001.

Recommendation 10

"We recommend that the campus:

- a. develop comprehensive records of all equipment issued to police officers; and
- b. strengthen procedures to ensure that property records are accurate and property survey reports are prepared as required."

Campus Response

We concur. All department equipment issued to individual officers will be listed in the record management system (ARMS). All equipment will be issued by or with the knowledge of the police lieutenant. Officer records will be internally audited every six months for accuracy. This will be accomplished by March 31, 2001.

Campus property assigned to the UPD will not be moved without notifying the property clerk. An annual internal property inventory will be completed and provided to the property clerk. This will be accomplished by June 30, 2001.

Recommendation 11

"We recommend that the campus keep current inventory records for ammunition."

Campus Response

We concur. A formalized inventory is now being maintained by the Department range master. The range master will sign for all ammunition purchases and maintain an inventory log. Inventory records will be reviewed by the Operations Lieutenant on a quarterly basis. The written process will be provided by March 31, 2001.

Recommendation 12

"We recommend that the campus establish procedures to conduct training in the legal and operational aspects of firearms on a semi-annual basis and maintain records of the training dates and attendance."

Campus Response

We concur. The Department range master will, during the second quarterly firearms qualification, include a classroom course on the legal aspects of firearms. Established process will be provided by March 31, 2001.

Recommendation 13

"We recommend that the campus:

- a. develop and distribute formalized policies and procedures for the areas identified above; and
- b. strengthen procedures over the distribution and maintenance of the UPD policies and procedures manual."

Campus Response

We concur. The Department Rules and Regulations as well as the General Orders Manual is being expanded to include procedures for purging, updating, and revising directives. In addition to the existing organizational chart, a written command protocol will be added. The Department now requires all Department employees to acknowledge the receipt of any issued directives. The Customer Satisfaction Survey conducted in 1999 was received with comparative analysis to other CSU campuses. The Department has submitted a request to P.O.S.T. to fund a Team Building Workshop. The purpose of the workshop will be to set short and long-term goals using the survey as part of the planning process. This workshop should be completed by August 2001.

The tracking of investigated cases is now being done on our Automated Records Management System (ARMS).

Recommendation 14

"We recommend that the campus:

- a. review and modify badge access to the PS building to ensure adequate safeguards and controls over confidential data are in place;
- b. establish sign out procedures over the usage of master keys to ensure accountability; and
- c. secure the key to the supply cabinet containing parking citations and permits."

Campus Response

We concur. The master access list was reviewed and only those individuals with required access remain on the list. Since the audit, all master keys have been transferred to the Facilities Services, and Operations Department. The key to the supply cabinet containing parking citations and permits is now in the personal possession of the parking assistant.

Recommendation 15

"We recommend that the campus update the Emergency Communications Dispatch Agreement between the County of Monterey and CSUMB."

Campus Response

We concur. The Department is in the final development stages of a new dispatch contract with the County of Monterey. The contract should be completed by April 30, 2001.

Recommendation 16

"We recommend that the campus perform background checks on all student assistants and establish procedures to ensure that radio communication training is provided to all student assistants and is properly documented."

Campus Response

We concur. All current Community Service Officers (CSOs) now have completed background checks. All future CSOs will have completed background checks. Documentation of radio communication training will be completed by February 28, 2001.

Recommendation 17

"We recommend that the campus enforce procedures for completion and approval of report review forms to ensure the proper routing of case files."

Campus Response

We concur. All police reports shall include a completed, signed report review form by the reviewing officer. If the records specialist receives an approved report without a completed, signed report review form, the report will be returned to a supervisor or police manager. This process has been implemented and documentation will follow by March 31, 2001.

Recommendation 18

"We recommend that procedures be strengthened to ensure that background checks are completed for all information technology administrators before they are provided access to the public safety server."

Campus Response

We concur. Background checks are complete on all individuals with access to the public safety server. If other employees are going to be granted access, a background check will be completed prior to access being given.

Recommendation 19

"We recommend that the campus:

- a. increase the password character requirement and implement/shorten periodic password changes;
- b. log off users after a specified period of nonuse."

Campus Response

We concur. The public safety server will require a minimum password length of six characters, have an idle disconnect time of 12 hours and have a password expiration date of 90 days. The record management software (ARMS) now has a password expiration date of 90 days. It does not have a minimum password length, but policy now requires the password to be at least six characters. Since ARMS can only be accessed through the public safety server, the idle disconnect time of the server applies to ARMS. This process will be accomplished by March 31, 2001.

Recommendation 20

"We recommend that the campus obtain current certification in CPR and first aid for the four police officers as specified by the Penal Code and establish procedures to maintain the certifications in personnel files."

Campus Response

We concur. The Department has now trained one officer who has recently certified all sworn officers in First Aid and AED (Automated Electronic Defibrillation). The training sergeant has established new procedures to ensure all certifications are current and on file. The written procedures will be accomplished by March 31, 2001.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

March 16, 2001

CHICO

MEMORANDUM

DOMINGUEZ HILLS

FRESNO

TO: Larry Mandel
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed 

HUMBOLDT

SUBJECT: Draft Final Report Number 00-39 on *Public Safety*,
California State University, Monterey Bay

LONG BEACH

LOS ANGELES

In response to your memorandum of March 16, 2001, I accept the response as submitted with the draft final report on Public Safety, California State University, Monterey Bay.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/dl

POMONA

Enclosure

SACRAMENTO

cc: Dr. Peter Smith, President

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS