

PUBLIC SAFETY
SAN DIEGO STATE UNIVERSITY

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ABBREVIATIONS

| | |
|--------|---|
| ABS | Auxiliary and Business Services – Office of the Chancellor |
| BA | Business Affairs – Office of the Chancellor |
| CBA | Collective Bargaining Agreement |
| CCR | California Code of Regulations |
| CCW | Carry Concealed Weapon |
| CFR | Code of Federal Regulations |
| CLETS | California Law Enforcement Telecommunications System |
| COBIT | Control Objectives for Information Technology |
| COPS | Community Oriented Policing Services |
| CPR | Cardiopulmonary Resuscitation |
| CRU | Critical Response Unit |
| CSO | Community Service Officer |
| CSU | California State University |
| CTO | Compensating Time Off |
| DMV | Department of Motor Vehicles |
| DPS/UP | Department of Public Safety/University Police |
| EMS | Emergency Medical Services |
| FIPS | Federal Information Processing Standards |
| IACLEA | International Association of Campus Law Enforcement Administrators |
| OPN | Orcutt Police Nunchaku |
| POST | Commission on Peace Officer Standards & Training |
| PS | Public Safety |
| RAD | Rape Aggression Defense |
| SAM | State Administrative Manual |
| SDSU | San Diego State University |
| SUPA | Statewide University Police Association |
| UCR | Uniform Crime Reporting |
| USC | United States Congress |
| 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

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- ▶ 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 increased greatly, 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 three years of campus crime statistics and basic security policies. In 1992, the *Campus Sexual Assault Victims’ Bill of Rights* was incorporated into the *Jeanne Clery Act*. In 1998, the *Jeanne Clery Act* was further amended to expand the scope of campus crime statistic reporting, ensure 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 department 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 led 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 of 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 the 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 San Diego State University (SDSU), the Department of Public Safety/University Police (DPS/UP) manages the PS program, which includes University Police and the Parking Office. The DPS director is also the chief of police.

OPINION

We visited the San Diego State University campus from September 18, 2000, through October 19, 2000, and audited the procedures in effect at that time.

In our opinion, the administration and management of the Department of Public Safety/University Police (DPS/UP) was adequate to meet campus law enforcement needs, ensure compliance with crime reporting disclosures, and operate a viable parking program. However, our review disclosed certain conditions that could result in errors and irregularities if not corrected. Specifically, the campus did not maintain adequate control over the following areas: documentation of the use of parking monies, special event parking, parking citation processing, chargebacks for services provided for special events, and mutual aid agreements.

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.

PARKING PROGRAM [9]

PARKING FUND EXPENDITURES AND ALLOCATIONS [9]

The use of parking funds was not always clearly documented and substantiated to demonstrate compliance with the Education Code. Adequate documentation and substantiation of parking fund expenditures ensure that these monies are used for permitted purposes and may increase the amount of funds available for the parking program.

SPECIAL EVENT PARKING [10]

Parking fees were not being charged for all special events. Charging for all special event parking ensures compliance with state regulations and may increase net parking revenues.

CITATION PROCESSING CONTROLS [13]

Internal controls over parking citation processing were not adequate. Adequate internal controls maximize the collection of parking fine revenue and reduce the risk of unauthorized access to the citation processing system.

BUSINESS PARKING PERMITS [14]

Internal controls over business parking permits needed improvement. Adequate reconciliations reduce the risk that missing funds will go undetected.

PUBLIC SAFETY FISCAL ADMINISTRATION [15]

CHARGEBACK CONTROLS [15]

Procedures regarding reimbursement (chargebacks) to the Department of Public Safety/University Police (DPS/UP) for security services provided to campus auxiliary enterprises and special events were unsatisfactory. Appropriate controls over chargebacks ensure compliance with state policy and increase the funds available for law enforcement activities.

PUBLIC SAFETY ACCOUNTS [16]

Controls over three Department of Public Safety/University Police (DPS/UP) accounts needed to be improved. Adequate controls over DPS/UP funds reduce the risk that misappropriation or loss of funds will not be detected.

POLICE ACTIVITIES AND CRIME REPORTING [18]

MUTUAL AID AGREEMENTS [18]

Mutual aid agreements had not been completed with the appropriate enforcement agencies for all counties where campus satellite locations were located. Such agreements reduce the risk of confusion regarding operational responsibility for the investigation of violent crimes and ensure compliance with state law.

CAMPUS CRIME AUTHORITIES AND CRIME DATA [18]

Procedures had not been formalized regarding the responsibility of campus security authorities to report crime-related data to the Department of Public Safety/University Police (DPS/UP). Formalized procedures decrease the risk of non-compliance with federal regulations.

EVIDENCE, WEAPONS, AND EQUIPMENT CONTROLS [19]

EVIDENCE [19]

Evidence was not always properly processed. Adequate evidence controls ensure the timely return of property to rightful owners and acceptability of evidence at trial.

EQUIPMENT [20]

Controls and record keeping for Department of Public Safety/University Police (DPS/UP) equipment needed improvement. Proper internal controls and accountability ensure the approval of non-standard equipment and reduce the risk of stolen assets.

RETIREE GUN PERMITS [22]

Procedures had not been established to ensure that retirees with gun permits qualify at least once every twelve months, and a signed copy of the Retired Officer Declaration form was not on file for the one retiree. Adequate controls ensure compliance with the retiree gun permit requirements.

PUBLIC SAFETY PERSONNEL ADMINISTRATION AND TRAINING [22]

CITIZEN COMPLAINT PROCEDURES [22]

Complainants were not always notified of the disposition of citizen complaints. Providing written notification to the complaining party within 30 days concerning the disposition of the complaint ensures compliance with the Penal Code.

CPR TRAINING [23]

First aid and cardiopulmonary resuscitation (CPR) training documentation could not be located for two officers. Maintenance of current training documentation in CPR and first aid ensures compliance with state regulations and increases a police officer's ability to administer life saving aid.

AWARD OF PERMANENT STATUS [24]

Officers that had completed their probationary period were not notified in writing by the campus president of their award of permanent status. Such notification ensures compliance with the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and the Statewide University Police Association (SUPA).

PUBLIC SAFETY PROGRAM ADMINISTRATION [24]

COMMUNITY SERVICE OFFICERS [24]

Controls over background checks for students employed as community service officers (CSOs) needed to be improved. Adequate background checks help to ensure CSO competency and integrity.

VEHICLE HOME STORAGE [25]

Although the chief of police had a State of California vehicle home storage permit, a vehicle travel log was not maintained. Maintaining a travel log ensures compliance with state regulations.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PARKING PROGRAM

PARKING FUND EXPENDITURES AND ALLOCATIONS

The use of parking funds was not always clearly documented and substantiated to demonstrate compliance with the Education Code.

Parking revenues were maintained in two accounts. Parking revenue from the sale of parking passes and daily parking receipts was deposited into the parking fees account, and revenue from parking fines was deposited into the parking fines account. Our review of account activity disclosed the following:

- ▶ Expenditures for joint office operations of University Police and the Parking Office were not allocated. Maintenance costs for the California Law Enforcement Telecommunications System (CLETS) printer were fully charged to the parking fee fund. In addition, radio maintenance and shredding charges were fully charged to the parking fines and forfeitures fund.
- ▶ Expenditures related to the purchase of pepper balls for the pepper guns were fully paid from the parking fee fund.
- ▶ Mediation service fees for the citation appeal process were paid from the parking fee fund versus the parking fines fund.
- ▶ The full salary of a clerical assistant was paid from the parking fee fund even though at least 50% of her time was spent on police administrative duties, such as access control monitoring.

Education Code §89701 states, in part, that all revenues received from parking facilities, to the extent not pledged in connection with bonds or notes issued pursuant to the CSU Revenue Bond Act of 1947, are appropriated for the acquisition, construction, operation, and maintenance of parking facilities, and for the study development, enhancement operation, and maintenance of alternate methods of transportation.

Education Code §89701.5 states, in part, that monies received as parking fines and forfeitures shall be used exclusively for the development, enhancement, and operation of alternate methods of transportation programs for students and employees, for the mitigation of the impact of off-campus student and employee parking in university communities, and for the administration of the parking fines and forfeitures programs.

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.

The director of Business Information Management and the associate vice president for Financial Management stated that the cost allocation rationale was not clearly documented.

Inadequate documentation and substantiation of parking fund expenditures increase the risk of inappropriate expenditures and may reduce the amount of funds available for the parking program.

Recommendation 1

We recommend that the campus:

- a. strengthen procedures to ensure that expenditures of parking funds are adequately documented and substantiated to ensure compliance with the Education Code; and
- b. determine the amount of services provided to parking operations by each campus provider, taking into consideration the specific Education Code restrictions, and include the services in the campus annual written cost allocation plan.

Campus Response

We concur.

- a. Documentation procedures for expenditures of parking funds will be implemented by May 30, 2001.
- b. Services provided to parking operations will be identified and included in the cost allocation plan, to be completed by June 30, 2001.

SPECIAL EVENT PARKING

Parking fees were not being charged for all special events.

We noted that:

- ▶ although certain events were charged for parking, various/numerous athletic events were held on campus for which attendees were not charged for parking. This practice was accomplished via “relaxed parking” whereby parking enforcement was suspended for designated lots for a designated

period of hours, which permitted event attendees to enter the lots without a daily fee permit or the required permit for the lot. No parking tickets were written during these times. As a result, gross revenues from parking fee and citation revenues were lost.

- ▶ for events organized by the Associated Students auxiliary organization, a \$0.25 parking fee was included in the ticket price. However, this parking fee charge had not been formally evaluated to determine whether the charge was adequate or not.

CSU directive ABS 87-36, *Parking Fee Increase and Revised Refund Schedule*, dated December 10, 1987, states that regulations require that the fee schedule be in effect every day and during all hours for both regular daily parking and for parking related to special events. The campus president may temporarily discontinue enforcement of the fee schedule only when it can be clearly demonstrated that collection of the fee for a special event is uneconomical.

CCR Title 5 §42201 (a) states that permission of the president of a campus to stop, park, or leave standing a vehicle on property of a campus may be granted to persons who have paid a parking fee. The fee shall be in accordance with schedules approved by the Trustees.

CCR Title 5 §42201 (b) (2) states that the payment of a fee shall not be required of persons not employed by the campus, visiting the campus for the purpose of transacting state business with the campus.

The associate vice president for Financial Management and the director of Business Information Management stated that the campus had considered charging a parking fee for all athletic events, but concluded that it was economically unfeasible because parking structures were distributed around the campus. It was thought that event attendees would try to avoid the parking fee by parking at other structures or on community streets surrounding the campus, which would require additional parking enforcement and may result in many complaints from the community. Increasing the parking fee portion of the ticket price had also been contemplated; however, Associated Students feared that the promoters would hold their events at other locations.

Unless supported by appropriate analysis, the decision to forgo charging for special event parking increases the risk of non-compliance with state regulations and possible reduction in net parking revenues.

Recommendation 2

We recommend that the campus:

- a. reevaluate charging parking fees for all special event parking and document the results of the reevaluation; and
- b. analyze the adequacy of the \$0.25 parking charge for Associated Students' events, document the results, and take appropriate action.

Campus Response

We concur. A written evaluation, and a plan for associated actions, will be completed by April 30, 2001.

CITATION PROCESSING CONTROLS

Internal controls over parking citation processing were not adequate.

We noted that:

- ▶ a parking citation receivable control account total had not been established on the campus accounting records. Such an account would serve as a crosscheck for verifying the accuracy of subsidiary records maintained by the Parking Department. Parking fine collections for fiscal year 1999/2000 was \$755,928.
- ▶ System access controls did not include a password change policy.
- ▶ A review of citation review request and administrative review forms disclosed that the reviewer did not always indicate the reason why a citation was dismissed/voided. Fourteen of 25 citation administrative review forms did not include the reason why the citation was dismissed. Five of eight voided citations lacked supervisory review, and two did not include the reason why the citation was voided.

SAM §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and record-keeping procedures adequate to provide effective control over assets, liabilities, revenues, and expenditures. The elements are expected to provide internal checks and balances.

Control Objectives for Information Technology (COBIT) and Federal Information Processing Standards Publication 112 (FIPS112) recommend guidelines to be established for an appropriate and enforced frequency of password changes. Furthermore, SAM §20050 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.

Vehicle Code §40202(e) states, in part, that if the issuing officer or agency determines that the notice of parking violation should be cancelled, the reason for the cancellation shall be set forth in writing.

The chief of police stated that the lack of processes and procedures was a management oversight. He further stated that there was a weakness in the process of how citation cancellations should be documented. The assistant director of the Department of Public Safety/University Police emphasized the department's role to service the campus community and added that the department tried to have a customer service oriented attitude in dealing with citation cancellation requests.

The lack of adequate internal controls could result in reduced parking fine revenue, inaccurate citation processing, and unauthorized access to the citation processing system.

Recommendation 3

We recommend that the campus:

- a. record outstanding parking citation receivables on the campus accounting records and regularly reconcile subsidiary detail records to that control total;
- b. establish procedures for an adequate password change policy; and
- c. strengthen procedures to ensure that reasons for voiding/dismissing a citation are documented on citation cancellation and administrative review forms, and that supervisory reviews are done for voided citations.

Campus Response

We concur.

- a. Outstanding parking citation receivables have been recorded on the campus accounting records. Based on subsidiary records, provided by the parking citation management company, the control total will be updated periodically.
- b. Passwords will be changed every six months.
- c. Procedures regarding improved documentation and supervisory reviews of voided citations will be implemented by April 30, 2001.

BUSINESS PARKING PERMITS

Internal controls over business parking permits needed improvement.

Reconciliations of long- and short-term business parking permit inventories to cash collected were not performed.

SAM §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and record-keeping procedures adequate to provide effective control over assets.

The chief of police stated that he had thought current procedures were adequate.

Lack of reconciliations may increase the risk that missing funds would not be detected.

Recommendation 4

We recommend that the campus establish procedures to reconcile long- and short-term business parking permit inventories to cash collected.

Campus Response

We concur. Procedures will be developed and implemented by April 30, 2001.

PUBLIC SAFETY FISCAL ADMINISTRATION

CHARGEBACK CONTROLS

Procedures regarding reimbursement (chargebacks) to the Department of Public Safety/University Police (DPS/UP) for security services provided to campus auxiliary enterprises and special events were unsatisfactory.

We noted that:

- ▶ a definable overhead rate was not applied to billings for special events sponsored by auxiliary organizations. Police officers, parking officers, the parking supervisor, and dispatchers were billed at flat rates of \$43, \$22, \$25 and \$26, respectively. This method did not ensure that actual overhead expenses and benefits were being recovered.
- ▶ DPS/UP overhead for special events was not applied to billings to university departments.
- ▶ A review of 25 special event billings disclosed that incorrect overtime rates were used on 13 billings to university departments, which resulted in minor differences. In two instances, stipends were not included in the overtime calculations.
- ▶ Auxiliary enterprises (i.e., Foundation, Aztec Shops, Aztec Center) were not fully charged for DPS/UP services provided to their respective areas on campus.

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

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

The associate vice president for Financial Management and the director of Business Information Management stated that normal campus procedures were not followed when the change from average to flat rates occurred for auxiliary organizations. The director of Business Information Management further stated that due to the lack of internal documentation and training, overtime rates were miscalculated.

Unsatisfactory controls over chargebacks increase the risk of non-compliance with state policy and reduce funds available for department operations.

Recommendation 5

We recommend that the campus:

- a. develop a definable DPS/UP overhead rate and modify billing procedures to include actual labor rates, employee benefits, and overhead on all special event billings;
- b. strengthen procedures to ensure that overtime calculations are accurate; and
- c. determine the amount of DPS/UP services provided to campus auxiliary enterprises and include the services in the campus annual written cost allocation plan to ensure that the university is fully reimbursed for services provided by the DPS/UP.

Campus Response

We concur. Procedures (including rate calculations and a cost allocation plan) will be developed and implemented by June 30, 2001.

PUBLIC SAFETY ACCOUNTS

Controls over three Department of Public Safety/University Police (DPS/UP) accounts needed to be improved.

We noted that:

- ▶ POST reimbursement checks received in the DPS/UP were not restrictively endorsed upon receipt and were forwarded to the campus Accounting Department instead of directly to the campus Cashier's Office. Additionally, deposit confirmation was not returned to the DPS/UP to ensure that the deposit was received in the Cashier's Office, and campus financial reports were not being regularly reviewed by the DPS/UP to verify that deposits were posted to the department's account.

- ▶ checks received at Rape Aggression Defense (RAD) training and RAD instructor certification sessions received in the DPS/UP were not restrictively endorsed upon receipt and were forwarded to the campus Accounting Department instead of being directly deposited to the campus Cashier's Office. Additionally, deposit confirmation was not returned to the University Police Department to ensure that the deposit was received in the Cashier's Office, and the DPS/UP did not verify deposits posted to their account.
- ▶ funds pertaining to report fees were forwarded to the campus Cashier's Office via campus mail. Additionally, deposit confirmation was not returned to the DPS/UP to ensure that the deposit was received in the Cashier's Office, and the DPS/UP did not verify deposits posted to their account.

SAM §8023 requires that all checks, money orders, and warrants received for deposit be restrictively endorsed for deposit as soon as practicable after receipt, but no later than the end of the working day.

SAM §8021 states that a separate series of transfer receipts will be used to localize accountability for cash or negotiable instruments to a specific employee from the time of its receipt to its deposit. Further, the receiving employee will sign a receipt whenever cash or checks not payable to the agency are transferred between employees. Agencies will retain copies of these receipts.

SAM §8032.3 states that except where the supervisor and the person depositing cash are not at the same location, the person supervising the person depositing cash will verify that receipts have been deposited intact.

SAM §20050 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 associate vice president for Financial Management stated that the campus had taken a pragmatic approach in handling the checks received by the DPS/UP; however, he added that he realized the process needed to be improved to enhance internal controls.

Inadequate controls over funds increase the risk of misappropriations or loss of funds.

Recommendation 6

We recommend that the campus endorse checks upon receipt, establish procedures for usage of transfer receipts and supervisor verification of check deposits, and consider modifying procedures to forward the checks directly to the campus Cashier's Office.

Campus Response

We concur. New procedures have been developed and are included in the General Orders for the Department of Public Safety/University Police.

POLICE ACTIVITIES AND CRIME REPORTING

MUTUAL AID AGREEMENTS

Mutual aid agreements had not been completed with the appropriate enforcement agencies for all counties where campus satellite locations were located.

Mutual aid agreements had not been established with the appropriate enforcement agencies for the Mount Laguna Observatory and joint classroom facilities at the South Western Community College.

Education Code §67381 states that local law enforcement agencies shall enter into written agreements with campus law enforcement agencies if there are colleges or university campuses located in the jurisdictions of the local law enforcement agencies. The Education Code further requires that each written agreement entered into shall designate which law enforcement agency shall have operational responsibility for the investigation of each Part 1 violent crime and delineate the specific geographical boundaries of each agency's operational responsibility, including maps as necessary.

The chief of police stated that there was a working arrangement; however, the need to formalize the arrangement was not recognized.

Not having written mutual aid agreements with local law enforcement agencies where campus satellite locations are located may result in confusion regarding operational responsibility for the investigation of violent crimes and non-compliance with state law.

Recommendation 7

We recommend that the campus execute mutual aid agreements for all campus satellite locations and establish procedures to ensure that such agreements are kept current.

Campus Response

We concur, and have executed the agreements. New procedures have been developed and are included in the General Orders for the Department of Public Safety/University Police.

CAMPUS CRIME AUTHORITIES AND CRIME DATA

Procedures had not been formalized regarding the responsibility of campus security authorities to report crime-related data to the Department of Public Safety/University Police (DPS/UP).

20 USC §1092(f)(1)(F)(i) requires that each institution prepare, publish, and distribute statistics concerning the occurrence on campus, in or on noncampus buildings or property, and on public property during the most recent calendar year, during the two preceding calendar years for which data are available of the various criminal offenses reported to campus security authorities or local police agencies.

CFR Title 34-Education, Chapter VI, §668.46, defines a campus security authority to include a campus police department, any individual who has responsibility or campus security, any individual or organization specified in the campus security policy as an individual or organization to which criminal offenses should be reported, and an official of an institution who has significant responsibility for student and campus activities.

The chief of police stated that the procedures were in place; however, the need to formalize the arrangement was not recognized.

Lack of formalized procedures increases the risk of non-compliance with federal regulations, as processes are likely to be forgotten when there are organizational changes.

Recommendation 8

We recommend that the campus formalize procedures regarding the crime reporting responsibilities of campus security authorities.

Campus Response

We concur. Procedures have been developed and incorporated into the General Orders of the Department of Public Safety/University Police.

EVIDENCE, WEAPONS AND EQUIPMENT CONTROLS

EVIDENCE

Evidence was not always properly processed.

We noted that:

- ▶ two BB-guns were confiscated for safekeeping purposes; however, no property release notification was sent to the owners regarding the release of the items. The written notifications were sent out during the audit fieldwork. A third BB-gun that was confiscated for safekeeping purposes was still in evidence, even though no one wanted to claim ownership for the item.

- ▶ a sword that was confiscated for safekeeping in 1996 was still in evidence. It could not be determined if property release notification was sent to the owner, as the case file had been purged.
- ▶ a pellet gun confiscated for safekeeping in 1998 and determined to be a nuisance was still in the evidence room and had not been destroyed.

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 the 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 chief of police stated that the exceptions noted were management oversights.

Inadequate controls over evidence increase the risk of untimely return of property to the rightful owners and unacceptable evidence at trial.

Recommendation 9

We recommend that the campus review the status of the aforementioned evidence, take appropriate actions, and strengthen procedures to ensure that evidence is promptly handled in the future.

Campus Response

We concur. The evidence has been processed as appropriate, and procedures have been included in the General Orders for the Department of Public Safety/University Police.

EQUIPMENT

Controls and record keeping for Department of Public Safety/University Police (DPS/UP) equipment needed improvement.

We noted that:

- ▶ records regarding equipment issued to officers were not up to date. Several articles of equipment required by the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and

the Statewide University Police Association (SUPA) were not documented as being issued to the officers.

- ▶ written authorization for the use of pepper spray and an Orcutt Police Nunchaku (OPN) had not been issued by the campus president.
- ▶ our review of 15 items from campus property records for the DPS/UP showed that two items could not be located, and three items were in different locations than indicated in the property records. Further, management was unable to tell us when the department inventory listing had last been updated.

Article 10.6 of the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and the Statewide University Police Association (SUPA), for July 1, 1998, through June 30, 2001, requires that officers be issued certain standard equipment. Other non-standard equipment may be issued when required by the president.

SAM §3520.5 states that a properly executed property survey report must be executed when disposing of state-owned property.

SAM §8652 states that the adjustment and reconciliation of the records will take place after the physical count has been completed.

SAM §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and record-keeping procedures adequate to provide effective control over assets.

The chief of police stated that the exceptions noted were management oversights. The associate vice president for Financial Management stated that the inventory listing needed to be adjusted.

Internal controls over DPS/UP equipment are compromised when the use of non-standard equipment is not properly approved, and the risk of loss increases when accountability is not maintained.

Recommendation 10

We recommend that the campus:

- a. develop comprehensive records of all equipment issued to police officers and establish procedures to maintain the records on a current basis;
- b. obtain written authorization from the president for the use of pepper spray and the OPN and strengthen procedures to ensure that the use of all non-standard equipment is properly approved; and
- c. strengthen procedures to ensure that DPS/UP property records are accurate and property survey reports are prepared, as required.

Campus Response

We concur.

- a. Procedures have been modified and are included in the General Orders of the Department of Public Safety/University Police. The General Orders have also been modified to identify equipment required by the Collective Bargaining Agreement.
- b. Written authorization for use of pepper spray and the OPN is being drafted for the President's signature.
- c. Equipment inventory and reporting procedures have been modified/created and included in the General Orders of the Department of Public Safety/University Police.

RETIREE GUN PERMITS

Procedures had not been established to ensure that retirees with gun permits qualify at least once every twelve months, and a signed copy of the Retired Officer Declaration form was not on file for the one retiree.

CSU policy, *Retired Officers' Identification Card*, requires retired officers who wish to carry a firearm to complete a Retired Officer Declaration form, which requires that a weapons proficiency course be completed at least every twelve months and the retiree to petition the public safety department for renewal of the carry concealed weapon (CCW) endorsement every five years. The original copy of the declaration is to be retained in the public safety department.

The chief of police stated that this was a management oversight.

Inadequate controls increase the risk of non-compliance with the retiree gun permit requirements.

Recommendation 11

We recommend that the campus establish procedures to comply with CSU retiree gun permit requirements.

Campus Response

We concur. Procedures have been developed and are included in the General Orders of the Department of Public Safety/University Police.

PUBLIC SAFETY PERSONNEL ADMINISTRATION AND TRAINING

CITIZEN COMPLAINT PROCEDURES

Complainants were not always notified of the disposition of citizen complaints.

Our review of five citizen complaint files disclosed that the complaining parties did not receive written notification of their complaint disposition in two instances.

Penal Code §832.7 (e) requires that the department or agency provide written notification to the complaining party of the disposition of the complaint within 30 days of the disposition.

The chief of police stated that the exceptions noted occurred due to lack of check-off procedures to ensure that all steps of the review process were completed.

Not providing written notification to the complaining party concerning the disposition of a citizen complaint within 30 days results in non-compliance with the Penal Code.

Recommendation 12

We recommend that the campus establish check-off procedures to ensure that all the steps of the citizen complaint review process are completed.

Campus Response

We concur. The General Orders of the Department of Public Safety/University Police have been modified to include new procedures for completion of the review process for citizen complaints.

CPR TRAINING

First aid and cardiopulmonary resuscitation (CPR) training documentation could not be located for two 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 chief of police stated that this was a management oversight.

Not maintaining current training documentation in CPR and first aid increases the risk of non-compliance with state regulations and reduces a police officer's ability to administer life saving aid.

Recommendation 13

We recommend that the campus obtain evidence of current training in CPR and first aid for the two officers as specified by the Penal Code and establish procedures to maintain training documentation on a current basis.

Campus Response

We concur. The two officers have since received the appropriate training. Procedures have been updated and are included in the General Orders of the Department of Public Safety/University Police.

AWARD OF PERMANENT STATUS

Officers that had completed their probationary period were not notified in writing by the campus president of their award of permanent status.

Article 13.11 of the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and the Statewide University Police Association (SUPA), for July 1, 1998, through June 30, 2001, states that an employee shall be notified in writing by the president as to the award of permanent status.

The director of Business Information Management stated that campus procedures did not include this process.

The lack of written notification by the campus president concerning the award of permanent status results in non-compliance with the CBA.

Recommendation 14

We recommend that the campus establish procedures to comply with the CBA award of permanent status notification requirements.

Campus Response

We concur. Procedures have been developed and are in place.

PUBLIC SAFETY PROGRAM ADMINISTRATION

COMMUNITY SERVICE OFFICERS

Controls over background checks for students employed as community service officers (CSOs) needed to be improved.

We noted that:

- ▶ background checks for student assistants hired as CSOs were not consistently completed. Our review of 38 student assistant records disclosed that Department of Motor Vehicles (DMV) record and fingerprint checks were not completed in 13 and 14 instances, respectively.
- ▶ standards had not been formalized and communicated to the applicants to release the department of any liability in case the department should, as a result of the fingerprint and DMV records checks, decide not to hire a student.
- ▶ results of reevaluations and/or reexaminations of background check results had not been adequately documented in student assistant files.

The SDSU Department of Public Safety/University Police (DPS/UP) CSO Manual (revised September 1, 2000) states that all CSOs are required to pass a qualifying process prior to being employed. The qualifying process requires, in part, DMV history and fingerprinting checks.

SAM §20050 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.

CSU State and Private Vehicles Manual states that when driving records raise doubt as to a person's ability to drive safely, permission to drive on university and state business should be refused.

The chief of police stated that the background checks had been performed, but documentation organization and record-keeping procedures were inadequate and needed to be improved.

Inadequate background checks compromise internal controls and may weaken CSO competency and integrity.

Recommendation 15

We recommend that the campus:

- a. strengthen procedures to ensure that background checks are performed for all student assistants;
- b. formalize standards to be used in evaluation of the background check results; and
- c. establish procedures to ensure adequate maintenance of all background checks and reevaluations/reexaminations.

Campus Response

We concur. Procedures will be developed and implemented by March 30, 2001.

VEHICLE HOME STORAGE

Although the chief of police had a State of California vehicle home storage permit, a vehicle travel log was not maintained.

SAM §4143.1 and §4143.2 state that travel logs are required for all vehicles assigned home storage permits and that travel log entries will be completed daily by the operator of the vehicle.

CCR Title 2 §599.807 (a) requires that an automobile travel log for each automobile in a form approved by the Department of General Services be maintained. It further indicates that such form shall include, among other information, a record of daily mileage traveled, date and time of travel, itinerary, and information regarding the overnight storage and shall identify the driver. The record is to be completed on a daily basis.

The chief of police indicated that he was not aware of this requirement.

Not maintaining a travel log for a state vehicle driven home results in non-compliance with the state regulations.

Recommendation 16

We recommend that the campus strengthen procedures to ensure compliance with travel log requirements.

Campus Response

We concur. A travel log has been placed in the vehicle and is being maintained.

APPENDIX A: PERSONNEL CONTACTED

| <u>Name</u> | <u>Title</u> |
|----------------------|--|
| Stephen L. Weber | President |
| John J. Carpenter | Chief of Police/Director, Department of Public Safety/University Police (DPS/UP) |
| Sharon Chapman | Payroll Specialist, Human Resources |
| Angela Fanucchi | Records Clerk, DPS/UP |
| Cheryl A. Fisher | Associate Director, Human Resources |
| Ellene J. Gibbs | Director of Business Information Management |
| Eddie Gilbert | Lieutenant |
| Janie Guerrero | Clerical Assistant III, Parking Services |
| Jo Hauser | Administrative Support Coordinator, DPS/UP |
| Gwen Hemphill-Cannon | Dispatcher |
| Alison Hunter | Tax and Audit Coordinator, Business Information Management |
| Chris Jacobsen | Detective |
| Linda Kennan | Administrative Coordinator, DPS/UP |
| Susan McCrary | Detective |
| Doug Miller | Police Officer |
| Mary Ann Patty | Manager, University Cashier's Office |
| Ken B. Perry | Associate Vice President, Financial Management |
| Constance Rhea | Information Systems Consultant |
| Debbie Richeson | Auxiliary Services Coordinator, DPS/UP |
| Sally Roush | Vice President, Business and Financial Affairs |
| Charles Schwoerke | Lieutenant |
| Michael S. Smoger | Assistant Director, DPS/UP |
| Linda A. Stewart | Assistant Vice President, Business and Financial Affairs |
| Stephen A. Williams | Captain |

Mr. Larry Mandel
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- a. Reevaluate charging parking fees for all special event parking and document the results of the reevaluation; and
- b. Analyze the adequacy of the \$0.25 parking charge for Associated Students' events, document the results, and take appropriate action.

Campus Response

We concur. A written evaluation, and a plan for associated actions, will be completed by April 30, 2001.

Recommendation 3

We recommend that the campus:

- a. Record outstanding parking citation receivables on the campus accounting records and regularly reconcile subsidiary records to that control total;
- b. Establish procedures for an adequate password change policy; and
- c. Strengthen procedures to ensure that reasons for voiding/dismissing a citation are documented on citation cancellation and administrative review forms, and that supervisory reviews are done for voided citations.

Campus Response

We concur.

- a. Outstanding parking citation receivables have been recorded on the campus accounting records. Based on subsidiary records, provided by the parking citation management company, the control total will be updated periodically.
- b. Passwords will be changed every six months.
- c. Procedures regarding improved documentation and supervisory reviews of voided citations will be implemented by April 30, 2001.

Recommendation 4

We recommend that the campus establish procedures to reconcile long and short term business parking permit inventories to cash collected.

Mr. Larry Mandel
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Campus Response

We concur. Procedures will be developed and implemented by April 30, 2001.

Recommendation 5

We recommend that the campus:

- a. Develop a definable Department of Public Safety/University Police overhead rate and modify billing procedures to include actual labor rates, employee benefits and overhead on all special event billings;
- b. Strengthen procedures to ensure that overtime calculations are accurate; and
- c. Determine the amount of Department of Public Safety/University Police services provided to campus auxiliary enterprises and include the service in the campus annual written cost allocation.

Campus Response

We concur. Procedures (including rate calculations and a cost allocation plan) will be developed and implemented by June 30, 2001.

Recommendation 6

We recommend that the campus endorse checks upon receipt, establish procedures for usage of transfer receipts and supervisor verification of checks deposits, and consider modifying procedures to forward the checks directly to the campus cashier's office.

Campus Response

We concur. New procedures have been developed and are included in the General Orders for the Department of Public Safety/University Police.

Recommendation 7

We recommend that the campus execute mutual aid agreements for all campus satellite locations and establish procedures to ensure that such agreements are kept current.

Mr. Larry Mandel
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March 27, 2001

Campus Response

We concur, and have executed the agreements. New procedures have been developed and are included in the General Orders for the Department of Public Safety/University Police.

Recommendation 8

We recommend that the campus formalize procedures regarding the crime reporting responsibilities of campus security authorities.

Campus Response

We concur. Procedures have been developed and incorporated into the General Orders of the Department of Public Safety/University Police.

Recommendation 9

We recommend that the campus review the status of the aforementioned evidence, take appropriate actions, and strengthen procedures to ensure that evidence is promptly handled in the future.

Campus Response

We concur. The evidence has been processed as appropriate, and procedures have been included in the General Orders for the Department of Public Safety/University Police.

Recommendation 10

- a. Develop comprehensive records of all equipment issued to police officers and establish procedures to maintain the records on a current basis;
- b. Obtain written authorization from the president for the use of pepper spray and the OPN and strengthen procedures to ensure that the use of all non-standard equipment is properly approved; and
- c. Strengthen procedures to ensure that the Department of Public Safety/University Police property records are accurate and property survey reports are prepared, as required.

Mr. Larry Mandel
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March 27, 2001

Campus Response

We concur.

- a. Procedures have been modified and are included in the General Orders of the Department of Public Safety/University Police. The General Orders have also been modified to identify equipment required by the Collective Bargaining Agreement.
- b. Written authorization for use of pepper spray and the OPN is being drafted for the President's signature.
- c. Equipment inventory and reporting procedures have been modified/created and included in the General Orders of the Department of Public Safety/University Police.

Recommendation 11

We recommend that the campus establish procedures to comply with CSU retiree gun permit requirements.

Campus Response

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Recommendation 12

We recommend that the campus establish check-off procedures to ensure that all the steps of the citizen complaint review process are completed.

Campus Response

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Mr. Larry Mandel
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March 27, 2001

Recommendation 13

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Campus Response

We concur. The two officers have since received the appropriate training. Procedures have been updated and are included in the General Orders of the Department of Public Safety/University Police.

Recommendation 14

We recommend that the campus establish procedures to comply with the CBA award of permanent status notification requirements.

Campus Response

We concur. Procedures have been developed and are in place.

Recommendation 15

We recommend that the campus:

- a. Strengthen procedures to ensure that background checks are performed for all student assistants;
- b. Formalize standards to be used in evaluation of the background check results; and
- c. Establish procedures to ensure adequate maintenance of all background checks and reevaluations/reexaminations.

Campus Response

We concur. Procedures will be developed and implemented by March 30, 2001.

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March 27, 2001

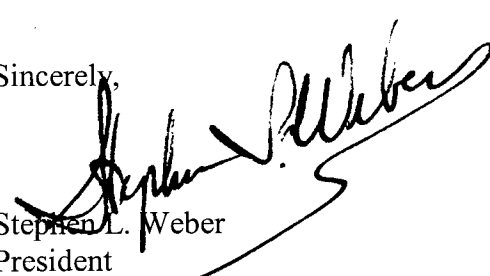
Recommendation 16

We recommend that the campus strengthen procedures to ensure compliance with travel log requirements.

Campus Response

We concur. A travel log has been placed in the vehicle and is being maintained.

Sincerely,


Stephen L. Weber
President

SLW/jsh

c: Sally F. Roush, Vice President for Business and Financial Affairs
Ellene J. Gibbs, Director, Business Information Management

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

April 13, 2001

CHICO

MEMORANDUM

DOMINGUEZ HILLS

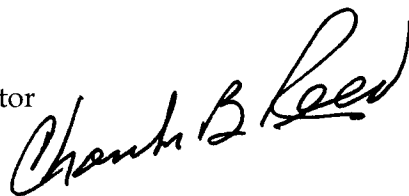
FRESNO

TO: Larry Mandel
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed



HUMBOLDT

SUBJECT: Draft Final Report Number 00-43 on *Public Safety*,
San Diego State University

LONG BEACH

LOS ANGELES

In response to your memorandum of April 13, 2001, I accept the response as submitted with the draft final report on Public Safety, San Diego State University.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

Enclosure

SACRAMENTO

cc: Dr. Stephen L. Weber, President

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS