

**DISASTER AND EMERGENCY PREPAREDNESS**

**SYSTEMWIDE**

**Audit Report 06-35**

**April 20, 2007**

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## **ABBREVIATIONS**

CFO	Chief Financial Officer
CO	Chancellor's Office
CSU	California State University
DEP	Disaster and Emergency Preparedness
DRII	Disaster Recovery Institute International
EO	Executive Order
EOC	Emergency Operations Center
GC	Government Code
OES	(California) Office of Emergency Services
SEMS	Standardized Emergency Management System
SWEPT	Systemwide Emergency Preparedness Taskforce

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## EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2005, the Board of Trustees, at its January 2006 meeting, directed that *Disaster and Emergency Preparedness* (DEP) be reviewed. Similar audits of Disaster and Contingency Planning were conducted in 2003.

We visited eight campuses and the chancellor's office (CO) from March 6, 2006, through November 3, 2006, and audited the procedures in effect at that time. Campus and CO specific findings and recommendations have been discussed and reported individually.

In our opinion, internal administrative and operational controls governing DEP were generally effective. Campus and CO management had established operating procedures, which ensured that DEP controls were aligned, for the most part, with state regulations and CO directives. However, administrative policy and controls governing business continuity planning and testing, procedures for emergency plans, development of campus rosters of emergency resources, documentation of emergency management plan overview training for new hires, and specialized emergency training for disaster and emergency team members needed improvement.

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

### GENERAL ENVIRONMENT [7]

Systemwide policy for business continuity planning did not ensure the development of comprehensive business recovery plans at eight of the campuses visited and the CO. A review of business continuity planning showed that plans were not fully developed and written at some campuses, while plans at other campuses needed to be reviewed and updated. Some campuses and the CO had not identified and prioritized functions and assets critical to operation continuity nor performed a risk assessment of realistic worst case disaster scenarios, including a business impact analysis. None of the eight campuses visited or the CO had determined specific budgetary limitations and requirements necessary to restore services in required time frames to ensure business continuity, and three campuses had not formed/formalized a business continuity planning committee.

### EMERGENCY MANAGEMENT PLAN [9]

Procedures for consistent review, update, and communication of emergency plans in a variety of methods needed improvement at seven of the eight campuses visited. The emergency plan was either outdated, not consistently reviewed on an annual basis, or required technical updates at five campuses. Further, at five campuses the emergency plan was not available to all emergency team members in a variety of formats or in more than one location. The website version of the emergency plan at one campus was neither readily available nor easily accessible, while the plan at another campus had not been communicated to the campus community as a whole. Additionally, campus rosters of emergency resources were either not developed or required improvement at six of the eight campuses visited.

A formal roster had not been developed at two campuses, while existing rosters at four campuses were incomplete, outdated, and/or did not contain evidence of annual review.

## **COMMUNICATIONS AND TRAINING [12]**

Documentation to support overview emergency management plan training for new hires needed improvement at six of the eight campuses visited and the CO. In varying degrees, the campuses and CO were not always able to provide documentation to support overview emergency management plan training for new hires, including type of training, dates of training, names of individuals trained, and evidence of a course syllabus or an agenda showing topics covered in the training. Further, specialized emergency training and related documentation for disaster and emergency team members were insufficient at seven of the eight campuses visited and the CO. Although specific deficiencies varied, most locations were unable to provide sufficient evidence of specialized emergency training for emergency operations center team members, emergency management team members, building marshals, and student health center staff.

## **TESTING AND DRILLS [14]**

Most business continuity plans had not been tested at all eight campuses visited. These campuses had developed at least one departmental business continuity plan; three campuses had multiple departmental plans, and two campuses had campuswide plans. However, only two campuses had tested departmental plans, and both of those tests concerned information technology.

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## INTRODUCTION

### **BACKGROUND**

The National Safety Council ([www.nsc.org](http://www.nsc.org)) has provided guidance showing that disasters and emergencies are inevitable. These events include personal injuries, fires, explosions, chemical spills, toxic gas releases, natural disasters such as earthquakes, tornadoes, floods, and epidemics, and man-made disasters such as terrorist activities and riots. Anticipating emergencies and planning for an appropriate response can greatly lessen the extent of injuries and health concerns. Emergency preparedness can also limit damage to property, equipment, and materials. Experience tells us that when disasters and emergencies occur, the emergency response based on emergency preparedness and crisis training programs, will significantly affect the extent of damages and injuries sustained. The president of each of the 23 California State University (CSU) campuses has been delegated the responsibility for the implementation and maintenance of an emergency management system program.

There is no single definition of what constitutes a disaster. A disaster can develop quickly, hitting full-force, with little or no warning. Other times, a disaster can loom on the horizon for weeks until it becomes large enough to be a threat. Government Code (GC) §8680.3 defines disaster to mean:

A fire, flood, storm, tidal wave, earthquake, terrorism, epidemic, or other similar public calamity that the governor determines presents a threat to public safety.

In California Code of Regulations, Title 19, §2402, Standardized Emergency Management System (SEMS) Regulations, emergency is defined to mean:

A condition of disaster or of extreme peril to the safety of persons and property caused by such conditions as air pollution, fire, flood, hazardous material incident, storm, epidemic, riot, drought, sudden and severe energy shortage, plant or animal infestations or disease, the governor's warning of an earthquake or volcanic prediction, or an earthquake or other conditions, other than conditions resulting from a labor controversy.

Executive Order (EO) 921, *California State University Emergency Management Program*, dated November 21, 2004, requires maintenance of an emergency management system on each campus that will be activated when a hazardous condition or natural disaster reaches or has the potential for reaching proportions beyond the capacity of routine operations. The campus shall write each emergency plan in accordance with and as described in SEMS regulations developed by the California Office of Emergency Services (OES). Additionally, the campuses shall support the Systemwide Emergency Preparedness Taskforce (SWEPT) assigned oversight responsibility for CSU systemwide emergency management. SWEPT is a multi-discipline committee charged with improving communication between police chiefs, emergency coordinators, risk managers, and environmental health and occupational safety directors. It proposes and establishes mechanisms/systems for coordinating a response to emergencies; and studies and proposes solutions to systemwide issues such as emergency communications, mutual assistance protocols, and training. Further, business continuity planning is an integral part of a comprehensive emergency management model, and it is recommended that each campus form a Business Continuity Planning Committee.

After the initial emergency response, restoration of business (“business continuity”) is of paramount importance. Two sources of industry guidance on standards and terminology are *Glossary of Terms* from the Disaster Recovery Institute International (DRII), and *Business Continuity: Best Practices* as defined by the Business Continuity Institute. The DRII *Glossary of Terms* describes business continuity as “the ability of an organization to ensure continuity of service and support for its customers and to maintain its viability before, after, and during an event.” In *Best Practices*, a disaster recovery plan is defined as “a plan to resume a specific essential operation, function, or process of an enterprise.”

Business continuity is frequently considered a broader term than emergency preparedness. The goal of emergency preparedness is to address the immediate impacts of the disaster and to respond as needed to bring the emergency to closure. Business continuity is a continuing cycle of preparation that includes the broader perspectives of disaster, response, recovery, mitigation, risk reduction, prevention, and preparedness, as depicted below:



Disaster recovery/emergency preparedness plans are required of state agencies by GC §8607(a), which states:

The OES, in coordination with all interested state agencies with designated response roles in the state emergency plan and interested local emergency management agencies shall jointly establish by regulation a SEMS for use by all emergency response agencies.

SEMS is the system required by GC §8607(a) for managing response to multi-agency and multi-jurisdiction emergencies in California. As a result of the 1991 East Bay Hills fire in Oakland, Senate Bill 1841 was passed and made effective January 1, 1993. The intent of this law is to improve the

coordination of state and local emergency response in California, and it implemented SEMS. SEMS regulations took effect in September 1994. SEMS consists of five organizational levels, which are activated as necessary: field response, local government, operational area, regional, and state. By standardizing key elements of the emergency management system, SEMS is intended to facilitate the flow of information within and between levels of the system and facilitate coordination among all responding agencies. SEMS incorporates the use of five essential Incident Command System functions: command (management), operations, planning/intelligence, logistics, and finance/administration. All CSU campuses are required to formally adopt and implement SEMS.

## **PURPOSE**

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Disaster and Emergency Preparedness* (DEP) activity and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

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

- ▶ Administration of DEP incorporates a defined mission, stated goals and objectives, and clear lines of organizational authority and responsibility; and is adequately funded.
- ▶ Plans and procedures address general and campus specific incidents; include recordkeeping systems for effective planning, administration, and reporting; maximize DEP resources; and are adequately communicated to emergency management personnel.
- ▶ An EOC provisioned with sufficient equipment, supplies, and other critical resources exists; and a roster of resources for materials and services that may be needed in an emergency situation is maintained.
- ▶ The emergency management plan is compliant with SEMS, including the use of the modular incident command system organization methodology and incident action plans; inclusive of an effective building marshal program for evacuation; and reviewed/updated at a minimum every year.
- ▶ The emergency management plan has been adequately communicated to the campus community, a roster of emergency management personnel is annually communicated to the chancellor's office, and support is provided to the SWEPT.
- ▶ Emergency management activities are effectively coordinated with appropriate city, county, operational area, state, federal, and private agencies; and include adequate mutual aid and assistance agreements.
- ▶ Specialized and/or general training has been provided to the emergency management team, building marshals, and all employees.

- ▶ Emergency plan testing, drills, and/or evacuations are adequately planned, conducted, and documented; and include periodic testing of mutual aid and assistance agreements.
- ▶ Generators, communications devices, and other equipment and supplies are functional, tested currently, and the related responsibility is appropriately assigned.
- ▶ The campus has a business continuity plan and if that plan is tested.

## **SCOPE AND METHODOLOGY**

The proposed scope of the audit, as presented in Attachment B, Audit Item 2 of the January 31 through February 1, 2006, meeting of the Committee on Audit, stated that DEP includes review of compliance with Trustee policy and systemwide directives, contingency and disaster recovery planning, backup communications, building safety and emergency egress including provisions for individuals with disabilities, the extent of plan testing, and relationships with state and federal emergency management agencies. DEP includes program and facility readiness and resource planning for actions related to natural and man-made disasters and the recovery therefrom.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustees policies, and Office of the Chancellor and campus policies, letters, and directives. The audit focused on procedures in effect from January 2005 through October 2006. In instances wherein it was necessary to review annualized data, fiscal year 2005/06 was the primary period reviewed.

We focused primarily upon the internal administrative, compliance, and operational controls over the campuswide emergency operations plan and related management activities. Specifically, we reviewed and tested:

- ▶ The emergency management organization.
- ▶ Emergency management and business continuity plans.
- ▶ Emergency management plan guidelines, policies, procedures, and recordkeeping.
- ▶ The building marshal program, emergency action plans, and the campus emergency hotline.
- ▶ The EOC, emergency equipment, and related emergency supplies.
- ▶ Coordination with other agencies and mutual aid and assistance agreements.
- ▶ Funding and budgetary controls for emergency management activities.
- ▶ Communication of the emergency management plan.
- ▶ Training for emergency management activities.
- ▶ Evacuation drills and emergency management and business continuity plan testing.

During the course of the audit, we visited the chancellor's office and eight campuses: Channel Islands, Dominguez Hills, Fresno, Humboldt, Pomona, San Bernardino, San Diego, and Sonoma. We interviewed personnel and audited procedures in effect at that time.

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# OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

## GENERAL ENVIRONMENT

Systemwide policy for business continuity planning did not ensure the development of comprehensive business recovery plans at eight campuses visited and the chancellor's office (CO).

Executive Order (EO) 921, *California State University Emergency Management Program*, dated November 12, 2004, prescribed that each president shall ensure that certain management activities are accomplished in support of emergency management, including development of a business continuity plan for the campus to be reviewed at a minimum every year. Further, as the scope of business continuity planning was beyond both the authority and capability of campus emergency planners, the EO stated that responsibility for continuity planning should be assigned to senior management personnel and recommended (but not required) that each campus form a business continuity planning committee. In addition, although each plan must be unique and designed for each campus, the EO identified (but did not require) the following common elements:

- Established goals and objectives that reflect the needs of the campus and its operating units.
- Functions and assets identified as critical to operation continuity and needed to support the campus mission with an evaluation of critical needs and prioritization of business requirements.
- A review of existing plans and agreements to determine how they might be integrated into the campuswide business continuity and disaster recovery plan; assessment of how labor agreements impact these plans, and the processes for addressing conflicts in an emergency situation.
- A risk assessment of realistic worst case scenarios to determine what can cause an upset in critical functions, including a business impact analysis.
- Determination of budgetary limitations and requirements, key factors in determining time frames in which services can be likely restored.
- Written plans made available to the campus community.
- Personnel training, tests and audits of plans to determine effectiveness, and a review and documentation of test results and lessons learned.

Our review disclosed the following:

- ▶ Business continuity plans were not fully developed and written at some campuses, while plans at other campuses needed to be reviewed and updated. Seven of the eight campuses visited and the CO had not completed a comprehensive review of business continuity needs, including development of an entity-wide business continuity plan. Three campuses had plans for several departments, four campuses had plans for only one department, and the CO did not have a plan.

Additionally, at four of the seven campuses where some business continuity plans had been written, we found that not all of the plans had been formally reviewed within 12 months.

- ▶ Three campuses and the CO had not identified and prioritized functions and assets critical to business continuity.
- ▶ Four campuses and the CO had not performed a risk assessment of realistic worst case disaster scenarios, including a business impact analysis.
- ▶ None of the eight campuses visited or the CO had determined specific budgetary limitations and requirements necessary to restore services in required time frames to ensure business continuity.
- ▶ Three campuses had not formed/formalized a business continuity planning committee.

Government Code (GC) §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

Certain management stated their belief that business continuity planning guidelines were inadequate, but they nonetheless offered additional explanations and causes for these issues. Some management stated that business continuity plan development and review was not current mainly due to resource limitations and failure to develop adequate procedures, while others stated that business continuity plan development and review was already in progress. Some management further stated that they had not yet dedicated sufficient resources to develop risk assessments, and management at all locations visited stated that budgetary planning for business continuity was not yet implemented because earlier business continuity plan processes needed to be completed first.

The absence of a business continuity planning policy that clearly defines requirements increases the risk of ineffective business recovery plans and delayed recovery from disasters and emergencies.

### **Recommendation 1**

We recommend that the chancellor's office:

- a. Advise campuses and responsible CO personnel of the importance of comprehensive business continuity planning, including development of a comprehensive business continuity plan to be reviewed annually, identification and prioritization of functions and assets critical to operation continuity, risk assessment of realistic worst case disaster scenarios, determination of budgetary limitations and requirements, and a formalized business continuity planning committee.

- b. Review and revise EO 921 to clarify expectations with respect to business continuity planning requirements.

### **Management Response**

We concur. The Office of the Chancellor recognizes business continuity planning as an integral part of a comprehensive emergency management model and supports campus efforts to implement effective internal systems of administrative and operations controls. The Office of Risk Management will issue a memorandum reminding the campuses and responsible CO personnel of the importance of comprehensive business continuity planning. The memorandum will include, but not be limited to, the development of comprehensive business continuity plans, identification of critical functions and assets, and the formation of business continuity planning committees.

At the June executive retreat, the chief risk officer will review systemwide policy for disaster and emergency preparedness (DEP), including business continuity planning.

The Office of Risk Management will review and revise EO 921, and develop additional systemwide policies for business continuity planning that will include, but not be limited to, the development of comprehensive and viable business continuity plans.

Due date: August 20, 2007

## **EMERGENCY MANAGEMENT PLAN**

### **EMERGENCY PLAN UPDATES AND DISTRIBUTION**

Procedures for consistent review, update, and communication of emergency plans in a variety of methods needed improvement at seven of the eight campuses visited.

We found that:

- ▶ The emergency plan was either outdated, not consistently reviewed on an annual basis, or required technical updates at five campuses.
- ▶ The emergency plan was not available to all emergency team members in a variety of formats or in more than one location at five campuses, which might limit its availability in the event of an emergency.
- ▶ The website version of the emergency plan at one campus was neither readily available nor easily accessible at one campus, while the plan at another campus had not been communicated to the campus community as a whole.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states, in part, that each campus president is delegated the responsibility for the implementation and maintenance of an emergency management system on the campus. The campus should develop an emergency management plan and review/update it at a minimum of every year. Further, the campus should communicate the emergency plan to the campus community in a variety of methods and on a continuous basis through public education such as web posting of the plan or through other mechanisms for regular dissemination of hazard planning.

GC §13402 states that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions.

Campus management cited various reasons for these issues including personnel resource constraints, uncertainty with regard to federal and California State University (CSU) requirements, and they simply had overlooked these issues.

Failure to timely review and update campus emergency plans, communicate them to the campus community, and ensure their availability to emergency team members in a variety of formats limits campus' ability to respond effectively to emergencies.

## **Recommendation 2**

We recommend that the chancellor's office remind the campuses of the importance of establishing procedures to ensure that campus emergency plans are reviewed and updated annually, available to all emergency team members in a variety of formats and in more than one location, and communicated campuswide.

## **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses of the importance of developing and maintaining sound internal controls for campus emergency plans.

At the June executive retreat, the chief risk officer will review systemwide policy for DEP, including requirements for consistent review, update, and communication of campus emergency plans.

Due date: August 20, 2007

## **CAMPUS ROSTER OF EMERGENCY RESOURCES**

Campus rosters of emergency resources were either not developed or required improvement at six of the eight campuses visited.

We found that:

- ▶ A formal roster of emergency resources had not been developed at two campuses.
- ▶ The existing rosters at four campuses were either incomplete, outdated, and/or did not contain evidence of annual review. For example, existing rosters had not been updated to include such things as food and water, locations of emergency supplies and equipment, responsible persons, expiration dates of food, and the last date of formal review.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that the campus should develop a roster of campus resources and memoranda of understanding for materials and services that may be needed in an emergency situation, including equipment, emergency power, communications, food and water, and update at least annually. The “updated as of date” should appear on each roster.

Campus management cited various reasons for these issues including oversight, personnel resource constraints, uncertainty with regard to CSU requirements, and the belief that their existing campus resource documentation was at least partially adequate.

Failure to complete and update the campus roster of emergency resources annually increases the risk that delays in locating critical resources could occur during an emergency.

### **Recommendation 3**

We recommend that the chancellor’s office remind the campuses of the need to develop complete and adequate rosters of emergency resources, which include all emergency equipment, locations of supplies including food and water, food and water expiration dates, responsible persons, and the last date that the rosters were reviewed and updated.

### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses of the need to develop complete and adequate rosters of emergency resources, which include all emergency equipment, locations of supplies including food and water, food and water expiration dates, responsible persons, and the last date that the rosters were reviewed and updated.

At the June executive retreat, the chief risk officer will review systemwide policy for DEP, including requirements for developing and updating comprehensive rosters of emergency resources.

Due date: August 20, 2007

## COMMUNICATIONS AND TRAINING

### OVERVIEW TRAINING

Documentation to support overview emergency management plan training for new hires needed improvement at six of the eight campuses visited and the CO.

We found that, in varying degrees, the campuses and CO were not always able to provide documentation to support overview emergency management plan training for new hires, including type of training, dates of training, names of individuals trained, and evidence of a course syllabus or an agenda showing topics covered in the training.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that the campus community is to be trained on the Standardized Emergency Management System (SEMS) compliant plan to include, at a minimum, overview training of every employee within one year of employment. Training attendance records shall be kept for a minimum of seven years.

GC §13401 states that each state agency must maintain effective systems of administrative control as an integral part of its management practices.

Management cited several reasons for this issue including lack of formalized training practices, personnel resource constraints, existing practices that did not allow for documentation of the training and follow-up with employees, and failure to collect or maintain documentation after training sessions.

Failure to ensure overview training for new hires increases the likelihood that emergency response would be inadequate.

#### **Recommendation 4**

We recommend that the chancellor's office remind the campuses and responsible CO personnel of the importance of ensuring that overview emergency management plan training is timely provided to all new hires and that supporting documentation be developed and maintained on file.

#### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses and responsible CO personnel of the importance of ensuring that overview emergency management plan training is timely provided to all new hires and that supporting documentation is developed and maintained on file.

At the June executive retreat, the chief risk officer will review systemwide policy for DEP, including requirements for providing and documenting overview emergency management plan training to all new hires.

Due date: August 20, 2007

## **SPECIALIZED EMERGENCY TRAINING**

Specialized emergency training and related documentation for disaster and emergency team members were insufficient at seven of the eight campuses visited and the CO.

Although specific deficiencies varied, most locations were unable to provide sufficient evidence of specialized emergency training for emergency operations center (EOC) team members, emergency management team members, building marshals, and student health center staff. This included specialized training in areas such as Incident Command Systems, crisis response, SEMS guidelines and certification, EOC procedures, and disasters that might require emergency medical services.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that the campus community is to be trained on the SEMS compliant plan to include, at a minimum, specialized training for employees who will operate as building marshals and for those designated as members of the campus emergency management team. Training attendance records shall be kept for a minimum of seven years.

EO 943, *Policy on University Health Services*, dated April 28, 2005, states that the president or designee shall be responsible for ensuring that campus emergency plans include provision for the training and assignment of student health center staff in disasters that may require emergency medical services.

SEMS Guidelines, *Planning and Developing SEMS, Operational Area*, dated December 23, 1994, advises that all personnel who will be staffing positions in the operational area EOC must maintain minimum training competencies pursuant to the approved course of instruction. The training should be provided to primary and alternate EOC staff. Training should be initiated as soon as feasible after EOC staff is designated. Provisions should be made for an ongoing training program to accommodate personnel changes.

GC §13401 states that each state agency must maintain effective systems of administrative control as an integral part of its management practices.

Management cited several reasons for this issue including lack of formalized training practices, personnel resource constraints and turnover, and scheduling conflicts. Management added that the failure to collect or maintain training documentation was mainly due to oversight.

Failure to provide sufficient specialized emergency training in critical emergency management skills increases the likelihood that an emergency response would be inadequate.

### **Recommendation 5**

We recommend that the chancellor's office remind the campuses and responsible CO personnel of the need to ensure that specialized emergency training is provided to all disaster and emergency team members and that supporting documentation be developed and maintained on file.

### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses and responsible CO personnel of the need to ensure that specialized emergency training is provided to all disaster and emergency team members and that supporting documentation be developed and maintained on file.

At the June executive retreat, the chief risk officer will review systemwide policy and SEMS Guidelines for DEP, including requirements for providing and documenting specialized emergency training to all disaster and emergency team members.

Due date: August 20, 2007

### **TESTING AND DRILLS**

Most business continuity plans had not been tested at all eight campuses visited.

Our review disclosed that all campuses visited had developed at least one departmental business continuity plan. Three campuses had multiple departmental plans and two campuses had campuswide plans. However, only two campuses had tested departmental plans and both of those tests concerned information technology.

EO 921, *California State University Emergency Management Program*, dated November 12, 2004, states that each campus shall develop a business continuity plan. Further, almost all business continuity plans contain certain common elements including testing and auditing the plans to determine the effectiveness of the overall business continuity and incident recovery program. This includes a review and documentation of test results and lessons learned. The review should occur annually, with testing occurring every two years at a minimum.

Management at six campuses stated that they had not yet had the opportunity to perform business continuity plan testing or to develop test plans useful to initiate business continuity plan testing. Management at another campus stated that some plans were still in development and test plans would follow, while management at the other campus stated that ongoing procedures would adequately meet testing requirements.

Inadequate testing of business continuity plans increases the risk of ineffective preparedness and unavailability of essential services.

### **Recommendation 6**

We recommend that the chancellor's office remind the campuses of the importance of developing and exercising test plans sufficient to ensure the effectiveness of campus business continuity activities, including a review and documentation of test results and lessons learned.

### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses of the importance of developing and exercising test plans sufficient to ensure the effectiveness of campus business continuity activities, including a review and documentation of test results and lessons learned.

At the June executive retreat, the chief risk officer will review systemwide policy for DEP, including requirements for testing business continuity plans.

The Office of Risk Management will review and revise EO 921, and develop additional systemwide policies for business continuity planning that include, but will not be limited to, testing the effectiveness of business continuity activities and reviewing and documenting the test results and lessons learned.

Due date: August 20, 2007

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
<u>Office of the Chancellor</u>	
Richard P. West	Executive Vice Chancellor and Chief Financial Officer (CFO)
Sue Bell-Ramirez	Assistant Director, Administration
Robert Boyhan	Director, Administration
Christine Destefano	Web Manager, Communications Department
Dennis Hordyk	Assistant Vice Chancellor, Financial Services
Charlene Minnick	Chief Risk Officer, Risk Management
Clara Potes-Fellow	Media Relations Manager, Public Affairs
Tom Roberts	Director, Contract Services and Procurement
Michelle Schlack	Associate Director, Risk Management
Jerry Wilde	Facilities Manager, Building Services
<u>California State University, Channel Islands</u>	
Richard R. Rush	President
Colleen Bennett	Manager, Human Resources
Dave Chakraborty	Director, Facilities and Planning
Trae Cotton	Interim Dean of Student Life, Student Affairs
Joanne Coville	Vice President, Finance and Administration
Jeff Cowgill	Police Lieutenant, Public Safety
Emily Deakin	Manager, General Accounting
Caroline Doll	Director of Special Projects, Finance and Administration
Tracey Dunn	Administrative Support Coordinator, Public Safety
Christine Girardot	Technology Coordinator, Human Resources
Leah Kirklin	Manager, Procurement and Support Services
Bill Kupfer	Director, Environmental Health and Safety
John Reid	Director, Public Safety
Rhonda Tyacke	Executive Assistant, Finance and Administration
Deborah Wylie	Associate Vice President, Operations, Planning and Construction
<u>California State University, Dominguez Hills</u>	
Boice M. Bowman	Interim President
James E. Lyons, Sr.	President (At time of review)
Brian Dahm	Director of Business Process Management (At time of review)
Irina Gaal	Chief of Medical Services, Student Health and Psychological Services
Robert Gill	Manager, Environmental Health, Occupational Safety and Risk Management
Russell Hudson	Media Relations and Public Affairs Coordinator, University Communications and Public Affairs Office
David McCulloch	Assistant Director, Non-Resident Alien Tax Compliance Coordinator, Business Process Management
Mary Ann Rodriguez	Vice President, Administration and Finance
Randy Sharp	Director, Physical Plant

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APPENDIX A: PERSONNEL CONTACTED

Susan Sloan Chief of Police  
Lynn Weddington Associate Director, University Housing Services  
Emmit Williams Director/Contracts Administrator, Procurement,  
Contracts, Logistical and Support Services  
Min Yao Associate Vice President, Information Technology

California State University, Fresno

John D. Welty President  
Lori Alemano Administrative Assistant, Police Department  
Mark Aydelotte Associate Vice President, University Communications  
Matt Babick Internal Auditor  
Erin Boele Assistant Director, Housing  
Richard Boes Director, Information Technology Services  
Robert Boyd Associate Vice President, Facilities  
Tom Gaffrey Events Coordinator, Public Safety  
David Huerta Chief of Police, Police Department  
Lisa Kao Environmental Quality Manager, Environmental Health and Safety  
Steven Katz Associate Vice President, Financial Services  
Steven Martinez Director, Environmental Health and Safety  
Olivia Mendoza Project Coordinator, Office of the Vice President for Administration  
David Moll Director, Public Safety  
Cynthia Teniente-Matson Vice President for Administration and CFO  
John Waayers Budget Officer, University Budget Office  
Jerilane Willis Administrative Assistant, Environmental Health and Safety

Humboldt State University

Rollin C. Richmond President  
David Bugbee Director, Contracts and Procurement  
John Capaccio Director, Housing and Dining Services  
Carl Coffey Vice President for Administrative Affairs  
Tammy Curtis Associate Director, Human Resources  
Thomas Dewey Chief of Police, University Police  
Mary Ann Evans Lead Buyer II, Contracts and Procurement  
Anna Kircher Chief Information Officer, Information Technology Services  
Aleli Lawson Assistant to the Chief, University Police  
Colin Livasy Facilities Worker, Plant Operations  
Paul Mann Senior Communication Officer, Public Affairs  
Jan Marnell Administrative Support, University Police  
Lori Rudebock Internal Auditor, Administrative Affairs  
Robert Schulz Associate Vice President, Facilities Management  
Rebecca Stauffer Director, Student Health and Counseling  
Monika Stoeffl Residential Life Coordinator, Housing and Dining Services  
Carol Terry Associate Vice President for Business Services

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APPENDIX A: PERSONNEL CONTACTED

California State Polytechnic University, Pomona

J. Michael Ortiz	President
Edwin Barnes	Interim Vice President, Administrative Affairs/Interim CFO
Janet Cain	Analyst, Administrative Affairs
Patricia Farris	Vice President, Administrative Affairs/CFO (At time of review)
Douglas Freer	Vice President, Student Affairs
Ron Fremont	Associate Vice President, Public Affairs
Regenia Griffin	Manager, Employee Services
Michael Guerin	Chief of Police and Director of Public Safety, University Police
Kathy Harper	Secretary, Finance and Administrative Services
Darwin Labordo	Associate Vice President, Administrative Affairs/Associate CFO
Mary Martinez	Manager, Diversity, Human Resources and Employee Services
Debbi McFall	Emergency Services Coordinator, University Police
Denton Mosier	Director, Instructional and Information Technology Support
Paul Nath	Facilities Worker, Facilities Management
Ann Overman-Scott	Director, Human Resources
Daryl Patton	Director of Internal Audit
Sharon Reiter	Executive Director, Administrative Affairs
Megan Stang	Director, University Housing Services

California State University, San Bernardino

Albert K. Karnig	President
Hamid Azhand	Associate Director, Capital Planning, Design and Construction
Tito Calderon	Associate Director, Dining Services/Commons and Catering
David DeMauro	Vice President, Administration and Finance
Roy Diaz	Coordinator, Emergency Operations Center
Lorraine Frost	Vice President, Information Resources and Technology
Scott Kovach	Support Services Supervisor, University Police Department
Bob Miller	Chief of Police, University Police Department
Jon Mohoroski	Manager, Office of Environmental Health and Safety
Linda Pella-Hartley	Executive Assistant, Administration and Finance
Patricia Smith	Director, Health and Psychological Counseling Center
William Takehara	Associate Vice President, Administration and Finance
Dale West	Director, Human Resources

San Diego State University

Stephen L. Weber	President
John Browning Jr.	Chief of Police, Public Safety
Valerie Carter	Manager, Audit and Tax
Norma Casas	Analyst, Audit and Tax
Terry Gee	Director, Environmental Health and Safety
Ellene Gibbs	Associate Vice President, Financial Operations
Eddie Gilbert	Lieutenant, Public Safety
Nancy Lopez	Assistant to the Vice President, Business and Financial Affairs
Joe Patterson	Director, Physical Plant
Kristen Ross	Occupational Safety Manager, Environmental Health and Safety
Sally Roush	Vice President, Business and Financial Affairs

Sonoma State University

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APPENDIX A: PERSONNEL CONTACTED

Ruben Armiñana	President
Letitia Coate	Associate Vice President, Administration and Finance
George Ellington	Captain, Police and Parking Services
Laurence Furukawa-Schlereth	Vice President, Administration and Finance
Ian Hannah	Administrative Project Manager, Administration and Finance
Tyson Hill	Physical Security Specialist, Police and Parking Services
Nate Johnson	Senior Director/Chief of Police, Police and Parking Services
Susan Kashack	Associate Vice President, Communications and Marketing
Kurt Koehle	Director, Internal Operations, Analysis and Review
Richard Ludmerer	Senior Director, Risk Management
Richard Marker	Senior Director, Facilities Services
Edna Nakamoto	Senior Director, Human Services
Tim Tiemens	Director, Housing



**Risk Management**  
401 Golden Shore, 5th Floor  
Long Beach, CA 90802-4210

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UNIVERSITY AUDITOR

MAY - 2 2007

THE CALIFORNIA STATE  
UNIVERSITY

**To:** Mr. Larry Mandel  
University Auditor

**Date:** April 27, 2007

**From:**   
Richard P. West  
Executive Vice Chancellor/Chief  
Financial Officer

**Phone:** 562-951-4580

**Subject:** Disaster and Emergency Preparedness, Audit Report Number 06-35

We have reviewed the above captioned report and express our responses in the attached document. Should you have any questions or need further information, please contact Charlene Minnick, Chief Risk Officer, at extension 1-4580.

RPW: mas  
Attachment

cc: Dennis Hordyk, Assistant Vice Chancellor, Financial Services  
Charlene Minnick, Chief Risk Officer, Systemwide Risk Management  
Michelle Schlack, Associate Director, Systemwide Risk Management  
Michael Zachary, Audit Manager

**CSU Campuses**  
Bakersfield  
Channel Islands  
Chico  
Dominguez Hills  
East Bay

Fresno  
Fullerton  
Humboldt  
Long Beach  
Los Angeles  
Maritime Academy

Monterey Bay  
Northridge  
Pomona  
Sacramento  
San Bernardino  
San Diego

San Francisco  
San José  
San Luis Obispo  
San Marcos  
Sonoma  
Stanislaus

## DISASTER AND EMERGENCY PREPAREDNESS

### SYSTEMWIDE

Audit Report 06-35

April 20, 2007

## GENERAL ENVIRONMENT

### Recommendation 1

We recommend that the chancellor's office:

- a. Advise campuses and responsible CO personnel of the importance of comprehensive business continuity planning, including development of a comprehensive business continuity plan to be reviewed annually, identification and prioritization of functions and assets critical to operation continuity, risk assessment of realistic worst case disaster scenarios, determination of budgetary limitations and requirements, and a formalized business continuity planning committee.
- b. Review and revise EO 921 to clarify expectations with respect to business continuity planning requirements.

### Management Response

We concur. The Office of the Chancellor recognizes business continuity planning as an integral part of a comprehensive emergency management model and supports campus efforts to implement effective internal systems of administrative and operations controls. The Office of Risk Management will issue a memorandum reminding the campuses and responsible Chancellor's Office personnel of the importance of comprehensive business continuity planning. The memorandum will include, but not be limited to, the development of comprehensive business continuity plans, identification of critical functions and assets, and the formation of business continuity planning committees.

At the June Executive Retreat, the Chief Risk Officer will review systemwide policy for disaster and emergency preparedness, including business continuity planning.

The Office of Risk Management will review and revise EO 921, and develop additional systemwide policies for business continuity planning that will include, but not be limited to, the development of comprehensive and viable business continuity plans.

Due Date: August 20, 2007

## **EMERGENCY MANAGEMENT PLAN**

### **EMERGENCY PLAN UPDATES AND DISTRIBUTION**

#### **Recommendation 2**

We recommend that the chancellor's office remind the campuses of the importance of establishing procedures to ensure that campus emergency plans are reviewed and updated annually, available to all emergency team members in a variety of formats and in more than one location, and communicated campuswide.

#### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses of the importance of developing and maintaining sound internal controls for campus emergency plans.

At the June Executive Retreat, the Chief Risk Officer will review systemwide policy for disaster and emergency preparedness, including requirements for consistent review, update, and communication of campus emergency plans.

Due Date: August 20, 2007

### **CAMPUS ROSTER OF EMERGENCY RESOURCES**

#### **Recommendation 3**

We recommend that the chancellor's office remind the campuses of the need to develop complete and adequate rosters of emergency resources, which include all emergency equipment, locations of supplies including food and water, food and water expiration dates, responsible persons, and the last date that the rosters were reviewed and updated.

#### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses of the need to develop complete and adequate rosters of emergency resources, which include all emergency equipment, locations of supplies including food and water, food and water expiration dates, responsible persons, and the last date that the rosters were reviewed and updated.

At the June Executive Retreat, the Chief Risk Officer will review systemwide policy for disaster and emergency preparedness, including requirements for developing and updating comprehensive rosters of emergency resources.

Due Date: August 20, 2007

## COMMUNICATIONS AND TRAINING

### OVERVIEW TRAINING

#### Recommendation 4

We recommend that the chancellor's office remind the campuses and responsible CO personnel of the importance of ensuring that overview emergency management plan training is timely provided to all new hires and that supporting documentation be developed and maintained on file.

#### Management Response

We concur. The Office of Risk Management will issue a memorandum reminding the campuses and responsible CO personnel of the importance of ensuring that overview emergency management plan training is timely provided to all new hires and that supporting documentation is developed and maintained on file.

At the June Executive Retreat, the Chief Risk Officer will review systemwide policy for disaster and emergency preparedness, including requirements for providing and documenting overview emergency management plan training to all new hires.

Due Date: August 20, 2007

### SPECIALIZED EMERGENCY TRAINING

#### Recommendation 5

We recommend that the chancellor's office remind the campuses and responsible CO personnel of the need to ensure that specialized emergency training is provided to all disaster and emergency team members and that supporting documentation be developed and maintained on file.

#### Management Response

We concur. The Office of Risk Management will issue a memorandum reminding the campuses and responsible CO personnel of the need to ensure that specialized emergency training is provided to all disaster and emergency team members and that supporting documentation be developed and maintained on file.

At the June Executive Retreat, the Chief Risk Officer will review systemwide policy and SEMS Guidelines for disaster and emergency preparedness, including requirements for providing and documenting specialized emergency training to all disaster and emergency team members.

Due Date: August 20, 2007

## TESTING AND DRILLS

### **Recommendation 6**

We recommend that the chancellor's office remind the campuses of the importance of developing and exercising test plans sufficient to ensure the effectiveness of campus business continuity activities, including a review and documentation of test results and lessons learned.

### **Management Response**

We concur. The Office of Risk Management will issue a memorandum reminding the campuses of the importance of developing and exercising test plans sufficient to ensure the effectiveness of campus business continuity activities, including a review and documentation of test results and lessons learned.

At the June Executive Retreat, the Chief Risk Officer will review, systemwide policy for disaster and emergency preparedness, including requirements for testing business continuity plans.

The Office of Risk Management will review and revise EO 921, and develop additional systemwide policies for business continuity planning that include, but will not be limited to, testing the effectiveness of business continuity activities, and reviewing and documenting the test results and lessons learned.

Due Date: August 20, 2007

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR



BAKERSFIELD

May 9, 2007

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

EAST BAY

FRESNO

TO: Mr. Larry Mandel  
University Auditor

FULLERTON

FROM: Charles B. Reed  
Chancellor

HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Audit Report 06-35 on *Disaster and Emergency Preparedness, Systemwide*

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of May 9, 2007, I accept the response as submitted with the draft final report on *Disaster and Emergency Preparedness, Systemwide*.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/jt

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Mr. Richard P. West, Executive Vice Chancellor and Chief Financial Officer

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS