

PUBLIC SAFETY

SYSTEMWIDE

Report Number 00-37

May 24, 2001

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CONTENTS

INTRODUCTION

Purpose.....	1
Scope and Methodology.....	3
Background	4
Opinion.....	6
Executive Summary.....	6

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Public Safety Systemwide Policy Manual.....	9
Collective Bargaining Agreement	10
Critical Response Unit.....	11
Parking Program	12
Parking Fund Expenditures and Allocations	12
Parking Citation Controls.....	13
Public Safety Fiscal Administration.....	14
Chargeback Controls	14
POST Funds	15
Evidence, Weapons and Equipment Controls.....	16
Weapons.....	16
Evidence.....	17
Equipment	18
Public Safety Program Administration	19
Police Activities and Crime Reporting	20
Personnel Administration and Training	22

APPENDICES

APPENDIX A:	Personnel Contacted
APPENDIX B:	Chancellor's Office Response
APPENDIX C:	Chancellor's Acceptance

ABBREVIATIONS

BA	Business Affairs – Office of the Chancellor
CBA	Collective Bargaining Agreement
CCR	California Code of Regulations
CLETS	California Law Enforcement Telecommunications System
COBIT	Control Objectives for Information Technology
COPS	Community Oriented Policing Services
CORI	Criminal Offender Record Information
CPR	Cardiopulmonary Resuscitation
CRU	Critical Response Unit
CSU	California State University
CTO	Compensatory Time Off
EMS	Emergency Medical Services
EO	Executive Order
FIPS112	Federal Information Processing Standards Publication 112
IACLEA	International Association of Campus Law Enforcement Administrators
POST	Commission on Peace Officer Standards & Training
PS	Public Safety
SAM	State Administrative Manual
SUAM	State University Administrative Manual
SUPA	Statewide University Police Association
UCR	Uniform Crime Reporting
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

INTRODUCTION

- ▶ 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.

During the course of the audit, we visited eight campuses: Fresno, Humboldt, Los Angeles, Monterey Bay, Pomona, San Bernardino, San Diego and San Jose. We interviewed campus personnel and audited procedures in effect at the time.

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). The titles of the departments assigned responsibility for managing CSU campus public safety and parking operations include, among others, the department of public safety, police and parking services, and the university police department.

OPINION

We visited the eight campuses from March 13, 2000, through December 22, 2000, and our opinion is based primarily upon our observations at those campuses.

In our opinion, the eight campuses, in general, met campus law enforcement needs, were in compliance with crime reporting disclosures, and operated viable parking programs. Campus specific findings and recommendations have been discussed and reported individually. However, our review disclosed some systemwide conditions that may affect ongoing operations and certain campus conditions that could result in errors and irregularities if not corrected. Specifically, the systemwide public safety policy manual was not current, completion of a systemwide study of public safety needs and staffing was almost 18 months overdue, and campuses did not maintain adequate control over the following areas: the allocation and use of parking monies, parking citation processing, chargebacks for services provided to special events and auxiliary enterprises, weapons qualifications, evidence, public safety equipment, and access to automated systems. The findings presented below were found in varying degrees at a majority of the campuses visited and, thus, took on systemwide implications. Areas needing improvement are referenced in the executive summary below.

EXECUTIVE SUMMARY

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

PUBLIC SAFETY SYSTEMWIDE POLICY MANUAL [9]

The systemwide Public Safety Policy Manual was not current. Maintaining a current comprehensive policies and procedures manual reduces misunderstandings related to the performance of duties and functions and inconsistencies in complying with state, federal, and California State University (CSU) systemwide policies.

COLLECTIVE BARGAINING AGREEMENT [10]

The chancellor's office was not in compliance with a Unit 8 side-letter agreement between the CSU and the Statewide University Police Association (SUPA) to complete a study of public safety needs and staffing issues systemwide by December 31, 1999. Timely completion of the required study ensures compliance with the collective bargaining unit agreement and prompt management attention to public safety needs and staffing issues.

CRITICAL RESPONSE UNIT [11]

The Critical Response Unit (CRU) had not been officially sanctioned, and its functions had not been formally defined. Operating a unit that has been officially recognized and given formally defined functions reduces misunderstanding between unit and management expectations and CSU liability due to inappropriate activities.

PARKING PROGRAM [12]

PARKING FUND EXPENDITURES AND ALLOCATIONS [12]

Expenditures of parking funds were not always clearly substantiated to demonstrate compliance with the Education Code, correctly allocated between parking and police operations, and/or used for permitted purposes at seven of the eight campuses visited. Adequate controls over the use and allocation of parking funds ensure that the monies are used for appropriate purposes and may increase the amount of funds available for the parking program.

PARKING CITATION CONTROLS [13]

Parking citation receivable control accounts had not been established on campus accounting records, and procedures had not been developed for some campuses to control, monitor, and reconcile parking citation processing by third-party vendors. Maintaining adequate internal controls maximizes parking fine revenue, reduces the risk that misappropriation or loss of funds will go undetected, and ensures compliance with the vendor agreement.

PUBLIC SAFETY FISCAL ADMINISTRATION [14]

CHARGEBACK CONTROLS [14]

Procedures regarding reimbursement (chargebacks) to public safety for security and/or parking services provided to special events and campus auxiliary enterprises were unsatisfactory at the eight campuses visited. Adequate controls over chargebacks ensure accurate, complete, and timely reimbursements to the public safety department and compliance with state policy and increase the funds available for law enforcement activities.

POST FUNDS [15]

Controls over reimbursements from the Commission on Peace Officer Standards and Training (POST) were not adequate at six of the campuses visited. Adequate controls over POST reimbursements and accounts reduce the risk that misappropriation or loss of funds will not be detected and increase the availability of training funds.

EVIDENCE, WEAPONS AND EQUIPMENT CONTROLS [16]

WEAPONS [16]

Controls over weapons qualifications and ammunition were unsatisfactory at seven of the campuses visited. Satisfactory controls over weapons qualifications and ammunition ensure weapon proficiency and reduce the risk of lost or stolen ammunition.

EVIDENCE [17]

Evidence was not adequately controlled, and confiscated weapons were not disposed of on a timely basis at five of the campuses visited. Adequate controls over these items ensure the acceptability of evidence at trial, timely return of property to rightful owners, efficient use of storage facilities, and compliance with confiscated weapons requirements.

EQUIPMENT [18]

Public safety department equipment was not always properly authorized and controlled at the eight campuses visited. Adequate internal controls and accountability over public safety equipment reduce the risk of stolen assets and ensure that officers are properly equipped with approved equipment.

PUBLIC SAFETY PROGRAM ADMINISTRATION [19]

Written policies and procedures had not been fully developed at five of the campuses visited. Maintenance of comprehensive policies and procedures reduces misunderstandings of the constraints and expectations related to the performance of duties and functions.

POLICE ACTIVITIES AND CRIME REPORTING [20]

Access to automated systems and/or criminal offender record information (CORI) needed improvement at seven of the campuses visited. Maintaining adequate controls over access to automated systems and CORI ensures only authorized users gain access to confidential data.

PERSONNEL ADMINISTRATION AND TRAINING [22]

Training requirements were not always met at seven campuses visited. Adhering to the POST and Penal Code training requirements optimizes job performance and life-saving abilities and reduces the risk of noncompliance with state regulations.

OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

PUBLIC SAFETY SYSTEMWIDE POLICY MANUAL

The systemwide Public Safety Policy Manual was not current.

The existing systemwide Public Safety Policy Manual was contained in State University Administrative Manual (SUAM) §4000, dated June 1989. Although a revision was initiated about four years ago out of concern that new police chiefs did not have some critical information in writing, the revision has not been completed.

Article 8.2 of the Collective Bargaining Agreement (CBA) between the California State University (CSU) Board of Trustees and the Statewide University Police Association (SUPA), for July 1, 1998, through June 30, 2001, states that the CSU shall maintain a systemwide Public Safety Policy Manual.

State Administrative Manual (SAM) §20050 states that a satisfactory system of internal administrative controls shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions. Further, policy and procedural or operational manuals that are not currently maintained are a danger signal of a poorly maintained or vulnerable control system.

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

The vice chancellor of human resources stated that recent meetings with legal staff have concluded that the draft manual submitted to her over a year ago needs to be divided into two separate documents. She further stated that this process is underway.

A lack of current and complete policies and procedures increases the risk of misunderstandings related to the performance of duties and functions and inconsistencies in complying with state, federal, and CSU systemwide policies.

Recommendation 1

We recommend that the chancellor's office finalize and disseminate an updated systemwide Public Safety Policy Manual and establish procedures to ensure that the manual is maintained on a current basis.

Management's Response

We concur. A draft document originally called the Public Safety Policy Manual was completed approximately eight months ago. In consultation with General Counsel it was determined that the document should be split into two parts: 1) a Public Safety Policy Manual which would include topics limited to those items in the old Public Safety Policy Manual as referenced in the MOU, and 2) a larger Operational Guidelines for Police Chiefs which would include both guidelines and procedures governing the actions of Police Chiefs within the system.

It is anticipated that the final draft of both the Public Safety Policy Manual and the Operational Guidelines for Police Chiefs will be presented to General Counsel for review by August 1, 2001. We hope to disseminate the completed documents no later than October 1, 2001.

The University Police Advisory Committee has been charged with recommending updates for the Public Safety Policy Manual on an ongoing basis. They will also recommend changes or updates in the Operational Guidelines for Police Chiefs.

COLLECTIVE BARGAINING AGREEMENT

The chancellor's office was not in compliance with a Unit 8 side-letter agreement between the CSU and the SUPA to complete a study of public safety needs and staffing issues systemwide by December 31, 1999.

The side-letter agreement between the CSU and the SUPA, dated July 14, 1999, required the establishment of a Joint Public Safety Labor-Management Committee to study public safety needs and staffing systemwide giving consideration to a list of 15 working conditions. The committee was to have issued a written report to the chancellor and SUPA directors no later than December 31, 1999. This had not been done.

The labor relations manager stated that there was a lack of staff to work on public safety matters, it appeared as if the union had no staff to work on the report either, and it was a voluntary assignment for the police chiefs who worked on the committee. The vice chancellor of human resources stated that the report is now in draft form but needs to be reviewed by the union before being forwarded to the chancellor and SUPA directors.

Failure to complete the study on a timely basis results in noncompliance with the collective bargaining unit agreement and delays management responsiveness to public safety needs and staffing issues.

Recommendation 2

We recommend that the chancellor's office finalize the public safety study.

Management's Response

We concur. The report was finalized by June 22, 2001.

CRITICAL RESPONSE UNIT

The Critical Response Unit (CRU) had not been officially sanctioned, and its functions had not been formally defined.

The CRU was formed in 1993 after CSU police chiefs agreed on the need for such a team. Although the Executive Council of Presidents requested that the formation of such a group be studied, neither the council, the chancellor, nor the CSU Board of Trustees officially sanctioned its formation. Additionally, the SUAM was not updated to include the CRU and corresponding operational policies and procedures; a systemwide review and acceptance of risks associated with the team had not been performed; and permanent consistent funding had not been secured.

SAM §20050 states that a satisfactory system of internal administrative controls shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions and an effective system of internal review. SAM §20050 further states that the *Standards for the Professional Practice of Internal Auditing*, issued by the Institute of Internal Auditors, defines internal control as a process designed to provide an organization reasonable assurance regarding the accomplishment of established objectives and goals for operations or programs.

The vice chancellor of human resources stated that the CRU existed when she joined the CSU. The San Jose campus police chief, who helped examine the possibility of forming such a group, stated that he proposed inclusion in the SUAM to allow establishment of a CRU operation, but did not know why his proposal was not carried forward.

Operation of a unit that has not been officially sanctioned with formally defined functions increases the risk of misunderstandings between unit and management expectations and CSU liability due to inappropriate activities.

Recommendation 3

We recommend that the chancellor's office obtain official status for the CRU and formally define CRU functions, taking into consideration corresponding risk implications.

Management's Response

We concur. An Executive Order officially establishing the CRU will be issued in accordance with normal University Procedures no later than October 2001.

PARKING PROGRAM

PARKING FUND EXPENDITURES AND ALLOCATIONS

Expenditures of parking funds were not always clearly substantiated to demonstrate compliance with the Education Code, correctly allocated between parking and police operations, and/or used for permitted purposes at seven of the eight campuses visited.

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 Business Affairs – Office of the Chancellor (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 (EO) 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.

Parking management at most of the campuses visited acknowledged the need for documentation, but felt that the funds were properly used. Parking management at two campuses stated that the practices were in place when they joined the department.

Inadequate controls over the use and allocation of parking monies increase the risk of inappropriate expenditures and reduce the amount of funds available for the parking program.

Recommendation 4

We recommend that the chancellor's office remind the campuses of the proper use of parking funds and provide guidance as to the acceptable form of documenting expenditures to demonstrate compliance with the Education Code.

Management's Response

We concur. The Executive Vice Chancellor for Business Affairs will issue a memorandum to the campuses indicating appropriate use of parking fund resources and describing campus policy documentation requirements. This guidance will be issued no later than 120 days after this report is finalized.

PARKING CITATION CONTROLS

Parking citation receivable control accounts had not been established on campus accounting records, and procedures had not been developed for some campuses to control, monitor, and reconcile parking citation processing by third-party vendors.

We found that none of the eight campuses visited had established a parking citation receivable control account on campus accounting records. Citation revenue ranged from \$80,000 to \$755,000. Four of the eight campuses had not established procedures to control, monitor, and reconcile parking citation processing by third-party vendors to ensure that citations were processed as intended and in accordance with the vendor agreement.

SAM §20050 states that the elements of a satisfactory system of internal accounting and administrative controls 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.

Parking management mostly stated that the establishment of a parking citation receivable control account had not been considered or was an oversight. Parking management from the campuses without procedures to control, monitor, and reconcile parking citation processing indicated a management oversight, the difficulty of establishing such procedures, or stated that such procedures would be implemented after their new system was installed.

The lack of adequate internal controls could result in reduced parking fine revenue, inaccurate and inefficient citation processing, the misappropriation or loss of funds going undetected, and noncompliance with the vendor agreement.

Recommendation 5

We recommend that the chancellor's office provide guidance concerning the internal accounting and administrative controls to be considered for adequate parking citation processing.

Management's Response

We concur. Guidance will be issued to the campuses indicating the need for an effective system of internal controls sufficient to provide effective control of parking citation receivables. This guidance will be issued no later than 120 days after this report is finalized.

PUBLIC SAFETY FISCAL ADMINISTRATION

CHARGEBACK CONTROLS

Procedures regarding reimbursement (chargebacks) to public safety for security and/or parking services provided to special events and campus auxiliary enterprises were unsatisfactory at the eight campuses visited.

We found that:

- ▶ formalized written procedures had not been established for chargeback processing at six campuses;
- ▶ the overhead rate was not defined or not substantiated at all the campuses visited;
- ▶ employee benefits were not included for billings to non-General Fund operations at five campuses;
- ▶ billings reviewed were not always accurate and prepared in a timely manner at four campuses; and
- ▶ auxiliary enterprises were not being charged for public safety services provided to their respective areas at six campuses.

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

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

CSU directive 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.*

EO 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 §20050 states that a satisfactory system of internal accounting and administrative controls shall include a system of record-keeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

Public safety management cited several reasons for these conditions, including current campus policy, not being aware of the requirements, and internal personnel issues.

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

Recommendation 6

We recommend that the chancellor's office remind the campuses of current policy regarding chargebacks for services provided by public safety, including those provided to auxiliary operations.

Management's Response

We concur. Campuses will be reminded of existing policies regarding chargebacks for services provided by public safety, including those provided to auxiliary operations. This reminder will be issued no later than 120 days after this report is finalized.

POST FUNDS

Controls over reimbursements from the Commission on Peace Officer Standards and Training (POST) were not adequate at six of the campuses visited.

Training and reimbursements were not tracked to ensure receipt of all reimbursements at three campuses; an adequate segregation of duties was not maintained over POST monies at three campuses; and POST checks were not restrictively endorsed upon receipt and deposit confirmation was not returned to the department at three campuses.

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 §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 controls 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.

At a majority of the campuses visited, management stated that segregation of duties and proper record keeping were not always possible due to limited staff.

Inadequate controls over POST reimbursements and accounts increase the risks that reimbursements will not be received, misappropriation or loss of funds will not be detected, and the availability of training funds will be reduced.

Recommendation 7

We recommend that the chancellor's office include minimum guidelines for the control of POST monies in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur with the audit findings. Campuses will be reminded of existing policies regarding internal controls over public safety fiscal administration no later than 120 days after this report is finalized. Minimum guidelines for the control of POST monies will be considered for the next revision of the Public Safety Policy Manual.

EVIDENCE, WEAPONS AND EQUIPMENT CONTROLS

WEAPONS

Controls over weapons qualifications and ammunition were unsatisfactory at seven of the campuses visited.

We found that weapons qualifications were not met at five campuses, and inventory records were not maintained for ammunition at three campuses and were incomplete at two other campuses.

CSU directive, BA 77-5, *Implementation of Executive Order No. 228: Campus Peace Officer Firearms Policy for the CSU and Colleges*, dated February 23, 1977, states, in part, that qualification must be accomplished with on-duty weapons; where shotguns are authorized, all peace officers must qualify at least semiannually; and regular qualification with off-duty weapons should be considered. *Executive Order No. 756, Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, effective September 21, 2000, superseded this directive.

EO No. 756, *Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, effective September 21, 2000, states, in part, that CSU peace officers shall not use an individual weapon until they are fully qualified in the use of that weapon; officers shall qualify with all types of firearms they may be required to use on a semiannual basis; and all officers in a campus police department shall be qualified to use the type of shotgun designated by the chief of police. The term CSU peace officer covers all sworn CSU police personnel, including all police officers, lieutenants, and campus police chiefs.

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

Most of the campuses acknowledged the need for improvement over weapons qualifications and ammunition, but did not cite any particular cause for the deficiencies except for staff shortages in some cases.

Inadequate controls over weapons qualifications and ammunition increase the risk of poor weapons proficiency and lost or stolen ammunition.

Recommendation 8

We recommend that the chancellor's office remind the campuses of current policy regarding weapons qualifications and include minimum guidelines for ammunition controls in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur. The current policy regarding weapon qualifications and ammunition controls will be discussed at the August meeting of Police Chiefs. This policy will also be included in the Operations Guidelines for Police which will be issued at the same time (October 2001) as the Policy Manual.

EVIDENCE

Evidence was not adequately controlled, and confiscated weapons were not disposed of on a timely basis at five of the campuses visited.

Our review disclosed problems concerning evidence verification and record keeping at four campuses and one campus that did not dispose of evidence on a timely basis. This latter campus had evidence dating back to 1985 for 690 cases. In addition, three campuses had confiscated weapons for cases dating from 1984 through 1997.

The IACLEA Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 23, states, in part, 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 the final disposition of found, recovered, and evidentiary property should be accomplished within six months after legal requirements have been satisfied.

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

Management stated that the findings were primarily the result of staff shortages and management oversights.

Inadequate controls over evidence increase the risk of unacceptable evidence at trial, untimely return of property to its rightful owners, inefficient use of evidence storage facilities, and noncompliance with confiscated weapons requirements.

Recommendation 9

We recommend that the chancellor's office include minimum guidelines for the control of evidence and confiscated weapons in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur and such guidelines will be included either in the Operations Guidelines for Police Chiefs or the Public Safety Policy Manual which will be issued in October 2001.

EQUIPMENT

Public safety department equipment was not always properly authorized and controlled at the eight campuses visited.

We found that:

- ▶ use of nonstandard equipment (i.e., pepper spray, shotguns, etc.) was not authorized by the campus president at five campuses;
- ▶ a comprehensive list of equipment issued to officers was either not maintained or not kept current at six campuses; and
- ▶ items selected from campus property records either could not be located or were no longer used but not surveyed off the property records.

Article 10.6 of the CBA between the CSU Board of Trustees and the SUPA, for July 1, 1998, through June 30, 2001, states that the following equipment, when required by the president, shall be available in each public safety department: mace and holder, shotgun, riot helmet and visor, gas mask and cartridge, and coveralls.

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

Management at some of the campuses stated that they were not aware of or misinterpreted the CBA requirement for presidential approval of nonstandard equipment. They further stated that lack of current comprehensive equipment lists or other problems were the result of staff shortages and management oversights.

Internal controls over public safety department equipment are compromised when the use of nonstandard equipment is not properly approved, and the risk of loss increases when accountability is not maintained.

Recommendation 10

We recommend that the chancellor's office include minimum guidelines for the approval and control of public safety equipment in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur and such guidelines will be included either in the Operations Guidelines for Police Chiefs or the Public Safety Policy Manual which will be issued in October 2001.

PUBLIC SAFETY PROGRAM ADMINISTRATION

Written policies and procedures had not been fully developed at five of the campuses visited.

Written policies and procedures for the following areas were lacking at one or more of the five campuses:

- ▶ award of special assignment stipends;
- ▶ communication and dispatcher operations;
- ▶ chain of command;
- ▶ monitoring the number and status of case files assigned to the investigator;
- ▶ reporting of off-duty incidents to department management;
- ▶ department goals and objectives;
- ▶ self-evaluation; and
- ▶ the use and care of mounted units.

Article 21.25 of the CBA between the CSU Board of Trustees and the SUPA, for July 1, 1998, through June 30, 2001, states that the special assignments shall be based on campus needs as determined by the chief of police.

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

SAM §20050 states that a satisfactory system of internal administrative controls shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions. Further, the nonexistence of policy and procedural or operational manuals is a danger signal of a vulnerable control system.

In some instances, management stated that certain policies and procedures were in draft form or being currently reviewed. Management from one campus stated that they were awaiting the revised systemwide Public Safety Policy Manual.

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

Recommendation 11

We recommend that the chancellor's office address the need for local policies and procedures to supplement systemwide requirements in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur. The need for local policies and procedures will be discussed at June meeting of the Council of Business Officers and the August meeting of the Police Chiefs. The Vice Chancellor for Human Resources will issue a memorandum to both groups and to the appropriate Vice Presidents of Student Affairs after the publication of the Operational Guidelines for Police Chiefs and Public Safety Policy Manual reminding them of the need to issue such policies and procedures.

POLICE ACTIVITIES AND CRIME REPORTING

Access to automated systems and/or criminal offender record information (CORI) needed improvement at seven of the campuses visited.

We found that:

- ▶ the lists of authorized users for the California Law Enforcement Telecommunications System (CLETS) obtained from the sheriff's offices included individuals no longer with the department at four campuses and showed that users were also sharing operator identifications at one of those campuses;
- ▶ access controls over the automated dispatch systems at five campuses included inadequate password character lengths, longer-than-recommended password expiration periods, and users not being logged off after a predetermined period of nonuse; and
- ▶ access to CORI was not properly supported at two campuses.

California Code of Regulations (CCR) Title 11 §707 states that automated systems handling CORI and the information derived therefrom shall be secure from unauthorized access, alteration, deletion, or release. Each authorized agency shall keep a record of each release of CORI from the automated system that shall contain the date of release, the requesting terminal identifier, the receiving terminal identifier, and the information given.

Penal Code §11142 and §11143 provide for criminal penalties for the release of CORI to unauthorized individuals.

Current practices for password management require a minimum length of password characters, maintain a password history to prevent reuse, and log off users after a predetermined time (see Department of Defense Password Management Guideline, a.k.a. Greenbook). Additionally, Control Objectives for Information Technology (COBIT) and Federal Information Processing Standards Publication 112 (FIPS112) also recommend guidelines to be established for an appropriate minimum password length and an appropriate and enforced frequency of password changes. Furthermore, SAM §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.

Management cited staff shortages and management oversights for not updating CLETS authorized users' lists and were mostly unaware of industry standards regarding automated system access controls. Management further stated that the improperly supported CORI requests appeared to be the failure of one individual.

Not maintaining adequate controls over the CLETS, CORI, and system access could allow unauthorized users to gain access to public safety systems and confidential data.

Recommendation 12

We recommend that the chancellor's office include minimum guidelines for access controls over automated systems and controls over CORI in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur. Such guidelines will be included in either the Operational Guidelines for Police Chiefs or the Public Safety Policy Manual which will be issued in October 2001.

PERSONNEL ADMINISTRATION AND TRAINING

Training requirements were not always met at seven campuses visited.

We found that:

- ▶ supporting documentation could not be provided to show that first aid and cardiopulmonary resuscitation (CPR) training was current for all officers at six of the campuses;
- ▶ a lieutenant at one campus who was appointed/promoted to lieutenant in March 1999 had not completed a POST certified management course; and
- ▶ three officers had not attended a minimum of 24 hours of class instruction over the last 24 months, as required by POST at one campus.

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.

CCR Title 11 Division 2, POST, §1005 (c) states that every peace officer promoted, appointed, or transferred to a middle management position shall satisfactorily complete a certified management course prior to promotion or within 12 months after the initial promotion, appointment, or transfer to such position.

CCR Title 11, §1005 and §1018, and POST procedure D-2 require 24-hours of continuing professional training for peace officers every two years. POST Bulletin 99-07 extended this requirement to executive and middle management positions, public safety dispatchers, and public safety dispatch supervisors effective July 1, 2000.

Management cited staff shortages, missed training sessions, and management oversights for the training deficiencies.

Not adhering to POST and Penal Code CPR training requirements reduces job performance and life-saving abilities and increases the risk of noncompliance with state regulations.

Recommendation 13

We recommend that the chancellor's office address the importance of adequate training in the revised systemwide Public Safety Policy Manual.

Management's Response

We concur. The importance of training will be discussed in the August meeting of Police Chiefs and it will be included in either the Public Safety Policy Manual or the Operational Guidelines for Police Chiefs.

APPENDIX A: PERSONNEL CONTACTED

CHANCELLOR'S OFFICE

Joel Block	Manager, Labor Relations
Ron Lindsey	Attorney, Office of General Counsel
Mike Lordanich	Police Chief and Public Safety Systemwide Coordinator
Jackie McClain	Vice Chancellor, Human Resources
Kim Wible	Police Chief and Systemwide Police Advisory Committee Member

CALIFORNIA STATE UNIVERSITY, FRESNO

John D. Welty	President
Gary Beddingfield	Parking Administrator
Lynn Button	Chief of Police
Marcy Gatzman	Administrative Support Coordinator
John Hernandez	Property Clerk
David Jensen	Sergeant/Range Master
Steven Katz	University Controller
Fred Martinez	Parking Coordinator
Russell Marzette	Clerical Assistant IV
Pam Mighaccio	Environmental Health and Safety Support Coordinator
Benjamin Quillian	Vice President for Administration
Chris Robinson	Internal Auditor
Linda Sabbatini	Accounting Supervisor, CSUF Auxiliary Corporations
Isabel Santos	Dispatcher
Sergio Silva	Lieutenant
Linda Stephens	Administrative Analyst/Specialist
Ruby Thakur	Administrative Support Assistant
Andy Washington	Corporal/Investigator
Pat Work	Manager, Accounts Payable and Non-Student Accounts Receivable

HUMBOLDT STATE UNIVERSITY

Alistair W. McCrone	President
Audrey Acorn	Accounting Technician II
Laurie Altizer	Administrative Coordinator
Thomas C. Babcock	Police Officer
Steven Butler	Vice President, Student Affairs
Patricia Clinton	Accounting Officer, Fiscal Affairs
Raymond Fagot	Police Sergeant
Gail Finney	Accounting Technician III
Robert Foster	Chief of Police
Richard A. Giacolini	Director, Contracts, Procurement and Risk Management
Jim Hulsebus	Lieutenant (retired)
Aleli Lawson	Administrative Coordinator
Paul Meyer	Campus Property Clerk
Carolyn Mueller	Executive Assistant to the President

APPENDIX A

John D. Parrish, III	Police Services Technician
Jan Scheffler	Dispatcher
Robert Schmeltzer	Police Officer
Roger Schroeder	Police Officer
Donna K. Sorensen	Director, Fiscal Affairs
Jennifer Sowle	Administrative Support Assistant II
Stephen Sullivan	Parking and Commuter Services Supervisor
James E. Walker	Police Sergeant
Toby Walker	Information Technology Consultant, Student Affairs
Linda Wood	Accounting Technician III

CALIFORNIA STATE UNIVERSITY, LOS ANGELES

James M. Rosser	President
Phillip F. Boone	Sergeant
Desiree D. Bumgarner	Assistant to the Chief
Cynthia Burks	Supervisor, General Accounting
Fausto Cáceres	Lead Payroll Technician
Raul R. Casanova	Police Officer
Martha Casillas	Administrative Analyst Specialist
Pamela Curran	Dispatcher
Jo Anne Disney	Collection Analyst
Vicki Enriquez	Administration Operations Analyst
Carmen E. Gachupin	Transportation Program Manager
Ann Harris	Accounts Receivable Supervisor
John A. Hernandez	Lieutenant/Assistant Director
Robert Horch II	Parking Manager
Greg King	Chief of Police
Yuet K. Lee	University Internal Auditor
George Limeli	Information Technology Consultant
Rosa D. Mejia	Records/Dispatch Supervisor
Kevin Millinger	Sergeant
Joseph F. Mitchell	Manager, Materials Management
Frank Navarro	Detective/Corporal
Sri Renganathan	University Controller
Monica Rico	Transportation Program Assistant
Michelle Tcheng	Cashier's Office
Ronnie Wills	Operations Supervisor

CALIFORNIA STATE UNIVERSITY, MONTEREY BAY

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

CALIFORNIA STATE POLYTECHNIC UNIVERSITY, POMONA

Bob H. Suzuki	President
Terry Allen	Police Officer
Rosemary Anaya	Director, Facilities Administrative Services
Yvonne Cordura	Administrative Support Assistant
Patricia Farris	Vice President, Administrative Affairs
Scott Foley	Police Officer
Faye Hatman	Budget Manager
Charles W. Holt	Manager of Parking and Administrative Services
Donald Kingwell	Police Officer
Darwin Labordo	Associate Vice President, Finance and Administrative Services
Donna Leonard	Administrative Support Assistant
George Lwin	Associate Director, Facilities Management
Lu Mandel	Dispatch Services Lead
Debbi McFall	Emergency Services Coordinator
David Patterson	Director, Environmental Health and Safety
Kim Plater	Chief of Police
Dan Ponder	Sergeant
Terri Ramirez	Senior Secretary (on leave)
Diane Sands	Grant Coordinator
Jane Self	Senior Payroll Coordinator
Michelle Serna	Police Officer
Alice Slaughter	Investigative Officer
Kris Surber	Grant Coordinator

Cindy Thibodeaux	Customer Service Representative, Facilities Management
Judy Tillie	Secretary (temporary)
Laraine Turk	Acting Vice President, Student Affairs
Ron Veach	Detective Sergeant
Leo Verdugo	Sergeant
Bruce Wilson	Sergeant

CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO

Albert K. Karnig	President
Lea Anderson	Disaster Preparedness Coordinator
Gerald Applegate	Police Officer
Carisa Barnes	Operations Supervisor, Parking Services Bureau
Brian Bodily	Sergeant
Manuel Castro	Administrative Sergeant
David DeMauro	Vice President, Administration and Finance
Mark Hoover	Police Officer
Deidre Kobziff	Supervisor, Commuter Services/Special Event Services
Dennis Kraus	Chief of Police/ Director, Department of Public Safety
Shannon Lewis	Sergeant
Marsha Lovell	Student Accounts Supervisor
Quentin Moses	Manager, Parking Services Bureau
Stephen Nowicki	Lieutenant
James Olinger	Information Technology Consultant, Administration and Finance
Ronald Profeta	Supervisor, Information Center
Samuel Sarmiento	Corporal
Pemar Sourgose	Administrative Support Assistant
Muriel Vita	Associate Director, Office of Accounting

SAN DIEGO STATE UNIVERSITY

Stephen L. Weber	President
John J. Carpenter	Chief of Police/Director, Department of Public Safety/University Police
Sharon Chapman	Payroll Specialist, Human Resources
Angela Fanucchi	Records Clerk
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
Gwen Hemphill-Cannon	Dispatcher
Alison Hunter	Tax and Audit Coordinator, Business Information Management
Chris Jacobsen	Detective
Linda Kennan	Administrative Coordinator
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
Sally Roush	Vice President, Business and Financial Affairs
Charles Schwoerke	Lieutenant
Michael S. Smoger	Assistant Director
Linda A. Stewart	Assistant Vice President, Business and Financial Affairs
Stephen A. Williams	Captain

SAN JOSE STATE UNIVERSITY

Robert L. Caret	President
Ric Abeyta	Chief of Police
Marianne Alvarez	Support Services Lieutenant
Yolanda Castro	Citation Coordinator
Jennifer Cohen	Property and Evidence Assistant
Marilyn Fratto	Financial Coordinator
Noemi Hinchberger	Records Supervisor
Don Kassing	Vice President, Administration and Finance
Claire Kotowski	Administrative Analyst
Susan Lantow	Assistant to Vice President, Administration and Finance
John Laws	Sergeant
Rose Lee	Associate Vice President, Financial and Administrative Program Planning
Bruce Lowe	Administrative Services Lieutenant
Shannon Maloney	Lieutenant/Operations Commander
Virginia McGregor	Dispatcher
Tom Pomeroy	Corporal
Lolita Powell	Traffic and Parking Operations Office Coordinator
Jim Renelle	Patrol Sergeant/Range Master
Carol Sooter	Associate Director, SJSU Foundation
Linda Vasquez	Associate Vice President, Business Operations
Robert Womack	Corporal
Mary Worth	Chief Operating Officer, SJSU Foundation



THE CALIFORNIA STATE UNIVERSITY

BAKERSFIELD • CHANNEL ISLANDS • CHICO • DOMINGUEZ HILLS • FRESNO • FULLERTON • HAYWARD • HUMBOLDT
 LONG BEACH • LOS ANGELES • MARITIME ACADEMY • MONTEREY BAY • NORTHBRIDGE • POMONA • SACRAMENTO
 SAN BERNARDINO • SAN DIEGO • SAN FRANCISCO • SAN JOSE • SAN LUIS OBISPO • SAN MARCOS • SONOMA • STANISLAUS

JACKIE R. McCLAIN
 VICE CHANCELLOR
 HUMAN RESOURCES

MEMORANDUM

Date: July 5, 2001
 To: Larry Mandel
 From: Jackie McClain *JRM*
 Re: Systemwide Public Safety Audit

RECEIVED
 University Auditor

JUL 06 2001

The California State
 University

- (1) We concur. A draft document originally called the Public Safety Policy Manual was completed approximately eight months ago. In consultation with General Counsel it was determined that the document should be split into two parts: 1) a Public Safety Policy Manual which would include topics limited to those items in the old Public Safety Policy Manual as referenced in the MOU, and 2) a larger Operational Guidelines for Police Chiefs which would include both guidelines and procedures governing the actions of Police Chiefs within the system.

It is anticipated that the final draft of both the Public Safety Policy Manual (PSPM) and the Operational Guidelines for Police Chiefs (OGPC) will be presented to General Counsel for review by August 1, 2001. We hope to disseminate the completed documents no later than October 1, 2001.

The University Police Advisory Committee has been charged with recommending updates for the Public Safety Policy Manual (see letter of May 30, 2001 attached) on an ongoing basis. They will also recommend changes or updates in the Operational Guidelines for Police Chiefs.

- (2) We concur. The report was finalized by June 22, 2001.
- (3) We concur. An Executive Order officially establishing the CRU will be issued in accordance with normal University Procedures no later than October 2001.
- (4) We concur. The Executive Vice Chancellor for Business Affairs will issue a memorandum to the campuses indicating appropriate use of parking fund resources and describing campus policy documentation requirements. This guidance will be issued no later than 120 days after this report is finalized.

- (5) We concur. Guidance will be issued to the campuses indicating the need for an effective system of internal controls sufficient to provide effective control of parking citation receivables. This guidance will be issued no later than 120 days after this report is finalized.
- (6) We concur. Campuses will be reminded of existing policies regarding charge backs for services provided by public safety, including those provided to auxiliary operations. This reminder will be issued no later than 120 days after this report is finalized.
- (7) We concur with the audit findings. Campuses will be reminded of existing policies regarding internal controls over public safety fiscal administration no later than 120 days after this report is finalized. Minimum guidelines for the control of POST monies will be considered for the next revision of the Public Safety Police Manual.
- (8) We concur. The current policy regarding weapon qualifications and ammunition controls will be discussed at the August meeting of Police Chiefs. This policy will also be included in the Operations Guidelines for Police which will be issued at the same time (October 2001) as the Police Manual.
- (9) We concur and such guidelines will be included either in the Operations Guidelines for Police Chiefs or the Public Safety Policy Manual which will be issued in October 2001.
- (10) We concur and such guidelines will be included either in the Operations Guidelines for Police Chiefs or the Public Safety Policy Manual which will be issued in October 2001.
- (11) We concur. The need for local policies and procedures will be discussed at June meeting of the Council of Business Officers and the August meeting of the Police Chiefs. The Vice Chancellor for Human Resources will issue a memorandum to both groups and to the appropriate Vice Presidents of Student Affairs after the publication of the Operational Guidelines for Police Chiefs and Public Safety Policy Manual reminding them of the need to issue such policies and procedures..
- (12) We concur. Such guidelines will be included in either the Operational Guidelines for Police Chiefs or the Public Safety Policy Manual which will be issued in October 2001.
- (13) We concur. The importance of training will be discussed in the August meeting of Police Chiefs and it will be included in either the Public Safety Policy Manual or the Operational Guidelines for Police Chiefs.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

July 19, 2001

CHICO

DOMINGUEZ HILLS

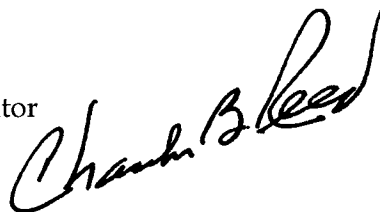
MEMORANDUM

FRESNO

TO: Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed
Chancellor



HAYWARD

HUMBOLDT

SUBJECT: Draft Final Report Number 00-37 on *Public Safety*,
Systemwide

LONG BEACH

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of July 19, 2001, I accept the response
as submitted with the draft final report on *Public Safety*, Systemwide.

MONTEREY BAY

NORTHRIDGE

LM:amd

POMONA

Enclosure

SACRAMENTO

SAN BERNARDINO

cc: Jackie R. McClain
Vice Chancellor of Human Resources

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS