

PUBLIC SAFETY

**CALIFORNIA STATE UNIVERSITY,
SAN BERNARDINO**

**Report Number 00-45
April 16, 2001**

Members, Committee on Audit

Frederick W. Pierce, IV, Chair
Harold Goldwhite, Vice Chair
Murray L. Galinson Shailesh J. Mehta
Neel I. Murarka Stanley T. Wang

Staff

University Auditor: Larry Mandel
Senior Director: Janice Mirza
Senior Auditor: Ellis Williams

**BOARD OF TRUSTEES
THE CALIFORNIA STATE UNIVERSITY**

CONTENTS

INTRODUCTION

Purpose.....	1
Scope and Methodology.....	2
Background	2
Opinion	4
Executive Summary.....	5

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Parking Program	9
Parking Fund Expenditures and Allocations	9
Citation Processing Controls	11
Revenue Reconciliation.....	13
Special Event Parking	15
Public Safety Fiscal Administration.....	16
Chargeback Controls	16
Miscellaneous Fees	18
Evidence, Weapons and Equipment Controls.....	19
Weapons.....	19
Equipment	20
Police Activities and Crime Reporting	21
CLETS Access	21
Release of Juvenile Records	22
Policies and Procedures	22
Personnel Administration and Training	23
CPR And First Aid Training.....	23
Stipends.....	24
Public Safety Program Administration	25

APPENDICES

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

ABBREVIATIONS

ABS	Auxiliary and Business Services – Office of the Chancellor
BA	Business Affairs – Office of the Chancellor
BOT	Board of Trustees
BP	Budget Planning – Office of the Chancellor
CBA	Collective Bargaining Agreement
CCR	California Code of Regulations
CLETS	California Law Enforcement Telecommunications System
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
CSUSB	California State University, San Bernardino
DOJ	Department of Justice
DPS	Department of Public Safety
EMS	Emergency Medical Service
FIPS112	Federal Information Processing Standards 112
IACLEA	International Association of Campus Law Enforcement Administrators
POST	Commission on Peace Officer Standards and Training
PS	Public Safety
RAD	Rape Aggression Defense
RIMS	Records Information Management System
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

- ▶ parking revenues are adequately controlled, properly accounted for, and used in accordance with CSU policy and state regulations, and parking citation issuance, processing and administration are adequately controlled and in accordance with the Vehicle Code.

SCOPE AND METHODOLOGY

This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies and Office of the Chancellor and campus policies, letters and directives. June 1999 to date was the primary period of review.

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

- ▶ procedures for communicating systemwide/campus specific policies, rules and regulations;
- ▶ staffing, scheduling and internal investigation procedures;
- ▶ budgeting procedures, chargeback and stipend processing, POST reimbursements, and the management of grants;
- ▶ dispatch operations, field reporting requirements, and case monitoring procedures;
- ▶ procedures for maintaining and securing public safety records, files and information;
- ▶ procedures for accumulating and reporting crime statistics;
- ▶ hiring, certification and training compliance;
- ▶ procedures for controlling evidence, weapons and other public safety equipment;
- ▶ procedures for controlling and processing parking revenues, parking citations and parking funds; and
- ▶ data security, disaster recover and backup procedures.

BACKGROUND

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

The proposed scope of such audits, as presented in Attachment B, Agenda Item 3 of the January 25-26, 2000, meeting of the Committee on Audit, stated that *Public Safety* includes primarily police activities and

law enforcement including parking/citations and crime reporting. The proposed audit scope would include the reliability and integrity of information; compliance with laws, policies, plans, procedures and regulations; the safeguarding of assets; the economical and efficient use of resources; and the accomplishment of objectives and goals. *Public Safety* was previously audited in 1992.

The California State University Public Safety Program was developed in 1974, commencing with a two-year pilot project on the Northridge campus. A systemwide committee subsequently forwarded recommendations regarding a “public safety approach” for CSU campuses to the Chancellor. The Chancellor’s Council of Presidents endorsed the recommendations as an appropriate program for the CSU, and then Chancellor Dumke issued a directive in 1977 stating that the necessary actions should be taken to bring the program to fruition.

Throughout the 1980’s, the CSU residence population increased greatly, and the problems associated with this growth were similar to those experienced by small municipal police departments. Sexual assaults, alcohol, drugs and vandalism increased; and legislation mandated more involvement by university police officers in the investigation and prevention of crimes, as well as care for the victims. As a result, public safety departments created policing programs and preventive patrols to deter crime. The growth of on-campus housing also increased the complexity of emergency planning. Parking structures were built on campuses, and an increase in auto burglaries and theft necessitated the need for increased patrols.

The Crime Awareness and Campus Security Act of 1989 became Title II of Public Law 101-542, *The Student Right-to-Know and Campus Security Act of 1990*. President George Bush signed the Act into law on November 8, 1990. The Act amended section 485 of the Higher Education Act of 1965 by adding campus crime statistic and security policy disclosure provisions for colleges and universities. This law (now known as the *Jeanne Clery Act*) applies to all institutions of higher education, both public and private, which participate in any federal student aid programs and requires schools to publicly disclose three years of campus crime statistics and basic security policies. In 1992, the *Campus Sexual Assault Victims’ Bill of Rights* was incorporated into the *Jeanne Clery Act*. In 1998, the *Jeanne Clery Act* was further amended to expand the scope of campus crime statistic reporting, ensure crime statistics are reported in accordance with the FBI’s Uniform Crime Reporting (UCR) program, and require the maintenance of a public police log of all reported crimes as well as a policy to issue timely warnings when a crime, reportable in the annual statistics, is known to the school and poses an ongoing threat to the campus.

In California, the *Kristen Smart Campus Safety Act of 1998* was signed into law on August 11, 1998. This act requires California colleges to promulgate rules requiring each of their respective campuses to enter into written agreements with local law enforcement agencies which will: (1) designate which law enforcement agency has operational responsibility for the investigation of violent crimes occurring on campus, and (2) delineate the specific boundaries of each agency’s operational responsibility.

In the 1990’s, campus police administrators, complying with increased training standards from the Commission on Peace Officer Standards and Training (POST), increased legislation and governmental reporting, crime trends and sophistication, and the need to upgrade and continue the professionalism of campus police agency response, collectively tried to upgrade Campus Public Safety department to

Professional Police departments. This included uniform standards, vehicles, equipment, training, emergency preparedness, the development of Critical Response Units (CRU), semi-annual meetings between police chiefs, working closely within the Chancellor's Human Resources Division, collective bargaining, and updating inadequate policies.

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

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

Throughout this report, we will refer to the program as Public Safety (PS). At California State University, San Bernardino (CSUSB), the Department of Public Safety (DPS) manages the PS program. CSUSB parking operations are managed by the Parking Services Bureau, which reports to the director of public safety/chief of police. CSUSB policing operations are referred to as the Police Services Bureau.

OPINION

We visited the California State University, San Bernardino campus from October 23, 2000, through December 22, 2000, and audited the procedures in effect at that time.

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

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

EXECUTIVE SUMMARY

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

PARKING PROGRAM [9]

PARKING FUND EXPENDITURES AND ALLOCATIONS [9]

Expenditures of parking funds were not always clearly documented and substantiated to demonstrate compliance with the Education Code. Adequate controls over the use and allocation of parking monies ensure that these monies are used for appropriate purposes and may increase the amount of funds available for the parking program.

CITATION PROCESSING CONTROLS [11]

Controls over parking citation processing, collection, and Auto Issue/Auto Process system access were unsatisfactory. Maintaining adequate internal controls maximizes parking fine revenue and reduces the risk that misappropriation or loss of funds will go undetected.

REVENUE RECONCILIATION [13]

Procedures for reconciling citation and parking decal revenue were not adequate. Maintaining adequate controls over revenue reconciliation helps ensure that all parking revenues are properly recorded and errors or misappropriations are detected.

SPECIAL EVENT PARKING [15]

Parking fees were not charged for special event activities held on Sundays. Charging for all special event parking ensures compliance with state regulations and increases the amount of funds available for parking operations.

PUBLIC SAFETY FISCAL ADMINISTRATION [16]

CHARGEBACK CONTROLS [16]

Procedures governing reimbursement (chargebacks) to the Department of Public Safety (DPS) for services rendered for special events needed improvement. Adequate controls over chargebacks ensure

INTRODUCTION

accurate, complete, and timely reimbursements to the DPS and increase the funds available for law enforcement activities.

MISCELLANEOUS FEES [18]

Proper approval had not been obtained for one miscellaneous fee, and accountability over another fee needed improvement. Satisfactory internal accounting and administrative controls reduce the risk that improper fees will be assessed and misappropriation or loss of funds will go undetected.

EVIDENCE, WEAPONS AND EQUIPMENT CONTROLS [19]

WEAPONS [19]

Controls over weapons qualifications, training, and ammunition needed improvement. Satisfactory controls over weapons and ammunition ensure weapon proficiency and reduce the risk of lost or stolen ammunition.

EQUIPMENT [20]

DPS equipment was not always properly authorized. Proper internal controls ensure the approval of nonstandard equipment.

POLICE ACTIVITIES AND CRIME REPORTING [21]

CLETS ACCESS [21]

Access controls to the California Law Enforcement Telecommunication System (CLETS) needed improvement. Adequate access controls prevent unauthorized access to restricted records.

RELEASE OF JUVENILE RECORDS [22]

The criminal activity information sent to the chancellor's office included arrest registers with the names of juvenile offenders. Properly controlling the release of information ensures compliance with privacy laws.

POLICIES AND PROCEDURES [22]

Written policies and procedures had not been developed for the DPS dispatch function. Maintaining a formal policies and procedures manual reduces misunderstandings related to the performance of duties and functions.

PERSONNEL ADMINISTRATION AND TRAINING [23]

CPR AND FIRST AID TRAINING [23]

First aid and cardiopulmonary resuscitation (CPR) training procedures were not adequate. Adequate training and maintenance of certification for such training ensures compliance with state regulations and increases the ability of police officers to administer life-saving aid.

STIPENDS [24]

Controls over the award of special assignment stipends needed to be improved. Adequate documentation of special assignment stipend rules reduces misunderstandings and ensures compliance with the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and the Statewide University Police Association (SUPA).

PUBLIC SAFETY PROGRAM ADMINISTRATION [25]

Data access and file backup controls over data maintained on the DPS file server were not adequate. Maintaining adequate system access controls and off-site data backup storage prevents unauthorized access to restricted data, ensures operational efficiency, and reduces the risk that important data will be lost in the event of a disaster.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

PARKING PROGRAM

PARKING FUND EXPENDITURES AND ALLOCATIONS

Expenditures of parking funds were not always clearly documented and substantiated to demonstrate compliance with the Education Code.

We noted that:

- ▶ 25 percent, 10 percent, and 5 percent of salaries for the chief of police, lieutenant and sergeant, respectively, were charged to parking operations. In addition, the purchasing department charged \$36,000 for services provided to the parking program. However, there was no documentation to support the valuation methods being used.
- ▶ The chief of police had sole access to a vehicle purchased from parking revenue funds.

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

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

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

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

The lieutenant stated that the rates charged were estimated based on time assigned for services rendered to the parking program. The parking services bureau manager stated that he had not been provided with supporting documentation for the purchasing charges.

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 1

We recommend that the campus:

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

Campus Response

The campus concurs with the recommendation and will implement the standard prescribed in Executive Order No. 753, *Allocation of Costs to Auxiliary Enterprises*. The campus acknowledges that this order supersedes all Memoranda of Understanding in place by Parking Services.

Charges to Parking Services from the Public Safety Department for services by two full-time dispatchers and direct time for the Director of Public Safety will be directly related and documented.
Completion date: September 15, 2001.

Direct charges for services provided by the Purchasing Department (\$36,000) will be calculated with justification as required by Executive Order No. 753.
Completion date: September 15, 2001.

The vehicle purchased by Parking Services has been moved into the Parking Services inventory. The use of this vehicle is shared by Parking staff, and documented mileage is provided. The Parking Services Department will strengthen procedures to ensure that all expenditures of parking funds are documented and substantiated to ensure compliance.

CITATION PROCESSING CONTROLS

Controls over parking citation processing, collection, and Auto Issue/Auto Process system access were unsatisfactory.

We noted that:

- ▶ A parking citation receivable control account total had not been established on the campus accounting records. Parking fine revenue for fiscal year 1999/2000 totaled approximately \$205,000. Such an account would serve as a cross-check for verifying the accuracy of subsidiary records maintained by the parking services bureau.
- ▶ Citation collection procedures did not include the use of holds on student accounts. In addition, a consistent schedule had not been established for sending collection letters. At the time of our review, parking records showed 6,836 outstanding parking fines, totaling \$183,000, dating back to 1996.
- ▶ A proper segregation of duties was not maintained over processing parking citations since the parking services bureau operations supervisor was also the parking system administrator who entered citations into the parking system and determined the disposition of contested parking citations.
- ▶ Auto Issue/Auto Process system access controls did not include an adequate password length. In addition, the information technology consultant took parking system backup files home instead of sending them to an official off-site storage location.

SAM §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and record-keeping procedures adequate to provide effective control over assets, liabilities, revenues, and expenditures. The elements are expected to provide internal checks and balances. In addition, there should be a plan that limits access to state agency assets to authorized personnel who require these assets in the performance of their assigned duties.

Current practices for password management require a minimum length of password characters and a password history be maintained to prevent reuse (see Department of Defense Password Management Guideline, a.k.a. Greenbook). 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.

SAM §4989.7 states, in part, that there should be agency policies in operation that mandate standards for the regular backup of all data, and management should protect computing configurations from theft and unauthorized use.

The vice president for administration and finance stated that due to significant staff turnover, it has been difficult to address these deficiencies. The parking services bureau operations supervisor indicated that she was not aware of the requirement for passwords to be a certain minimum length and that the Auto Issue/Auto Process system only allowed for a lesser number of characters. Additionally, the information technology consultant stated that the backup tapes were taken to his home temporarily while other storage options were under review.

The lack of adequate internal controls and comprehensive collection procedures reduces revenue from parking fines and forfeitures and increases the risk that inappropriate activities will not be detected.

Recommendation 2

We recommend that the campus:

- a. record outstanding parking citation receivables on the campus accounting records and regularly reconcile subsidiary detail records to that control total;
- b. analyze and evaluate collection policies and procedures to determine which collection methods are the most effective and strengthen current procedures accordingly;
- c. strengthen procedures to ensure a proper segregation of duties in the processing of parking citations; and
- d. strengthen Auto Issue/Auto Process system controls over passwords and off-site backup storage.

Campus Response

The campus concurs with the recommendation and has established a new position whose responsibilities will address the majority of the concerns outlined in this finding. The position will enable (1) segregation of duties, (2) establishment of procedures, guidelines, and accountability for citation revenue receivables, and (3) determine the collection method that would be most effective to strengthen the procedures.

Completion date: September 15, 2001.

Parking Services staff are working with the Accounting Office to establish methods to identify students and place holds on student records. A process is being developed to establish a DMV online service that will allow immediate access to vehicle registration information.

Completion date: September 15, 2001.

Responsibilities of a clerical employee and a student assistant have been realigned to enter citations into the parking system. The operation supervisor will continue to determine the disposition of contested parking citations.

Program changes have been made to allow Auto Process to accept 10-digit passwords. In addition to the password, security access also includes the officer's name and ID number. The database cannot be accessed without the combination of a password, officer's name, and ID number.

Estimated completion date: December 1, 2001.

REVENUE RECONCILIATION

Procedures for reconciling citation and parking decal revenue were not adequate.

We noted that:

- ▶ the parking services bureau did not routinely reconcile citation revenues collected to outstanding parking citations to ensure that all funds were properly received; and
- ▶ the bursar's office did not complete a reconciliation of parking decal revenue to decals sold or provide documentation to support the revenue collected to the parking services bureau.

SUAM §3821 requires that the chief business officer shall establish control procedures to ensure that all monies due are collected, safeguarded, deposited, reconciled, remitted, and invested in a timely manner.

SAM §20050 requires a system of record-keeping procedures adequate to provide effective accounting control over revenues and expenditures.

The parking services bureau operations supervisor stated that she had discontinued performing the citation revenue reconciliation because of staff resources and time constraints. The student accounts supervisor stated that the accounting system did not have the capability to provide detailed report information. The parking services bureau manager indicated that system interface was a problem and that the parking services bureau planned to obtain the computer software needed to help correct the problem.

Inadequate control over revenue reconciliation increases the risk that errors or misappropriations will go undetected.

Recommendation 3

We recommend that the campus develop procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected.

Campus Response

The campus concurs with the recommendation and will establish procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected.

Completion date: September 15, 2001.

SPECIAL EVENT PARKING

Parking fees were not charged for special event activities held on Sundays.

The California State University, San Bernardino (CSUSB) Parking Policy states that permits are required for parking at all times, which is supported by signs posted in all permit parking areas. Exceptions include quarter breaks, graduation, Sundays, and legal and administrative holidays as observed by the university, except when parking officers are present during special events.

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

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

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

The parking services bureau manager of parking services stated that the practice of not charging on Sundays had been in place for many years as a service to the campus community.

Failure to charge for parking for all special events increases the risk of noncompliance with state regulations and reduces the amount of funds available for parking operations.

Recommendation 4

We recommend that the campus establish procedures to charge parking fees for all special events.

Campus Response

The campus concurs with the recommendation. The Parking Policy has been revised, with input from the Campus Transportation Committee, to charge for Sunday and special events parking. The proposed revised policy will be reviewed by the campus Administrative Council, and a recommendation will be forwarded to President Karnig.

Completion date: September 15, 2001.

PUBLIC SAFETY FISCAL ADMINISTRATION

CHARGEBACK CONTROLS

Procedures governing reimbursement (chargebacks) to the Department of Public Safety (DPS) for services rendered for special events needed improvement.

We noted that:

- ▶ formalized written chargeback policies and procedures had not been developed;
- ▶ documentation was not available to support the 10-percent overhead rate applied to chargebacks; and
- ▶ staff benefits were not included in the chargeback rates.

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

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

CSU systemwide directive BP 86-69, *Staff Benefits – Billing Rates for Services of General Fund Employees*, dated September 29, 1986, states that billings for services of General Fund employees should include staff benefit-type charges in accordance with SAM §8740, and campuses will be responsible for the derivation of benefit rates applicable to their campus.

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

SAM §8752 indicates that departments must recover full costs whenever goods or services are provided to others.

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

The administrative sergeant stated that the department had not established formal chargeback policies and procedures and that the rates used had always been the same.

Unsatisfactory controls over chargebacks increase the risk of inaccurate and incomplete reimbursement to the DPS for services rendered and reduce funds available for law enforcement activities.

Recommendation 5

We recommend that the campus:

- a. establish formal written procedures for special event chargeback processing;
- b. substantiate the validity of the overhead rate applied to police officer billings; and
- c. strengthen procedures to include employee benefits in chargeback rates for special event billings.

Campus Response

The campus concurs with the recommendation.

- a. The Department of Public Safety has created a new General Order to establish a procedure to calculate and implement Police Services Special Event Chargeback Rates.
- b. The Department of Public Safety has created a memorandum that will be forwarded to Special Events Scheduling to be used when applying chargeback rates to special event invoicing. A memorandum will be sent each time a pay rate change has been authorized (beginning of new police officer bargaining unit contract) for implementation.
- c. The Department of Public Safety has substantiated the validity of the overhead rate applied to police officer billings by listing below the reasons for applying a 10-percent overhead (administrative activity) rate to police officer billings for Special Events. A quantitative analysis will be developed which will support the 10-percent overhead rate.
 - Pre-event meetings;
 - Event manpower assessment and deployment;
 - Event manpower scheduling;
 - Post-event documentation and verification; and
 - Post-event meetings.

Completion date: September 15, 2001.

MISCELLANEOUS FEES

Proper approval had not been obtained for one miscellaneous fee, and accountability over another fee needed improvement.

The Rape Aggression Defense (RAD) training program fee (\$15) was established in April 1999 without approval by the chancellor. In addition, fees from police report requests were being improperly maintained in the Commission on Peace Officer Standards and Training (POST) account.

Standing Orders of the CSU Board of Trustees (BOT), Chapter III §6, states that the chancellor is to establish all new fees; and subject to overall direction of the BOT and the chancellor, the campus president is authorized to increase, decrease, or abolish campus fees.

SAM §20050 states that a satisfactory system of internal accounting and administrative control shall include segregation of duties appropriate for proper safeguarding of assets and a system of record-keeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The lieutenant stated that the decision was made in conjunction with the RAD staff to implement the fee at the current level.

Unsatisfactory internal accounting and administrative controls increase the risk that improper fees could be assessed and misappropriation or loss of funds will go undetected.

Recommendation 6

We recommend that the campus:

- a. obtain approval from the chancellor for the RAD fee; and
- b. discontinue depositing revenue received from reports into the POST account, establish a new account, and transfer the balance of previously received fees into the new account.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has submitted a request for the establishment of a "RAD Fee" to the CSUSB Campus Fee Advisory Committee for approval.

The Department of Public Safety has submitted a memorandum authorizing that all "Request for Report" fees be deposited into a newly created Trust Fund Account and that fee payments, accrued during the fiscal years 1999 through 2001, be transferred into the new Trust Fund Account.

Completion date: July 1, 2001.

EVIDENCE, WEAPONS AND EQUIPMENT CONTROLS

WEAPONS

Controls over weapons qualifications, training, and ammunition needed improvement.

We noted that:

- ▶ during 2000, four officers, including the chief of police and the lieutenant, did not complete weapons qualification requirements;
- ▶ documentation was not maintained to support the periodic training in the moral and ethical use of firearms; and
- ▶ fourteen boxes of ammunition items stored in the department armory were not listed on the inventory.

The DPS firearm policy requires all sworn personnel below the level of lieutenant to qualify quarterly with their duty weapon.

CSU directive, BA 77-5, *Implementation of Executive Order No. 228: 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 and regular qualification with off-duty weapons should be considered, and training in the legal and moral aspects of firearm use must be accomplished semi-annually. *Executive Order No. 756, Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, effective September 21, 2000, superseded this directive.

Executive Order 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 semi-annual basis; and all officers shall receive semi-annual training in the legal and operational aspects of firearms. 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 control include, but are not limited to, an effective system of internal review and record-keeping procedures adequate to provide effective control over assets.

The chief of police stated that he had not taken the time to go to the range to requalify. He further stated that he was not aware of the requirement regarding training in the moral and ethical use of firearms and indicated that the unrecorded ammunition may have been overlooked during the office relocation.

Unsatisfactory controls over weapons and ammunition increase the risks of poor weapon proficiency, improper firearm use, and lost or stolen ammunition.

Recommendation 7

We recommend that the campus:

- a. establish procedures to ensure that all sworn personnel meet minimum weapons qualifications;
- b. establish procedures to conduct training in the moral and legal aspects of firearms on a semi-annual basis and maintain records of the training dates and attendance; and
- c. strengthen procedures to ensure that all ammunition items are properly included on the inventory.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has updated the Departmental Policy and Procedure Manual to include minimum weapons qualifications and semi-annual training for moral and legal aspects of firearms. The updated procedure manual includes a clause which addresses security procedures for ammunition owned by the Department of Public Safety, as well as firearm inventory procedures.

EQUIPMENT

DPS equipment was not always properly authorized.

We noted that written authorization for the use of pepper spray had not been obtained from the campus president.

Article 10.6 of the Collective Bargaining Agreement (CBA) between the CSU Board of Trustees and the Statewide University Police Association (SUPA), for July 1, 1998, through June 30, 2001, 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 control include, but are not limited to, an effective system of internal review and record-keeping procedures adequate to provide effective control over assets.

The chief of police indicated that the campus administration was not aware of the requirement for presidential approval for nonstandard equipment other than shotguns.

Internal controls over public safety department equipment are compromised when the use of non-standard equipment is not properly approved.

Recommendation 8

We recommend that the DPS obtain campus presidential approval for the use of pepper spray.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to obtain presidential authority for the use of pepper spray equipment.

Completion date: June 1, 2001.

POLICE ACTIVITIES AND CRIME REPORTING

CLETS ACCESS

Access controls to the California Law Enforcement Telecommunication System (CLETS) needed improvement.

Our review of the list of authorized users obtained from the County of San Bernardino disclosed that 3 of the 11 authorized users were no longer employees of the DPS.

California Code of Regulations (CCR), Title 11 §707, states that automated systems handling criminal offender record information (CORI) and the information derived therefrom shall be secure from unauthorized access, alteration, deletion, or release.

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

The administrative sergeant stated that the department had not contacted the County of San Bernardino to update the access listing.

Not maintaining adequate access controls over the CLETS could permit unauthorized users to gain access to restricted records and result in criminal penalties.

Recommendation 9

We recommend that the campus establish procedures to regularly review and update CLETS user access profiles.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has updated active General Order that established guidelines for access controls for CLETS.

RELEASE OF JUVENILE RECORDS

The criminal activity information sent to the chancellor's office included arrest registers with the names of juvenile offenders.

The Welfare and Institutions Code §827 gives the juvenile court control over the release of all juvenile information to be disclosed to third parties by any law enforcement official.

The chief of police stated that the Department of Justice (DOJ) and the chancellor's office were only provided information they requested.

Lack of controls over the release of information increases noncompliance with privacy laws.

Recommendation 10

We recommend that the campus strengthen procedures over the release of information related to juvenile offenders.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to list the persons/agencies who may legally obtain juvenile information/records.

POLICIES AND PROCEDURES

Written policies and procedures had not been developed for the DPS dispatch function.

SAM §20050 states that a satisfactory system of internal administrative control shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions. Further, the nonexistence of policy and procedural or operational manuals is a danger signal of a 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 manual further states that the agency should establish a written directive for command protocol.

The administrative sergeant stated that the department used manuals from outside agencies and on-the-job training techniques for new dispatchers. He further stated that a formal policies and procedures manual for dispatch operations was in draft form.

Failure to maintain a comprehensive policies and procedures manual 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 campus finalize development of dispatch operations policies and procedures and distribute them accordingly.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to authorize the implementation of the Department of Public Safety Dispatch Center Policy and Procedures Manual. The General Order also outlines the process to continually maintain (revise/update) the Manual.

Completion Date: July 1, 2001.

PERSONNEL ADMINISTRATION AND TRAINING

CPR AND FIRST AID TRAINING

First aid and cardiopulmonary resuscitation (CPR) training procedures were not adequate.

We noted that two officers hired in December 1999 and April 2000 had not received initial certification for first aid and CPR training, and one other officer had not received refresher training even though his first aid certification expired in 1999.

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

The administrative sergeant stated that these officers missed the last training session, and a new session had not yet been scheduled.

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

Recommendation 12

We recommend that the campus strengthen procedures to ensure that all police officers receive CPR and first aid training and maintain certifications on a current basis in accordance with specifications prescribed in the Penal Code.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to establish yearly CPR and first aid training.

STIPENDS

Controls over the award of special assignment stipends needed to be improved.

The DPS had not developed specific rules for the award of special assignment stipends.

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.

SAM §20050 states that a satisfactory system of internal administrative control shall include, but not be limited to, an established system of practices to be followed in performance of duties and functions.

The administrative sergeant stated that the department followed the requirements established in the CBA.

Failure to document special assignment stipend rules increases the risks of misunderstandings and noncompliance with the CBA.

Recommendation 13

We recommend that the campus establish rules for the award of special assignment stipends.

Campus Response

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to establish guidelines for awarding departmental stipends.

PUBLIC SAFETY PROGRAM ADMINISTRATION

Data access and file backup controls over data maintained on the DPS file server were not adequate.

We found that:

- ▶ users were not forced by the system to periodically change their passwords;
- ▶ the system did not require passwords to be an adequate length;
- ▶ system access was not automatically disabled after prolonged inactivity; and
- ▶ backup data files were maintained in a safe in the DPS rather than stored at an off-site location.

SAM §20050 requires, 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.

Current practices for password management require a minimum length of password characters, maintenance of a password history to prevent reuse, and automatic user log off after a predetermined time (see Department of Defense Password Management Guideline, a.k.a. Greenbook). COBIT and FIPS112 also recommend guidelines to be established for an appropriate minimum password length and an appropriate and enforced frequency of password changes.

SAM §4989.7 states, in part, that there should be agency policies in operation that mandate standards for the regular backup of all data, and management should protect computing configurations from theft and unauthorized use.

The sergeant responsible for system administration stated that he did not believe it was necessary to change passwords regularly and that backup files kept in the safe facility were protected.

Inadequate system security and backup could result in unauthorized access to campus systems and loss of important data in the event of a disaster.

Recommendation 14

We recommend that the campus:

- a. strengthen access controls over the DPS file server; and
- b. implement procedures to send DPS backup data files to an off-site location.

Campus Response

The campus concurs with the recommendation.

- a. The Department of Public Safety has submitted a work order to the division's Information Technology Consultant requesting implementation access controls to strengthen access to the departmental server/network.

- b. The Department of Public Safety has created a new General Order to establish guidelines for locating department backup files to an offsite facility.

Completion date: August 1, 2001.

APPENDIX A: PERSONNEL CONTACTED

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

State of California

California State University, San Bernardino
5500 University Parkway
San Bernardino, California 92407-2397

MEMORANDUM

DATE : May 22, 2001
TO : Larry Mandel
University Auditor
The California State University

RECEIVED
University Auditor

MAY 23 2001

**The California State
University**

FROM : David DeMauro, Vice President 
for Administration and Finance

SUBJECT: **Campus Response to Audit Report Number 00-45**
PUBLIC SAFETY REVIEW
California State University, San Bernardino

Attached for your consideration are campus responses to *Public Safety Review* -- Audit Report Number 00-45.

Within the next 30 days, support documentation will be submitted separately for the items which the campus considers to be closed.

A diskette is also enclosed containing the campus response.

xc: Quentin Moses
Steve Nowicki

CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO

PUBLIC SAFETY REVIEW
REPORT NUMBER 00-45CAMPUS RESPONSE
5-21-01PARKING FUND EXPENDITURES AND ALLOCATIONS

RECOMMENDATION 1

We recommend that the campus:

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

CAMPUS RESPONSE:

The campus concurs with the recommendation and will implement the standard prescribed in Executive Order No. 753, Allocation of Costs to Auxiliary Enterprises. The campus acknowledges that this order supersedes all Memoranda of Understanding in place by Parking Services.

Charges to Parking Services from the Public Safety Department for services by two fulltime dispatchers and direct time for the Director of Public Safety will be directly related and documented. **Completion date: September 15, 2001.**

Direct charges for services provided by the Purchasing Department (\$36,000) will be calculated with justification as required by Executive Order No. 753. **Completion date: September 15, 2001.**

The vehicle purchased by Parking Services has been moved into the Parking Services inventory. The use of this vehicle is shared by Parking staff, and documented mileage is provided. The Parking Services Department will strengthen procedures to ensure that all expenditures of parking funds are documented and substantiated to ensure compliance.

CITATION PROCESSING CONTROLS**RECOMMENDATION 2**

We recommend that the campus:

- a. record outstanding parking citation receivables on the campus accounting records and regularly reconcile subsidiary detail records to that control total;
- b. analyze and evaluate collection policies and procedures to determine which collection methods are the most effective and strengthen current procedures accordingly;
- c. strengthen procedures to ensure a proper segregation of duties in the processing of parking citations; and
- d. strengthen Auto Issue/Auto Process system controls over passwords and offsite backup storage.

CAMPUS RESPONSE:

The campus concurs with the recommendation and has established a new position whose responsibilities will address the majority of the concerns outlined in this finding. The position will enable (1) segregation of duties, (2) establishment of procedures, guidelines, and accountability for citation revenue receivables, and (3) determine the collection method that would be most effective to strengthen the procedures. **Completion date: September 15, 2001.**

Parking Services staff are working with the Accounting Office to establish methods to identify students and place holds on student records. A process is being developed to establish a DMV online service that will allow immediate access to vehicle registration information. **Completion date: September 15, 2001.**

Responsibilities of a clerical employee and a student assistant have been realigned to enter citations into the parking system. The operation supervisor will continue to determine the disposition of contested parking citations.

Program changes have been made to allow Auto Process to accept 10-digit passwords. In addition to the password, security access also includes the officer's name and ID number. The database cannot be accessed without the combination of a password, officer's name and ID number. **Estimated completion date: December 1, 2001.**

REVENUE RECONCILIATION

RECOMMENDATION 3

We recommend that the campus develop procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected.

CAMPUS RESPONSE:

The campus concurs with the recommendation and will establish procedures to reconcile citation and parking decal revenue to ensure that all monies due are collected. **Complete date: September 15, 2001.**

SPECIAL EVENT PARKING

RECOMMENDATION 4

We recommend that the campus establish procedures to charge parking fees for all special events.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Parking Policy has been revised, with input from the Campus Transportation Committee, to charge for Sunday and special events parking. The proposed revised policy will be reviewed by the campus Administrative Council, and a recommendation will be forwarded to President Karnig. **Completion date: September 15, 2001.**

PUBLIC SAFETY FISCAL ADMINISTRATION

CHARGEBACK CONTROLS

RECOMMENDATION 5

We recommend that the campus:

- a. establish formal written procedures for special event chargeback processing;
- b. substantiate the validity of the overhead rate applied to police officer billings; and
- c. strengthen procedures to include employee benefits in chargeback rates for special event billings.

CAMPUS RESPONSE:

The campus concurs with the recommendation.

- a. The Department of Public Safety has created a new General Order to establish a procedure to calculate and implement Police Services Special Event Chargeback Rates.
- b. The Department of Public Safety has created a memorandum that will be forwarded to Special Events Scheduling to be used when applying chargeback rates to special event invoicing. A memorandum will be sent each time a pay rate change has been authorized (beginning of new police officer bargaining unit contract) for implementation.
- c. The Department of Public Safety has substantiated the validity of the overhead rate applied to police officer billings by listing below the reasons for applying a 10% overhead (administrative activity) rate to police officer billings for Special Events. A quantitative analysis will be developed which will support the 10% overhead rate.
 - Pre-event meetings;
 - Event manpower assessment and deployment;
 - Event manpower scheduling;
 - Post-event documentation and verification; and
 - Post-event meetings.

Completion date: September 15, 2001.

MISCELLANEOUS FEES

RECOMMENDATION 6

We recommend that the campus:

- a. obtain approval from the Chancellor for the RAD fee; and
- b. discontinue depositing revenue received from reports into the POST training account, establish a new account, and transfer the balance of previously received fees into the new account.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has submitted a request for the establishment of a "RAD Fee" to the CSUSB Campus Fee Advisory Committee for approval.

The Department of Public Safety has submitted a memorandum authorizing that all "Request for Report" fees be deposited into a newly created Trust Fund Account and that fee payments, accrued during the fiscal years 1999 through 2001 be transferred into the new Trust Fund Account.

Completion date: July 1, 2001

EVIDENCE, WEAPONS AND EQUIPMENT CONTROLS

WEAPONS

RECOMMENDATION 7

We recommend that the campus:

- a. establish procedures to ensure that all sworn personnel meet minimum weapons qualifications;
- b. establish procedures to conduct training in the moral and legal aspects of firearms on a semi-annual basis and maintain records of the training dates and attendance; and
- c. strengthen procedures to ensure that all ammunition items are properly included on the inventory.

CAMPUS RESPONSE

The campus concurs with the recommendation. The Department of Public Safety has updated the Departmental Policy and Procedure Manual to include minimum weapons qualifications and semi-annual training for moral and legal aspects of firearms. The updated procedure manual includes a clause which addresses security procedures for ammunition owned by the Department of Public Safety, as well as firearm inventory procedures.

EQUIPMENT

RECOMMENDATION 8

We recommend that the DPS obtain campus president approval for the use of pepper spray.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to obtain presidential authority for the use of pepper spray equipment.

Completion date: June 1, 2001.

POLICE ACTIVITIES AND CRIME REPORTING

CLETS ACCESS

RECOMMENDATION 9

We recommend that the campus establish procedures to regularly review and update CLETS user access profiles.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has updated active General Order that established guidelines for access controls for CLETS.

RELEASE OF JUVENILE RECORDS

RECOMMENDATION 10

We recommend that the campus strengthen procedures over the release of information related to juvenile offenders.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to list the persons/agencies who may legally obtain juvenile information/records.

POLICIES AND PROCEDURES

RECOMMENDATION 11

We recommend that the campus finalize development of dispatch operations policies and procedures and distribute them accordingly.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to authorize the implementation of the Department of Public Safety Dispatch Center Policy and Procedures Manual. The General Order also outlines the process to continually maintain (revise/update) the Manual.

COMPLETION DATE: July 1, 2001.

PERSONAL ADMINISTRATION AND TRAINING

CPR AND FIRST AID TRAINING

RECOMMENDATION 12

We recommend that the campus strengthen procedures to ensure that all police officers receive CPR and first aid training and maintain certifications on a current basis in accordance with specifications prescribed in the Penal Code.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to establish yearly CPR and first aid training.

STIPENDS

RECOMMENDATION 13

We recommend that the campus establish rules for the award of special assignment stipends.

CAMPUS RESPONSE:

The campus concurs with the recommendation. The Department of Public Safety has created a new General Order to establish guidelines for awarding departmental stipends.

PUBLIC SAFETY PROGRAM ADMINISTRATION

RECOMMENDATION 14

We recommend that the campus:

- a. strengthen access controls over the DPS file server; and
- b. implement procedures to send DPS backup data files to an offsite location.

CAMPUS RESPONSE:

The campus concurs with the recommendation.

- a. The Department of Public Safety has submitted a work order to the division's Information Technology Consultant requesting implementation access controls to strengthen access to the departmental server/network.

- b. The Department of Public Safety has created a new General Order to establish guidelines for locating department backup files to an offsite facility.

Completion date: August 1, 2001.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

June 7, 2001

FIBCO

MEMORANDUM

DOMINGUEZ HILLS

FRESNO

TO: Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed 

HAYWARD

SUBJECT: Draft Final Report Number 00-45 on *Public Safety*,
California State University, San Bernardino

HUMBOLDT

LONG BEACH

LOS ANGELES

In response to your memorandum of June 7, 2001, I accept the response
as submitted with the draft final report on Public Safety, California State
University, San Bernardino.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

LM:amd

POMONA

Enclosure

SACRAMENTO

cc: Dr. Albert K. Karnig, President
Mr. David DeMauro, Vice President for Administration and Finance

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS