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ABBREVIATIONS

ALP           American Language Program
BCIS          Bureau of Citizenship and Immigration Services
DCP           Disaster and Contingency Planning
DRII          Disaster Recovery Institute International
EO            Executive Order
IEE           International Education and Exchange
SAM           State Administrative Manual
SEMS          Standardized Emergency Management System
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2002, the Board of Trustees, at its January 2003 meeting, directed that Disaster and Contingency Planning (DCP) be reviewed. DCP was partially audited in 1997 in a sequence of audits on Seismic Safety and Disaster Readiness.

We visited the California State University, Fullerton campus from July 14, 2003, through August 11, 2003, and audited the procedures in effect at that time.

In our opinion, the administration and management of DCP activities need to be improved to ensure reasonable preparation, response, and recovery.

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

EMERGENCY READINESS [7]

Campus-wide emergency plan documents were in various stages of revision; while some emergency plan designees did not have the most recent copy of the emergency plan, maintain an offsite copy of the plan, or know the alternate location for the emergency operations center. Additionally, most of the primary emergency plan designee positions for the finance and administration area were unfilled and identification of emergency management backup personnel had not been completed. The campus network of building marshals was not adequately staffed and trained in certain instances, and an inventory of emergency response skills for disaster service worker volunteers had not been developed. Purchasing and contracting agreements were not in place for certain post-emergency resources, including temporary shelter, heavy equipment, fencing, and building materials. In addition, administration of the federal Student and Exchange Visitor Program for non-immigrant students did not include written policies and procedures for admitting students and reporting information at one department and for enrollment in courses taken online or through distance education. Finally, new student orientation did not include emergency preparedness.

FACILITY ISSUES [16]

Emergency property inventory control duties were not adequately segregated since one staff member was responsible for maintaining emergency property records and taking physical inventories.

BUSINESS CONTINUITY [17]

In the event of a disaster or emergency, the campus did not have a complete business continuity plan for non-data processing services.
INTRODUCTION

Government Code §8680.3 defines disaster to mean:

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

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

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

Mohammad Qayoumi, vice president for administration and finance and chief financial officer at California State University, Northridge, recently authored a book entitled, Mission Continuity Planning, published by the National Association of College and University Business Officers. This publication defines two types of disasters: 1) those that happen suddenly and without notice (e.g., earthquakes), and 2) phased disasters where there can be early warning of eminent danger (e.g., winter storms).

Since the September 11th terrorist attacks, there have been a number of federal initiatives affecting colleges and universities including controls over international students and registration requirements surrounding select agents and toxins. The federal Department of Homeland Security has implemented a new system called Student and Exchange Visitor Information System to record and monitor information about international students. Other federal agencies including Health and Human Services and the Center for Disease Control have also issued regulations.

Two sources of industry guidance on standards and terminology are Business Continuity: Best Practices as defined by the Business Continuity Institute and a Glossary of Terms from the Disaster Recovery Institute International (DRII). In Best Practice, a disaster recovery plan is “a plan to resume a specific essential operation, function or process of an enterprise.” The DRII’s Glossary of Terms describes disaster recovery as an “approved set of arrangements and procedures that enable an organization to respond to a disaster and resume its critical business functions within a defined time frame.”

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

The Office of Emergency Services, in coordination with all interested state agencies with designated response roles in the state emergency plan and interested local emergency management agencies shall
jointly establish by regulation a standardized emergency management system for use by all emergency response agencies.
The Standardized Emergency Management System (SEMS) is the system required by Government Code §8607(a) for managing response to multi-agency and multi-jurisdiction emergencies in California. SEMS consists of five organizational levels, which are activated as necessary: field response, local government, operational area, regional, and state. By standardizing key elements of the emergency management system, SEMS is intended to facilitate the flow of information within and between levels of the system and facilitate coordination among all responding agencies. SEMS incorporates the use of five essential Incident Command System functions: command, operations, planning/intelligence, logistics, and finance/administration.

Business/mission continuity is frequently considered a broader term than emergency planning. The goal of emergency planning is to address the immediate impacts of the disaster and to respond as needed to bring the emergency to closure. Business/mission continuity is a continuing cycle of preparation that includes:

**PURPOSE**

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of Disaster and Contingency Planning (DCP) activity and to determine the adequacy of controls over the related processes to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.
Within the overall audit objective, specific goals included determining whether:

- Campuses have developed DCP and other processes that address the most probable incidents that may affect the safety of personnel, damage assets, or cause significant business interruptions and that are also designed to comply with recent terrorism measures.

- Buildings can be safely secured and evacuated, when appropriate, or configured for sheltering-in-place in response to disasters or emergencies.

- The DCP plan is adequately tested and maintained.

- Equipment, information (such as the amount of hazardous materials or number of occupants in a building), supplies, and trained personnel will be available when needed.

- Campuses have a well-equipped emergency operations center.

- Buildings have been retrofitted to the extent practical and reasonable facility measures have been taken such as anchoring furniture and other potential falling objects, providing adequate fire suppression measures, and securing building ventilation and air handling systems so potential biological agents cannot be easily introduced to contaminate widespread areas.

- Campuses have done what they can to reduce the risk of power interruptions.

- Reasonable business continuity plans have been formulated according to priorities established for critical business applications, processes, and systems.

- Continuity of operations beyond initial response periods is realistically addressed.

**SCOPE AND METHODOLOGY**

The proposed scope of the audit as presented in Attachment B, Agenda Item 2 of the January 23-24, 2003, meeting of the Committee on Audit, stated that DCP includes program and facility readiness and resource planning for actions related to natural and man-made disasters and the recovery there from. Potential impacts include injury of students, staff, faculty, and visitors; disruption of programs and services; financial exposures; damage claims from injured parties; and property damage.

Our study and evaluation were conducted in accordance with the *Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. Industry-
wide standards were also considered. The audit review period was July 1, 2001, to date. At California State University, Fullerton, the university police department has overall responsibility for DCP. Our primary focus involved the internal administrative, compliance, and operational controls over DCP management. Specifically, we reviewed and tested:

- DCP policies and procedures.
- DCP plans.
- Availability of DCP resources including communication systems, equipment, and supplies.
- Mutual aid agreements.
- Extent of exercises/tests of DCP capabilities.
- Training of DCP personnel.
- Registration and monitoring of visa students.
- Control of select agents and toxins regulated by the federal government.
- Preparation of facilities to withstand disasters.
- Business/mission continuity arrangements for critical processes.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

EMERGENCY READINESS

EMERGENCY MANAGEMENT PLAN

Certain campus emergency management plan documents and procedures were not up to date.

We noted that:

- Campus-wide emergency management planning documents were in various stages of revision including: Section 1.7 of Administrative Practices, Part 2 of Campus Emergency Management Roles and Responsibilities, and Part 3 of Functional Annexes.

- Six of ten emergency plan designees did not have the most recent copy of the emergency management plan, Basic Plan, Part 1.

- Six of ten selected emergency plan designees did not have a full copy or any excerpts of the emergency management plan outside of their office.

- Six of ten selected emergency plan designees did not know the alternate location for the emergency operations center.

Executive Order (EO) No. 696, Implementation of the California State University Emergency Preparedness Program, dated January 29, 1999, requires the campus to ensure that the management activities in support of emergency preparedness include maintenance and regular updating of the institutional emergency management system, and the distribution of the plan and appropriate update materials to key employees and other significantly involved persons both on and off campus.

The director of public safety/chief of university police stated that the campus emergency management plan was continuously under revision and plan designees were instructed that the campus website had the updated sections. She further stated that the emergency management plan would be available for designees at the campus, as needed, and an assessment was underway to identify an alternate location for the emergency operations center.

The absence of an updated and sufficiently distributed emergency plan impacts the ability of the campus to properly respond to disasters.

Recommendation 1

We recommend that the campus complete updating the emergency management plan and sufficiently distribute it to emergency plan designees.
Campus Response

We concur. In March 2004, key campus emergency operations committee designees and critical personnel will receive updated hard copy versions of the position specific checklists and other portions of the plan that apply to their respective responsibilities. Going forward, updates will be continuously distributed in a timely manner.

POSITION DESIGNEES

The roster of designees in key emergency plan positions was incomplete.

We noted that:

- Primary designees for five of the six positions in the finance and administration function area were unfilled.
- Identification of backup personnel in the campus emergency management organization was underway.

Title 5 §41302 states that during periods of campus emergency, as determined by the president of the individual campus, the president may, after consultation with the chancellor, place into immediate effect any emergency regulations, procedures, and other measures deemed necessary or appropriate to meet the emergency, safeguard persons and property, and maintain educational activities.

The director of public safety/chief of university police stated that the campus emergency management organization formed earlier in the year, and efforts were in progress to complete the roster.

The ability of the campus to activate the emergency management plan and effectively respond to emergencies is impacted if key primary and alternate plan positions are unfilled.

Recommendation 2

We recommend that the campus fill the vacant positions and establish procedures to maintain a full complement of designees in key plan positions.

Campus Response

We concur. All positions have been filled, and an exit process is now in place to assure a full complement of designees in key plan positions are appointed on an ongoing basis.
NON-IMMIGRANT STUDENTS

Comprehensive policies and procedures were not in place for certain administrative aspects of the Student and Exchange Visitor Program.

Our review disclosed that:

- Documented policies and procedures at the American Language Program (ALP) for admitting students and reporting of information to the Bureau of Citizenship and Immigration Services (BCIS) were under development.

- The office of international education and exchange (IEE) had not documented policies and procedures for enrollment in courses taken online or through distance education.

State Administrative Manual (SAM) §20050 indicates that the elements of a satisfactory system of internal accounting and administrative controls include a system of record-keeping procedures and organization that provides segregation of duties.

Code of Federal Regulations, Title 8, Part 214, *Retention and Reporting of Information for F, J and M Nonimmigrants; Student and Exchange Visitor Information System; Final Rule*, §214.2 (f)(6)(i)(G), dated December 11, 2002, indicates that for students enrolled in classes for credit or classroom hours, no more than the equivalent of one class or three credits per session, term, semester, trimester, or quarter may be counted toward the full course of study requirement if the class is taken online or through distance education and does not require the student’s physical attendance for classes, examination, or other purposes integral to completion of the class.

The director of ALP stated that documented policies and procedures were in progress. The director of IEE stated that the limits for online and distance education for non-immigrant students are under review.

Failure to adequately document the policies and procedures for non-immigrant students increases exposure to non-compliance with federal regulations.

**Recommendation 3**

We recommend that the campus:

a. Finalize and distribute the policies and procedures for admitting students and reporting information to BCIS.

b. Document and distribute policies and procedures for enrollment in courses taken online or through distance education.
Campus Response

We concur. Policies for the admittance of non-immigrant students into the American Language Program and reporting of information to the Bureau of Citizenship and Immigration Services have been completed. In addition, the office of international education and exchange is in the process of documenting policies and procedures for the enrollment in courses taken online or through distance education that explain the requirements for each student’s physical attendance for the completion of a class. These policies will be complete in March 2004.

BUILDING MARSHALS

In certain instances, the campus network of building marshals, and the needed requisite training, was not in place.

A review of ten building marshals with the responsibility to perform evacuations for designated campus building areas disclosed that:

- In two instances, the individual in the building marshal program separated from the campus.
- In one instance, an individual no longer considered himself part of the building marshal program.
- In one instance, an individual changed a work location and a volunteer was not yet reassigned responsibility to coordinate an evacuation in the area.
- In one instance, an individual was not aware of the designated assembly area where personnel should gather after evacuating.
- Two primary building marshals were assigned to coordinate the evacuation of an eight-story building with secondary evacuation personnel from outside the building to serve on a need-only basis.
- The responsibility to perform an evacuation on a floor was not clear between two building marshals assigned to adjacent floors.


The director of environmental health and instructional safety stated that the roster of building marshals changes due to separations and employee transfers. He further stated that recruiting efforts were underway for additional building marshals to strengthen evacuation coverage.
Emergency responsiveness may be delayed without an adequately staffed and trained team of building marshals to lead emergency evacuations.
Recommendation 4

We recommend that the campus ensure an effective network of building marshals and provide them with the required training.

Campus Response

We concur. All campus buildings now have an effective network of building marshals. The existing training program will be enhanced by a formal semester program commencing in March 2004.

DISASTER SERVICE WORKER VOLUNTEERS

The campus had not completed an inventory of emergency response skills for disaster service worker volunteers.

We noted that the campus was delegated the authority to register disaster service volunteers from the Governor’s Office of Emergency Services in May 1994. However, efforts were underway to develop a skills inventory as a basis for recruiting and assigning disaster service worker volunteers.

Title 19 §2570.1 and §2570.2 indicate, in part, that the legislature has provided a state-funded program of workers’ compensation benefits for disaster service worker volunteers who contribute their services to protect the health and safety and preserve the lives and property of the people of the state. A disaster service worker is any person registered with a disaster council or the Governor’s Office of Emergency Services, or a state agency granted authority to register disaster service pursuant to the California Emergency Services Act without pay or other consideration.

The director of public safety/chief of university police stated that the campus was developing a compilation of emergency response skills within the campus community.

Not maintaining an inventory of emergency response skills for disaster service worker volunteers increases the risk that competent members in the campus community will not be considered.

Recommendation 5

We recommend that the campus complete an inventory of emergency response skills for disaster service worker volunteers.

Campus Response

We concur. Campus employees will be asked to identify skills that would be useful in response to an emergency or disaster by April 2004. A database of responses and emergency contact information will be maintained to facilitate timely deployment.
PURCHASING AND CONTRACTING AGREEMENTS

The campus did not have purchasing and contracting agreements for certain post-emergency resources.

We noted that the campus has a mutual aid agreement with the American Red Cross of Orange County and a job order contract for maintenance, repair, and new construction projects not to exceed $400,000; however, purchasing and contracting agreements for post-emergency resources were not in place for temporary shelter, heavy equipment, fencing, and building materials.


The director of public safety/chief of university police stated that the campus was in the process of assessing the needed post-emergency resources from external vendors. The director of physical plant stated that certain emergency plan designees were provided high dollar procurement card purchase limits for resources in the event of a disaster.

The absence of purchasing and contracting agreements for off-campus emergency resources can contribute to the inability of the campus to appropriately respond to emergencies.

**Recommendation 6**

We recommend that the campus analyze current resource capabilities and make contractual agreements with vendors for critical post-emergency resources not in place.

**Campus Response**

We concur. The campus will continue to analyze resource capabilities and put in place contractual agreements deemed beneficial.

**PLAN COMMUNICATION**

The emergency management plan was not sufficiently communicated to students.

New faculty and staff received orientation for emergency preparedness through sessions offered by environmental health and instructional safety and faculty affairs, respectively. However, new student orientation conducted by student affairs did not include emergency preparedness.

The dean of students stated that the division of student affairs was not previously aware of a requirement to communicate emergency procedures to students with the exception of the campus housing residents.

Students that are unfamiliar with emergency procedures could cause unnecessary confusion and denigrate response capabilities.

**Recommendation 7**

We recommend that the campus include a presentation of emergency preparedness during new student orientation.

**Campus Response**

We concur. An emergency preparedness document for students on campus preparedness and their responsibility for personal preparedness will be completed in March 2004 for inclusion in the student handbook, on the student portal, and for new student orientation materials.

**FACILITY ISSUES**

Emergency property inventory control duties were not adequately segregated.

One staff member was responsible for maintaining emergency property inventory records and taking physical inventories.

SAM §8652 states that the person in charge of maintaining the inventory records will not be in charge of taking physical inventories.

Inadequate separation of duties increases the risk that errors and irregularities will not be prevented or detected in a timely manner.

**Subsequent to the end of our fieldwork, the campus provided us with documentation evidencing the realignment of responsibilities for adequate segregation of duties within the emergency property inventory process.**
BUSINESS CONTINUITY

The campus did not have a sufficient business continuity plan in the event of a disaster or emergency.

We noted that a business continuity plan is in place to enable business operations to continue in the event of an extended outage of data processing services. In addition, the campus was implementing a document imaging system for certain departments. However, business continuity plans were in various stages of development for other critical campus functions.

EO No. 696, *Implementation of the California State University Emergency Preparedness Program*, dated January 29, 1999, requires the campus to maintain an emergency management system which should become effective when a hazardous condition or natural disaster reaches or has the potential to reach proportions beyond the capacity of routine operations.

SAM §4843.1 requires each state agency to establish and maintain both an operational recovery plan and a plan to resume operations following a disaster.

The director of public safety/chief of university police stated that various departments in the campus community were requested to prepare a business continuity plan and that the process was not yet completed.

Without a sufficient business continuity plan, disaster recovery would be more difficult.

**Recommendation 8**

We recommend that the campus complete the development of business continuity plans.

**Campus Response**

We concur. Plans documents will be in place by May 2004.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milton A. Gordon</td>
<td>President</td>
</tr>
<tr>
<td>Susan Amdahl</td>
<td>Grant Support Assistant, College of Natural Sciences and Mathematics</td>
</tr>
<tr>
<td>Michael Anthony</td>
<td>Associate Director of Maintenance and Operations, Physical Plant</td>
</tr>
<tr>
<td>Robert Aylmer</td>
<td>Acting Executive Director, Student Health and Counseling Center</td>
</tr>
<tr>
<td>Welson Badal</td>
<td>Manager, Vice President of Administration Information Technology</td>
</tr>
<tr>
<td>Robert Baker</td>
<td>Sergeant, University Police</td>
</tr>
<tr>
<td>William Barrett</td>
<td>Associate Vice President, Administration</td>
</tr>
<tr>
<td>Dick Bednar</td>
<td>Senior Director, Information Technology Services</td>
</tr>
<tr>
<td>Robert Belloli</td>
<td>Chair, Chemistry</td>
</tr>
<tr>
<td>James Blackburn</td>
<td>Director, Admissions and Records</td>
</tr>
<tr>
<td>Jay Bond</td>
<td>Associate Vice President, Facilities Management</td>
</tr>
<tr>
<td>Garland Bryan</td>
<td>Chief Engineer, DMS Engineering Services</td>
</tr>
<tr>
<td>Pearl Cheng</td>
<td>Director of Finance and Administration, Foundation</td>
</tr>
<tr>
<td>Brian Christie</td>
<td>Building Trades Manager, Physical Plant</td>
</tr>
<tr>
<td>Debbie Ellis</td>
<td>Administrative Services Supervisor, University Police</td>
</tr>
<tr>
<td>Robert Ericksen</td>
<td>Director, International Education and Exchange</td>
</tr>
<tr>
<td>Susan Fisher</td>
<td>Radiation Safety Director, Environmental Health and Instructional Safety</td>
</tr>
<tr>
<td>Quentin Frazier</td>
<td>Emergency Preparedness Coordinator, University Police</td>
</tr>
<tr>
<td>Robert Gill</td>
<td>Environmental Compliance Manager, Environmental Health and Instructional Safety</td>
</tr>
<tr>
<td>Willie Glen</td>
<td>Lieutenant, University Police</td>
</tr>
<tr>
<td>Naomi Goodwin</td>
<td>Assistant Vice President, Administration</td>
</tr>
<tr>
<td>Willie Hagan</td>
<td>Vice President, Administration</td>
</tr>
<tr>
<td>Holly Hall</td>
<td>Assistant Director of Operational Services, Physical Plant</td>
</tr>
<tr>
<td>Davida Hopkins-Parham</td>
<td>Executive Assistant to the Vice President, Academic Affairs</td>
</tr>
<tr>
<td>Judith King</td>
<td>Director, Public Safety/Chief of University Police</td>
</tr>
<tr>
<td>Robert Koch</td>
<td>Vice Chair, Biology</td>
</tr>
<tr>
<td>Mark Lopez</td>
<td>Executive Assistant to the Chief Financial Officer</td>
</tr>
<tr>
<td>Karyn Magno</td>
<td>New Student Programs Coordinator, Dean of Students</td>
</tr>
<tr>
<td>Pam McLaren</td>
<td>Public Affairs Associate</td>
</tr>
<tr>
<td>Kandy Mink</td>
<td>Dean of Students</td>
</tr>
<tr>
<td>Sherri Newcomb</td>
<td>Chief Financial Officer</td>
</tr>
<tr>
<td>Craig Newton</td>
<td>Chief Engineer, Physical Plant</td>
</tr>
<tr>
<td>Carmen Peak</td>
<td>Procurement Operations Manager, Contracts and Procurement</td>
</tr>
<tr>
<td>Juliana Peterson</td>
<td>Receptionist, Office of the Registrar</td>
</tr>
<tr>
<td>Christine Pircher-Barnes</td>
<td>Student Services Coordinator, American Language Program</td>
</tr>
<tr>
<td>Lynne Richmond</td>
<td>Director, American Language Program</td>
</tr>
<tr>
<td>Lay Tuan Tan</td>
<td>Associate Director, International Education and Exchange</td>
</tr>
<tr>
<td>Alexander Tzoumas</td>
<td>Director, Internal Audit</td>
</tr>
<tr>
<td>Name</td>
<td>Position and Position Information</td>
</tr>
<tr>
<td>-----------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Willem van der Pol</td>
<td>Director, Physical Plant</td>
</tr>
<tr>
<td>Juli Waldschmidt</td>
<td>Student Activities Coordinator, American Language Program</td>
</tr>
<tr>
<td>Howard Wang</td>
<td>Associate Vice President, Student Affairs</td>
</tr>
<tr>
<td>Thomas Whitfield</td>
<td>Director, Environmental Health and Instructional Safety</td>
</tr>
<tr>
<td>Sally Yassine</td>
<td>Contract Operations Manager, Contracts and Procurement</td>
</tr>
</tbody>
</table>
March 3, 2004

Larry Mandel
University Auditor

FROM: Milton A. Gordon
President

SUBJECT: Response for Disaster and Contingency Planning Incomplete Draft, Report Number 03-41

I am pleased to forward California State University, Fullerton’s official response to the recommendations in the Incomplete Draft of the Disaster and Contingency Planning, report number 03-41.

Once again, we would like to thank the University Auditor and his staff for conducting the audit in a professional manner and identifying meaningful ways to improve our financial controls.

The Campus Auditor, Alex Tzoumas, will also forward the responses to you electronically for your convenience. Should you have questions, please contact Alex at 714-278-5760 or atzoumas@fullerton.edu.

Attachment

cc: Willie J. Hagan, Vice President for Administration
    Robert L. Palmer, Vice President for Student Affairs
    Ephraim P. Smith, Vice President for Academic Affairs
    Alexander G. Tzoumas, Director Internal Audit
EMERGENCY READINESS

EMERGENCY MANAGEMENT PLAN

Recommendation 1

We recommend that the campus complete updating the emergency management plan and sufficiently distribute it to emergency plan designees.

Campus Response

We concur. In March 2004 key campus Emergency Operations Committee (EOC) designees and critical personnel will receive updated hard copy versions of the position specific checklists and other portions of the plan that apply to their respective responsibilities. Going forward, updates will be continuously distributed in a timely manner.

POSITION DESIGNEES

Recommendation 2

We recommend that the campus fill the vacant positions and establish procedures to maintain a full complement of designees in key plan positions.

Campus Response

We concur. All positions have been filled and an exit process is now in place to assure a full complement of designees in key plan positions are appointed on an ongoing basis.

NON-IMMIGRANT STUDENTS

Recommendation 3

We recommend that the campus

a. Finalize and distribute the policies and procedures for admitting students and reporting information to BCIS.

b. Document and distribute policies and procedures for enrollment in courses taken online or through distance education.
Campus Response

We concur. Policies for the admittance of non-immigrant students into the American Language Program and reporting of information to the Bureau of Citizenship and Immigration Services have been completed. In addition, the Office of International Education and Exchange is in the process of documenting policies and procedures for the enrollment in courses taken online or through distance education that explain the requirements for each student’s physical attendance for the completion of a class. These policies will be complete in March 2004.

BUILDING MARSHALS

Recommendation 4

We recommend that the campus ensure an effective network of building marshals and provide them with the required training.

Campus Response

We concur. All campus buildings now have an effective network of building marshals. The existing training program will be enhanced by a formal semester program commencing in March 2004.

DISASTER SERVICE WORKER VOLUNTEERS

Recommendation 5

We recommend that the campus complete an inventory of emergency response skills for disaster service worker volunteers.

Campus Response

We concur. Campus employees will be asked to identify skills that would be useful in response to an emergency or disaster by April 2004. A database of responses and emergency contact information will be maintained to facilitate timely deployment.

PURCHASING AND CONTRACTING AGREEMENTS

Recommendation 6

We recommend that the campus analyze current resource capabilities and make contractual agreements with vendors for critical post-emergency resources not in place.

Campus Response

We concur. The campus will continue to analyze resource capabilities and put in place contractual agreements deemed beneficial.
PLAN COMMUNICATION

Recommendation 7

We recommend that the campus include a presentation of emergency preparedness during new student orientation.

Campus Response

We concur. An emergency preparedness document for students on campus preparedness and their responsibility for personal preparedness will be completed in March 2004 for inclusion in the student handbook, on the student portal, and for new student orientation materials.

BUSINESS CONTINUITY

Recommendation 8

We recommend that the campus complete the development of business continuity plans.

Campus Response

We concur. Plans documents will be in place by May 2004.
March 25, 2004

MEMORANDUM

TO: Mr. Larry Mandel
University Auditor

FROM: Charles B. Reed
Chancellor

SUBJECT: Draft Final Report Number 03-41 on Disaster and Contingency Planning, California State University, Fullerton

In response to your memorandum of March 25, 2004, I accept the response as submitted with the draft final report on Disaster and Contingency Planning, California State University, Fullerton.

CBR/bth

Enclosure

cc: Dr. Milton A. Gordon, President
Mr. Alex Tzoumas, Director of Internal Audit