POLICE SERVICES

CALIFORNIA POLYTECHNIC STATE UNIVERSITY,
SAN LUIS OBISPO

Audit Report 12-62
February 5, 2013

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ABBREVIATIONS

Cal Poly California Polytechnic University, San Luis Obispo
CLETS California Law Enforcement Telecommunications Systems
CSU California State University
EO Executive Order
OUA Office of the University Auditor
POST Commission on Peace Officer Standards and Training
PS Police Services
UPD University Police Department
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor (OUA) during the last quarter of 2011, the Board of Trustees at its January 2012 meeting directed that Police Services be reviewed. The OUA had previously reviewed Police Services in 2008.

We visited the California Polytechnic State University, San Luis Obispo campus from November 5, 2012, through December 7, 2012, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on police services activities. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls for police services activities in effect as of December 7, 2012, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

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

GENERAL ENVIRONMENT [7]

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy, and the campus did not always comply with systemwide requirements. For example, the firearms policy did not include information on the tracking of ammunition purchases and inventory procedures, ammunition purchases and distribution were not tracked or documented, and ammunition inventories were not reconciled.

SYSTEM ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION [8]

Confidentiality agreements for California Law Enforcement Telecommunication System users were not renewed every two years.

FISCAL ADMINISTRATION [9]

Unclaimed or outstanding California Commission on Peace Officer Standards and Training reimbursements were not reviewed and investigated in a timely manner.
MAJOR INCIDENTS AND CRIME REPORTING [10]

The campus Clery report did not disclose all required elements regarding missing person procedures, and the campus did not always report crimes defined as major incidents to the chancellor’s office.

WEAPONS AND AMMUNITION CONTROLS [11]

UPD weapons policies needed updating, and presidential approval for the use of certain non-standard weapons was not documented. For example, the UPD firearms policies stated that qualifications for duty weapons were required to be performed quarterly; however, certain officers did not meet weapons qualification training requirements.
INTRODUCTION

BACKGROUND

The California State University (CSU) Public Safety Program began in 1974 with a two-year pilot project on the CSU 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, and public safety departments were established on all CSU campuses. In 2007, those departments were renamed “police services” to emphasize the service aspect, and since then, campuses have been adjusting their organizations accordingly.

The CSU residence population has increased greatly over the years, and the problems associated with this growth have been similar to those experienced by small municipalities. Sexual assaults, alcohol use, drug abuse, and vandalism have increased, and legislation has mandated more involvement by university police officers in the investigation and prevention of crimes, as well as the care of the victims. As a result, CSU police services departments have created policing programs and preventive patrols to deter crime. Also, the growth of on-campus housing has increased the complexity of emergency planning, and parking structures built on campuses have sparked an increase in auto burglaries and theft and have necessitated the need for increased patrols.

The Crime Awareness and Campus Security Act of 1989 became Title 2 of Public Law 101-542, the Student Right-to-Know and Campus Security Act of 1990. The act amended Section 485 of the Higher Education Act of 1965 by adding campus crime statistics 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, that participate in any federal student aid programs and requires schools to publicly disclose basic security policies and three years of campus crime statistics.

In 1992, the Campus Sexual Assault Victims’ Bill of Rights was incorporated into the Jeanne Clery Act. Then, in 1998, the act was amended to expand the scope of campus crime statistic reporting, to ensure crime statistics are reported in accordance with the Federal Bureau of Investigation’s Uniform Crime Reporting program, and to require the maintenance of a public police log of all reported crimes. It also requires each campus to maintain a policy that mandates the issuance of timely warnings when a crime, reportable in the annual statistics, is known to the school and poses an ongoing threat to the campus. The Higher Education Opportunity Act of 2008 reauthorized the Higher Education Act of 1965 and provided additional campus reporting requirements, such as the relationship of campus security personnel with state and local police, emergency response and evacuation procedures, and missing person procedures.

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 that designate which law enforcement agency has operational responsibility for the investigation of violent crimes occurring on campus. It also requires campuses to delineate the specific boundaries of each agency’s operational responsibility.

Recent budget cuts in higher education in California have resulted in increased student protests and demonstrations at the CSU and other California educational institutions. It remains a challenge to balance freedom of speech and assembly with the maintenance of order, and there has been increased scrutiny by the public and the legislature regarding the management of these events, especially in the use of force.
In recent years, in response to increased training standards from the Commission on Peace Officer Standards and Training (POST) and governmental agencies, campus administrators have worked to upgrade the quality of university police services, and five CSU campuses are currently accredited by international accreditation agencies. CSU Los Angeles, CSU Fullerton, CSU San Marcos, and San Francisco State University have received accreditation from the Commission on Accreditation for Law Enforcement Agencies, and San Francisco State University and CSU Northridge have received accreditation from the International Association of Campus Law Enforcement Agencies.

At the systemwide level, policies have been developed to create uniform standards for vehicles, equipment, training, emergency preparedness, and critical response units, as well as semiannual meetings of campus police chiefs. In April 2001, the chancellor’s office issued Executive Order (EO) 787, modifying the CSU Public Safety Policy Manual that was required by agreement between the CSU Board of Trustees and the Statewide University Police Association. In 2007, administrative and risk management responsibilities for systemwide police services were reassigned from Systemwide Human Resources to the Office of Risk Management.

In 2010, in response to the recommendations of the 2008 Police Services Systemwide Audit, a systemwide chief law enforcement officer position was created. Responsibilities of the chief law enforcement officer include oversight over compliance issues in police services and emergency management, such as developing policies and procedures addressing systemwide police services, emergency preparedness, critical incident response, and chancellor’s office security issues. The position reports to the assistant vice chancellor of risk management and public safety.

In addition, EO 1046, Police and Public Safety Police Guidelines, and additional police services technical letters were implemented in 2010 to further define systemwide policies and expectations for campus police departments. These policies require campuses to maintain event management and crowd control procedures, as well as use-of-force guidelines and procedures, to ensure that management of protests and demonstrations is adequately and consistently controlled throughout the CSU system.

Throughout this report, we will refer to the program as police services. The titles of the departments assigned responsibility for managing CSU campus public safety and parking operations include, among others, the department of public safety, police and parking services, and the university police department.
INTRODUCTION

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of police services and law enforcement, and to determine the adequacy of controls over related processes to ensure compliance with relevant government regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

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

- Administration and management of the police services (PS) program provide an effective internal control environment, clear lines of organizational authority and responsibility, current and comprehensive policies and procedures, and self-evaluation techniques to measure program and management effectiveness.

- Access to the police services office and automated systems is adequately controlled and limited to authorized persons, data backup procedures are in place, and physical security over system hardware is adequate.

- Security and retention of departmental records are adequate.

- Staffing and scheduling provide appropriate coverage, effective use of overtime, and compliance with collective bargaining agreements.

- Hiring, certification, and training of police services employees is in accordance with POST standards, state regulations, and CSU policy.

- Citizen complaints and internal investigations are handled in compliance with state and federal regulations, CSU policy, and collective bargaining agreements.

- Budgeting processes adequately address police services funding and expenditures, and budget monitoring processes ensure effective accounting and management control.

- POST reimbursements, PS expenditures, and cost recovery for services and events are adequately controlled.

- Processes and policies exist for managing and reporting major incidents in accordance with state and federal regulations and CSU policy.

- 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 of 1998.

- Weapons are appropriately authorized, and weapons and ammunition are properly handled, accounted for, and safeguarded.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment A, Audit Agenda Item 2 of the January 24 and 25, 2012, meeting of the Committee on Audit stated that Police Services includes compliance with federal, state, and local rules and regulations, systemwide directives, and campus policies and procedures. Proposed audit scope would include review of campus policies and procedures; compliance with state-mandated standards and training requirements; timely and appropriate response to incidents, including appropriate policies and training governing the use of force; controls over sensitive or special equipment; accurate crime reporting; appropriate adjudication of internal investigations or personnel complaints; and access to law enforcement data.

Our study and evaluation were conducted in accordance with the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with Board of Trustee policies and Office of the Chancellor and campus policies, letters, and directives. The audit focused on procedures in effect from January 1, 2010, through December 7, 2012.

We focused primarily on the internal administrative, compliance, and operations controls over PS activities. Specifically, we reviewed and tested:

- Procedures for communicating systemwide and campus-specific policies, rules, and regulations.
- Staffing, scheduling, and internal investigation procedures.
- Fiscal procedures for budgeting, chargebacks, POST reimbursements, and expenses.
- 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 weapons and ammunition.
- Data security, disaster recovery, and backup procedures.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy, and the campus did not always comply with systemwide requirements.

We found that:

- The UPD policy manual did not include specific policies on mitigating campus crime and encouraging crime prevention activities.

- Campus and UPD information security policies did not include information security practices addressing system intervals and time outs for periods of non-use for the Automated Response Management System.

- The Clery reporting policy did not include expectations for the reconciliation of crime statistics data with Clery statistics, chancellor’s office reporting, and Uniform Crime Reporting regulations.

- The active shooter/incident response policy did not include expectations for conducting annual active shooter training exercises, and documentation showing that annual active shooter training had been conducted in 2010 and 2011 had not been maintained.

- The UPD firearms policy did not include information on the tracking of ammunition purchases and inventory procedures. In addition, ammunition purchases and distribution were not tracked or documented, and ammunition inventory reconciliations were not performed.

Technical Letter Police Services (PS) 2010-01, California State University Police Services Policies and Manual Maintenance Requirements, dated July 26, 2010, states, in part, that each campus police department shall implement and maintain operational policies and procedures in the following areas: mitigating campus crime and encouraging crime prevention deterrence activities; information security of police data, access to terminals, computer-aided dispatch/record management systems, Department of Justice terminals, data backup and storage procedures in accordance with best practices doctrines to include but not be limited to password complexity, intervals, and off-site storage; reconciliation of crime statistics data and consistency of data with the Jeanne Clery statistics, the Chancellor’s Criminal Statistics Report, and the Uniform Crime Reporting regulations; an active shooter/incident policy that includes expectations for conducting periodic, but not less than annual, active shooter training exercises, classroom instruction, table top exercises, and other applicable training methods; and procedures for tracking ammunition purchases, inventory, distribution, and use.

The chief of police stated that these particular policies and procedures had not been included in the departmental manual due to oversight. He also stated that active shooter training was provided to the officers in 2010 and 2011, but documentation showing that the training was conducted had not been maintained.
Incomplete written policies and procedures increase the risk of non-compliance with government and California State University (CSU) requirements and the potential for weaknesses in the internal control environment.

**Recommendation 1**

We recommend that the campus:

a. Update UPD policies and procedures to incorporate all information required by systemwide policy.

b. Maintain documentation showing that annual active shooter training has been conducted.

c. Track and document ammunition purchases and distribution and perform ammunition inventory reconciliations per updated campus policies.

**Campus Response**

We concur.

a. UPD will update policies and procedures to incorporate information required by systemwide policy.

b. UPD will maintain documentation showing that active shooter training has been conducted annually.

c. UPD will update campus firearms policies and will document and track ammunition purchases and distribution. UPD will perform ammunition inventory reconciliations per updated campus policies.

Date of completion: June 7, 2013
Failure to renew confidentiality agreements in a timely manner increases the risk that confidential criminal record information will be misused.

**Recommendation 2**

We recommend that the campus renew confidentiality agreements for CLETS users every two years.

**Campus Response**

We concur. UPD will adopt procedures that include renewing confidentiality agreements for CLETS users every two years.

Date of completion: June 7, 2013

**FISCAL ADMINISTRATION**

Unclaimed and outstanding California Commission on Peace Officer Standards and Training (POST) reimbursements were not reviewed and investigated in a timely manner.

We reviewed eight POST training classes for fiscal years 2010/11 and 2011/12, and we found that in five instances, follow-up on outstanding reimbursement requests had not been performed in a timely manner. This resulted in a delay in reimbursement for four of the requests; the fifth was still outstanding at the time of fieldwork.

State Administrative Manual §20050 states that elements of a satisfactory system of internal accounting and administrative controls shall include, but are not limited to, a system of authorization and recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues and expenditures.

The chief of police stated that follow-up on POST reimbursements was not timely due to the procedural oversight of the department administrator, coupled with delayed response or lack of response from POST.

Failure to adequately administer POST training reimbursements increases the risk that misappropriation of funds will not be detected, reimbursements will not be received, and the availability of UPD training funds will be reduced.

**Recommendation 3**

We recommend that the campus review and investigate unclaimed and outstanding POST reimbursements in a timely manner.
Campus Response

We concur. UPD will review and submit all applicable POST reimbursements in a timely manner and will investigate the implementation of more efficient methods for submissions and inquiries directly to POST.

Date of completion: June 7, 2013

MAJOR INCIDENTS AND CRIME REPORTING

The campus Clery report did not disclose all required elements regarding missing person procedures, and the campus did not always report crimes defined as major incidents to the chancellor’s office.

20 United States Congress §1092(j), Missing Person Procedures, states in part that each institution of higher education that provides on-campus housing and participates in any program under this title shall establish a missing student notification policy for students that provides each student who resides in on-campus housing a means to register confidential contact information in the event that the student is determined to be missing for a period of more than 24 hours, and that informs each residing student that the institution will notify the appropriate law enforcement agency not later than 24 hours after the time that the student is determined missing in accordance with such procedures.

Technical Letter PS 2010-07, Major Incident Reporting Requirements, dated July 28, 2010, states, in part, that campus police chiefs are to notify the systemwide chief law enforcement officer of major incidents by telephone or email, as appropriate. A major incident is any incident involving the campus and its students, faculty, or staff that may be newsworthy or potentially sensitive and includes serious crimes such as homicide, rape, robbery, assault, burglary, arson, bombs, riots, and disturbances.

The chief of police stated that the department understands the definition of a major incident and the required communications, and utilizes other communication methods, but the incident information was not disseminated and documented using the major incident report form due to oversight.

Failure to report major incidents to the chancellor’s office increases the risk of non-compliance with CSU policy and the risk that appropriate CSU officials will be unaware of potentially sensitive situations.

Recommendation 4

We recommend that the campus disclose all required elements regarding its missing person procedures in the campus Clery report and report all crimes defined as major incidents to the chancellor’s office.
Campus Response

We concur. UPD will include all required elements regarding its missing person procedures in the campus Clery report. UPD will also report all crimes defined as major incidents to the chancellor’s office per systemwide policy.

Date of completion: June 7, 2013

WEAPONS AND AMMUNITION CONTROLS

UPD weapons policies needed updating, and presidential approval for the use of certain non-standard weapons was not documented.

We found that:

- Policy 312, *Firearms*, stated that sworn personnel were required to qualify with their duty weapons quarterly and their off-duty and secondary weapons semiannually. However, certain officers did not meet qualification training requirements for duty, secondary, and off-duty weapons in 2010, 2011, and 2012.

- Policy 432, *Patrol Rifles*, did not state the training qualification requirements for patrol rifles. Campus practice was to perform these qualifications semiannually, but certain officers did not meet the semiannual qualification in 2010, 2011, and 2012.

- Policy 432, *Patrol Rifles*, stated that patrol rifles were inspected and maintained monthly. However, campus practice was to perform rifle maintenance on an annual basis.

- UPD weapons policies did not address the timing for shotgun qualifications and inspections. Campus practice was to perform shotgun qualifications semiannually and to perform inspections at least three times per year. However, certain officers did not meet the semiannual shotgun qualification in 2010, 2011, and 2012.

- Presidential authorization for the use of non-standard weapons, including rifles, pepper spray, pepper spray launchers, and Tasers, was not documented.

- Policy 308, *Control Devices and Techniques*, required the documentation of control device inspection and maintenance, but the rangemaster did not maintain written documentation of this maintenance.

California Polytechnic State University, San Luis Obispo (Cal Poly) UPD Policy 312, *Firearms*, states that all sworn personnel are required to qualify quarterly with their duty weapon on an approved range course, and semiannually with their off-duty and secondary weapons.

Cal Poly UPD Policy 432, *Patrol Rifles*, states that the rangemaster or armorer shall inspect and service each patrol rifle on a monthly basis.
Collective Bargaining Agreement, Statewide University Police Association, Unit 8, Article 10.6 states in part that the following equipment, when authorized by the president, shall be available in each police department: aerosol pepper spray and holder, shotgun, rifle, and Taser.

Cal Poly UPD Policy 308, *Control Devices and Techniques*, states that every control device will be periodically inspected by the rangemaster or the designated instructor for a particular control device. The inspection should be documented.

The chief of police stated that qualifications were missed because the frequency conflicted with the need to staff and maintain 24-hour patrol coverage, at times creating scheduling conflicts. He further stated that other discrepancies, including those having to do with inspection and maintenance, had not been noticed due to oversight. In addition, he stated that although the police department followed the campus process for weapons purchases, written presidential authorization for non-standard weapons had been obtained by the prior chiefs for shotguns, but not for all non-standard duty weapons.

Failure to maintain current policies and procedures relating to weapons qualification and inspection requirements, failure to ensure that weapons qualifications and weapons maintenance are completed and documented, and failure to document presidential approval for weapons used on campus increases the risk that officers will not be fully qualified to respond to incidents, increases the possibility that weapons will not be properly maintained and will not function correctly in emergency situations, and increases the potential for liability arising from the use of such weapons.

**Recommendation 5**

We recommend that the campus:

a. Update campus weapons policies in the areas of duty, secondary, and off-duty weapons qualifications, as well as rifle and shotgun qualifications and inspections, to reflect UPD practices and systemwide requirements.

b. Ensure that all weapons qualifications and inspections are performed in accordance with campus policies.

c. Obtain the president’s written authorization for the use of non-standard weapons.

d. Document the inspection and maintenance of control devices.

**Campus Response**

We concur.

a. UPD will update campus weapons policies related to duty, secondary, and off-duty weapons qualifications, as well as rifle and shotgun qualifications and inspections. Updated policies will reflect UPD practices and systemwide requirements.
b. All weapons qualifications and inspections will be performed in accordance with campus and systemwide policies.

c. UPD will obtain the president’s written authorization for the use of non-standard weapons.

d. UPD will document the inspection and maintenance of all control devices per updated department policy.

Date of completion: June 7, 2013
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<tr>
<th>Name</th>
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<tr>
<td>Jeffrey D. Armstrong</td>
<td>President</td>
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<td>Marc Benadiba</td>
<td>Assistant Director, Fiscal Services/Payroll Services</td>
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<td>Betty Burns</td>
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<td>Business Services Coordinator, Police Department</td>
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<td>Rick Ramirez</td>
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March 8, 2013

Mr. Larry Mandel
University Auditor
Office of the University Auditor
The California State University
401 Golden Shore Road
Long Beach, CA 90805-4275

Subject: Campus Responses to Recommendations of Incomplete Draft Audit Report Number (12-62), Police Services, California Polytechnic State University, San Luis Obispo

Dear Larry:

Enclosed are responses to the recommendations in the incomplete draft of the Police Services audit report (Audit Report 12-62). The responses are submitted to you for review and acceptance by the Chancellor. The responses include a corrective action plan and time frame for completion.

Please direct questions to Lorie Leetham, Assistant Vice President, Fiscal Services and Auxiliary Reporting, at (805)756-5421 (lleetham@calpoly.edu).

Sincerely,

[Signature]

Lawrence R. Kelley
Vice President for Administration and Finance

cc: J. Armstrong, L. Leetham
GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus:

a. Update UPD policies and procedures to incorporate all information required by systemwide policy.

b. Maintain documentation showing that annual active shooter training has been conducted.

c. Track and document ammunition purchases and distribution and perform ammunition inventory reconciliations per updated campus policies.

Campus Response

a. We concur. UPD will update policies and procedures to incorporate information required by systemwide policy.

   Date of Completion: June 7, 2013

b. We concur. UPD will maintain documentation showing that active shooter training has been conducted annually.

   Date of Completion: June 7, 2013

c. We concur. UPD will update campus firearms policies and will document and track ammunition purchases and distribution. UPD will perform ammunition inventory reconciliations per updated campus policies.

   Date of Completion: June 7, 2013

SYSTEMS ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION

Recommendation 2

We recommend that the campus renew confidentiality agreements for CLETS users every two years.
Campus Response

We concur. UPD will adopt procedures that include renewing confidentiality agreements for CLETS users every two years.

Date of Completion: June 7, 2013

FISCAL ADMINISTRATION

Recommendation 3

We recommend that the campus review and investigate unclaimed and outstanding POST reimbursements in a timely manner.

Campus Response:

We concur. UPD will review and submit all applicable POST reimbursements in a timely manner and will investigate the implementation of more efficient methods for submissions and inquiries directly to POST.

Date of Completion: June 7, 2013

MAJOR INCIDENTS AND CRIME REPORTING

Recommendation 4

We recommend that the campus disclose all required elements regarding its missing person procedures in the campus Clery report and report all crimes defined as major incidents to the chancellor’s office.

Campus Response:

We concur. UPD will include all required elements regarding its missing person procedures in the campus Clery report. UPD will also report all crimes defined as major incidents to the chancellor’s office per systemwide policy.

Date of Completion: June 7, 2013

WEAPONS AND AMMUNITION CONTROLS

Recommendation 5

We recommend that the campus:

a. Update campus weapons policies in the areas of duty, secondary and off-duty weapons qualifications, as well as rifle and shotgun qualifications and inspections, to reflect UPD practices and systemwide requirements.
b. Ensure that all weapons qualifications and inspections are performed in accordance with campus policies.

c. Obtain the president’s written authorization for the use of non-standard weapons.

d. Document the inspection and maintenance of control devices.

**Campus Response:**

a. We concur. UPD will update campus weapons policies related to duty, secondary, and off-duty weapons qualifications, as well as rifle and shotgun qualifications and inspections. Updated policies will reflect UPD practices and systemwide requirements.

   Date of Completion: June 7, 2013

b. We concur. All weapons qualifications and inspections will be performed in accordance with campus and systemwide policies.

   Date of Completion: June 7, 2013

c. We concur. UPD will obtain the president’s written authorization for the use of non-standard weapons.

   Date of Completion: June 7, 2013

d. We concur. UPD will document the inspection and maintenance of all control devices per updated department policy.

   Date of Completion: June 7, 2013
March 27, 2013

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Timothy P. White
    Chancellor

SUBJECT: Draft Final Report 12-62 on Police Services,
         California Polytechnic State University, San Luis Obispo

In response to your memorandum of March 27, 2013, I accept the response as submitted with the draft final report on Police Services, California Polytechnic State University, San Luis Obispo.

TPW/amd