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May 11, 2020

Dr. Dianne F. Harrison, President
California State University, Northridge
18111 Nordhoff Street
Northridge, CA 91330

Dear Dr. Harrison:

Subject: Audit Report 19-40, Emergency Management, California State University, Northridge

We have completed an audit of *Emergency Management* as part of our 2019 Audit Plan, and the final report is attached for your reference. The audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

I have reviewed the management response and have concluded that it appropriately addresses our recommendations. The management response has been incorporated into the final audit report, which has been posted to Audit and Advisory Services' website. We will follow-up on the implementation of corrective actions outlined in the response and determine whether additional action is required.

Any observations not included in this report were discussed with your staff at the informal exit conference and may be subject to follow-up.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,



Larry Mandel
Vice Chancellor and Chief Audit Officer

c: Timothy P. White, Chancellor

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EMERGENCY MANAGEMENT

**California State University,
Northridge**

Audit Report 19-40
March 26, 2020

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls related to emergency management and to ensure compliance with relevant federal and state regulations; Trustee policy; Office of the Chancellor (CO) directives; campus procedures; and where appropriate, federal guidance and industry-accepted standards.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, except for the weaknesses described below, the operational and administrative controls for emergency management as of February 6, 2020, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

Overall, we found that the campus had an effective emergency management program that generally aligned with systemwide, state, and federal requirements. However, we did identify components of the program that needed improvement. Specifically, we found that the campus emergency operations plan (EOP) did not contain all required elements, and department and college emergency action plans (EAP) were not always developed, reviewed, updated, and provided to the emergency manager on an annual basis. Also, some buildings did not have building marshals assigned. Additionally, the campus emergency operations center (EOC) was not adequately equipped with emergency resources, and the campus did not ensure that new employees had completed emergency preparedness training.

Specific observations, recommendations, and management responses are detailed in the remainder of this report.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. EMERGENCY OPERATIONS PLAN

OBSERVATION

The campus EOP and its supplemental materials, annexes, and appendices did not contain all elements required by systemwide policy.

We found that although some required elements, in part or in whole, were covered in other campus processes, procedures, or programs, they were not documented or referenced in the campus EOP. Specifically, the campus EOP did not address the following elements:

- Provisions for training and assignment of student health center staff in disasters that may require emergency medical services.
- Procedures for testing emergency response and evacuation on at least an annual basis.
- Annexes that detailed deny-entry, lockdown, and accounting-for-all-persons procedures.
- The integration of any campus auxiliary organizations and locations owned or leased by the university into campus emergency management planning activities.
- Training specific to student health center and counseling center staff with responsibilities for emergency management functions, and how they interface with emergency operations.

A comprehensive EOP provides assurance that the campus will be able to effectively respond to emergencies, decreases the risk of loss and injury to the campus community, and helps to ensure that roles and responsibilities are clearly outlined.

RECOMMENDATION

We recommend that the campus:

- a. Update the EOP to include all required elements mentioned above.
- b. Distribute the updated EOP and discuss it with the campus EOC team and other key emergency personnel.

MANAGEMENT RESPONSE

We concur.

- a. The emergency director will ensure that the EOP is updated to include the elements mentioned in the audit observation above.

- b. The updated EOP will be distributed and discussed with the campus EOC team and other key emergency personnel.

Expected completion date: May 15, 2020

2. EMERGENCY ACTION PLANS

OBSERVATION

The campus EAPs were not always developed, reviewed, updated, and provided to the emergency manager on an annual basis.

The campus requires departments or colleges to develop their own EAP so that members of each department or college best understand the nature of their work, potential workplace hazards, the layout of their facilities, and special needs specific to their department or college.

We obtained and reviewed the listing of EAPs, and we found that:

- 96 of the 99 EAPs were not always annually reviewed and updated, including 28 EAPs that had not been updated since 2016.
- Eight EAPs had not been developed and/or submitted to the emergency manager.

Maintaining current EAPs allows for a quicker and more efficient initial response to an incident and helps to ensure the safety of employees, students, and visitors in the event of an emergency.

RECOMMENDATION

We recommend that the campus:

- a. Remind departments and colleges to annually review, update, and provide updated EAPs to the emergency manager.
- b. Develop EAPs noted above.

MANAGEMENT RESPONSE

We concur.

- a. The emergency director will notify departments and colleges of their responsibility to develop, annually review, update, and provide updated EAPs to the emergency manager.
- b. Departments without an EAP will develop one and provide a copy to the emergency manager.

Expected completion date: August 10, 2020

3. BUILDING MARSHAL PROGRAM

OBSERVATION

The campus building marshal roster was not current, and some campus buildings did not have building marshals assigned.

We reviewed the current building marshal roster and the evacuation drill records from 2017 to 2019, and we found that:

- Six of the 15 employees we reviewed were no longer building marshals.
- A building marshal had not been assigned to facilitate emergency procedures for six buildings.

Maintaining an effective building marshal program helps to ensure that students, faculty, and staff will be properly prepared to respond to an emergency situation.

RECOMMENDATION

We recommend that the campus clearly identify, assign, and maintain a current list of building marshals for all campus buildings.

MANAGEMENT RESPONSE

We concur. The campus will clearly identify, assign, and maintain a current list of building marshals for all campus buildings.

Expected completion date: July 15, 2020

4. EMERGENCY RESOURCES AND EMERGENCY OPERATIONS CENTER

OBSERVATION

The campus listing of emergency resources did not have adequate information, and the EOC was not adequately equipped to ensure that it would be functional in an emergency.

We reviewed the campus' listing of emergency resources and the EOC, and we found that:

- The listing of emergency resources did not include the location of resources or who was responsible for maintaining the resources.
- The listing of emergency resources was not dated to document its most recent review and revision. As a result, we were unable to determine whether the listing had been reviewed and updated at least annually, as required by systemwide policy.

- The EOC did not have adequate emergency supplies to operate for 72 hours, and some supplies had expired.

Having adequate emergency resources and maintaining a well-equipped EOC provides assurance that the campus emergency team will have all necessary resources available to respond to and manage emergency situations.

RECOMMENDATION

We recommend that the campus:

- a. Identify who is responsible for maintaining resources and update the listing of emergency resources to include the location of resources.
- b. Establish a process to annually inspect the emergency supplies and update the listing of emergency resources to ensure that all supplies are usable in the event of an emergency.
- c. Equip the EOCs with adequate and current emergency supplies to operate for 72 hours.

MANAGEMENT RESPONSE

We concur.

- a. The emergency manager will identify needed resources (an emergency resources annex to be included in the EOP) and update the listing of emergency resources to include the location of resources.
- b. The emergency manager will establish a process to annually inspect the emergency supplies and update the listing of emergency resources to ensure that all supplies are usable in the event of an emergency.
- c. The campus will equip the EOCs with adequate and current emergency supplies to operate for 72 hours.

Expected completion date: August 1, 2020

5. NEW-HIRE EMERGENCY PREPAREDNESS TRAINING

OBSERVATION

The campus did not ensure that new employees had completed the required emergency preparedness training.

We noted that the emergency manager provided new-hire emergency preparedness training to campus employees as part of the new-hire orientation. However, we found that not all new hires had attended and received training within their first year of employment. Specifically, we reviewed the new-hire orientation training records from January 2017 to

October 2018, and we found that about 14 percent of new employees did not attend the new-hire orientation.

Provision of emergency preparedness training to new employees ensures that employees are aware of emergency and evacuation procedures, increases safety, and allows for an adequate response in the event of an emergency.

RECOMMENDATION

We recommend that the campus develop and document a process to monitor emergency preparedness training to all new hires within their first year of employment.

MANAGEMENT RESPONSE

We concur. The emergency manager will develop and document a process to train and monitor emergency preparedness training to all new hires within their first year of employment.

Expected completion date: August 15, 2020

GENERAL INFORMATION

BACKGROUND

The California State University (CSU) consists of 23 campuses, with approximately 41,000 students and more than 52,000 faculty and staff. Each campus is responsible for the safety and general welfare of all members of the campus community. Because emergencies and disasters can occur with little to no warning and encompass a wide range of events, including earthquakes, fires, active-shooter situations, pandemics, protests or riots, and other natural and manmade disasters, it is critical that campuses plan ahead so that when emergencies happen, an appropriate response can be coordinated. The president of each CSU campus has been delegated responsibility for the implementation and maintenance of the campus emergency management program.

The Federal Emergency Management Agency (FEMA) is the federal agency that leads the country in preparing for, preventing, responding to, and recovering from disasters. FEMA emphasizes the use of hazard mitigation planning to reduce the loss of life and property due to natural and other hazard risks and publishes a number of emergency planning guides, including *Building a Disaster Resistant University* and the *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education*. The Department of Education (DOE) and the National Fire Protection Agency (NFPA) have also developed relevant federal guidance for emergency management programs.

On February 28, 2003, the president of the United States issued Homeland Security Presidential Directive 5, *Management of Domestic Incidents*, which directed that the National Incident Management System (NIMS) be developed. NIMS provides a common approach to managing incidents that allows government departments and agencies, nongovernmental organizations, and the private sector to work together. NIMS requires the use of a standard organizational framework, the Incident Command System (ICS), for incident response. Federal departments and agencies, as well as state, local, and tribal governments, are required to fully comply with NIMS and adopt ICS to receive federal preparedness funding and grants.

The cornerstone of California's emergency response system is the Standardized Emergency Management System (SEMS), which state agencies are required by law to use when responding to emergencies involving multiple jurisdictions or agencies. Key components of SEMS, codified in Government Code §8607, include the use of ICS, multiagency coordination, mutual aid, and defined operational areas. SEMS was developed as a result of the 1991 East Bay Hills fire in Oakland, which drew attention to the need for better coordination among emergency services responders.

As a result of federal and state regulations, all CSU campuses are required to incorporate NIMS, SEMS, and ICS into their emergency management program. Executive Order (EO) 1056, *California State University Emergency Management Program*, guides campuses on developing and maintaining an emergency management program on each campus. At the systemwide level, Systemwide Risk Management (SRM) has administrative oversight and programmatic responsibility for the emergency management function and coordinates the Emergency Coordinators working group, an advisory body for CSU systemwide emergency management. In 2018, the SRM issued coded memorandum Risk Management 2018-1, *Emergency Management*, to replace out-of-date sections in EO 1056 and further define the

responsibilities and needs of an effective campus management program and two technical memoranda to provide additional guidance to campuses for building coordinator programs and emergency plans.

At California State University, Northridge (CSUN), the department of police services (DPS) is charged with coordinating the activities needed to prepare for and respond to campus-wide emergencies or disasters. The responsibilities at DPS include planning, implementing, and maintaining an emergency management program on campus, including emergency preparedness, training, response, and recovery. The campus chief of police is designated as the primary person responsible for overseeing the emergency management program and is responsible for maintenance of the annual review and issuance of the EOP, with the assistance of the emergency manager. The emergency manager has overall responsibility for the implementation of the campus emergency management program. The president of the university, or his or her secondary in the line of succession as outlined in the EOP, has the authority to implement the campus EOP.

SCOPE

We visited the CSUN campus from December 2, 2019, through February 6, 2020. Our audit and evaluation included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. The audit focused on procedures in effect from January 1, 2017, through October 31, 2019.

Specifically, we reviewed and tested:

- Emergency management administration and organization, including clear lines of organizational authority and responsibility, and current and comprehensive policies and procedures.
- The EOP and event-specific annexes, including integration of SEMS, NIMS, and ICS components, and considerations for special populations on campus such as international students, students and personnel with limited English proficiency, and people with access and functional needs.
- The EOC, emergency equipment, and related emergency supplies and resources.
- Mutual-aid agreements outlining coordination with other agencies.
- The effectiveness of the building marshal or similar program and evacuation procedures and drills.
- Emergency management training for new hires and emergency management team members.
- Testing and drills for emergency communication systems and emergency incidents, and the preparation of appropriate after-action reports.

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. Our testing and methodology, which was designed to provide a review of key administrative and operational controls, included interviews, walkthroughs, and detailed testing on certain aspects of the campus emergency operations program. Our review was limited to gaining reasonable assurance that essential elements of the campus emergency management program were in place and did not examine all aspects of the program.

CRITERIA

Our audit was based upon standards as set forth in federal and state regulations and guidance; CSU Board of Trustee policies; Office of the Chancellor policies, letters, and directives; campus procedures; and other sound administrative practices. This audit was conducted in conformance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

This review emphasized, but was not limited to, compliance with:

- 20 United States Code §1092(f), *Higher Education Opportunity Act*
- Code of Federal Regulations Title 28, Part 36, *American Disabilities Act*
- Code of Federal Regulations Title 29, Part 1910, *Occupational Safety and Health Standards*
- California Code of Regulations, Title 8, §3220, *Emergency Action Plan*
- DOE, *Action Guide for Emergency Management at Institutions of Higher Education*
- DOE, *The Handbook for Campus Safety and Security Reporting 2016 Edition*
- FEMA, *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education*
- NFPA 1600, *Standard on Disaster/Emergency Management and Business Continuity/Continuity of Operations Programs*
- Government Code §8607
- Government Code §13402 and §13403
- EO 943, *University Health Services*
- EO 1056, *California State University Emergency Management Program*
- Coded memorandum Human Resources 2004-10, *Mutual Aid*
- Coded memorandum Risk Management 2018-01, *Emergency Management*
- Technical memorandum Risk Management, *CSU Campus Emergency Plan Topics*
- Technical memorandum Risk Management, *CSU Building Coordinator Program*
- CSUN *Annual Security Reports*
- CSUN *Emergency Operations Plan*
- CSUN *Fire Safety Reports*

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