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December 5, 2019

Dr. Jane Close Conoley, President
California State University, Long Beach
1250 Bellflower Boulevard
Long Beach, CA 90840

Dear Dr. Conoley:

Subject: Audit Report 19-52, *Emergency Management*, California State University, Long Beach

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, Long Beach

Audit Report 19-52
October 22, 2019

EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls for emergency management and to ensure compliance with relevant governmental regulations; Trustee policy; Office of the Chancellor 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 September 12, 2019, 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 did not have a process for providing annual refresher training for building marshals and emergency operations center (EOC) team members, did not always perform and document simulated emergency exercises in accordance with systemwide requirements, and, in part due to a lack of volunteers, did not have building marshals assigned and trained for all campus buildings. We also identified opportunities for improvement related to the campus emergency operations plans (EOP), mutual aid agreements, and documentation of specialized employee training and designated roles and responsibilities within the emergency management program.

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

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. EMPLOYEE EMERGENCY TRAINING

OBSERVATION

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

Systemwide policy requires that new employees complete emergency preparedness training within one year of employment and that specialized training be provided to employees designated as building marshals and EOC team members upon appointment, with annual refresher training provided annually thereafter.

We noted that the office of emergency management (OEM) provided new-hire emergency preparedness training to lecturers and faculty as a component of the campus' new-hire orientation. However, we reviewed records for ten lecturers and faculty hired during 2017 and 2018 and found that the campus had not maintained documentation showing that they attended and received emergency preparedness training within their first year of employment.

Additionally, we noted that initial training was provided to building marshals through annual in-person training sessions, and EOC team members received role-specific training when assigned to an EOC unit or position. However, we found that documentation of the initial training was limited to the building marshal and EOC rosters, which included the date the employees received the training, and not all employees listed on these rosters had initial training dates documented.

Further, we noted that building marshals were offered the option to attend subsequent building marshal trainings each year, but we found that the campus did not have a process to provide and require annual refresher training for building marshals and EOC team members.

Providing and monitoring emergency preparedness training helps to ensure that the emergency program is in compliance with systemwide requirements and that employees and emergency personnel are prepared to respond in emergencies.

RECOMMENDATION

We recommend that the campus:

- a. Provide and document specialized annual refresher training to building marshals and EOC team members.
- b. Develop a written process to document and monitor the completion of emergency preparedness training, including new-hire training for lecturers and faculty and specialized training for building marshals and EOC team members.
- c. Communicate the training requirements and monitoring processes to key campus personnel.

MANAGEMENT RESPONSE

We concur. Specialized annual refresher training will be documented, scheduled, and offered to all building marshals and EOC personnel.

The campus will develop a written process to document and monitor the completion of emergency preparedness training, including new-hire training for lecturers and faculty and specialized training for building marshals and EOC team members.

Further, the campus will communicate the training requirements and monitoring processes to key campus personnel.

This corrective action will be completed by January 31, 2020.

2. EMERGENCY EXERCISES

OBSERVATION

The campus did not conduct and document required simulated emergency exercises in accordance with systemwide policy.

We reviewed emergency exercises records for 2017 and 2018 and found that:

- Functional exercises were not conducted on a biennial basis, as required by Executive Order (EO) 1056, *California State University Emergency Management Program*.
- Simulated emergency exercise results and lessons learned were not always documented in the form of after-action reports. Specifically, we reviewed nine emergency drills and exercises and found that in three instances, after-action reports were not available.
- The campus had not conducted evacuation drills at the Lancaster University Center.

Completing and documenting emergency drills and simulations ensure that emergency team members, students, faculty, and staff will be properly prepared to respond to an emergency situation, increases safety, and reduces the risk of noncompliance with campus and California State University (CSU) requirements.

RECOMMENDATION

We recommend that the campus:

- a. Conduct and document functional exercises on a biennial basis.
- b. Document the results and lessons learned from all simulated emergency exercises using after-action reports and review the results with the campus emergency management team.

- c. Conduct and document evacuation drills at the Lancaster University Center on an annual basis or document its inclusion in facility-wide evacuation drills.

MANAGEMENT RESPONSE

We concur. Moving forward, functional exercises will be conducted and documented every other year, beginning in 2020.

The campus will document the results and lessons learned from all simulated emergency exercises, including functional exercises, using after-action reports and review the results with the campus emergency management team.

The Lancaster facility will be included in the annual evacuation drill each February and documented in the subsequent after-action report. The Lancaster facility will conduct an evacuation drill in February 2020.

This corrective action will be completed by February 28, 2020.

3. BUILDING COORDINATOR PROGRAM

OBSERVATION

Building marshals were not always assigned or clearly identified for all campus buildings, and building-specific emergency action plans (EAP) had not been developed.

We reviewed the campus building marshal roster and found that:

- A building marshal had not been assigned and trained to facilitate emergency procedures for ten buildings or facilities.
- Emergency procedures for five buildings or facilities would be performed by a building marshal residing in another location. However, we found that the building marshals responsible for these buildings had not been clearly identified and assigned.

Additionally, we found that the campus had not developed building-specific EAPs that included procedures for reporting emergencies, accounting for all employees, performing rescue/medical duties, making accommodations for people with disabilities, and listing contact information for employees who may have questions regarding the EAP. We noted that the OEM created a building emergency plan template that included most of these items, but building marshals were not required to use this template, and it was treated as an additional, optional resource.

Clearly assigning building marshals and communicating emergency procedures through 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. Clearly identify, assign, and train building marshals for all campus buildings where marshals are determined necessary.
- b. Develop building-specific EAPs that include the items noted above, and review, update, and submit them to the emergency management team on an annual basis.
- c. Communicate responsibilities for maintaining building EAPs to the appropriate campus personnel.

MANAGEMENT RESPONSE

We concur. The campus will clearly identify, assign, and train building marshals for all campus buildings where marshals are determined necessary.

The campus will develop building-specific EAPs that include the items noted above, and review, update, and submit them to the emergency management team on an annual basis.

The campus will communicate responsibilities for maintaining building EAPs to the appropriate campus personnel.

Corrective action will be completed by April 30, 2020.

4. EMERGENCY OPERATIONS PLAN

OBSERVATION

The campus EOP did not contain all required elements.

We found that some required elements, in part or in whole, were covered by other campus processes, procedures, or programs. However, they were not documented or referenced in the EOP. Key plan elements that were missing included, but were not limited to, provisions for training and assignment of student health center staff in disasters that may require emergency medical services; addressing the unique needs of special populations on campus, including international students and individuals with disabilities or other functional needs; and annexes that detail deny-entry, lockdown, and accounting-for-all-persons procedures.

Additionally, we found that the campus did not have a process to allow for student health services staff to review medical disaster plans and/or related sections or annexes of the EOP, as required by EO 943, *University Health Services*.

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.
- b. Distribute the updated EOP, including all supporting materials, to the campus EOC team and other key emergency personnel.
- c. Distribute the updated EOP to the campus community.
- d. Establish a process for the student health services staff to annually review medical disaster plans and/or related sections or annexes of the EOP.

MANAGEMENT RESPONSE

We concur. The campus EOP will be updated to include all required elements and provided to the EOC team and other key emergency personnel. The updated EOP will be available to the campus community on the university police website and promoted via established social media channels. The updated and distributed EOP will include all supporting materials, including new annexes regarding shelter-in-place, lockdown procedures, and accounting for missing persons.

The campus will establish a process for the student health center to review and approve the disaster medical plan annex and/or related sections of the EOP prior to its publishing this year and each year moving forward.

Corrective action will be completed by February 28, 2020.

5. ROLES AND RESPONSIBILITIES

OBSERVATION

Communication regarding roles and responsibilities for emergency management functions needed improvement.

Specifically, we found that:

- Not all EOC roster positions were filled or clearly assigned, including primary and/or alternate positions for various EOC units.
- The emergency executive was not clearly identified on the EOC roster submitted to the Office of the Chancellor.

Clearly defined and communicated roles and responsibilities help ensure that emergency management duties are understood and performed in compliance with campus and systemwide requirements.

RECOMMENDATION

We recommend that the campus fill and clearly identify EOC team members for all required positions, including the emergency executive.

MANAGEMENT RESPONSE

We concur. The campus will fill and clearly identify EOC team members for all required positions, including the emergency executive.

Corrective action will be completed by January 31, 2020.

6. MUTUAL AID AGREEMENTS

OBSERVATION

Mutual aid agreements with external stakeholders were not always current.

We found that the memorandum of understanding (MOU) between the university police department (UPD) and the Long Beach Police Department, which included an agreement of mutual aid assistance, expired in September 2018.

Current mutual aid agreements document the resources, services, and support external entities will provide during an incident and help ensure that such support is available in the event of an emergency.

RECOMMENDATION

We recommend that the campus:

- a. Continue efforts to renew the MOU with the Long Beach Police Department.
- b. Establish a process to review and renew mutual aid agreements with external entities prior to the agreements' expiration date.

MANAGEMENT RESPONSE

We concur. The MOU with the Long Beach Police Department will be renewed, and the campus will establish a process to review and renew mutual aid agreements with external entities prior to the agreements' expiration date.

Corrective action will be completed by February 28, 2020.

GENERAL INFORMATION

BACKGROUND

The CSU consists of 23 campuses, with approximately 479,000 students and more than 50,000 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. 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, the 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 the coded memorandum Risk Management 2018-01, *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, Long Beach (CSULB), the OEM, a sub-unit of UPD that operates under the umbrella of administration and finance, is responsible for the day-to-day administration of the emergency management program, including planning, implementation, and maintenance. The emergency management program includes maintaining the campus EOP, training the emergency management team, stocking and maintaining an adequate EOC, and scheduling and providing emergency preparedness training to the campus community. OEM is also responsible for the building marshal program, including training building marshals and supplying the necessary equipment for the marshals to perform their roles.

SCOPE

We visited the CSULB campus from August 12, 2019, through September 12, 2019. 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 September 12, 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 emergency operations plan 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 emergency operations center, emergency equipment, and related emergency supplies and resources.
- Coordination with other agencies, including mutual aid and assistance.
- 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*
- 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*
- CSULB *Building Marshal Program*
- CSULB *Emergency Operations Plan*

AUDIT TEAM

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