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June 10, 2020

Dr. Adela de la Torre, President
San Diego State University
5500 Campanile Drive
San Diego, CA 92182

Dear Dr. de la Torre:

Subject: Audit Report 20-01, Emergency Management, San Diego State University

We have completed an audit of *Emergency Management* as part of our 2020 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

San Diego State University

Audit Report 20-01
April 28, 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; and campus procedures.

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 March 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 found that due to turnover in the emergency manager position and various management positions throughout the campus, some components of the existing emergency management program needed improvement and updating. Specifically, the campus did not have a formal building safety coordinator (BSC) program or policy that addressed initial and refresher specialized training or roles and responsibilities; the BSC roster included employees who were no longer active; and some BSCs had not completed annual refresher specialized training. Additionally, both the campus emergency operations plan (EOP) and the student health services (SHS) emergency action plan (EAP) required updating, as neither had been updated during the audit scope period.

We also found that the EOP evacuation annex did not address individuals with access and functional needs and that both the campus and SDSU Research Foundation (SDSURF) evacuation procedures were in draft form. In addition, evacuation drills at the satellite campus and SDSURF satellite locations had not been performed during the audit scope period. Further, emergency preparedness training was not consistently completed by new staff within one year of hiring. Also, one generator in our review had not been tested on a monthly basis as required.

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

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. BUILDING SAFETY COORDINATORS

OBSERVATION

The BSC program needed improvement.

Specifically, we found that the campus had a BSC program that included more than 300 BSCs and included both campus and auxiliary buildings. However, a formal written program or policy had not been developed to address key elements, including, but not limited to, initial and refresher specialized training requirements and roles and responsibilities before, during, and after an emergency or incident.

Additionally, in our review of the December 2019 roster of BSCs, we found that the roster was incomplete as it contained some blank fields and did not include all SDSURF satellite locations. The roster also included individuals who were no longer active employees. Specifically, we reviewed 20 BSCs and found that four were no longer active employees.

Further, we confirmed that the campus held BSC refresher specialized training on an annual basis during the audit scope period. However, in our review of the 20 BSCs noted above, we found that none had completed the training during 2018 and 2019, as required by systemwide policy.

Developing a formal BSC program or policy helps to ensure roles and responsibilities and training requirements are clearly communicated, and a current roster and completion of training helps to ensure that BSCs will be available and prepared to respond during a campus emergency.

RECOMMENDATION

We recommend that the campus:

- a. Develop a formal BSC program or policy that addresses key elements of the program, including, but not limited to, initial and refresher specialized training and roles and responsibilities before, during, and after an emergency, and communicate the program or policy to key personnel and BSCs.
- b. Develop a process to review and update the BSC roster to ensure that it includes current employees and all locations, and that all data fields are complete.
- c. Develop a process to effectively deliver and monitor completion of annual refresher specialized training.

MANAGEMENT RESPONSE

We concur. The campus will:

- a. Develop a formal BSC program or policy that addresses key elements of the program. The program or policy will be communicated to key personnel and BSCs.
- b. Develop a process to review and update the BSC roster to ensure that it includes current employees and all locations, and that all data fields are complete.
- c. Develop a process to effectively deliver and monitor completion of annual refresher specialized training.

Estimated completion date: January 31, 2021

2. EMERGENCY OPERATIONS PLAN

OBSERVATION

The campus EOP needed updating.

We reviewed the campus EOP as of June 2017 and found that:

- Although a synopsis of the EOP dated March 2019 was posted on the Emergency Services website, the full EOP had not been updated annually in 2018 and 2019 and did not include a signed acknowledgement documenting approval and distribution of the current plan.
- Appendix E, *SDSU Emergency Operations Center (EOC) Response Organization*, included an outdated EOC organization chart.
- Part 6 and Annex I, *Campus Emergency Equipment and Supplies*, did not include current inventories of emergency supplies, as some were dated 2014 and 2015.
- Part 7B, *Schedule of Training, Drills and Exercises*, indicated that training would be scheduled on an ongoing basis but did not specify specialized training requirements for BSCs and emergency team members.
- The EOP did not include a provision for the training and assignment of SHS staff during disasters that may require emergency medical services.

A current and 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 ensures that roles, responsibilities, and training requirements are clearly outlined.

RECOMMENDATION

We recommend that the campus:

- a. Update the EOP to address all elements mentioned above and include a signed acknowledgement documenting approval and distribution of the plan.

- b. Update the EOP synopsis as appropriate to ensure continued distribution to the campus community.
- c. Establish a process to ensure that the EOP is reviewed and updated as needed on an annual basis.

MANAGEMENT RESPONSE

We concur. The campus will:

- a. Update the EOP to address all elements mentioned above and include a signed acknowledgement documenting approval and distribution of the plan.
- b. Update the EOP synopsis as appropriate to ensure continued distribution to the campus community.
- c. Establish a process to ensure that the EOP is reviewed and updated as needed on an annual basis.

Estimated completion date: January 31, 2021

3. STUDENT HEALTH SERVICES

OBSERVATION

The SHS emergency action plan required updating.

SHS had an EAP that detailed medical response levels in the event of campus emergencies. However, in our review of the plan, we found that the EAP had not been updated since April 2016, contained outdated information, and did not define training requirements in support of this plan.

Further, we confirmed with SHS management that SHS staff did not review the EAP or the campus EOP on a periodic basis during the audit scope period.

A current EAP ensures that roles, responsibilities, and training requirements for SHS staff are clearly defined and ensures that SHS staff are prepared to respond appropriately in the event of an emergency that requires medical services.

RECOMMENDATION

We recommend that the campus:

- a. Evaluate and update the EAP to address all elements mentioned above, and distribute and review the updated EAP with SHS staff and key personnel.
- b. Develop a process to ensure that the EAP is reviewed and updated as needed on a periodic basis.

- c. Develop a process to ensure that SHS staff completes EAP and campus EOP training as required.

MANAGEMENT RESPONSE

We concur. The campus will:

- a. Evaluate and update the EAP to address all elements mentioned above, and distribute and review the updated EAP with SHS staff and key personnel.
- b. Develop a process to ensure that the EAP is reviewed and updated as needed on a periodic basis.
- c. Develop a process to ensure that SHS staff completes EAP and campus EOP training as required.

Estimated completion date: January 31, 2021

4. EVACUATION PROCEDURES

OBSERVATION

Campus and auxiliary evacuation procedures needed improvement.

We found that the campus EOP included a campus evacuation annex that described a course of action for campus evacuations; however, this annex did not address individuals with access and functional needs.

Additionally, the campus had a building evacuation checklist on the campus Emergency Services website; however, this checklist was in draft form and did not specifically address evacuations at the campus.

Further, SDSURF had evacuation procedures for each of its satellite locations. However, we noted that these procedures included outdated information, as they had been in draft form since 2016 and did not address accounting for all people.

Current and comprehensive evacuation procedures provide assurance that emergency response personnel can effectively respond to emergencies, assist individuals with access and functional needs, and account for personnel.

RECOMMENDATION

We recommend that the campus, in conjunction with SDSURF:

- a. Update the EOP evacuation annex as noted above to address individuals with access and functional needs, and distribute and review the updated annex to the EOC team and other key personnel.

- b. Update the evacuation checklist to ensure that it addresses evacuations at the campus, and publish the finalized checklist to ensure distribution to the campus community.
- c. Update SDSURF evacuation procedures to address accounting for all people and distribute finalized procedures to key personnel and satellite locations.

MANAGEMENT RESPONSE

We concur. The campus, in conjunction with SDSURF, will:

- a. Update the EOP evacuation annex to address individuals with access and functional needs, and distribute and review it with the EOC team and other key personnel.
- b. Update the evacuation checklist, publish it, and distribute it to the campus community.
- c. Update SDSURF evacuation procedures and distribute them to key personnel and satellite locations.

Estimated completion date: January 31, 2021

5. EMERGENCY EXERCISES AND DRILLS

OBSERVATION

Evacuation drills were not conducted at satellite locations, and documentation of exercises and drills was not consistently retained.

The campus had satellite locations in Calexico, California, and SDSURF had satellite locations throughout the greater San Diego area. We found that evacuation drills had not been performed at these satellite locations during the audit scope period.

Additionally, we reviewed five emergency exercises and five evacuation drills, and we found that the campus could not locate records for one exercise and four evacuation drills. Thus, we could not substantiate that results and lessons learned from these exercises and drills had been documented or that they were reviewed with the campus emergency management team.

Performing and documenting emergency exercises and evacuation drills helps to ensure that all campus and auxiliary locations are prepared to effectively respond to emergency situations and ensures compliance with systemwide, state, and federal guidelines.

RECOMMENDATION

We recommend that the campus, in conjunction with SDSURF:

- a. Schedule and perform evacuation drills at satellite locations.

- b. Develop a process to ensure that results and lessons learned from exercises and drills are documented, reviewed with the campus emergency management team, and retained according to systemwide record retention guidelines.

MANAGEMENT RESPONSE

We concur. The campus, in conjunction with SDSURF, will schedule and perform evacuation drills at satellite locations. A process will also be developed to ensure that results and lessons learned are documented, reviewed with the campus emergency management team, and retained according to systemwide record retention guidelines.

Estimated completion date: January 31, 2021

6. EMERGENCY PREPAREDNESS TRAINING

OBSERVATION

Emergency preparedness training was not consistently completed.

Systemwide policy requires that new employees complete emergency preparedness overview training within one year of hiring. We found that employees were completing new-hire orientation, which included an overview of safety and emergency procedures. However, in our review of ten employees hired during the audit scope period, we found that three did not complete new-hire orientation within one year of their hiring.

Completion of emergency preparedness training helps to ensure that employees are aware of emergency and evacuation procedures, increases safety, and allows for compliance with systemwide guidelines.

RECOMMENDATION

We recommend that the campus develop a process to monitor and ensure that employees complete emergency preparedness training within one year of hiring, and communicate the process to key personnel.

MANAGEMENT RESPONSE

We concur. The campus will develop a process to monitor and ensure that employees complete emergency preparedness training within one year of hiring and communicate the process to key personnel.

Estimated completion date: January 31, 2021

7. EMERGENCY GENERATORS

OBSERVATION

Emergency generators were not always tested on a monthly basis as required.

Testing and maintenance of most campus and auxiliary emergency generators was contracted to Global Power, while some auxiliary emergency generators were serviced by Bay City Electric. National Fire Protection Association (NFPA) 110, *Standard for Emergency and Standby Power Systems*, requires monthly testing of emergency generators for a minimum of 30 minutes.

We reviewed ten campus and auxiliary emergency generators, and we found that one was not tested on a monthly basis as required. The generator was designated to provide emergency power to the University Towers residence hall.

Performing testing of emergency generators provides assurance that critical resources will be readily available and functioning in the event of an emergency.

RECOMMENDATION

We recommend that the campus, in conjunction with SDSURF, develop a process to ensure that emergency generators are tested on a monthly basis as required.

MANAGEMENT RESPONSE

We concur. The campus, in conjunction with SDSURF, will develop a process to ensure that emergency generators are tested on a monthly basis as required.

Estimated completion date: January 31, 2021

GENERAL INFORMATION

BACKGROUND

The California State University (CSU) consists of 23 campuses, with approximately 481,000 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 CSU Systemwide Managers Council, an advisory body for CSU systemwide emergency management. In 2018, SRM issued the Coded Memorandum (RM-2018-1) 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 SDSU, the office of emergency preparedness, a unit of the university police department, is charged with coordinating all activities needed to prepare for and respond to emergency situations. The responsibilities of the office of emergency preparedness include developing, implementing, and maintaining the university's state of readiness through emergency planning, technology integration, community education, public outreach, and sustained partnerships. The emergency management program is overseen by the emergency manager, who is responsible for coordinating all activities related to preparedness, response, and recovery on campus. The emergency manager is also responsible for maintaining the campus EOP and administering the building and floor marshal program and reports to the chief of police, who reports to the associate vice president of administration in the division of Business and Financial Affairs.

SCOPE

We visited the SDSU campus from January 27, 2020, through March 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, 2018, to March 6, 2020.

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 operational, and administrative controls, included interviews, walkthroughs, and detailed testing on certain aspects of the emergency management program. Our review was limited to gaining reasonable assurance that essential elements of the 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; Trustee policy; Office of the Chancellor directives; and campus and auxiliary procedures; as well as sound administrative practices and consideration of the potential impact of significant risks. 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 110, *Standard for Emergency and Standby Power Systems*
- 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*
- SDSU *Emergency Operations Plan*
- SDSU SHS *Emergency Action Plan: Policies and Procedures*
- SDSU *Building Evacuation Checklist*
- SDSURF *Emergency Procedures*

AUDIT TEAM

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