

**Audit and Advisory Services**  
401 Golden Shore  
Long Beach, CA 90802-4210

562-951-4430  
562-951-4955 (Fax)  
lmandel@calstate.edu

May 6, 2020

Dr. Ellen N. Junn, President  
California State University, Stanislaus  
One University Circle  
Turlock, CA 95382

Dear Dr. Junn:

**Subject: Audit Report 20-03, *Emergency Management*, California State University, Stanislaus**

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

**CSU Campuses**

Bakersfield • Channel Islands • Chico • Dominguez Hills • East Bay • Fresno • Fullerton • Humboldt • Long Beach • Los Angeles • Maritime Academy • Monterey Bay  
Northridge • Pomona • Sacramento • San Bernardino • San Diego • San Francisco • San José • San Luis Obispo • San Marcos • Sonoma • Stanislaus

# **EMERGENCY MANAGEMENT**

**California State University, Stanislaus**

Audit Report 20-03  
April 8, 2020

## EXECUTIVE SUMMARY

### OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls related to emergency management (EM) 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 February 28, 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. The program had undergone several key personnel changes during the years reviewed, with responsibility shifting between the Office of Safety and Risk Management (SRM) and the University Police Department (UPD) as the campus experienced turnover in critical emergency management personnel. We identified components of the program that needed improvement. Specifically, we found that the campus emergency operations plan (EOP) had not been reviewed annually and did not contain all required elements. In addition, the campus could not provide evidence that all employees had completed required emergency preparedness training within one year of hire, nor that parties subject to specialized training requirements had met requirements in both the frequency and content of training. Further, the campus did not conduct all simulated emergency exercises to test emergency response procedures as required by systemwide policy. We also identified opportunities for improvement related to the 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. EMERGENCY OPERATIONS PLAN

#### OBSERVATION

The campus EOP and its supplemental materials, annexes, and appendices had not been reviewed and updated on an annual basis and did not contain all required elements.

Specifically, we found that the most current version of the plan was dated August 2018. Although the campus had a process in place to review and distribute the plan, the review for 2019 had not been completed due to turnover in key EM positions during that year.

Additionally, we found that the EOP did not address all required elements. Key plan elements that were missing or out of date included provisions for training and assignment of Student Health Center staff in disasters that may require emergency medical services; processes to ensure that the Student Health Center reviewed medical disaster plans or annexes to the EOP annually; processes to address the unique needs of special populations on campus, including international students and those with limited English proficiency; and processes to address the integration of any campus auxiliary organizations and locations owned or leased by the university into campus emergency management planning activities.

We also noted a gap in review and update of significant required annexes in the EOP. Specifically, the assessment of threats and hazards was last performed in 2013, and the roster of campus resources was last updated in 2016.

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 helps to ensure that roles and responsibilities are clearly outlined.

#### RECOMMENDATION

We recommend that the campus:

- a. Resume established processes for the annual review and update of the EOP.
- b. Update the EOP to address all required elements mentioned above.
- c. Update the assessment of threats and hazards and the roster of resource annexes.

#### MANAGEMENT RESPONSE

We concur. The campus will resume established processes for the annual review and update of the EOP. The campus will update the EOP to address all required elements mentioned above. The campus will update the assessment of threats and hazards and the roster of resource annexes.

Expected completion date: July 31, 2020

## 2. EMERGENCY PREPAREDNESS TRAINING

### OBSERVATION

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

Systemwide policy requires that every employee, within one year of hiring, complete emergency preparedness training, and that specialized training be provided to employees designated as building/floor marshals and Emergency Operations Center (EOC) team members and members of the campus EM team.

We reviewed training records for 2018 and 2019 and found that:

- New employees did not consistently complete required emergency preparedness training within one year of employment. The campus offered the training as part of the new-hire orientation, but employees were not required to attend this orientation, and there were no alternative processes to monitor compliance with the requirement. Of the 15 new-hire records we reviewed, seven had no documentation indicating that the training had been completed.
- Building and floor marshals did not consistently complete specialized annual training. There was no documentation showing that three of the building/floor marshals we reviewed had completed specialized training in 2019.
- EOC/EM team members did not consistently complete specialized annual training specific to EOC/EM roles and responsibilities. Of the 16 EOC/EM team members we reviewed, the campus could not provide documentation showing that nine and four members, respectively, attended specialized training in 2018 and 2019. Also, the campus could not provide documentation demonstrating that four of the 16 received training that encompassed required topics on Standardized Emergency Management System (SEMS)/National Incident Management System (NIMS) or crisis response.

Providing and monitoring emergency preparedness training helps to ensure that the emergency program complies with systemwide requirements and that employees and emergency operations personnel are prepared to respond in an emergency.

### RECOMMENDATION

We recommend that the campus:

- a. Develop and implement a process, including an identification of the responsible party, to ensure that all employees receive required new-hire emergency management training within one year of their hiring.
- b. Develop a process to ensure that EOC/EM team members and other parties subject to specialized training, including building and floor marshals, are required to complete training, and retain documentation that they received this training.

**MANAGEMENT RESPONSE**

We concur. The campus will develop and implement a process, including an identification of the responsible party, to ensure that all employees receive required new-hire emergency management training within one year of their hiring. The campus will develop a process to ensure that the EOC/EM team members and other parties subject to specialized training, including building and floor marshals, are required to complete training and retain documentation that they received this training.

Expected completion date: August 31, 2020

**3. EMERGENCY EXERCISES**

**OBSERVATION**

The campus did not conduct, complete, and document required emergency exercises, simulations, and evacuation drills in accordance with systemwide policy.

We reviewed emergency exercise records for 2018 and 2019 and found that:

- A functional exercise was not conducted and documented in 2018.
- The campus had not conducted evacuation drills at the Stockton campus in 2018 and 2019.

Completing and documenting emergency drills and simulations ensures 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 federal and state law and systemwide and campus requirements.

**RECOMMENDATION**

We recommend that the campus:

- a. Conduct and document emergency exercise and evaluation drills in accordance with systemwide policy.
- b. Conduct and document evacuation drills at the Stockton campus on an annual basis.

**MANAGEMENT RESPONSE**

We concur. The campus will conduct and document emergency exercise and evacuation drills in accordance with systemwide policy. The campus will conduct and document evacuation drills at the Stockton campus on an annual basis.

Expected completion date: June 30, 2020

#### 4. ROLES AND RESPONSIBILITIES

##### **OBSERVATION**

Identification of roles and responsibilities for emergency management functions needed improvement.

We found that the campus had not timely updated roles and responsibilities for EM after turnover of individuals with key roles for the EOC and other critical functions affected the command structure for emergency situations. Specifically, we noted that the roster provided to the Systemwide Office of Risk Management in December 2019 lacked designations for the roles of primary, secondary, and tertiary emergency managers, as well as the name of the responsible emergency executive, mainly due to terminations of these individuals.

Clearly defined and communicated roles and responsibilities, particularly during times of management turnover, help ensure that emergency management duties are understood and performed in compliance with campus and systemwide requirements.

##### **RECOMMENDATION**

We recommend that the campus ensure timely identification of critical emergency management roles and update rosters to reflect current assignments.

##### **MANAGEMENT RESPONSE**

We concur. The campus will ensure timely identification of critical emergency management roles and update rosters to reflect current assignments.

Expected completion date: June 30, 2020

## 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 California State University, Stanislaus (Stanislaus State), responsibility for the day-to-day administration of EM resides in SRM within the division for Business and Finance. The EM program is overseen by the interim director of SRM, who reports to the vice president and is responsible for implementation and maintenance of an all-hazards EOP and the development and implementation of programs and projects in emergency planning, training, response, and recovery. The EOP provides for an alternative command structure in declared emergencies, consistent with the ICS, in which the EOC director takes charge of the various sections implementing decisions made at the ICS policy group level. The role of EOC director has been assigned to the university chief of police, and all executive management positions are included on the policy group team.

## SCOPE

We visited the Stanislaus State campus from January 27, 2020, through February 28, 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 February 28, 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 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.
- 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, if applicable) 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 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*

## AUDIT TEAM

Senior Audit Manager: Ann Hough

Internal Auditor: James Kim