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May 4, 2020

Dr. Ellen J. Neufeldt, President
California State University San Marcos
333 S. Twin Oaks Valley Road
San Marcos, CA 92096

Dear Dr. Neufeldt:

Subject: Audit Report 20-32, *Emergency Management*, California State University San Marcos

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

**California State University
San Marcos**

Audit Report 20-32
April 9, 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 27, 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 related to the campus emergency operations plan (EOP), emergency preparedness training, emergency action plans (EAP), emergency generators, and emergency exercises. Specifically, the EOP and EAP did not contain all required elements, and EOC team members did not always complete specialized emergency preparedness training. We also found that the campus did not have a process to provide and document the completion of building marshal training, and building marshals had not been assigned to all campus buildings. Additionally, the campus did not have emergency generators at campus student housing or a documented plan to relocate students living in student housing in the event of a power outage. Further, the campus did not conduct biennial functional emergency exercises.

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:

- Provision of training and assignment of student health and counseling services (SHCS) staff in disasters that may require emergency medical services. We found that the SHCS annex was still in draft form.
- Reference to a roster of campus resources and contracts for materials and services that may be needed in an emergency.
- Integration of any campus auxiliary organizations and locations owned or leased by the university into campus emergency management planning activities.
- Accounting-for-all-persons procedures.

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. Finalize the SHCS annex.
- c. Distribute the updated EOP and discuss it with the campus EOC team and other key emergency personnel.

MANAGEMENT RESPONSE

We concur. The campus will update the EOP to include all required elements mentioned above, finalize the SHCS annex, and distribute the updated EOP and discuss it with the campus EOC team and other key emergency personnel.

Estimated completion date: December 31, 2020

2. SPECIALIZED EMERGENCY PREPAREDNESS TRAINING

OBSERVATION

EOC team members did not always complete specialized emergency preparedness training as required by systemwide and campus policies.

We reviewed the training records for ten EOC team members from 2018 to 2019, and we found that:

- Specialized training was not always provided to EOC team members as required by systemwide policy. Specifically, EOC training on core concepts of EOC operations; overview training of the Incident Command System (ICS), National Incident Management System (NIMS), Standardized Emergency Management System (SEMS), EOC planning process and response expectations; and section-specific training was not provided to certain members in 2018 and 2019.
- The campus did not consistently retain training documentation for three members, as required by systemwide policy.
- Two members had not completed one of the required Federal Emergency Management Agency (FEMA) training sessions, as required by campus policy.

Specialized emergency preparedness training helps to ensure that EOC team members will be properly prepared to respond to emergency situations.

RECOMMENDATION

We recommend that the campus provide specialized emergency preparedness training to EOC team members and retain documentation of the training.

MANAGEMENT RESPONSE

We concur. The campus will provide specialized emergency preparedness training to EOC team members and retain documentation of the training.

Estimated completion date: December 31, 2020

3. BUILDING MARSHAL TRAINING

OBSERVATION

The campus did not have a process to provide and document the completion of building marshal training.

We reviewed the training records for 11 building marshals from 2018 to 2019, and we found that the campus did not always maintain documentation for the completion of building

marshal program overview, evacuation chair or medsled, and first aid, CPR, or AED training, as required by campus policy.

Building marshal training ensures that building marshals will be properly prepared to respond to emergency situations.

RECOMMENDATION

We recommend that the campus develop a documented process to provide and document completion of building marshal training.

MANAGEMENT RESPONSE

We concur. The campus will develop a documented process to provide and document completion of building marshal training.

Estimated completion date: December 31, 2020

4. EMERGENCY ACTION PLANS

OBSERVATION

EAPs were not always developed and did not contain all required elements, and building marshals were not assigned to all campus buildings.

We found that:

- Two buildings did not have an EAP or assigned building marshals.
- EAPs did not always contain all required elements, including procedures for reporting emergencies, emergency evacuations, employees who remain to operate critical plant operations before they evacuate, accounting for all employees, performing rescue or medical duties, making accommodations for people with disabilities, and listing contact information for employees who may have questions regarding the EAP.

Maintaining comprehensive EAPs and assigned building marshals for all buildings 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. Develop and update EAPs to include the elements noted above, and distribute and provide training on the updated EAPs to all building marshals.
- b. Assign building marshals to the buildings noted above.

MANAGEMENT RESPONSE

We concur. The campus will develop and update EAPs to include the elements noted above, and distribute and provide training on the updated EAPs to all building marshals. The campus will assign building marshals to all buildings.

Estimated completion date: December 31, 2020.

5. EMERGENCY GENERATORS

OBSERVATION

The campus did not have a documented plan to relocate students living in student housing in the event of a power outage.

We found that two housing locations were not adequately equipped with emergency generators, and the campus did not have an alternative plan to relocate students in the event of a power outage.

A documented relocation plan provides assurance that students will be safely relocated in the event of a power outage.

RECOMMENDATION

We recommend that the campus document a plan to relocate students living in student housing in the event of a power outage or consider installing an emergency generator at housing locations.

MANAGEMENT RESPONSE

We concur. The campus will document a plan to relocate students living in student housing in the event of a power outage. We will also estimate the cost to install emergency generators.

Estimated completion date: December 31, 2020

6. EMERGENCY EXERCISES

OBSERVATION

The campus did not conduct biennial functional exercises in accordance with systemwide policy.

We reviewed the emergency exercises and evacuation drills from 2018 to 2019 and found that functional exercises were not conducted on a biennial basis.

Completing and documenting emergency exercises helps to ensure that emergency team members, students, faculty, and staff will be properly prepared to respond to an emergency,

increases safety, and reduces the risk of noncompliance with campus and California State University (CSU) requirements.

RECOMMENDATION

We recommend that the campus conduct and document functional exercises biennially.

MANAGEMENT RESPONSE

We concur. The campus will conduct and document functional exercises biennially.

Estimated completion date: December 31, 2020

GENERAL INFORMATION

BACKGROUND

The 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.

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 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 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 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 Coded memorandum Risk Management 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 San Marcos (CSUSM), the office of emergency management, a unit of the department of university police, is charged with coordinating all activities needed to prepare for and respond to emergency situations. The responsibilities of the office of emergency management include planning, implementing, and maintaining an emergency management program on campus, including emergency preparedness, planning, training, response, and recovery. 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 marshal program and reports to the chief of police, who reports to the vice president of finance and administrative services.

SCOPE

We visited the CSUSM campus from January 27, 2020, through February 27, 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, through February 27, 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.
- 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 operational, and administrative controls, included interviews, walkthroughs, and detailed testing on certain aspects of the campus 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*
- CSUSM *Emergency Operations Plan*
- CSUSM *Emergency Action Plan*
- CSUSM *Annual Security Reports*
- CSUSM *Fire Safety Reports*
- CSUSM *Building Marshal Handbook*

AUDIT TEAM

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Internal Auditor: Cinthia Santamaria