


## MEMORANDUM

**Date:** November 8, 2023

**To:** Steve Relyea  
Executive Vice Chancellor and Chief Financial Officer

**From:** Vlad Marinescu   
Vice Chancellor and Chief Audit Officer

**Subject:** **Audit Report 23-01, *Emergency Management*, CSU Office of the Chancellor**

We have completed an audit of *Emergency Management* as part of our 2023-2024 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 will be 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 chancellor's office personnel over the course of this review.

c: Mildred García, Chancellor  
Yamilette Rodriguez, Chair, Committee on Audit  
Jean Picker Firstenberg, Vice Chair, Committee on Audit

# EMERGENCY MANAGEMENT

**OFFICE OF THE CHANCELLOR**

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**AUDIT REPORT 23-01  
NOVEMBER 8, 2023**

## EXECUTIVE SUMMARY

### AUDIT OBJECTIVES AND BACKGROUND

In accordance with the fiscal year (FY) 2023-24 Audit Plan, as approved by the Board of Trustees, Audit and Advisory Services performed an audit of emergency management (EM) at the Office of the Chancellor (CO).

The objectives of the audit were to ascertain the effectiveness of operational and administrative controls for EM and to ensure compliance with relevant federal and state regulations; Trustee policy; CO directives; and campus procedures.

The California State University (CSU) consists of 23 campuses, with approximately 460,000 enrolled students and more than 55,000 employees. 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. At the CO, the overall responsibility for the emergency management program resides with the chancellor and the executive vice chancellor/chief financial officer, who serves as the CO's emergency operations executive. The CO emergency management program ensures the safety and welfare of approximately 680 employees, as well as guests and visitors to the CSU headquarters facilities in Long Beach, California.

### OVERALL 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 EM as of August 25, 2023, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

### AUDIT SCOPE AND RESULTS

In general, we found that EM operations were effective and services were provided in compliance with CSU policies and procedures. In our review, we did not note any issues related to the core function of the EM program at the CO. In 2020, the CO hired its first director of systemwide emergency management and continuity, with both systemwide and CO EM responsibilities. In addition, during fieldwork, the CO hired a new emergency and continuity manager. The director of systemwide emergency management and continuity has strengthened the EM program by updating systemwide policy, completing CO building evacuation standard operating procedures, and implementing the Titan HST Outreach Campaign to support emergency communication needs.

However, our review did note a few areas for improvement relating to the EM plan and certain emergency exercises and drills. Specifically, the emergency operations plan (EOP) was not reviewed and updated annually, the CO had not conducted a full-scale exercise in the past five years, and the results of evacuation drills performed at the leased Catalina Landing (CL) building were not documented. A summary of the observations noted in the report is presented in the table below. Further details are specified in the remainder of the report.

Area	Processes Reviewed	Audit Assessment
<b>Program Administration</b>	Oversight of EM program, regulations and standards, and policies and procedures.	<i>Effective – no reportable observations noted.</i>
<b>Emergency Management Program</b>	Roles and responsibilities of the EM team, EOP, evacuation procedures, roster of resources and contracts, and emergency operations center.	<i>Observation noted in annual review of the EOP.</i>
<b>Communications and Training</b>	Communication systems, emergency plan distribution and communication, and training.	<i>Effective – no reportable observations noted.</i>
<b>Testing and Drills</b>	Systems testing, emergency incident reviews and testing, evacuation testing, emergency exercises, and emergency generator testing.	<i>Observation noted in full-scale emergency exercises and after-action reports for evacuation drills.</i>

The audit focused on procedures in effect from July 1, 2021, through August 25, 2023. Our audit and evaluation included the audit tests we considered necessary in determining whether operational, administrative, and financial controls are in place and operative. Our review was limited to gaining reasonable assurance that essential elements of EM were in place and did not examine all aspects of the program.

## **OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES**

### **1. EMERGENCY EXERCISES AND DRILLS**

#### **OBSERVATION**

A full-scale emergency exercise had not been performed at the CO within the past five years, and the results and lessons learned from evacuation drills performed at the leased CL office building were not documented in an after-action report as required by systemwide policy.

Systemwide policy requires that tabletop exercises be performed annually, functional exercises be performed every other year, and full-scale exercises be performed at least every five years. Full-scale exercises are typically the most complex and resource-intensive type of exercise and may or may not involve multiple agencies, organizations, and jurisdictions. Systemwide management noted that a review of the policy may be necessary to ensure that it is relevant to CO requirements, as the CO is not as complex as a campus with residents; multiple buildings; various student, employee, and community services; and student/faculty populations.

Additionally, we noted that although evacuation drills had been performed at the leased CL office building, an after-action report was not provided to the CO and reviewed by the EM team. Per systemwide policy, at the completion of each exercise or simulated emergency incident, written documentation of the exercise or test results and lessons learned should be documented.

Performing and documenting emergency exercises and drills ensures that areas for improvement are identified, communicated, and addressed.

#### **RECOMMENDATION**

We recommend that the CO:

- a. Perform emergency exercises in accordance with current systemwide policy, or, if it is determined that CO emergency requirements differ from those of the campuses, update the systemwide policy to specify the required emergency exercises and resources relevant to the CO.
- b. Document the results and lessons learned from all evacuation drills, including those at the leased CL office building, and review the results with the CO emergency management team.

<b>MANAGEMENT RESPONSE</b>
We concur with the findings and will address Item A by December 31, 2023. Item B will be addressed on an ongoing basis, beginning with evacuation drills conducted in November 2023.

### **2. EMERGENCY OPERATIONS PLAN**

#### **OBSERVATION**

The CO EOP had not been annually reviewed and updated as required by systemwide policy.

We reviewed the current EOP and found that it had not been reviewed or updated since 2019 and that it did not include information pertaining to the leased CL 310 office building.

A current and comprehensive EOP provides assurance that the CO can effectively respond to various types of emergencies and decreases the risk of loss and injury to the CO community.

**RECOMMENDATION**

We recommend that the campus:

- a. Establish a process for annual review of the EOP and update the EOP to include locations owned or leased by the CO.
- b. Communicate the updated EOP to relevant personnel.

<b>MANAGEMENT RESPONSE</b>
We concur with the findings and will address both items by June 30, 2024.

## GENERAL INFORMATION

### ADDITIONAL BACKGROUND

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.

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*, defines the key components of an effective campus emergency management program. At the systemwide level, Systemwide Risk Management has administrative oversight and programmatic responsibility for the emergency management function and coordinates the Emergency Coordinators throughout the 23 campuses.

At the CO, the director of systemwide emergency management and continuity is responsible for the administration of the EM program. The responsibilities of the director include, but are not limited to, the maintenance of the CO emergency management plan, execution of emergency exercises and drills, coordination of EM activities with external partners, maintenance of the EOC, and management of emergency resources, including providing emergency and continuity program guidance to the 23 CSU campuses.

### 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 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:

- 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*
- FEMA, *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education*
- Government Code §8607
- Government Code §13402 and §13403
- EO 1056, *California State University Emergency Management Program*
- Coded memorandum Risk Management 2018-1, *Emergency Management*
- *CO Emergency Management Plan*

**AUDIT TEAM**

Audit Manager: Kyle Ishii

Senior Auditor: Cinthia Santamaria