April 25, 2023

Dr. Richard Yao, President  
California State University Channel Islands  
1 University Drive  
Camarillo, CA 93012

Dear Dr. Yao:

Subject: Audit Report 22-11, Police Services, California State University Channel Islands

We have completed an audit of Police Services as part of our 2022-2023 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.

There were no reportable observations revealed during the review. The final audit report has been posted to Audit and Advisory Services’ website.

I wish to express my appreciation for the cooperation extended by the campus personnel over the course of this review.

Sincerely,

Vlad Marinescu  
Vice Chancellor and Chief Audit Officer

c: Jolene Koester, Interim Chancellor  
Lateefah Simon, Chair, Committee on Audit  
Yammilette Rodriguez, Vice Chair, Committee on Audit
EXECUTIVE SUMMARY

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of operational, administrative, and financial controls over police services and to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor (CO) directives, collective bargaining agreements, and campus procedures.

CONCLUSION

Based upon the results of the work performed within the scope of the audit, the operational, administrative, and financial controls for police services as of March 3, 2023, taken as a whole, provided reasonable assurance that risks were being managed and objectives were met.

There were no reportable observations revealed during the review.
GENERAL INFORMATION

BACKGROUND

The statutory authority for California State University (CSU) police departments and police officers is contained in the California Education and Penal codes. Campus law enforcement officers have the primary law enforcement authority on campus and share the one-mile radius around the campus as concurrent jurisdiction with local law enforcement. Jurisdiction for each campus is further defined by written agreements, required by the Kristen Smart Campus Safety Act of 1998, with local law enforcement agencies.

Each campus has a university police department (UPD) that provides a full range of law enforcement and policing services. UPD is responsible for providing a safe and secure environment where students, faculty and staff can achieve their responsibilities and objectives. In August 2021, the CSU system adopted Campus Law Enforcement Policies that provided clarification on required systemwide policies issued by the CO and distinguished these from the campus policies under the authority of the president. To ensure standard practices, the policy also mandated campus adoption of the services of Lexipol, a company that provides policy manuals, training bulletins, and consulting services to law enforcement agencies. The CSU system mandated increased transparency when, in June 2021, it adopted the Campus Police and Safety Advisory Committee policy. The policy requires formation of a committee to review campus police and safety matters that affect students, faculty, staff, and visitors, and to advise the president on suggested changes or enhancements to public safety policy.

In addition to federal and state regulations, the CSU adheres to the California Commission on Peace Officer Standards and Training (POST) for the employment and training of police officers. Some CSU campuses have also earned accreditation from the Commission on Accreditation for Law Enforcement Agencies or the International Association of Campus Law Enforcement Agencies.

At California State University Channel Islands (CSU Channel Islands), the UPD includes university police, investigations/crime prevention, safety escorts, campus community outreach, emergency medical technician and first-responder services for Ventura County, behavioral threat assessments, parking services, transportation services, fire-life services, Live Scan fingerprinting services, emergency preparedness, and security of records. All sections of the department work to ensure that the campus is a safe place to study, teach, work, reside, and visit. The department uses a proactive approach that includes crime prevention and safety programs available on a continuing basis. The chief of university police reports to the associate vice president for administrative services/human resources officer. The police department is part of the campus Public Safety Unit, which employs 33 full-time personnel, including sworn and non-sworn staff, and five student assistant positions.

SCOPE

We performed fieldwork from January 17, 2023, through March 3, 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. The audit focused on procedures in effect from January 1, 2021 to March 3, 2023.

Specifically, we reviewed and tested:

- Police services administration and organization, including clear lines of organizational authority and responsibility, defined mission and goals, and current and comprehensive policies and procedures.
- Access to the police services office and automated systems to determine that it is adequately controlled and limited to authorized persons, that data backup procedures are in place, and that physical security over system hardware is adequate.
- Security and retention of departmental records.
- Administration of services to the public to determine whether they ensure participant safety and minimize campus liability.
- Compliance with CSU policy and state regulations with regard to relationships with outside agencies.
- Compliance with POST standards, state regulations, and CSU policy in the training of police services employees.
- Processes to ensure that costs are appropriately and timely recovered for services provided to campus self-support funds, auxiliary organizations, and external third parties.
- UPD disbursements, including proper approval and adequate support for transactions.
- Proper handling of, accounting for, and safeguarding of weapons, equipment, and ammunition.
- Adequate safeguarding and accounting for property and evidence.

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, administrative and financial controls, included interviews, walkthroughs, and detailed testing on certain aspects of police services. Our review was limited to gaining reasonable assurance that essential elements of the police services function 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 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:

- Education Code §67381, Kristen Smart Campus Safety Act of 1998
- Penal Code §13500 to §13553, Commission on Peace Officer Standards and Training
- California Department of Justice, California Law Enforcement Telecommunications System Policies, Practices, and Procedures
- Government Code §15150 to §15167, California Law Enforcement Telecommunications
- Government Code §13402 and §13403
- Government Code §3300-3313, Public Safety Officers
- POST Administrative Manual
- Executive Order (EO) 1031, *Records Retention*
- EO 1069, *Risk Management and Public Safety*
- *Campus Law Enforcement Policies*
- *Campus Police and Safety Advisory Committee*
- *University-Wide Training Guide*
- ICSUAM §3552.01, Cost Allocation/Reimbursement Plans for the CSU Operating Fund
- ICSUAM §8000, Information Security
- SUPA Collective Bargaining Agreement
- CSU Channel Islands *Police Department Policy Manual*
- CSU Channel Islands *Procurement Credit Card Handbook*

**AUDIT TEAM**

- **Audit Manager:** Kyle Ishii
- **Internal Auditor:** Rita Guy