

**POLICE SERVICES**

**SYSTEMWIDE**

**Audit Report 08-24**

**April 16, 2009**

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## **ABBREVIATIONS**

ARMS	Automated Records Management System
CALEA	Commission on Accreditation for Law Enforcement Agencies
CBA	Collective Bargaining Agreement
CSU	California State University
DOE	Department of Education
EMP	Emergency Management Plan
EO	Executive Order
IACLEA	International Association of Campus Law Enforcement Administrators
ORM	Office of Risk Management
POST	Commission on Peace Officer Standards and Training
PS	Police Services
RIMS	Records Information Management System
SAM	State Administrative Manual
TPS	Transportation and Parking Services
UPD	University Police Department

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## **EXECUTIVE SUMMARY**

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2005, the Board of Trustees, at its January 2008 meeting, directed that *Police Services* be reviewed. *Police Services* was last audited in 2000.

We visited eight campuses from February 18, 2008, through November 21, 2008, and audited the procedures in effect at that time. Campus specific findings and recommendations have been discussed and reported individually.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on police services controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, the operational and administrative controls of police services in effect as of November 21, 2008, taken as a whole, were sufficient to meet the objectives stated below.

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.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **SYSTEMWIDE POLICIES AND PROCEDURES [7]**

Systemwide policies for police services (PS) were outdated, did not accurately reflect PS programmatic responsibilities at the Office of the Chancellor, and/or were not always available for critical activities.

### **CAMPUS PROGRAM ADMINISTRATION [9]**

The campus emergency management plan needed improved oversight at all eight campuses visited. This is a repeat finding from the prior Disaster and Emergency Preparedness Audit performed in 2006. In addition, automated systems access and data backup procedures needed improvement at four of the eight campuses visited. A similar finding related to access controls over automated dispatch systems was noted in the prior PS audit. Crime statistics reporting showed discrepancies at four of the eight campuses visited; the administration of weapons qualifications needed improvement at four of eight campuses visited, which is a repeat finding from the prior PS audit; and ammunition inventory control procedures needed improvement at five of the eight campuses visited, which is also a repeat finding from the prior PS audit.

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## INTRODUCTION

### **BACKGROUND**

The California State University (CSU) Public Safety Program was developed in 1974, commencing with a two-year pilot project on the CSU Northridge campus. A systemwide committee subsequently forwarded recommendations regarding a "public safety approach" for CSU campuses to the chancellor. The chancellor's Council of Presidents endorsed the recommendations as an appropriate program for the CSU, and thereafter, necessary actions were taken to bring the program to fruition. In 2007, the CSU campus police departments were renamed from public safety to police services to emphasize the service aspect of the campus police departments, and campuses have been adjusting their organizations accordingly.

The CSU residence population has increased greatly over the years, and the problems associated with this growth have been similar to those experienced by small municipal police departments. Sexual assaults, alcohol, drugs, and vandalism increased; and legislation mandated more involvement by university police officers in the investigation and prevention of crimes, as well as care for the victims. As a result, CSU police services departments created policing programs and preventive patrols to deter crime. The growth of on-campus housing also increased the complexity of emergency planning. Furthermore, parking structures were built on campuses, and an increase in auto burglaries and theft necessitated the need for increased patrols.

The Crime Awareness and Campus Security Act of 1989 became Title 2 of Public Law 101-542, The Student Right-to-Know and Campus Security Act of 1990. President George Bush signed the act into law on November 8, 1990. The act amended Section 485 of the Higher Education Act of 1965 by adding campus crime statistics and security policy disclosure provisions for colleges and universities. This law (now known as the Jeanne Clery Act) applies to all institutions of higher education, both public and private, which participate in any federal student aid programs and requires schools to publicly disclose three years of campus crime statistics and basic security policies. In 1992, the *Campus Sexual Assault Victims' Bill of Rights* was incorporated into the Jeanne Clery Act. In 1998, the Jeanne Clery Act was amended to expand the scope of campus crime statistic reporting, ensure crime statistics were reported in accordance with the Federal Bureau of Investigation's Uniform Crime Reporting program, and require the maintenance of a public police log of all reported crimes as well as a policy to issue timely warnings when a crime, reportable in the annual statistics, is known to the school and poses an ongoing threat to the campus. The law was most recently amended in 2000 to require schools, beginning in 2003, to notify the campus community about where public "Megan's Law" information about registered sex offenders on campus could be obtained.

In California, the Kristen Smart Campus Safety Act of 1998 was signed into law on August 11, 1998. This act requires California colleges to promulgate rules requiring each of their respective campuses to enter into written agreements with local law enforcement agencies, which will: (1) designate which law enforcement agency has operational responsibility for the investigation of violent crimes occurring on campus and (2) delineate the specific boundaries of each agency's operational responsibility.

In recent years (and in response to increased training standards from the Commission on Peace Officer Standards and Training (POST), legislatures, and governmental agencies), campus administrators have worked to upgrade the quality of university police services. This has included, but was not limited to, the development of uniform standards for vehicles, equipment, training, emergency preparedness, and critical response units; semiannual meetings of campus police chiefs; and close interaction with Systemwide Human Resources and the Office of Risk Management at the chancellor's office. In April 2001, the chancellor's office issued Executive Order 787, modifying the CSU Public Safety Policy Manual that was required by agreement between the Board of Trustees of the CSU and the Statewide University Police Association. The CSU Police Departments' Systemwide Operational Guidelines were developed and issued by the Systemwide Police Advisory Committee in 2002, and revised in November 2007, with the intent of providing detailed guidance to support the broad and general coverage provided by the Public Safety Policy Manual. Additionally, CSU Los Angeles, CSU Fullerton, and San Francisco State University received accreditation by the Commission on Accreditation for Law Enforcement Agencies (CALEA); and most recently, the International Association of Campus Law Enforcement Agencies accredited San Francisco State University and CSU Northridge. Sonoma State University anticipates CALEA accreditation in 2009. Lastly, in 2007, administrative and risk management responsibilities for systemwide police services were reassigned from Systemwide Human Resources to the Office of Risk Management.

Throughout this report, we will refer to the program as police services. The titles of the departments assigned responsibility for managing CSU campus public safety and parking operations include, among others, the department of public safety, police and parking services, and the university police department.

## **PURPOSE**

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of police services, police activities, and law enforcement, and to determine the adequacy of controls over parking revenues and citations, and crime reporting.

Within the overall audit objective, specific goals included determining whether:

- ▶ Administration and management of the police services program provide an effective internal control environment, clear lines of organizational authority and responsibility, current and comprehensive policies and procedures, and self-evaluation techniques to measure program and management effectiveness.
- ▶ Staffing and scheduling provide appropriate coverage, effective use of overtime and compliance with the collective bargaining agreement (CBA).
- ▶ Police services participation in campus emergency management and the CSU Critical Response Unit are clearly defined, training is provided, and a designated emergency operations center exists.
- ▶ Access to the police services office and automated systems is adequately controlled and limited to authorized persons, data backup procedures are in place, and physical security over system hardware is adequate.
- ▶ Budgeting procedures adequately address police services funding and expenditure, and budget monitoring procedures ensure effective accounting and management control.
- ▶ Chargebacks and POST reimbursements, miscellaneous revenues, and petty cash are adequately controlled, and grants are administered in accordance with grant requirements.
- ▶ The dispatch function is properly controlled, and daily activity logs/records are comprehensive and permit measurement of the effectiveness and efficiency of police operations.
- ▶ Police activities are adequately documented, and access to police services records, investigative files, and criminal offender record information is sufficiently restricted and safeguarded.
- ▶ Crime reporting procedures are well controlled and in accordance with federal and state regulations, and relationships with outside agencies comply with the Kristen Smart Campus Security Act of 1998.
- ▶ Campus safety plan, Megan's Law compliance, and crime awareness programs are in place and in accordance with federal and state regulations.

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INTRODUCTION

- ▶ Hiring, certification, and training policies comply with POST, performance evaluation administration is consistent and timely, stipends and compensatory time off are administered in compliance with the CBA, and internal investigations are handled in accordance with state regulations, CSU policy, and the CBA.
- ▶ Crime scene evidence, weapons, and other police services equipment are properly handled, accounted for, and safeguarded, and weapon issuance and use comply with state regulations and CSU policy.
- ▶ Parking revenues are adequately controlled, properly accounted for, and used in accordance with CSU policy and state regulations, and parking citation issuance, processing, and administration are adequately controlled and in accordance with the California Vehicle Code.



## SCOPE AND METHODOLOGY

The proposed scope of audit, as presented in Attachment B, Agenda Item 2 of the January 22-23, 2008, meeting of the Committee on Audit, stated that *Public Safety* (now *Police Services*) includes primarily police activities and law enforcement including parking program administration and enforcement, and crime reporting. Potential impacts include lack of, out-of-date, or undistributed policies and procedures; underdeveloped or unused measures for self-evaluation and improvement; poor or undefined relationships with external agencies; inefficient use of physical assets or human resources; non-compliance with state-mandated standards and training requirements; unauthorized use of law enforcement data; inadequate crime reporting; lack of control or poor maintenance over sensitive or special equipment; excessive costs; lost parking fine revenue; inadequate control or supervision over activities having safety or liability considerations; and poor adjudication of internal investigations or personnel complaints.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect from January 1, 2007, through November 21, 2008, along with limited testing of calendar year 2005 and 2006 records.

We focused primarily upon the internal administrative, compliance, and operational controls provided by the CSU police department's systemwide operational guidelines, campus policies and general orders, and chancellor's office executive orders, and related management activities on campuses, although we also relied on external laws and regulations as well. Most of our work involved the direct interface with police services and parking functions reporting to police services.

Specifically, we reviewed and tested:

- ▶ Procedures for communicating systemwide/campus specific policies, rules, and regulations.
- ▶ Staffing, scheduling, and internal investigation procedures.
- ▶ Fiscal procedures for budgeting, chargebacks, POST reimbursements, grants, stipends, and expenses.
- ▶ Dispatch operations, field reporting requirements, and case monitoring procedures.
- ▶ Procedures for maintaining and securing public safety records, files, and information.
- ▶ Procedures for accumulating and reporting crime statistics.
- ▶ Hiring, certification, and training compliance.
- ▶ Procedures for controlling evidence, weapons, and other public safety equipment.
- ▶ Procedures for controlling and processing parking revenues, parking citations, and parking funds.
- ▶ Data security, disaster recovery, and backup procedures.
- ▶ Disaster preparedness operational procedures if the function reports to police services.

During the course of the audit, we visited eight campuses: Bakersfield, Channel Islands, Dominguez Hills, Long Beach, San Bernardino, San Francisco, San José, and Stanislaus. We interviewed campus personnel and audited procedures in effect at the time of audit.

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## OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

### SYSTEMWIDE POLICIES AND PROCEDURES

Systemwide policies for police services (PS) were outdated, did not accurately reflect PS programmatic responsibilities at the Office of the Chancellor, and/or were not always available for critical activities.

During our PS audits, we noted that the following systemwide policies were outdated and had not been revised since 2000:

- ▶ Executive Order (EO) 756, *Authorized Weapons, Weapons Training and Use of Weapons in California State University (CSU) Police Departments*, dated September 21, 2000. Specifically, the policy did not include provisions for the use of tasers at the campuses.
- ▶ EO 787, *Implementation of Public Safety Policy Manual*, dated August 23, 2001.
- ▶ EO 797, *Critical Response Unit*, dated November 29, 2001.

We also noted that although the Office of Risk Management (ORM) was delegated systemwide authority for PS in late 2007, none of these policies, including the *Public Safety Policy Manual*, cited the transfer of this authority from the vice chancellor of human resources to the chief risk officer. Also, the policies did not include the ORM's PS programmatic responsibilities such as the resolution of prior PS issues noted in internal audit reports or external agency reports, monitoring the viability and sustenance of campus controls in significant PS areas, and reporting the state of compliance to chancellor's office management.

Lastly, we noted that:

- ▶ Although a review of the *CSU Police Department Systemwide Operational Guidelines* had been performed in December 2007, there was no requirement for a periodic review and update of the document to ensure consistency with other CSU policies.
- ▶ Active shooter training exercise requirements were not supported by formal systemwide policies. Based on directives from ORM in early 2008, all CSU campuses were required to perform detailed active shooter exercises along with adequate after-action reports and analysis. However, we found that there was no formal systemwide policy or standards in place to guide such training activities, including how often they must be performed and by whom, the level of effort expected, procedures to be performed, and required reporting when such an exercise is accomplished. Although the CSU Critical Response Unit policy states that campuses should alert local police units in an actual scenario, there is no guidance for the campuses beyond that notification.

The Unit 8 Statewide University Police Association, Collective Bargaining Agreement, dated July 18, 2006, states that the CSU shall maintain its public safety policy manual, subject to revision by the CSU.

Government Code §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

The International Association of Campus Law Enforcement Administrators (IACLEA) Manual, *Standards for Campus Law Enforcement, Public Safety, and Security Agencies*, Chapter 4, states that the agency should establish a formal written directives system to provide employees with a clear understanding of the constraints and expectations relating to the performance of their duties. This formal written directives system should include, in part, procedures for indexing, purging, updating, and revising directives.

Systemwide management stated that no specific requirements or standards had been set for updating systemwide policies for police services because such updates were ongoing, and systemwide policies for active shooter training exercises had simply not been developed yet.

The absence of current and complete PS policies and procedures increases the risk of misunderstandings related to the performance of duties and functions, inconsistencies in complying with state and federal requirements, inconsistent treatment and handling of issues, and possible litigation.

#### **Recommendation 1**

We recommend that the chancellor's office:

- a. Review and update existing PS systemwide policies to include, but not be limited to, a clear indication of PS programmatic responsibilities at the Office of the Chancellor.
- b. Establish a specific means for future review and maintenance of systemwide PS policies to ensure that they are updated and communicated at appropriate intervals.
- c. Implement processes for periodic monitoring and reporting to executive management the quality and viability of campus controls in significant PS areas.
- d. Develop and implement systemwide policies describing the expectations for active shooter training exercises.

### **Management Response**

- a. We concur that a systemwide protocol to update and explain programmatic responsibilities is necessary. By November 2009, Systemwide Risk Management will draft an EO describing programmatic responsibilities of systemwide risk management. Said EO will detail systemwide police services expectations that campus policies are consistent with EO 756, 787, and 797 and compliant with industry standards such as those demonstrated in the following accreditation organizations: Commission on Accreditation for Law Enforcement Agencies, Inc. and International Association of Campus Law Enforcement Administrators. Campus police departments will implement and maintain operational policies and procedures, which will be incorporated into an EO.
- b. We concur. The EO as described in Response 1a will be completed and distributed to the police chiefs by November 2009 and then reviewed, updated (as applicable), and communicated to the police chiefs annually.
- c. We concur. Executive management control of campus police policies/manuals will be reviewed by the systemwide police coordinator on an annual basis. The systemwide police coordinator will provide an annual "statement of accomplishment" to the systemwide chief risk officer.
- d. We concur. In early 2008, the chancellor directed all campus police departments to organize and perform active shooter drills, one for each of the campuses. All campuses completed this assignment within established or approved time frames. We will update EO 1013 to include the requirement for campuses to develop an active shooter policy and expectations for and the conducting of active shooter training periodically, which will also be referenced in proposed EO as noted in Response 1a.

## **CAMPUS PROGRAM ADMINISTRATION**

### **CAMPUS EMERGENCY PLAN**

The campus emergency management plan (EMP) needed improved oversight at all eight campuses visited. This is a repeat finding from the prior Disaster and Emergency Preparedness Audit performed in 2006.

We found that:

- ▶ The EMP showed effective dates older than one year, and there was no evidence of a full review and approval within the last year at all eight campuses visited. As such, we had no assurance that the EMP was current, accurate, or complete.
- ▶ Emergency food and/or water was not adequately provisioned, either through on-hand supplies or through contractual agreements with available providers at four of the eight campuses visited.

EO 1013, *CSU Emergency Management Plan*, dated August 7, 2007, states that each campus is delegated the responsibility for the implementation and maintenance of an emergency management program on campus and for developing a campus plan. On an annual basis, or more frequently as needed, the plan should be reviewed, updated, and distributed to the emergency management team members and others as identified by the campus. The policy further states that the campus should establish and equip a functional campus emergency operations center consistent with State Emergency Management System, National Incident Management System, and Incident Command System guidelines and maintain a campus (emergency) roster of resources that includes food and water, with the update/revision date appearing on the roster.

Campus management cited various reasons for not reviewing and updating the EMP, including personnel resource constraints, the mandatory review had been overlooked, and their assertion that the EMP had been informally reviewed, but not formally approved and documented. Additionally, the campuses stated that food and water resources were not always adequate due to personnel and budgetary resource constraints or failure to implement contractual agreements for the provision of emergency food and water.

Failure to maintain an updated EMP increases the risk that emergency responders will not be fully trained in important revisions to the plan and increases the risk of inadequate response to emergencies. Additionally, failure to maintain usable food and water supplies increases the risk that the campus would be unable to support emergency operations for more than a short period of time.

### **Recommendation 2**

We recommend that the chancellor's office:

- a. Remind the campuses to review and update the EMP and ensure that emergency food and water supplies are adequately provisioned.
- b. Include expectations for this area, including appropriate references to other related systemwide policies, such as EO 1013, in the updated systemwide PS policies and procedures.

### **Management Response**

We concur. The chancellor's office will send a reminder of systemwide policy-guided expectations for emergency management plan oversight and maintenance to campuses as per the provisions related to EO 1013. This will be done by September 2009.

## **AUTOMATED SYSTEMS ACCESS AND BACKUP CONTROLS**

Automated systems access and data backup procedures needed improvement at four of the eight campuses visited. A similar finding related to access controls over automated dispatch systems was noted in the prior PS audit.

We found that:

- ▶ Access controls over the university police department (UPD) Automated Records Management System (ARMS) or the Records Information Management System (RIMS) included neither an adequate password character length (complexity), nor the requirement to change the passwords at any given interval at four of the eight campuses visited.
- ▶ Backup of sensitive operational data was performed, but the backup tapes were maintained on-site in the UPD server room with the source data rather than off-site at two of the eight campuses visited.

The California State Information Security Office, *Information Security Program Guide for State Agencies*, dated October 2007, states that best practices for access control are for the administrator to establish password standards such as minimum length requirements with a combination of characters and numbers, and appropriate periodic password aging, in order to prevent unauthorized disclosure of the agency's information assets. Best practices for data backup are to establish procedures to implement an agreed backup policy and strategy, including the extent (e.g., full or differential/incremental), frequency, off-site storage, testing, physical and environmental protection, restoration, and encryption. The guide further states that access control refers to the process of controlling access to systems, networks, and information based on business and security requirements. Best practices are to audit access level rights at regular intervals, apply the access method of "least privilege" where access to, or the flow of, information is only granted to the extent necessary to get the job done, and remove access upon employee termination or when the need no longer exists.

Campus management stated that password complexity and change requirements had not been implemented because the department staffs were unaware of the best practices for access control identified in the *Information Security Program Guide for State Agencies* dated October 2007. Management also stated that adequate backup procedures were not performed because of staffing turnover and failure to follow written procedures.

Inadequate data security controls increases the risk that sensitive data will be breached and that regulatory sanctions for the release of such information could be applied, and failure to maintain backup tapes off-site increases the risk that the data will be unrecoverable should a loss occur.

### **Recommendation 3**

We recommend that the chancellor's office:

- a. Remind the campuses to develop and implement data security and backup procedures for RIMS and ARMS to ensure that password complexity is adequate, passwords are changed at predetermined intervals, and data backup tapes are stored off-site.
- b. Include expectations and provisions for automated systems access and data backup, including appropriate references to other related systemwide policies, in the updated systemwide PS policies and procedures.

### **Management Response**

We concur. We will remind the campuses to implement security and backup procedures for RIMS/ARMS (computer-aided dispatch and records management system) program to include password complexity, intervals, and off-site storage in accordance with systemwide information security policy and data security doctrines. This will be done by September 2009. As per Response 1a, systemwide guidelines will include expectations for automated systems in campus police departments and will be done by November 2009.

### **CRIME STATISTICS**

Crime statistics reporting showed discrepancies at four of the eight campuses visited.

Our review of crime statistics showed that they were reported to the Department of Education (DOE) on its website and on the campus website in accordance with applicable laws. However, our reconciliation of statistics disclosed discrepancies between the two in various reporting categories in the 2004 through 2007 reporting years.

20 USC §1092(f) *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* states, in part, that participating institutions shall collect campus crime statistics and distribute them to all current students and employees and any applicant for enrollment or employment upon request, and on an annual basis shall submit to the secretary (of education) a copy of the statistics.

Campus management stated that the statistical discrepancies found during the audit were entirely due to clerical errors during input to the DOE website and the lack of adequate reconciliation procedures.

Failure to accurately report crime statistics both on the campus and the DOE website increases the potential for inadequate reporting to citizens, students, and other interested parties, and could result in fines and penalties from the DOE.

### **Recommendation 4**

We recommend that the chancellor's office:

- a. Remind the campuses to immediately correct any inaccurate statistical reporting differences between the campus and the DOE website records, and implement a procedure to perform an annual reconciliation of campus and DOE website statistics to the source data.
- b. Include expectations and provisions for crime statistic reporting in the updated systemwide PS policies and procedures.

### **Management Response**

- a. We concur. We will remind campuses to correct inaccuracies of statistical reporting prior to the next reporting deadline of October 1, 2009. Such inaccuracies are regulated and audited by the DOE. Once statistical data is input, it is locked. (IT security on campus website must unlock and

permit any correction to occur.) Conversely, department *Jeanne Clery* crime statistic data will often conflict with the chancellor's crime report form due to differences in data gathering and definitions of crime classifications. We will review and modify campus forms in order to make the reports more consistent. We will remind campuses of existing regulations concerning crime data reporting to be completed on or before October 1, 2009.

- b. We concur. Expectations and provisions for crime statistics reporting are clearly outlined in the Federal Register, and campuses will be reminded to follow expectations and provisions for crime statistics reporting as per the Federal Register, laws, and applicable regulations. This will be done by September 2009. As per Response 1a, systemwide guidelines will include the requirement that crime statistic reporting be included in campus police department policies and will be done by November 2009.

## **WEAPONS QUALIFICATIONS**

Administration of weapons qualifications needed improvement at four of the eight campuses visited. This is a repeat finding from the prior PS audit.

Our review of range qualification records for 2006, 2007, and 2008 for both active duty and retired officers showed that the campuses were not always able to provide range qualification records showing officers' names, dates, signatures, pass or fail results, and signature approval by the rangemaster for all periods reviewed. Some periods in 2008 were not within the scope of audit due to the timing of the audit.

EO 756, *Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, dated September 21, 2000, states, in part, that CSU peace officers shall not use an individual weapon until they are fully qualified in the use of that weapon; officers shall qualify with all types of firearms they may be required to use on a semiannual basis; and all officers in a campus police department shall be qualified to use the type of shotgun designated by the chief of police. The term CSU peace officer covers all sworn CSU police personnel, including all police officers, lieutenants, and campus police chiefs.

State Administrative Manual (SAM) §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and recordkeeping procedures adequate to provide effective control over assets.

Campus management stated that range qualification records were not always maintained due to transitions from hard-copy records to automated records, officers missing qualifying events due to conflicts in schedules, and simple oversight of the recordkeeping function.

Failure to maintain adequate records of weapons qualifications increases the risk that officers will not be fully qualified to respond to incidents and emergencies.



### **Recommendation 5**

We recommend that the chancellor's office remind the campuses of the need to consistently maintain all range qualification records that show officers' names, dates, signatures, pass or fail results, and signature approval by the rangemaster.

### **Management Response**

We concur. Campuses will be reminded by September 2009 of the need to ensure they have a "weapons qualifications" policy. Recognizing the diversity of campuses, while campuses will be delegated authority to have policies developed pertaining to campus-specific police service manuals that adhere to systemwide police service policies and procedures, the chiefs will be responsible for ensuring they have a "weapons qualifications" policy. This will be done by November 2009 as per Response 1a.

## **AMMUNITION INVENTORY**

Ammunition inventory control procedures needed improvement at five of the eight campuses visited. This is a repeat finding from the prior PS audit.

We noted that:

- ▶ Although ammunition supplies were always secured safely, existing procedures did not provide for the tracking of ammunition inventory, including opening and closing balances, as well as purchases and issues of ammunition at five of the eight campuses visited.
- ▶ Existing campus UPD policies did not provide sufficient guidance with regard to ammunition inventory procedures at five of the eight campuses visited.
- ▶ There were no systemwide policies for ammunition inventory control.

SAM §20050 states that the elements of a satisfactory system of internal administrative control include, but are not limited to, an effective system of internal review and recordkeeping procedures adequate to provide effective control over assets.

Campus management stated that procedures and practices for ammunition inventory tracking had not been implemented because the campus police departments were unaware of any requirements for ammunition inventory tracking, and systemwide management stated that policies for ammunition inventory control had simply not been developed yet.

Failure to maintain ammunition inventory records, and related policies governing ammunition inventory, increases the risk of loss, misplacement, or misuse.

**Recommendation 6**

We recommend that the chancellor's office develop and implement systemwide policies governing ammunition inventory tracking. These policies would include, but not be limited to, inventory purchases, issues, and balances, as well as periodic physical inventories.

**Management Response**

We concur. We recognize the importance of being accountable for all department materials and supplies. Campuses will be reminded by September 2009 to have a policy regarding the monitoring and regulation of weapons and ammunition inventory. As per Response 1a, systemwide guidelines will include the requirement that campus police departments have policy regarding the monitoring and regulation of weapons and ammunition inventory. This will be done by November 2009.

**Recommendation 7**

We recommend that the chancellor's office remind the campuses of the need to develop and implement ammunition inventory policies and procedures that align with systemwide policies and expectations.

**Management Response**

We concur. We will remind campuses by September 2009 to develop a local policy to inventory and track ammunition purchases, inventory, distribution, and use. Such policy will be referenced in the revised systemwide guidelines as per Response 1a and will be done by November 2009.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
<u>Office of the Chancellor</u>	
Benjamin F. Quillian	Executive Vice Chancellor, and Chief Financial Officer
Richard P. West	Executive Vice Chancellor and Chief Financial Officer (At time of review)
Nate Johnson	Systemwide Police Coordinator
Charlene Minnick	Chief Risk Officer, Office of Risk Management
Colleen Nickles	Assistant Vice Chancellor, Financial Services
<u>California State University, Bakersfield</u>	
Horace Mitchell	President
Mary Barnes	Administrative Assistant II
David Castro	Dispatcher
Michael Chavez	Director of Procurement
Will Draucker	Police Officer
Kellie Garcia	Director, Human Resources
Justin Gildner	Sergeant, Police Services
Steve Holmes	Corporal, Police Services
Greg Kinder	Sergeant, Police Services
Desiree Langley	Dispatcher
Jesus Navarrete	Police Officer
Claudia Neal	Chief of Police
Michael Neal	Vice President, Business and Administrative Services
James Pfeiffer	Parking Officer
Jack Rutledge	Lieutenant
Thomas Smith	Parking Officer
Doug Wade	Assistant Vice President, Fiscal Services
<u>California State University, Channel Islands</u>	
Richard R. Rush	President
Shawn Bartlett	Corporal, University Police Department (UPD)
Joanne Coville	Vice President, Finance and Administration
Jeff Cowgill	Sergeant, UPD
Tracey Dunn	Executive Assistant to the Chief, UPD
Deanne Ellison	Customer Service Manager, Transportation and Parking Services (TPS)
Kevin Medley	Officer, UPD
Colleen Mitchell	Business Services Analyst, TPS
Michael Morris	Lieutenant, UPD
Ray Porras	Director, TPS
John Reid	Chief of Police and Director of Public Safety, UPD
Al Rice	Sergeant, UPD
Lynn Rice	Dispatcher, UPD

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APPENDIX A: PERSONNEL CONTACTED

California State University, Dominguez Hills

Mildred García	President
Mark Cartwright	Parking Administrator, Parking Services
Lisa Chavez	Director, Accounting Services (At time of review)
Robert Gill	Director, Risk Management, Environmental Health Occupational Safety
Dovie Harness	Cashier Coordinator Analyst, Supervisor/Cashier's Office
Susie Mirasol	Assistant to Chief of Police, University Police
Lorena Raymundo-Yusuf	Manager, Accounting Services
William Reddick	Dispatcher, University Police
Mary Ann Rodriguez	Vice President, Administration and Finance
Amparo Sahagun	Administrative Support Coordinator, Parking Services
Daniel Salazar	Dispatcher, University Police
Susan Sloan	Chief, University Police
Tonya Staab	Sergeant, University Police
Karen Wall	Associate Vice President , Administration and Finance
Suzanne Wallace	Division Fiscal Officer, Office of the Vice President for Student Affairs
George Whitehouse	Sergeant, University Police
Bennie Williams	Sergeant Detective, University Police
Emmit Williams	Director, Contracts Administrator, Procurement, Contract, Logistical and Support Services

California State University, Long Beach

F. King Alexander	President
Scott Brown	Sergeant, University Police Department (UPD)
Maria Chavez	Cashier, UPD
Laurinda Fuller	Senior Auditor, Internal Auditing Services
Betty Harris	Assistant Director, Finance, UPD
Denitra Jones	Citation Processing, UPD
Maria Naraki	Administrative Assistant, Parking Administration
Gregory Pascal	Communication Supervisor, UPD
Mark Rudometkin	Associate Director, Parking Administration
Ami Rzasa	Corporal, UPD
Christopher Schivley	Corporal/Detective, UPD
Stanley Skipworth	Chief of Police, UPD
Gail Smith	Administrative Assistant, UPD
Fernando Solorzano	Captain, UPD
Aysu Spruill	Director, Internal Auditing Service
Mary Stephens	Vice President, Administration and Finance
Hanson Tith	Sergeant, UPD
Daniel Valdez	Sergeant, UPD
David Wagner	Special Services/Investigations, UPD
Scot Willey	Sergeant/Detective, UPD
Loretta Young	Internal Auditing Analyst, Internal Auditing Services

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APPENDIX A: PERSONNEL CONTACTED

California State University, San Bernardino

Albert K. Karnig	President
Karen Abbey	Property Coordinator, Property Management
Virginia Ashton	Administrative Support Coordinator, UPD
Jimmy Brown	Chief of Police, UPD
David DeMauro	Vice President, Administration and Finance (At time of review)
Walter Duncan	Lieutenant, UPD
Le Andre Fields	Sergeant, UPD
Scott Kovach	Support Services Supervisor, UPD
James Olinger	Information Technology Consultant, Administration and Finance
Linda Pella-Hartley	Executive Assistant, Administration and Finance (At time of review)
Samuel Sarmiento	Sergeant, UPD
Robert Tiberi	Disaster Preparedness Coordinator, UPD
Dale West	Assistant Vice President, Human Resources

San Francisco State University

Robert A. Corrigan	President
Selina Chua	Property Clerk, UPD
Michael Cramer	Information Systems Specialist, UPD
Anthony Duenas	Captain, UPD
Kirk Gaston	Chief of Police, UPD
Lily Gee	Administrative Analyst/Specialist, UPD
Francis Hui	Administrative Support Coordinator, UPD
Ronald Lam	Senior Sergeant, UPD
Abraham Leal	Sergeant, UPD
Troy Liddi	Police Officer, UPD
Franz Lozano	Internal Auditor, Internal Audit
Joy Manaois	Fiscal Services Manager, UPD
Leroy Morishita	Vice President, Administration and Finance
Gayle Orr-Smith	Emergency Preparedness Coordinator, UPD
Mark Osborne	Associate Internal Auditor, Internal Audit
Reggie Parson	Captain, UPD
Julie Shearer	Records/Communications Supervisor, UPD
Jun Takahashi	Captain, UPD
Patricia Tolar	Administrative Analyst/Specialist, UPD
Martha Villanueva	IACLEA/CALEA Accreditation Manager, UPD
Patrick Wasley	Deputy Chief of Police, UPD
Rene Wilson	Sergeant, UPD

San José State University

Jon Whitmore	President
Don W. Kassing	President (At time of review)
Marianne Alvarez	Lieutenant of Administration, UPD
Andre Barnes	Chief of Police, UPD
Yolanda Castro	Parking System and Citation Collection Analyst, UPD
Noemi Hinchberger	Records Coordinator, UPD
Patricia Julien	Financial Coordinator, UPD

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APPENDIX A: PERSONNEL CONTACTED

San José State University (cont.)

Claire Kotowski	Executive Assistant to the Chief of Police, UPD
Sue Lantow	Assistant Vice President, Administration and Finance
Rose Lee	Vice President, Administration and Finance
Warren Lee	Dispatcher II, UPD
Ninh Pham-Hi	Director of Internal Control
Dorothy Poole	Assistant Vice President, Administration and Finance
Amado Ramirez	Sergeant, UPD
Jim Renelle	Lieutenant of Support Services, UPD
Alex Yupanqui	Property and Evidence Technician, UPD

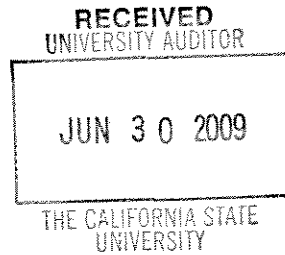
California State University, Stanislaus

Hamid Shirvani	President
Matthew Dillon	Sergeant, UPD
Suzanne Green	Interim Vice President, Business and Finance
Elizabeth Hodge	Dispatcher, UPD
Steven Jaureguy	Chief of Police, UPD
Amy Lew	Communications Center Supervisor, UPD
Mo Mirza	Campus Auditor, Financial Services
Donevon Murrell	Administrative Analyst/Specialist, UPD
Steven Olsen	Corporal, UPD
Soath Paramy	Information Technology Consultant, Information Technology
Baltazar Reyes	Parking Officer, UPD
Andrew Roy	Sergeant, UPD
Misty Strobe	Dispatcher, UPD
Amy Thomas	Assistant Director, Environmental Health and Occupational Safety
Reggie Thompson	Operations Lieutenant, UPD
Kenton Whitfield	Vice President, Business and Finance (At time of review)



**Business & Finance Division**  
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Long Beach, CA 90802-4210

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**Dr. Benjamin F. Quillian**  
Executive Vice Chancellor/CFO

562-951-4000  
Fax 562-951-4970  
bquillian@calstate.edu

**Date:** June 30, 2009

**To:** Larry Mandel  
University Auditor

**From:** Benjamin F. Quillian *B.F.*  
Executive Vice Chancellor and Chief Financial Officer

**Subject:** Status Report on Completion of Revised Response for Audit Report  
Number 08-24, *Police Services, Systemwide*

Enclosed is a copy of the revised response to the recommendations made pursuant to  
Audit Report Number 08-24, *Police Services, Systemwide*.

Should you have any questions, please feel free to contact Colleen Nickles, Charlene  
Minnick, or me.

RW:ztg

Enclosures

c: Colleen Nickles, Assistant Vice Chancellor, Financial Services  
Charlene Minnick, Systemwide Chief Risk Officer  
Nate Johnson, Systemwide Police Coordinator

**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

**SYSTEMWIDE POLICIES AND PROCEDURES**

Response 1a:

We concur that a systemwide protocol to update and explain programmatic responsibilities is necessary. By November, 2009, Systemwide Risk Management will draft an executive order describing programmatic responsibilities of systemwide risk management. Said executive order will detail systemwide police services expectations that campus policies are consistent with executive orders 756, 787, 797 and compliant with industry standards such as those demonstrated in the following accreditation organizations; Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA) and International Association of Campus Law Enforcement Administrators (IACLEA). Campus police departments will implement and maintain, but not limited to, operational policies and procedures which will be incorporated into an EO.

Response 1b:

We concur. The executive order as described in 1a will be completed and distributed to the police chiefs by November 2009 and then reviewed, updated (as applicable) and communicated to the police chiefs annually.

Response 1c:

We concur. Executive management control of campus police policies/manuals will be reviewed by the systemwide Police Coordinator on an annual basis. The systemwide police coordinator will provide an annual "statement of accomplishment" to the systemwide Chief Risk Officer.

Response 1d:

We concur. In early 2008, the Chancellor directed all campus police departments to organize and perform active shooter drills one each of the campuses. All campuses completed this assignment within established or approved timeframes. We will update executive order 1013 to include the requirement for campuses to develop an active shooter policy, expectations for and the conducting of active shooter training periodically which will also be referenced in proposed executive order as noted in Response 1a.

**CAMPUS EMERGENCY PLAN**

Response 2a/b:

We concur. The Chancellor's Office will send a reminder of Systemwide policy guided expectations for emergency management plan oversight and maintenance to campuses as per the provisions related to Executive Order 1013. This will be done by September 2009.



**AUTOMATED SYSTEMS ACCESS AND BACKUP CONTROLS**

Response 3a/b:

We concur. We will remind the campuses to implement security and backup procedures for RIMS/ARMS (computer aided dispatch and records management system) program to include password complexity, intervals, and off-site storage in accordance with systemwide information security policy and data security doctrines. This will be done by September 2009. As per 1a, systemwide guidelines will include expectations for automated systems in campus police departments and will be done by November 2009.

**CRIME STATISTICS**

Response 4a:

We concur. We will remind campuses to correct inaccuracies of statistical reporting prior to the next reporting deadline of 10/1/09. Such inaccuracies are regulated and audited by the Department of Education. Once statistical data is input it is locked. (IT security on campus website must unlock and permit any correction to occur). Conversely, department Jeanne Clery crime statistic data will often conflict with the Chancellor's crime report form due to differences in data gathering and definitions of crime classifications. We will review and modify campus forms in order to make the reports more consistent. We will remind campuses of existing regulations concerning crime data reporting to be completed on or before October 1, 2009.

Response 4b:

We concur. Expectations and provisions for crime statistics reporting are clearly outlined in the Federal Register and campuses will be reminded to follow expectations and provisions for crime statistics reporting as per the Federal Register, laws and applicable regulations. This will be done by September 2009. As per 1a, systemwide guidelines will include the requirement that crime statistic reporting be included in campus police department policies and will be done by November 2009

**WEAPONS QUALIFICATIONS**

Response 5:

We concur. Campuses will be reminded by September 2009 of the need to ensure they have "weapons qualifications" policy. Recognizing the diversity of campuses, while campuses will be delegated authority to have policies developed pertaining to campus-specific police service manuals that adhere to systemwide police service policies and procedures, the chiefs will be responsible for ensuring they have a "weapons qualifications" policy. This will be done by November 2009 as per 1a.

**AMMUNITION INVENTORY**

Response 6:

We concur. We recognize the importance of being accountable for all department materials and supplies. Campuses will be reminded by September 2009 to have a policy regarding the monitoring and regulation of weapons and ammunition inventory. As per 1a, systemwide guidelines will include the requirement that campus police departments have policy regarding the monitoring and regulation of weapons and ammunition inventory. This will be done by November 2009.

Response 7:

We concur. We will remind campuses by September 2009 to develop a local policy to inventory and track ammunition purchases, inventory, distribution and use. Such policy will be referenced in the revised systemwide guidelines as per 1a and will be done by November 2009.

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR



BAKERSFIELD

August 5, 2009

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel  
University Auditor

FRESNO

FROM: Charles B. Reed  
Chancellor

A handwritten signature in black ink that reads "Charles B. Reed". The signature is written in a cursive style and is positioned to the right of the typed name "Charles B. Reed".

FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 08-24 on *Police Services*, Systemwide

LONG BEACH

In response to your memorandum of August 5, 2009, I accept the response as submitted with the draft final report on *Police Services*, Systemwide.

LOS ANGELES

MARITIME ACADEMY

MONTEREY BAY

CBR/amd

NORTHRIDGE

Enclosure

POMONA

c: Mr. George V. Ashkar, Interim Assistant Vice Chancellor/Controller  
Dr. Benjamin F. Quillian, Executive Vice Chancellor/Chief Financial Officer

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS