POLICE SERVICES

CALIFORNIA STATE UNIVERSITY,
EAST BAY

Audit Report 12-61
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Members, Committee on Audit

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University Auditor: Larry Mandel
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ABBREVIATIONS

ARMS Automated Response Management System
ASI Associated Students, Inc.
CBA Collective Bargaining Agreement
CCW Concealed Weapons
CSU California State University
CSUEB California State University, East Bay
EO Executive Order
GO General Order
ICSUAM Integrated California State University Administrative Manual
OUA Office of the University Auditor
POST Commission on Peace Officer Standards and Training
PS Police Services
SAM State Administrative Manual
SUPA Statewide University Police Association
UPD University Police Department
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor (OUA) during the last quarter of 2011, the Board of Trustees at its January 2012 meeting directed that Police Services be reviewed. The OUA had previously reviewed Police Services in 2008.

We visited the California State University, East Bay campus from November 5, 2012, through December 7, 2012, and audited the procedures in effect at that time.

In our opinion, due to the effect of the weaknesses described below, the fiscal, operational, and administrative controls for police services as of December 7, 2012, taken as a whole, were not sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of major concern include: policies and procedures, information systems access and physical security of facilities, training, fiscal administration, major incidents, and weapons and ammunitions controls.

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.

GENERAL ENVIRONMENT [7]

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy and were not always updated and appropriately distributed.

SYSTEM ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION [9]

Administration of UPD information systems needed improvement. For example, Automated Response Management System data backups were not encrypted. In addition, the campus did not have documented procedures addressing the physical security of UPD offices and other campus facilities, and some terminated employees continued to have access to the facilities.

PERSONNEL ADMINISTRATION AND TRAINING [12]

Training records were not adequately documented, and training was not always completed as required. For example, qualifications for duty weapons were not performed as required by California State University and campus policy, and documentation was not always available to demonstrate whether officers had qualified on off-duty weapons, shotguns, rifles, or Tasers.
FISCAL ADMINISTRATION [14]

Reimbursement processing for California Commission on Peace Officer Standards and Training (POST) training needed improvement. Specifically, segregation of duties for the POST reimbursement process was inadequate, and reimbursement requests for POST training courses were not always submitted, or were not submitted in a timely manner. In addition, UPD did not recover costs from Associated Students, California State University, East Bay, and UPD review and approval of staffing needs for special events was not documented.

MAJOR INCIDENTS AND CRIME REPORTING [17]

The campus emergency management plan was not updated annually and was last revised in September 2010. This is a repeat finding from the prior Emergency Preparedness audit.

WEAPONS AND AMMUNITION CONTROLS [17]

UPD weapons policies needed updating. For example, weapons qualification requirements were unclear, and weapons policies did not address the timing for shotgun qualifications and inspections or weapons inventory. In addition, administration of off-duty and non-standard weapons needed improvement. Specifically, presidential authorization for the use of non-standard weapons on the campus was not documented, a listing of off-duty weapons was not maintained, and inspections of off-duty and non-standard weapons were not documented. Also, administration of retiree gun permits needed improvement, as the rangemaster was unaware of campus retiree weapons policies and there was no documentation to demonstrate which retiring officers were issued identification cards with a concealed weapons endorsement. Finally, ammunition purchases, distribution, and inventory were not adequately monitored.
INTRODUCTION

BACKGROUND

The California State University (CSU) Public Safety Program began in 1974 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, and public safety departments were established on all CSU campuses. In 2007, those departments were renamed “police services” to emphasize the service aspect, and since then, 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 municipalities. Sexual assaults, alcohol use, drug abuse, and vandalism have increased, and legislation has mandated more involvement by university police officers in the investigation and prevention of crimes, as well as the care of the victims. As a result, CSU police services departments have created policing programs and preventive patrols to deter crime. Also, the growth of on-campus housing has increased the complexity of emergency planning, and parking structures built on campuses have sparked an increase in auto burglaries and theft and have 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. 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, that participate in any federal student aid programs and requires schools to publicly disclose basic security policies and three years of campus crime statistics.

In 1992, the Campus Sexual Assault Victims’ Bill of Rights was incorporated into the Jeanne Clery Act. Then, in 1998, the act was amended to expand the scope of campus crime statistic reporting, to ensure crime statistics are reported in accordance with the Federal Bureau of Investigation’s Uniform Crime Reporting program, and to require the maintenance of a public police log of all reported crimes. It also requires each campus to maintain a policy that mandates the issuance of timely warnings when a crime, reportable in the annual statistics, is known to the school and poses an ongoing threat to the campus. The Higher Education Opportunity Act of 2008 reauthorized the Higher Education Act of 1965 and provided additional campus reporting requirements, such as the relationship of campus security personnel with state and local police, emergency response and evacuation procedures, and missing person procedures.

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 that designate which law enforcement agency has operational responsibility for the investigation of violent crimes occurring on campus. It also requires campuses to delineate the specific boundaries of each agency’s operational responsibility.

Recent budget cuts in higher education in California have resulted in increased student protests and demonstrations at the CSU and other California educational institutions. It remains a challenge to balance freedom of speech and assembly with the maintenance of order, and there has been increased scrutiny by the public and the legislature regarding the management of these events, especially in the use of force.
In recent years, in response to increased training standards from the Commission on Peace Officer Standards and Training (POST) and governmental agencies, campus administrators have worked to upgrade the quality of university police services, and five CSU campuses are currently accredited by international accreditation agencies. CSU Los Angeles, CSU Fullerton, CSU San Marcos, and San Francisco State University have received accreditation from the Commission on Accreditation for Law Enforcement Agencies, and San Francisco State University and CSU Northridge have received accreditation from the International Association of Campus Law Enforcement Agencies.

At the systemwide level, policies have been developed to create uniform standards for vehicles, equipment, training, emergency preparedness, and critical response units, as well as semiannual meetings of campus police chiefs. In April 2001, the chancellor’s office issued Executive Order (EO) 787, modifying the CSU Public Safety Policy Manual that was required by agreement between the CSU Board of Trustees and the Statewide University Police Association. In 2007, administrative and risk management responsibilities for systemwide police services were reassigned from Systemwide Human Resources to the Office of Risk Management.

In 2010, in response to the recommendations of the 2008 Police Services Systemwide Audit, a systemwide chief law enforcement officer position was created. Responsibilities of the chief law enforcement officer include oversight over compliance issues in police services and emergency management, such as developing policies and procedures addressing systemwide police services, emergency preparedness, critical incident response, and chancellor’s office security issues. The position reports to the assistant vice chancellor of risk management and public safety.

In addition, EO 1046, Police and Public Safety Police Guidelines, and additional police services technical letters were implemented in 2010 to further define systemwide policies and expectations for campus police departments. These policies require campuses to maintain event management and crowd control procedures, as well as use-of-force guidelines and procedures, to ensure that management of protests and demonstrations is adequately and consistently controlled throughout the CSU system.

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

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of police services and law enforcement, and to determine the adequacy of controls over related processes to ensure compliance with relevant government regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

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

- Administration and management of the police services (PS) 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.

- 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.

- Security and retention of departmental records are adequate.

- Staffing and scheduling provide appropriate coverage, effective use of overtime, and compliance with collective bargaining agreements.

- Hiring, certification, and training of police services employees is in accordance with POST standards, state regulations, and CSU policy.

- Citizen complaints and internal investigations are handled in compliance with state and federal regulations, CSU policy, and collective bargaining agreements.

- Budgeting processes adequately address police services funding and expenditures, and budget monitoring processes ensure effective accounting and management control.

- POST reimbursements, PS expenditures, and cost recovery for services and events are adequately controlled.

- Processes and policies exist for managing and reporting major incidents in accordance with state and federal regulations and CSU policy.

- 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.

- Weapons are appropriately authorized, and weapons and ammunition are properly handled, accounted for, and safeguarded.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment A, Audit Agenda Item 2 of the January 24 and 25, 2012, meeting of the Committee on Audit stated that Police Services includes compliance with federal, state, and local rules and regulations, systemwide directives, and campus policies and procedures. Proposed audit scope would include review of campus policies and procedures; compliance with state-mandated standards and training requirements; timely and appropriate response to incidents, including appropriate policies and training governing the use of force; controls over sensitive or special equipment; accurate crime reporting; appropriate adjudication of internal investigations or personnel complaints; and access to law enforcement data.

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 Board of Trustee policies and Office of the Chancellor and campus policies, letters, and directives. The audit focused on procedures in effect from January 1, 2010, through December 7, 2012.

We focused primarily on the internal administrative, compliance, and operations controls over PS activities. Specifically, we reviewed and tested:

- Procedures for communicating systemwide and campus-specific policies, rules, and regulations.
- Staffing, scheduling, and internal investigation procedures.
- Fiscal procedures for budgeting, chargebacks, POST reimbursements, and expenses.
- 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 weapons and ammunition.
- Data security, disaster recovery, and backup procedures.
GENERAL ENVIRONMENT

University Police Department (UPD) policies and procedures did not contain all information required by systemwide policy and were not always updated and appropriately distributed.

We found that:

- The UPD policy manual did not include specific policies for mitigating crime or for crime prevention activities.
- The UPD incident response policy did not include expectations for conducting annual active shooter training exercises or for completion of training reports.
- The Clery reporting policy did not include expectations for the reconciliation of crime statistics data with Clery statistics, chancellor’s office reporting, and Uniform Crime Reporting regulations.
- The UPD manual was not updated annually. The last update occurred in April 2011.
- Documentation was not maintained to demonstrate that department employees received, or had been provided access to, the UPD policy manual or the systemwide public safety policy manual.
- Documentation was not maintained to demonstrate that employees were notified of changes in UPD policies.

Executive Order (EO) 1046, *Police and Public Safety Policy Guidelines*, effective January 1, 2010, states, in part, that the president is delegated responsibility for implementing and maintaining a campus public safety policy and procedure manual to ensure the safety of the campus employees, students and visitors. The manual must conform to industry standings and include minimum standards established by the associate vice chancellor for risk management and public safety. Campus police departments maintain and update the manual annually.

Technical Letter Police Services (PS) 2010-01, *California State University Police Services Policies and Manual Maintenance Requirements*, dated July 26, 2010, states, in part, that police chiefs shall establish a program where operational policies are reviewed annually and updated as necessary to meet current statutory and executive mandates. The policy further states that campus police departments shall implement and maintain operational policies and procedures in the following areas: mitigating campus crime and encouraging crime prevention deterrence activities; reconciliation of crime statistics data and consistency of data with the Jeanne Clery statistics, the Chancellor’s Criminal Statistics Report, and the Uniform Crime Reporting regulations, and an active shooter/incident policy that includes expectations for conducting periodic, but not less than annual, active shooter training exercises, classroom instruction, tabletop exercises, and other applicable training methods.
California State University, East Bay (CSUEB) UPD Policy 106, *Policy Manual*, requires all employees to read the policy manual and sign a statement of receipt acknowledging that they received a copy or have been provided access to the policy manual. In addition, it states that all changes to the policy manual will be posted on the departmental intranet home page, and that the sergeant will forward the revisions to all employees, who shall acknowledge receipt by return email.

Collective Bargaining Agreement (CBA), Statewide University Police Association (SUPA), Unit 8, Article 8.2 states, in part, that the California State University (CSU) shall maintain a systemwide public safety policy manual that shall be distributed to all employees.

The vice president of administration and finance stated that the failure to maintain and distribute the UPD policy manual was due to two executive leadership transitions in a very short period and the organizational decision to commit to a contracted service, Lexipol, for standardized policy development. He further stated that as the Lexipol service was being initiated, the entire command staff turned over, incoming command officers were unfamiliar with Lexipol, and the vendor was unable to support such an environment in transition.

Incomplete written policies and procedures increase the risk of non-compliance with government and CSU requirements and the potential for weaknesses in the internal control environment.

**Recommendation 1**

We recommend that the campus:

a. Update UPD policies and procedures to incorporate all information required by systemwide policy.

b. Ensure that the UPD policy manual is updated annually.

c. Maintain documentation demonstrating that department employees received, or have been provided access to, the UPD policy manual or the systemwide public safety policy manual.

d. Maintain documentation demonstrating that employees are notified of changes in UPD policies.

**Campus Response**

We agree.

a. The campus has updated its policies and procedures in the CSU East Bay Police Department Policy Manual, which incorporates all information required by systemwide policy. The updated manual will be provided to the chancellor’s office by April 30, 2013.

b. The campus will ensure that the UPD policy manual is updated annually. A new General Order (GO) #2012-01, *University Police Department Policies and Procedures Manual, Regulations and General Orders*, addresses the annual updates. This will be provided to the chancellor’s office by April 30, 2013.
c. The campus will maintain documentation demonstrating that department employees received the updated CSU East Bay Police Department Policy Manual. This documentation will be provided to the chancellor’s office by April 30, 2013.

d. The campus will maintain documentation demonstrating that employees are notified of changes in UPD policies. GO #2012-01 also addresses this, and will be provided to the chancellor’s office by April 30, 2013.

SYSTEMS ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION

SYSTEM ACCESS

Administration of UPD information systems needed improvement.

We found that:

- UPD information security policies did not include procedures for approving additions, changes, and terminations of system access rights or reviewing existing account-holder access rights for the Automated Response Management System (ARMS).

- The annual review of ARMS users was not documented.

- ARMS contained protected data, but ARMS data backups were not encrypted.

Integrated California State University Administrative Manual (ICSUAM) §8060.0, Access Control, effective April 19, 2010, states that campuses must have a documented process for provisioning approved additions, changes, and terminations of access rights and reviewing access of existing account holders. It further states that appropriate campus managers and data owners must review, at least annually, user access rights to information assets containing protected data, and the results of the review must be documented.

Technical Letter PS 2010-01, CSU Police Services Policies and Manual Maintenance Requirements, dated July 26, 2010, states that campus police departments shall implement and maintain operational policies and procedures in the following areas: information security of police data, access to terminals, computer-aided dispatch/record management systems, Department of Justice terminals, and data backup and storage procedures in accordance with best practices doctrines to include, but not be limited to, password complexity, intervals, and off-site storage.

The California State Information Security Office, Information Security Program Guide for State Agencies, dated April 2008, states that 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. In addition, a plan should be documented to maintain, restore, and recover operations to ensure availability of information at the required level and time frame following a disruption, failure of critical systems, or disaster.
The vice president of administration and finance stated that the lack of formal UPD policies concerning system access, data backups, and disaster recovery was due to oversight during the change in command staff and implementation of the Lexipol standardized policy development. He also stated that UPD was unaware of the annual review and encryption requirements.

Failure to establish policies and procedures addressing UPD systems access and to document reviews of system users and encrypt data backups increases the risk of inappropriate access to systems and misuse of sensitive data.

**Recommendation 2**

We recommend that the campus:

a. Update UPD information security policies to include procedures for approving additions, changes, and terminations of system access rights and for reviewing existing account-holder access rights for the ARMS.

b. Document the annual review of ARMS users.

c. Encrypt ARMS data backups.

**Campus Response**

We agree.

a. The campus will update UPD information security policies to include procedures for approving additions, changes, and terminations of system access rights and for reviewing existing account-holder access rights for the ARMS. The policies will be updated by June 15, 2013.

b. The campus will document the annual review of ARMS users. This will be completed by June 15, 2013.

c. The campus will encrypt ARMS data backups. The encryption will be completed by June 15, 2013.

**PHYSICAL ACCESS**

The campus did not have documented procedures addressing the physical security of UPD offices and other campus facilities, and some terminated employees continued to have access to the facilities.

Specifically, we found that:

- Policies and procedures had not been developed to address the periodic review and monitoring of individuals with physical access to the UPD offices and other campus facilities.
Eight terminated employees still had keys to UPD offices, and one terminated employee had a set of master keys to campus facilities.

UPD did not have an adequate area to store keys when they were not in use.

State Administrative Manual (SAM) §20050 states that the elements of a satisfactory system of accounting and administrative control shall include, in part, a plan that limits access to state assets to authorized personnel who require these assets in the performance of assigned duties.

State of California Department of Justice, California Law Enforcement Telecommunication System Policies, Practices and Procedures, revised October 2008, states that reasonable measures shall be taken to locate terminals and equipment in an area with adequate physical security to provide protection from vandalism or sabotage and to preclude access to California Law Enforcement Telecommunication System-provided information by other than authorized personnel. This includes unauthorized viewing or access to computer terminals, access devices, or stored/printed data at all times.

CSUEB Key Control Policy states that department chairs and office managers who request building master keys must develop and document procedures that will ensure the keys will not leave the campus, and that keys left on campus must be kept in a secured location.

The vice president of administration and finance stated that the lack of adequate physical security was due to two transitions in management staff. Also, he stated that as work areas were being delegated, several practices and methods were not fully communicated, and some documented protocols were lost as workstations were physically moved from one area to another. He further stated that the situation inadvertently got worse as the second transition took effect.

Inadequate control over access to UPD offices and campus facilities increases campus exposure to loss from inappropriate acts.

**Recommendation 3**

We recommend that the campus:

a. Develop policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices and other campus facilities.

b. Remove UPD office access and collect master keys from terminated UPD employees.

c. Provide an adequate area for UPD to store keys when they are not in use.

**Campus Response**

We agree.
a. The campus has developed policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices and other campus facilities. GO #2012-02, *University Police Department Key Issue Control*, will be provided to the chancellor’s office by April 30, 2013.

b. The campus will remove UPD office access and collect master keys from terminated UPD employees. The keys will be collected by May 30, 2013.

c. The campus will provide an adequate area for UPD to store keys when they are not in use. This storage area will be identified by April 30, 2013.

**PERSONNEL ADMINISTRATION AND TRAINING**

Training records were not adequately documented, and training was not always completed as required.

We reviewed 15 training files for 11 sworn officers, two dispatchers, and two community service officers, and we found that:

- Although training certificates and documentation were kept in individual employee files, the department did not maintain a log to ensure that training requirements were being met.

- Qualifications for duty weapons for the 11 sworn officers were not performed quarterly as required by campus policy or semiannually as required by systemwide policy. The last documented qualifications occurred in 2009 for one officer, July 2011 for eight officers, August 2011 for one officer, and December 2011 for one officer.

- There was no documentation to indicate whether any of the officers carried off-duty weapons or whether they had qualified on these weapons per department policy.

- There was no documentation to demonstrate that any of the officers were qualified to use shotguns.

- There was no documentation to indicate whether seven of the officers were qualified to use rifles. Of the four officers who had qualified on rifles, one had not been tested since 2009.

- There was no documentation to demonstrate that any of officers participated in active-shooter or use-of-force training in 2010, 2011, or 2012.

- There was no documentation to indicate whether six of the officers were qualified to use Tasers. Of the five officers who had qualified on Tasers, four had not received training since 2010, and one had not received training since 2009.

- There was no documentation to demonstrate that the two dispatchers reviewed had received required annual training.
EO 1046, *Police and Public Safety Policy Guidelines*, effective January 1, 2010, states that training records must list officers’ names, dates, signatures, pass or fail results, and signature-approval of the rangemaster or other area-specific certification/approval.

EO 756, *Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, dated September 21, 2000, states, in part, that qualified campus peace officers who are armed shall receive semiannual training in the legal and operational aspects of firearms and shall complete the requirements to remain qualified on each weapon they use.

CSUEB UPD Policy 312, *Firearms*, states that all sworn personnel are required to qualify quarterly with their duty weapon on an approved range course.

CSUEB UPD Policy 432, *Patrol Rifles*, states that officers shall successfully complete quarterly training and qualification.

The vice president of administration and finance stated that the inadequate documentation was due to the lack of a defined path for the training unit and the lack of training for the department training manager.

Inadequate monitoring of training increases the risk that mandated training requirements will not be met.

**Recommendation 4**

We recommend that the campus:

a. Maintain a log to ensure that training requirements are being met.

b. Ensure that qualifications for duty weapons, off-duty weapons, shotguns, and rifles are performed and documented in accordance with CSU and campus policies.

c. Ensure that training for active shooters, use of force, use of Tasers, and dispatchers is performed and documented in accordance with CSU and campus policies.

**Campus Response**

We agree.

a. The campus has developed a training matrix, including a log, to ensure that training requirements are met. This log will be provided to the chancellor’s office by April 30, 2013.

b. The campus will ensure that qualifications for duty weapons, off-duty weapons, shotguns, and rifles are performed and documented in accordance with CSU and campus policies. Documentation of the new Range Policy and Qualification Schedule will be provided to the chancellor’s office by April 30, 2013.
c. The campus will ensure that training for active shooters, use of force, use of Tasers, and dispatchers is performed and documented in accordance with CSU and campus policies. The campus has developed a CSU East Bay Police Department Training and Career Development Plan. This document (43 pages) will be provided to the chancellor’s office by April 30, 2013. Documentation of active shooter training participants for the December 1, 2012, course will also be provided to the chancellor’s office by April 30, 2013.

**FISCAL ADMINISTRATION**

**POST REIMBURSEMENTS**

Reimbursement processing for California Commission on Peace Officer Standards and Training (POST) training needed improvement.

We found that:

- There were no procedures for requesting and monitoring POST reimbursements.

- Segregation of duties for the POST reimbursement process was inadequate. One individual requested POST reimbursements, received reimbursement checks, and deposited reimbursement checks. There were no mitigating controls in place, as reimbursements were not monitored and deposits were not reconciled to reimbursement claims.

- Five of the ten reimbursement requests for POST training courses during fiscal years 2010/11 and 2011/12 that we reviewed had not been submitted, and two had not been submitted in a timely manner.

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.

ICSUAM §3102.02, *Segregation of Cash Handling Duties*, effective April 1, 2011, states that mailed remittances shall be verified, processed by a separate individual, and restrictively endorsed by the close of business on the date of receipt. The person collecting cash, issuing cash receipts, and preparing the departmental deposit must be someone other than the person performing the monthly review of the general ledger, the person maintaining accounts receivable records, or the person following up on collectibles.

The vice president of administration and finance stated that procedures were not developed due to the transition of the management team. He also stated that POST requirements were not effectively communicated throughout the systemwide UPD organization to address these requirements. He further stated that duties were not segregated due to staffing shortages, which also caused the delayed submission of POST reimbursement requests.
Failure to adequately administer POST training reimbursements increases the risk that misappropriation of funds will not be detected, reimbursements will not be received, and the availability of UPD training funds will be reduced.

Recommendation 5

We recommend that the campus:

a. Develop procedures for requesting and monitoring POST reimbursements.
b. Implement adequate segregation of duties for the POST reimbursement process.
c. Ensure that POST reimbursement requests are submitted in a timely manner.

Campus Response

We agree.

a. The campus has developed procedures for requesting and monitoring POST reimbursements. This policy was documented via GO #2012-04, University Police Department POST Course Reimbursement to Agency, and will be provided to the chancellor’s office by April 30, 2013.
b. The campus will implement adequate segregation of duties for the POST reimbursement process. These procedures will be implemented and provided to the chancellor’s office by May 30, 2013.
c. The campus will ensure that POST reimbursement requests are submitted in a timely manner. This policy was also documented on GO #2012-04 and will be provided to the chancellor’s office by April 30, 2013.

COST RECOVERY

UPD did not recover costs from Associated Students, California State University, East Bay (AS).

We found that the campus cost recovery plan did not include reimbursement for general police services from AS. In addition, we found that AS was not charged for costs incurred by UPD while staffing special services and events.

ICSUAM §3552.01, Cost Allocation/Reimbursement Plans for the CSU Operating Fund, effective April 1, 2011, states that the campus chief financial officer must ensure that all costs incurred by the CSU Operating Fund for services, products, and facilities provided to auxiliary organizations, enterprise programs/activities/fund sources, or entities external to the university are properly and consistently recovered with cash and/or a documented fair exchange of value. This includes all costs for services, products, and facilities borne by the CSU Operating Fund on behalf of enterprise programs/activities/fund sources and auxiliary organizations.

The vice president of administration and finance stated that AS activities were inadvertently excluded from the annual cost recovery model and from special services and event reimbursements.
Incomplete reimbursements to the UPD reduce funds available for law enforcement activities.

Recommendation 6

We recommend that the campus:

a. Include reimbursement for general police services from AS in the campus cost recovery plan.
b. Charge AS for costs incurred by UPD while staffing special services and events.

Campus Response

We agree.

a. The campus will include reimbursement for general police services from AS in the campus cost recovery plan. AS was inadvertently excluded from the cost recovery model for 2012/13, but has been included for the fiscal year 2013/14 chargeback process. Documentation from the university budget office will be provided to the chancellor’s office by April 30, 2013.
b. The campus will charge AS for costs incurred by UPD while staffing special services and events. This will be implemented and documented by May 30, 2013.

SPECIAL EVENTS

UPD review and approval of staffing needs for special events was not documented.

We reviewed the planning forms for all nine third-party events held in fiscal year 2011/12, and we found that the UPD review and signature portion had not been completed on any of the forms.

SAM §20050 states that elements of a satisfactory system of internal accounting and administrative controls include a system of authorization and recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

The vice president of administration and finance stated that the UPD review and signature portion on planning forms for special events was not completed due to staffing shortages and other priorities.

Failure to document approval of resources used for special events increases the risk that events will not be adequately staffed; reimbursements will be inaccurate, incomplete, and untimely; and funds available for law enforcement activities will be reduced.

Recommendation 7

We recommend that the campus ensure that UPD review and approval of staffing needs for special events is documented.
Campus Response

We agree. The campus will ensure that UPD review and approval of staffing needs for special events is documented. The special event tracking program has been assigned to a sergeant, who will participate with university special events scheduling and formally sign off on all special events planning. Documentation of this process will be provided by May 30, 2013.

MAJOR INCIDENTS AND CRIME REPORTING

The campus emergency management plan was not updated annually and was last revised in September 2010. This is a repeat finding from the prior Emergency Preparedness audit.

EO 1056, California State University Emergency Management Program, effective March 1, 2011, states that on an annual basis, or more frequently as needed, the campus emergency management plan should be reviewed, updated, and distributed to the emergency management team members and others as identified by the campus. Documentation of review, update, and distribution must be in the form of a signed and dated written acknowledgment that is attached to the master campus emergency plan.

The vice president of administration and finance stated that the update was overlooked due to transition issues associated with two chief officer installations in a relatively short time frame.

Failure to maintain an updated emergency management plan increases the risk of inadequate emergency response.

Recommendation 8

We recommend that the campus update the campus emergency management plan annually.

Campus Response

We agree. The campus has hired an emergency operations center commander, who is updating the campus emergency management plan. The target date for the update is May 10, 2013.

WEAPONS AND AMMUNITION CONTROLS

WEAPONS POLICIES

UPD weapons policies needed updating.

We found that:

- Weapons qualification requirements were unclear. Systemwide policy required qualifications for duty weapons to be performed at least semiannually, and campus policy stated that qualifications for duty weapons were to be performed quarterly. However, campus practice was to perform
these qualifications annually. In addition, campus policy stated that qualifications for patrol rifles were to be performed quarterly and that inspections were to be performed monthly. However, campus practice was to perform qualifications and inspections annually.

- UPD weapons policies did not address the timing for shotgun qualifications and inspections or weapons inventory.

CSUEB UPD Policy 312.4, *Firearms*, states that all sworn personnel are required to qualify quarterly with their duty weapon on an approved range course.

CSUEB UPD Policy 432, *Patrol Rifles*, states that officers shall successfully complete quarterly training and qualification. It further states that the rangemaster or armorer shall inspect and service each patrol rifle on a monthly basis.

EO 756, *Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments*, dated September 21, 2000, states, in part, that qualified campus peace officers who are armed shall receive semiannual training in the legal and operational aspects of firearms and shall complete the requirements to remain qualified on each weapon they use.


The vice president of administration and finance stated that policies were not updated due to the transition of the management team and decreased staffing levels.

Failure to maintain current policies and procedures relating to weapons qualification and inspection requirements increases the risk that officers will not be fully qualified to respond to incidents, increases the possibility that weapons will not be properly maintained and will not function correctly in emergency situations, and increases the potential for liability arising from use of such weapons.

**Recommendation 9**

We recommend that the campus update policies for duty weapon and rifle qualifications, shotgun qualifications and inspections, and weapons inventories.

**Campus Response**

We agree. The campus has updated policies for duty weapon and rifle qualifications, shotgun qualifications and inspections, and weapons inventories. See the CSU East Bay Police Department Training and Career Development Plan, Position Requirements section, pages 16 to 34. In addition, Chapter 3 of the updated UPD policy manual, Section 312, *Firearms*, addresses duty weapons and firearms qualifications.
OFF-DUTY AND NON-STANDARD WEAPONS

Administration of off-duty and non-standard weapons needed improvement.

We found that:

- Presidential authorization for the use of non-standard weapons such as shotguns, pepper spray, rifles, and Tasers on the campus was not documented.
- A listing of off-duty weapons was not maintained.
- There was no documentation demonstrating that off-duty weapons, shotguns, Tasers, or rifles were inspected per department requirements.

EO 756, Authorized Weapons, Weapons Training and Use of Weapons in CSU Police Departments, dated September 21, 2000, states, in part, that qualified officers may use personally owned side arms with the written approval of the chief. It further states that campus presidents may authorize in writing and make available to qualified campus officers additional weapons.

CBA, SUPA, Unit 8, Article 10.6 states, in part, that the following equipment, when authorized by the president, shall be available in each police department: aerosol pepper spray and holder, shotgun, rifle, and Taser.

CSUEB UPD Policy 312.2.2, Firearms, states that off-duty weapons are permitted upon approval of the chief. The policy further requires the officer to qualify annually with the weapon at the department’s range qualification and that the weapon be inspected by the rangemaster prior to being carried off-duty, and then as deemed necessary by the rangemaster.

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.

The vice president of administration and finance stated that a clear UPD policy providing the prescribed weapons of choice, as supported by EO 756, was never established due to oversight. In addition, he stated that he was unaware of the requirement for documented presidential approval. He further stated that failure to document and monitor off-duty weapons was due to staffing constraints.

Failure to document proper approval for weapons used on campus and to ensure weapons qualifications are completed increases the risk that officers will not be fully qualified to respond to incidents, increases the possibility that weapons will not be properly maintained and will not function correctly in emergency situations, and increases the potential for liability arising from the use of such weapons.

Recommendation 10

We recommend that the campus:
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

a. Obtain written presidential authorization for the use of non-standard weapons.
b. Maintain a listing of off-duty weapons.
c. Document inspections of off-duty weapons, shotguns, Tasers, and rifles.

Campus Response

We agree.

a. The campus has obtained written presidential authorization for the use of non-standard weapons. This letter of authorization will be provided to the chancellor’s office by April 30, 2013.

b. The campus will maintain a listing of off-duty weapons. This will be documented and provided to the chancellor’s office by May 30, 2013.

c. The campus will document inspections of off-duty weapons, shotguns, Tasers, and rifles. This documentation will be provided to the chancellor’s office by May 30, 2013.

RETIREE GUN PERMITS

Administration of retiree gun permits needed improvement.

We found that:

- The rangemaster was unaware of current retiree weapons policies.
- There was no documentation to demonstrate which retiring officers were issued an identification card with a concealed weapons (CCW) endorsement or that the department tracked the retired officers with CCW endorsements to determine whether they met firearms qualifications required for the renewal of the endorsements.
- There was no documentation to demonstrate that retiring officers were made aware of the current retiree weapons policies.

CSUEB UPD Policy 220, Retired Officer CCW Endorsements, states in part that any full-time sworn officer who carried a concealed firearm during the course and scope of his/her employment shall be issued an identification card with a “CCW Approved” endorsement upon honorable retirement. It further states that in order to maintain the CCW-approved endorsement, the retired officer must qualify annually with the authorized firearm, remain subject to all department policies, and only be authorized to carry a firearm inspected and approved by the department.

California Penal Code §26300 states, in part, that honorably retired peace officers shall have an endorsement on the officer’s identification certificate stating that the issuing agency approves the officer’s carrying of a concealed and loaded firearm.
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.

The vice president of administration and finance stated that UPD was unaware of the requirements and that recent changes in state law and federal law were significant, but may not have been fully communicated throughout the CSU system.

Inadequate monitoring of weapons qualification and inspection requirements for retirees increases the potential for liability arising from use of such weapons, and failure to educate retirees on weapon-carrying policies and procedures increases the risk of non-compliance with government and CSU requirements.

**Recommendation 11**

We recommend that the campus:

a. Ensure that the rangemaster is aware of current retiree weapons policies.

b. Document the issuance of CCW endorsements, and track UPD retirees with CCW endorsements to determine whether they meet firearms qualifications required for renewal of the endorsement.

c. Ensure that UPD retirees are aware of current retiree weapons policies.

**Campus Response**

We agree.

a. The campus will ensure that the rangemaster is aware of current retiree weapons policies. The policies will be communicated to the rangemaster and documentation provided to the chancellor’s office by May 10, 2013.

b. The campus will document the issuance of CCW endorsements and track UPD retirees with CCW endorsements to determine whether they meet firearms qualifications required for renewal of the endorsement. This will be addressed and documented by May 30, 2013.

c. The campus will ensure that UPD retirees are aware of current retiree weapons policies. Retiree weapons policies are addressed in GO #2012-03, *University Police Department Employee Separation Protocols*, dated November 30, 2012. In addition, an annual provisional notification schedule has been established for retiree qualification requirements. Documentation of these will be provided to the chancellor’s office by May 10, 2013.

**AMMUNITION**

Ammunition purchases, distribution, and inventory were not adequately monitored.
We found that:

- There were no policies or procedures for tracking ammunition purchases and inventory.
- The department did not document or track ammunition distribution.
- The annual ammunition physical inventory count was not reconciled to inventory purchase and distribution records.


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.

The vice president of administration and finance stated that the failure to monitor ammunition inventory was due in part to the lack of a dedicated armory to properly store weapons and ammunition. He further stated that policies were not updated and inventory was not reconciled due to transition of the management team and decreased staffing levels.

Inadequate controls over ammunition inventory increases campus exposure to loss from inappropriate acts.

**Recommendation 12**

We recommend that the campus:

a. Develop and implement policies and procedures for tracking ammunition purchases and inventory.

b. Document and track ammunition distribution.

c. Reconcile the annual ammunition physical inventory count to inventory purchase and distribution records.

**Campus Response**

We agree.

a. The campus will develop and implement policies and procedures for tracking ammunition purchases and inventory. These will be developed and provided to the chancellor’s office by May 10, 2013.
b. The campus will document and track ammunition distribution. This will be completed and provided to the chancellor’s office by May 10, 2013.

c. The campus will reconcile the annual ammunition physical inventory count to inventory purchase and distribution records. A physical ammunition inventory was completed on November 15, 2012. An interim physical ammunition inventory and reconciliation, with evidence of ammunition purchase and distribution tracking, is planned for May 30, 2013. Evidence of the reconciliation will be provided to the chancellor’s office by June 30, 2013.
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leroy Morishita</td>
<td>President</td>
</tr>
<tr>
<td>Debbie Brothwell</td>
<td>Deputy Vice President, Finance</td>
</tr>
<tr>
<td>Gladys Contreras</td>
<td>Administrative Coordinator, University Police</td>
</tr>
<tr>
<td>Bruce Edwards</td>
<td>Adjutant to the Chief</td>
</tr>
<tr>
<td>Kevin Gonzales</td>
<td>Sergeant, University Police</td>
</tr>
<tr>
<td>Maggie Graney</td>
<td>Director, Compliance and Internal Control</td>
</tr>
<tr>
<td>Cecilia Grima</td>
<td>Facilities Reservations Coordinator</td>
</tr>
<tr>
<td>James Hodges</td>
<td>Chief of Police, University Police</td>
</tr>
<tr>
<td>Mattie Johnson</td>
<td>Dispatcher</td>
</tr>
<tr>
<td>Rozilla Lal</td>
<td>Dispatcher</td>
</tr>
<tr>
<td>Omar Miakhail</td>
<td>Sergeant, University Police</td>
</tr>
<tr>
<td>Stan Skipworth</td>
<td>Interim Chief of Police</td>
</tr>
<tr>
<td>Martha Wallace</td>
<td>Administrative Analyst, University Scheduling</td>
</tr>
<tr>
<td>Jeniffer Wellington</td>
<td>Information Technology Consultant</td>
</tr>
<tr>
<td>Brad Wells</td>
<td>Vice President, Administration and Finance, and Chief Financial Officer</td>
</tr>
</tbody>
</table>
April 11, 2013

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore
Long Beach, CA 90802

RE: Audit Report Number 12-61
Police Services, California State University, East Bay
Campus Responses to Audit Recommendations

Dear Mr. Mandel,

At my request, the Director of Compliance and Internal Control sent the responses to the Police Services audit to your office earlier today via e-mail. I reviewed and approved the responses yesterday.

Please consider this as authorization to process the campus responses into the official audit report.

Thank you.

Sincerely,

Bradley Wells
Vice President, Administration & Finance, CFO

cc: Maggie Graney, Director of Compliance and Internal Control
POLICE SERVICES
CALIFORNIA STATE UNIVERSITY,
EAST BAY
Audit Report 12-61

GENERAL ENVIRONMENT

Recommendation 1

We recommend that the campus:

a. Update UPD policies and procedures to incorporate all information required by systemwide policy.

b. Ensure that the UPD policy manual is updated annually.

c. Maintain documentation demonstrating that department employees received, or have been provided access to, the UPD policy manual or the systemwide public safety policy manual.

d. Maintain documentation demonstrating that employees are notified of changes in UPD policies.

Campus Response

a. We agree. The campus has updated its policies and procedures in the CSU East Bay Police Department Policy Manual, which incorporates all information required by systemwide policy. The updated manual will be provided to the chancellor’s office by April 30, 2013.

b. We agree. The campus will ensure that the UPD policy manual is updated annually. A new General Order (GO) #2012-01, University Police Department Policies and Procedures Manual, Regulations and General Orders, addresses the annual updates. This will be provided to the chancellor’s office by April 30, 2013.

c. We agree. The campus will maintain documentation demonstrating that department employees received the updated CSU East Bay Police Department Policy Manual. This documentation will be provided to the chancellor’s office by April 30, 2013.

d. We agree. The campus will maintain documentation demonstrating that employees are notified of changes in UPD policies. GO #2012-01 also addresses this, and will be provided to the chancellor’s office by April 30, 2013.
SYSTEMS ACCESS, PHYSICAL SECURITY, AND RECORDS RETENTION

SYSTEM ACCESS

Recommendation 2

We recommend that the campus:

a. Update UPD information security policies to include procedures for approving additions, changes, and terminations of system access rights and for reviewing existing account-holder access rights for the ARMS.

b. Document the annual review of ARMS users.

c. Encrypt ARMS data backups.

Campus Response

a. We agree. The campus will update UPD information security policies to include procedures for approving additions, changes, and terminations of system access rights and for reviewing existing account-holder access rights for the ARMS. The policies will be updated by June 15, 2013.

b. We agree. The campus will document the annual review of ARMS users. This will be completed by June 15, 2013.

c. We agree. The campus will encrypt ARMS data backups. The encryption will be completed by June 15, 2013.

PHYSICAL ACCESS

Recommendation 3

We recommend that the campus:

a. Develop policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices and other campus facilities.

b. Remove UPD office access and collect master keys from terminated UPD employees.

c. Provide an adequate area for UPD to store keys when they are not in use.

Campus Response

a. We agree. The campus has developed policies and procedures to address the periodic review and monitoring of individuals with access to UPD offices and other campus facilities. GO #2012-02, University Police Department Key Issue Control, will be provided to the chancellor’s office by April 30, 2013.

b. We agree. The campus will remove UPD office access and collect master keys from terminated UPD employees. The keys will be collected by May 30, 2013.

Page 2 of 7
c. We agree. The campus will provide an adequate area for UPD to store keys when they are not in use. This storage area will be identified by April 30, 2013.

PERSONNEL ADMINISTRATION AND TRAINING

Recommendation 4

We recommend that the campus:

a. Maintain a log to ensure that training requirements are being met.

b. Ensure that qualifications for duty weapons, off-duty weapons, shotguns, and rifles are performed and documented in accordance with CSU and campus policies.

c. Ensure that training for active shooters, use of force, use of Tasers, and dispatchers is performed and documented in accordance with CSU and campus policies.

Campus Response

a. We agree. The campus has developed a training matrix, including a log, to ensure that training requirements are met. This log will be provided to the chancellor’s office by April 30, 2013.

b. We agree. The campus will ensure that qualifications for duty weapons, off-duty weapons, shotguns, and rifles are performed and documented in accordance with CSU and campus policies. Documentation of the new Range Policy and Qualification Schedule will be provided to the chancellor’s office by April 30, 2013.

c. We agree. The campus will ensure that training for active shooters, use of force, use of Tasers, and dispatchers is performed and documented in accordance with CSU and campus policies. The campus has developed a CSU East Bay Police Department Training and Career Development Plan. This document (43 pages) will be provided to the chancellor’s office by April 30, 2013. Documentation of active shooter training participants for the December 1, 2012, course will also be provided to the chancellor’s office by April 30, 2013.

FISCAL ADMINISTRATION

POST REIMBURSEMENTS

Recommendation 5

We recommend that the campus:

a. Develop procedures for requesting and monitoring POST reimbursements.

b. Implement adequate segregation of duties for the POST reimbursement process.

c. Ensure that POST reimbursement requests are submitted in a timely manner.
Campus Response

a. We agree. The campus has developed procedures for requesting and monitoring POST reimbursements. This policy was documented via GO #2012-04, *University Police Department POST Course Reimbursement to Agency*, and will be provided to the chancellor’s office by April 30, 2013.

b. We agree. The campus will implement adequate segregation of duties for the POST reimbursement process. These procedures will be implemented and provided to the chancellor’s office by May 30, 2013.

c. We agree. The campus will ensure that POST reimbursement requests are submitted in a timely manner. This policy was also documented on GO #2012-04, and will be provided to the chancellor’s office by April 30, 2013.

COST RECOVERY

Recommendation 6

We recommend that the campus:

a. Include reimbursement for general police services from Associated Students (AS) in the campus cost recovery plan.

b. Charge AS for costs incurred by UPD while staffing special services and events.

Campus Response

a. We agree. The campus will include reimbursement for general police services from AS in the campus cost recovery plan. AS was inadvertently excluded from the cost recovery model for 2012/13, but has been included for the 2013/14 fiscal year chargeback process. Documentation from the university budget office will be provided to the chancellor’s office by April 30, 2013.

b. We agree. The campus will charge AS for costs incurred by UPD while staffing special services and events. This will be implemented and documented by May 30, 2013.

SPECIAL EVENTS

Recommendation 7

We recommend that the campus ensure that UPD review and approval of staffing needs for special events is documented.

Campus Response

We agree. The campus will ensure that UPD review and approval of staffing needs for special events is documented. The special event tracking program has been assigned to a sergeant, who will participate with university special events scheduling, and formally sign off on all special events planning. Documentation of this process will be provided by May 30, 2013.
MAJOR INCIDENTS AND CRIME REPORTING

Recommendation 8

We recommend that the campus update the campus emergency management plan annually.

Campus Response

We agree. The campus has hired an emergency operations center commander, who is updating the campus emergency management plan. The target date for the update is May 10, 2013.

WEAPONS AND AMMUNITION CONTROLS

WEAPONS POLICIES

Recommendation 9

We recommend that the campus update policies for duty weapon and rifle qualifications, shotgun qualifications and inspections, and weapons inventories.

Campus Response

We agree. The campus has updated policies for duty weapon and rifle qualifications, shotgun qualifications and inspections, and weapons inventories. See the CSU East Bay Police Department Training and Career Development Plan, Position Requirements section, pages 16 to 34. In addition, Chapter 3 of the updated UPD policy manual, Section 312, Firearms, addresses duty weapons and firearms qualifications.

OFF-DUTY AND NON-STANDARD WEAPONS

Recommendation 10

We recommend that the campus:

a. Obtain written presidential authorization for the use of non-standard weapons.

b. Maintain a listing of off-duty weapons.

c. Document inspections of off-duty weapons, shotguns, Tasers, and rifles.

Campus Response

a. We agree. The campus has obtained written presidential authorization for the use of non-standard weapons. This letter of authorization will be provided to the chancellor’s office by April 30, 2013.

b. We agree. The campus will maintain a listing of off-duty weapons. This will be documented and provided to the chancellor’s office by May 30, 2013.
c. We agree. The campus will document inspections of off-duty weapons, shotguns, Tasers, and rifles. This documentation will be provided to the chancellor’s office by May 30, 2013.

RETIREE GUN PERMITS

Recommendation 11

We recommend that the campus:

a. Ensure that the rangemaster is aware of current retiree weapons policies.

b. Document the issuance of CCW endorsements, and track UPD retirees with CCW endorsements to determine whether they meet firearms qualifications required for renewal of the endorsement.

c. Ensure that UPD retirees are aware of current retiree weapons policies.

Campus Response

a. We agree. The campus will ensure that the rangemaster is aware of current retiree weapons policies. The policies will be communicated to the rangemaster and documentation provided to the chancellor’s office by May 10, 2013.

b. We agree. The campus will document the issuance of CCW endorsements, and track UPD retirees with CCW endorsements to determine whether they meet firearms qualifications required for renewal of the endorsement. This will be addressed and documented by May 30, 2013.

c. We agree. The campus will ensure that UPD retirees are aware of current retiree weapons policies. Retiree weapons policies are addressed in GO #2012-03, University Police Department Employee Separation Protocols, dated November 30, 2012. In addition, an annual provisional notification schedule has been established for retiree qualification requirements. Documentation of these will be provided to the chancellor’s office by May 10, 2013.

AMMUNITION

Recommendation 12

We recommend that the campus:

a. Develop and implement policies and procedures for tracking ammunition purchases and inventory.

b. Document and track ammunition distribution.

c. Reconcile the annual ammunition physical inventory count to inventory purchase and distribution records.
Campus Response

a. We agree. The campus will develop and implement policies and procedures for tracking ammunition purchases and inventory. These will be developed and provided to the chancellor’s office by May 10, 2013.

b. We agree. The campus will document and track ammunition distribution. This will be completed and provided to the chancellor’s office by May 10, 2013.

c. We agree. The campus will reconcile the annual ammunition physical inventory count to inventory purchase and distribution records. A physical ammunition inventory was completed on November 15, 2012. An interim physical ammunition inventory and reconciliation, with evidence of ammunition purchase and distribution tracking, is planned for May 30, 2013. Evidence of the reconciliation will be provided to the chancellor’s office by June 30, 2013.
April 17, 2013

MEMORANDUM

TO: Mr. Larry Mandel
    University Auditor

FROM: Timothy P. White
      Chancellor

SUBJECT: Draft Final Report 12-61 on Police Services,
         California State University, East Bay

In response to your memorandum of April 17, 2013, I accept the response as submitted with the draft final report on Police Services, California State University, East Bay.

TPW/amd