

RIVERSIDE: AUDIT & ADVISORY SERVICES

October 26, 2015

To: Mike Lane, Chief
University of California Police Department (UCPD), Riverside

Subject: Internal Audit of Campus Safety and Security

Ref: R2015-11

We have completed our audit of Campus Safety and Security in accordance with the University of California, Riverside Audit Plan. Our report is attached for your review. We will perform audit follow-up procedures in the future to review the status of management action. This follow-up may take the form of a discussion or perhaps a limited review. Audit R2015-11 will remain open until we have evaluated the actions taken.

We appreciate the cooperation and assistance provided by your staff. Should you have any questions concerning the report, please do not hesitate to contact me.

Gregory Moore
Director

cc: Audit Committee Members
Assistant Chief Freese

UNIVERSITY OF CALIFORNIA AT RIVERSIDE
AUDIT & ADVISORY SERVICES
MEMBER OF ASSOCIATION OF COLLEGE & UNIVERSITY AUDITORS

INTERNAL AUDIT REPORT R2015-11
CAMPUS SAFETY AND SECURITY

OCTOBER 2015

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**UC RIVERSIDE
CAMPUS SAFETY AND SECURITY
INTERNAL AUDIT REPORT R2015-11
OCTOBER 2015**

I. MANAGEMENT SUMMARY

Based upon the results of work performed within the scope of the audit, it is our opinion that, overall, the system of internal control over processes to manage campus safety and security is operating satisfactorily and is generally in compliance with University policies and procedures.

Positive observations included:

- * Management has instituted an organizational redesign that puts foremost the safety of students, staff, and faculty. The administrative reorganization includes the consolidation of enterprise risk management functions under a single unit, in order to provide a focused and integrated approach to addressing critical campus preparedness programs and activities.
- * The University of California (UC) has voluntarily adopted the National Fire Protection Association (NFPA) National Standard on Disaster / Emergency Management and Business Continuity Programs (NFPA 1600) which represents a “total program approach” to the challenge of integrating disaster and emergency management with business continuity planning. This collaboratively developed standard has been universally endorsed by the American National Standards Institute, the 9/11 Commission, US Congress, and the federal Department of Homeland Security.
- * UC Riverside (UCR) is successfully operating the Emergency Notification System that builds on existing methods of information distribution and communication and greatly enhances UCR's ability to quickly and reliably communicate with students, staff, and faculty in an emergency.
- * In 2013, the University Task Force on Safety was formed to discuss the campus environment as well as actions that may be taken to enhance campus safety. UCR has implemented the high priority initiatives recommended by the task force, including: night time transportation service that transports students from an on-campus location to apartments around the campus; motor vehicle and bicycle patrols in areas immediately adjacent to campus frequented by students on-foot; and video cameras and appropriate signage in selected open areas on- and off-campus.

We observed some areas that need enhancement to strengthen internal controls and/or effect compliance with University policy:

- 1) The UC Police Department (UCPD) is using a 25 year old radio system that is overdue for complete replacement, as component parts are no longer being manufactured. (Observation III.A.)
- 2) The nature and extent of joint training opportunities and exercises involving UCPD, faculty, staff, and students to develop skills and build/reaffirm relationships may not be adequate. (Observation III.B.)
- 3) Multiple approaches can be taken to promote campus safety and security initiatives. (Observation III.C.)

These items are discussed below. Minor items that were not of a magnitude to warrant inclusion in the report were discussed verbally with management.

II. INTRODUCTION

A. PURPOSE

UCR Audit & Advisory Services (A&AS), as part of its Audit Plan, reviewed management practices and operating procedures to evaluate whether current processes provide effective administrative control over campus safety and security in compliance with University policies and procedures and applicable regulation.

B. BACKGROUND

The federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) was passed in 1990. Since then, colleges and universities have been required to provide annual statistics on crimes that occur on campus, in residence halls, in non-campus buildings and facilities used by faculty, staff, and students, and in nearby public areas. Such data must be reported to the U.S. Department of Education, which hosts a dedicated Web site where users can review crime statistics for higher education institutions. Other requirements under the Act include enacting policies to handle reports of missing students, compiling and reporting fire data, having an emergency response, notification, and testing policy, issuing timely warnings about crimes which pose a serious or ongoing threat, and maintaining a public crime log.

According to an article in The Chronicle of Higher Education¹, there are inconsistencies in how institutions report data and statistical information in published reports contain inaccuracies and are subject to conflicting

¹ In Campus – Crime Reports, There's Little Safety in Numbers, Sara Lipka, The Chronicle of Higher Education, January 30, 2009

interpretations. The author's findings suggest that the objective of the Clery Act's required statistical reports – to keep students safe – may not be fully achieved. The law requires colleges and universities to compile and publish data on campus crimes, diverting limited resources away from their otherwise best use into Clery Act compliance efforts. Time and money spent on meeting disclosure requirements may arguably be better used for training and education, police patrols of campus, and programs to create safer environments.

After the April 2007 shootings at Virginia Tech, renewed attention focused on how colleges and universities manage campus safety and security issues. Beyond long-established programs to protect persons and property, safety and security efforts undertaken by higher education institutions must now also address the possibility of terrorist acts and threats of violence against students, faculty, and administrators in campus as well as in public property accessible from campus. In addition, the perils of natural disasters, cyber attacks, and contagious disease outbreaks have made the challenge of ensuring campus safety and security more complex and all-encompassing.

C. **SCOPE**

Audit procedures were performed to evaluate whether current organizational structure and administrative processes to manage campus public safety and security, including related plans, activities, and equipment, are adequate and appropriate, operating as intended, and effective and efficient.

The scope of the audit was limited to the review of current processes and activities observable during the time of inquiry and focused on the following principal areas:

- Emergency Preparedness and Plans
- Response Coordination and Training
- Prevention and Hazard Mitigation
- Communication Systems and Equipment
- Mental Health Services and Behavioral Intervention

We performed the following procedures:

- Reviewed University policy, procedures, programs, and initiatives;
- Reviewed applicable Federal and State legislation, Homeland Security, law enforcement, and related-subject publications, higher education industry standards, guides, and recommendations;
- Discussed campus law enforcement and safety and security activities with UC Police Department Chief and Assistant Chief, Environmental Health & Safety (EH&S) Director, and selected campus/department personnel;
- Evaluated responses to audit-prepared internal control questionnaire on campus public safety and security;

- Reviewed records, reports, presentations, correspondence, online data, and other materials related to campus safety and security programs and initiatives, including information from the University Task Force on Safety, the Executive Management Policy Group (EMPG) Guide, the Emergency Notification System, UCR Clery Act Annual Security Reports, and Annual Fire Safety Reports.

Review procedures were applied to policy and procedures related to campus safety and security and activities that support prevention, preparedness, and coordinated response. The procedures were not designed to evaluate business continuity planning activities, funding or budgeting issues, and/or compliance with the Clery Act.

D. INTERNAL CONTROLS AND COMPLIANCE

As part of the review, internal controls were examined within the scope of the audit.

Internal control is a process designed to provide reasonable, but not absolute, assurance regarding the achievement of objectives in the following categories:

- * effectiveness and efficiency of operations
- * reliability of financial reporting
- * compliance with applicable laws and regulations

Substantive audit procedures were performed during the period January through May 2015. Accordingly, this evaluation of internal controls is based on our knowledge as of that time and should be read with that understanding.

III. OBSERVATIONS, COMMENTS, AND RECOMMENDATIONS

A. Communications Equipment and Interoperability

UCPD is using a 25 year old radio system that is overdue for complete replacement, as component parts are no longer being manufactured.

COMMENTS

In 2014, UCPD's radio system failed and was down for a two week period, during which a sub-optimal temporary radio system was relied on. In order to restore the system, UCPD's radio vendor had to locate used parts in storage at the Azusa Police Department, as the needed part was out of production.

Interoperable communications is critical to initial response, public health, safety, and security. During crisis situations, one of the most serious problems that may occur is poor communication due to lack of appropriate and efficient means to collect, process and transmit important and timely information. Interoperability

may be hampered by the use of outdated equipment, lack of coordination and cooperation between agencies, or competition for resources, funding, ownership, and control of communications systems.

To achieve interoperability with the Riverside Police Department (RPD) and the campus community, UCPD currently has the ability to “patch” its radio system with the RPD radio system. A radio patch is established when a radio on one system (or frequency) and another on a second system (or frequency) are connected so that what is received on one is retransmitted on the other. However, UCPD's 25 year old radio system may not provide the dependability needed for effective radio patching or interoperability.

UCPD and Computing & Communications (C&C) have developed two options for replacing the campus public safety radio system. The more expensive option (about \$650k) is to join the Riverside County Public Safety Enterprise Communication (PSEC) radio system, while the less expensive option (about \$250k) is to go with a private radio communications solutions provider, Golden State Communications, Inc..

The Riverside County PSEC radio system provides county-wide interoperable communications between public safety and first responder agencies with voice and data traffic on separate networks that allow more efficient voice communication and data exchanges. The PSEC system is Project 25 compliant. Project 25 is a suite of standards for digital radio communications for use by federal, state/province and local public safety agencies in North America to enable them to communicate with other agencies and mutual aid response teams in emergencies.

RECOMMENDATIONS

UCPD should continue to work with campus management to evaluate alternatives and select the best solution to ensure effective and reliable communications equipment and systems.

MANAGEMENT RESPONSE

UCPD will continue to work with Chuck Rowley and his staff to pursue a solution to the radio system that is reliable, effective and within budget. We hope to have a decision made about which solution to proceed with before January, 2016.

B. Coordination and Training

The nature and extent of joint training opportunities and exercises involving UCPD, faculty, staff, and students to develop skills and build/reaffirm relationships may not be adequate.

COMMENT

Joint training and exercises are significant parts in preparing for the possibility of an emergency situation on campus. They offer opportunities to build personal relationships and to develop and strengthen skills together. Learning about campus safety and security, critical incident response, and related subject matter together will reinforce the policy of cooperation and respect between and among UCPD, Emergency Management, campus administration, faculty, students, and staff.

At the time of the audit fieldwork, UCPD had not performed a table top exercise with the EMPG for more than a year. The EMPG is the top-level policy-making body for UCR emergency management operations. UCPD hopes to participate in table top training exercises with the EMPG at least once every year.

UCPD hosts regular training for staff on crisis response and responding to disruptive people. However, training for students is limited to annual orientation with new and transfer students. In addition, UCPD conducts annual active shooter training with UCPD officers, student Community Service Officers (CSOs) and allied agencies, but the broader campus community has not yet been participating in these drills.

RECOMMENDATIONS

Management should increase the frequency and enhance the quality of joint training exercises and drills involving UCPD, students, faculty, and staff to develop skills, build relationships, encourage cooperation, and promote unity.

MANAGEMENT RESPONSE

On September 21, 2015, we conducted a EMPG training session to provide orientation on the new Enterprise Risk Management (ERM) team, made up of UCPD, Risk Management, EH&S, and Emergency Management. We will continue to partner with the ERM team to pursue the increased frequency of joint training with the EMPG. We now have two Crime Prevention Officers which will allow us to increase the frequency and quality of emergency response training with students, faculty and staff.

C. **Promoting Campus Safety and Security Initiatives**

Multiple approaches can be taken to promote campus safety and security initiatives.

COMMENTS

Students, parents, faculty, and staff need more than statistical reports from which to obtain a sense of safety, security, and well-being on campus. Beyond reporting

and statistics, the value of campus safety and security programs and activities can be advocated in various ways.

RECOMMENDATIONS

UCPD Chief and campus directors responsible for public safety and security should have direct access to senior management. A direct reporting relationship is not necessary, but ongoing, face-to-face contact between and among Senior Management Group (SMG) members, organization heads, campus police, and safety and security professionals should be commonplace. Events of this type are essential to fostering open communications, a sense of community, and a culture of peace and order, safety, and security.

In March 2013, the Obama administration authorized the formation of the National Center for Campus Public Safety (NCCPS) whose mission is “to bring together all forms of campus public safety, professional associations, advocacy organizations, community leaders, and others to improve and expand services to those who are charged with providing a safe environment on the campuses of the nation's colleges and universities.” NCCPS’s main goals include developing key partnerships with professional associations, advocacy and nonprofit organizations, and government programs to enhance and centralize information and resources that are beneficial to the public safety community. One such professional association is the International Association of Campus Law Enforcement Administrators (IACLEA), the leading authority for the campus public safety community. The IACLEA advances public safety for educational institutions by providing educational resources, advocacy, and professional development services. A representative of the IACLEA is a member of the NCCPS advisory board, which helps shape the national agenda and priorities for the NCCPS. Several UC campuses (UCB, UCI, UCM, UCLA, UCSB, UCSD, and UCSF) are members of the IACLEA. UCR should consider membership in the IACLEA.

MANAGEMENT RESPONSE

UCPD – Riverside will continue to analyze the potential return on investment of pursuing IACLEA accreditation. A significant hurdle that would have to be jumped to pursue IACLEA accreditation is the need for additional command staff level resources to dedicate to such a time and resource consuming process.