



## Campus Fire & Life Safety

*Internal Audit Report No. I2024-106*

July 5, 2024

***Prepared By***

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***Approved By***

Mike Bathke, Director

July 5, 2024

**JOHN STERRITT  
EXECUTIVE DIRECTOR  
ENVIRONMENTAL HEALTH & SAFETY**

**RE: Fire & Life Safety Audit  
Report No. I2024-106**

Internal Audit Services performed a limited review of fire and life safety practices and processes at the American Campus Communities, University Student Housing, and select main campus buildings and the final report is attached.

We extend our gratitude and appreciation to all personnel with whom we had contact while conducting our review. If you have any questions, please do not hesitate to contact me.

Sincerely,



Mike Bathke  
Director

Attachment

C: Audit Committee

Eric Gardner, Campus Assistant Fire Marshal – Environmental Health & Safety  
Joe Rizkallah, Assistant Director of Fire & Life Safety – Environmental Health & Safety  
Dale Saunders, Lead Campus Fire Marshal – Environmental Health & Safety

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## I. MANAGEMENT SUMMARY

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In accordance with the fiscal year (FY) 2023-2024 audit plan, Internal Audit Services (IAS) performed a limited review of the UCI Environmental Health & Safety's (EH&S) fire and life safety services unit's internal controls and business practices to determine their compliance with the Office of the State Fire Marshal Memorandum of Understanding Title 19 Inspection Program (Title 19) requirements as well as the sales and services agreements with four American Campus Communities (ACC) and ensured proper, accurate, and timely reporting inspection documentation. The review identified that internal controls, monitoring, and oversight were inadequate in minimizing business risks, promoting best business practices, and ensuring compliance with campus requirements. IAS notes the following observations.

**American Campus Communities (ACC)** – Fire extinguishers inspections were not performed and/or documented as required by Title 19. IAS notes that fire extinguishers in three buildings were not inventoried for inspections. Fire sprinkler systems were inspected annually but not every quarter as required. An annual building inspection was not performed and documented for eight of the ten buildings selected for review. In addition, IAS notes exceptions in the reporting and delivery of the deficiency reports issued to ACC. These observations are further discussed in section V.1.

**Main Campus Facilities** – Fire extinguisher inspections were not performed and documented as required. Fire sprinkler systems were inspected annually but not every quarter as required. In addition, IAS notes exceptions in the fire alarm and sprinkler system inspection report documentation and management review. These observations are detailed in section V.2.

**University Student Housing (Housing)** – There is no oversight to ensure that proper fire extinguisher inspections are conducted and in a timely manner as required by Title 19 or that the 5-year sprinkler certification report is reviewed as required. The Title 19 Memorandum of Understanding (MOU) between EH&S and Housing is not reviewed and/or updated in a timely manner. The MOU IAS reviewed was last signed in 2013. These observations are noted in section V.3.

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## II. BACKGROUND

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The Fire and Life Safety (FLS) Services Unit is essential in protecting the campus community from injuries, business interruptions, and property damage resulting from fires and related perils. The Unit's purpose is to ensure reasonable and consistent protection for persons and property in or on UCI properties. The FLS staff provides code enforcement through inspections and testing as well as active dialogue with campus personnel, local, and state fire agencies. The staff perform routine inspections and testing of existing fire protection systems (including but not limited

to fire alarms, sprinkler systems, etc.) to ensure they are operational and in compliance with local fire codes and state regulatory Title 19 requirements.

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### III. PURPOSE, SCOPE, AND OBJECTIVES

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The purpose of this audit was to review the currently established FLS Services Unit's practices and processes as well as the management review, monitoring, and oversight of the fire and life safety systems. The scope included a focused review and sample testing of fire extinguishers, fire alarm systems, sprinkler systems, and building inspections and testing in calendar year 2023.

For testing purposes, IAS included the following objectives:

1. Determine if the internal controls and business practices of the FLS Services Unit regarding fire and life safety systems at ACC are sufficient and efficient to ensure proper and timely inspections and/or testing as well as proper, accurate, and timely documentation and reporting as required and in compliance with the Title 19 inspection program and as stated in the sales and services agreements;
2. Determine if the internal controls and business practices of the FLS Services Unit regarding fire and life safety systems at the main campus are sufficient and efficient to ensure proper and timely inspections and/or testing as well as proper, accurate, and timely documentation and reporting as required and in compliance with the Title 19 inspection program; and
3. Determine if the internal controls and business practices of the FLS Services Unit regarding fire and life safety systems at Housing are sufficient and efficient to ensure proper and timely inspections and/or testing as well as proper, accurate, and timely documentation and reporting as required and in compliance with the Title 19 inspection program as detailed in the MOU between EH&S and Housing.

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### IV. CONCLUSION

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IAS identified some deficiencies within the FLS Services Unit processes, particularly in ensuring proper, accurate, and timely inspections, documentation, and reporting. Furthermore, inadequacies were noted in the monitoring and oversight aspects, raising concerns about the unit's capability to guarantee compliance with both State regulations and the terms specified in sales and service agreements.

IAS discussed observation details with management, who formulated action plans to address the issues. The details are presented below.

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**V. OBSERVATIONS AND MANAGEMENT ACTION PLANS**

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**1. American Campus Communities (ACC)****Background**

Title 19 California Code of Regulations (CCR) § 574.1 states, “Fire extinguishers shall be manually inspected when initially placed in service. Thereafter extinguishers shall be manually inspected at least monthly by the building owner, occupant, or his/her authorized agent or electronically monitored. Fire extinguishers shall be inspected at more frequent intervals when circumstances require as determined by the Authority Having Jurisdiction.”<sup>1</sup> However, the sales and services agreement between EH&S and American Campus Communities (ACC), states that “EH&S will conduct quarterly fire extinguisher inspections as required by State Fire Marshal Regulations.”

Title 19 CCR § 904 – 904.2 states that “water-based fire protection systems shall be inspected, tested, and maintained” by a licensed contractor in accordance with NFPA 25 (2011 edition) including Annexes A, B, C, D, and G as amended by the State of California (published as NFPA 25, 2013 California Edition).<sup>2</sup> According to the Automatic Extinguishing Systems (AES) report form that originates from the State of California State Fire Marshal’s office, the frequency of inspections is quarterly and/or annually.

Through the MOU for the Designated Campus Fire Marshal (DCFM) Program between the California Department of Forestry and Fire Protection – Office of the State Fire Marshal (OSFM) and The Regents of the University of California (Regents), the OSFM grants authority to oversee compliance with fire and life safety regulations to the Lead DCFM (LDCFM) at all UC campuses. This includes supervising individual DCFMs and handling responsibilities related to Title 19 and Title 24 regulations. Additionally, the LDCFM is tasked with ensuring compliance with State requirements for annual fire alarm and building inspections.

The sales and services agreements between EH&S and ACC state that EH&S will:

- conduct quarterly fire extinguisher inspections as required by State Fire Marshal Regulations,
- perform fire sprinkler testing and inspections per NFPA 25 requirements,
- review the 5-year sprinkler certification report to verify NFPA Standards are met,

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<sup>1</sup> Title 19 CCR, § 574.1. Retrieved from [govt.westlaw.com/calregs/Document/I100C1B3D5BE511EC98C8000D3A7C4BC3?originationContext=document&transitionType=StatuteNavigator&nedToInjectTerms=False&viewType=FullText&ppcid=c6a687dc791b4cc2845f4ea1852c772d&contextData=%28sc.Default%29](http://govt.westlaw.com/calregs/Document/I100C1B3D5BE511EC98C8000D3A7C4BC3?originationContext=document&transitionType=StatuteNavigator&nedToInjectTerms=False&viewType=FullText&ppcid=c6a687dc791b4cc2845f4ea1852c772d&contextData=%28sc.Default%29)

<sup>2</sup> Title 19 CCR, § 904-904.2. Retrieved from [govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I15F181725BE511EC98C8000D3A7C4BC3&transitionType=Default&contextData=%28sc.Default%29#I15F9BED45BE511EC98C8000D3A7C4BC3](http://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I15F181725BE511EC98C8000D3A7C4BC3&transitionType=Default&contextData=%28sc.Default%29#I15F9BED45BE511EC98C8000D3A7C4BC3)

- conduct annual building inspections of the common areas per Title 19 requirements, and
- review reports of monthly rooms inspections conducted by ACC.

### Observation

IAS selected ten buildings in four ACC communities for further review to determine if inspections and/or testing were conducted as required and properly documented in 2023. The following is a summary of the observations.

#### Fire Extinguishers:

- Title 19 CCR § 574.1 states that fire extinguishers shall be manually inspected at least monthly and the sales and services agreements between EH&S and ACC state that “EH&S will conduct quarterly fire extinguisher inspections as required by State Fire Marshal Regulations.” The review revealed a misalignment between the regulatory requirement and the terms outlined in the agreements. EH&S fire extinguisher inspection reports documented that inspections were performed quarterly in accordance with the agreements.
- In October 2023, IAS requested all 2023 fire extinguisher inspection reports for the nine out of ten buildings equipped with fire extinguishers. However, IAS received only 19 reports from the nine buildings, covering the period from January through September 2023. IAS notes that to comply with Title 19 requirements, a total of 81 monthly fire extinguisher inspections should have been performed and documented during this period. Furthermore, it should also be noted that to fulfill the terms outlined in the sales and service agreements, a total of 27 quarterly fire extinguisher inspections should have been conducted and documented.
- The inspector did not certify seven of the 19 reports with signatures or dates.
- Although all fire extinguisher inspections were performed quarterly as per the agreements, only one report was appropriately titled and filed as a quarterly report.
- No fire extinguishers were inventoried in three buildings.
- There is no oversight by the LDCFM to ensure that fire extinguishers inspections are performed properly and timely in accordance with Title 19 requirements.

Fire Sprinkler, Fire Alarm, and Building Inspections:

The fire sprinkler, fire alarm, and building inspections are documented onto one report.

- Title 19 CCR § 904 requires inspections and testing of fire sprinkler systems as required by NFPA 25. The sales and service agreements between EH&S and ACC state that EH&S will perform fire sprinkler testing and inspections per NFPA 25 requirements. However, fire sprinkler systems are inspected only once during the annual testing and not every quarter as noted on the AES form.
- The fire sprinkler system inspection for one building was not conducted in a timely manner, as required annually. The inspection, which took place on November 7, 2023, occurred approximately 21 months after the last inspection conducted on February 10, 2022. Additionally, there is a discrepancy in the timing of the deficiency report issuance. The report, which compiles all violations and exceptions identified during the EH&S inspection and testing, was issued to ACC in March 2023, even though the inspection itself was not completed until November 2023.
- For eight of the ten buildings selected for review, an annual building inspection was not performed and documented.
- EH&S did not document its reviews of the 5-year sprinkler certification report to verify compliance with NFPA standards. Consequently, IAS was unable to confirm that EH&S provided the necessary oversight of 5-year certification testing, inspection, and repairs conducted by external contractors in accordance with the agreement.
- The sprinkler technician is not identified on the report and did not certify all ten inspection reports with signatures and dates.
- The building inspectors did not date their attestations on two reports.
- EH&S did not document its reviews of the ACC monthly rooms inspection reports. Therefore, IAS could not confirm that EH&S reviews were properly or timely performed.
- There appears to be a lack of management review or oversight by the LDCFM to ensure the proper and timely performance of fire sprinkler systems and building inspections, as required.

Inspection Reporting to ACC:

Where all inspection reports for Main Campus Facilities and Housing are emailed, the Campus Assistant Fire Marshal explained that they hand-delivered their reports to the ACC maintenance managers. Therefore, due to the absence of

documentation regarding the delivery of reports, IAS was unable to verify whether building inspection reports were provided to ACC management as stipulated by the agreements.

Also, inspection failures noted on six inspection reports were not documented on the deficiency reports issued to ACC.

Furthermore, IAS observed that the sales and services agreement specified that EH&S shall provide ACC management with quarterly reports pertaining to fire alarm and fire sprinkler testing and inspection. However, the agreements do not stipulate the provision of fire extinguisher inspection or building inspection reports.

Implementation of appropriate oversight, monitoring, and tracking, by the LDCFM as noted in the MOU between OSFM and the Regents, would promote timely, consistent, and efficient inspections, testing, and reporting to ensure compliance with state and contractual requirements as well as consistent record keeping practices.

### **Management Action Plans**

*Please see Appendix A at the end of this report for detailed implementation steps.*

#### **MAP 1: Review Monthly Fire Extinguisher Inspection Reports to ensure compliance with Title 19 requirements.**

The Campus Assistant Fire Marshal (CAFM) will review fire extinguishers inspection reports to ensure compliance with Title 19 requirements. Any exceptions noted during the review will be documented and provided to ACC management promptly for proper and timely follow up. These reports will also be sent to the LDCFM and Assistant Director of Fire & Life Safety to ensure accuracy. The CAFM will implement quality control measures to ensure reports are properly documented in a timely manner. Additionally, the CAFM will transition reporting from quarterly to monthly, collaborate on software updates, and manage a biannual review of the fire extinguisher inventory.

#### **Due date: September 30, 2024**

#### **MAP 2: Management of Fire Sprinkler, Fire Alarm, and Building Inspections within ACC**

The CAFM will develop and implement a comprehensive set of procedures to ensure the efficient management of the Fire Sprinkler, Fire Alarm, and Building inspections and reports. These procedures will cover various aspects, including review of monthly room inspections, documenting reports without findings, retaining inspection reports for three years, verifying and recording inspections, and reviewing compliance with inspection schedules. The CAFM will also oversee the development of annual inspection schedules and will communicate any

exceptions or delays to the LDCFM and Assistant Director of Fire & Life Safety for their review and to ACC management. Additionally, the CAFM will establish procedures for reviewing completed reports to ensure accuracy and proper documentation, and electronic distribution of quarterly reports to ACC management, while also maintaining records for a three-year period. Furthermore, the CAFM will coordinate with ACC management and ACC Facilities Management to address any delayed or rescheduled inspections, ensuring timely communications and documentation of such changes.

The CAFM is responsible for managing the process of 5-year certification obligations. This includes developing and submitting quarterly scorecards outlining all such obligations to the LDCFM, the Assistant Director of Fire & Life Safety, and ACC management. Additionally, the CAFM will review all ACC documentation pertaining to 5-year certification, compiling comprehensive scorecards quarterly that detail inspection completion and any compliance concerns. Concurrently, the CAFM will also maintain a record of reports provided by ACC Facilities Management regarding necessary actions related to 5-year certifications. This will ensure a continuous exchange of information to guarantee that all buildings under their jurisdiction will remain compliant and up to date with certification requirements.

Additionally, the LDCFM and Assistant Director of FLS will provide oversight of these processes by documenting their review of all quarterly inspection reports to ensure that all inspections were conducted properly, timely, and were documented.

**Due date: September 30, 2024**

#### **MAP 3: Inspection Reporting to ACC**

The CAFM will establish and put into action a procedure to guarantee that reports for fire sprinkler, fire alarm, and building inspections for ACC are either emailed or recorded, with hard copies retained for an audit trail. Additionally, the CAFM will submit quarterly reports to the LDCFM and Assistant Director of Fire & Life Safety Services to ensure the accuracy of ACC quarterly reports in accordance with the MOU. Furthermore, the CAFM will develop protocols to ensure that any inspection failures are promptly communicated to ACC management and the Assistant Director of Fire & Life Safety. Moreover, the CAFM will oversee that building inspections and fire extinguisher reports are emailed, recorded, and delivered to ACC management as outlined in the MOU requirements.

As part of these responsibilities, the CAFM will also document the delivery of quarterly reports concerning fire sprinkler, fire alarm, building inspections, and/or fire extinguisher inspections to ACC management.

**Due date: September 30, 2024**

## 2. Main Campus Facilities

### Background

The MOU for the DCFM Program between OSFM and The Regents delegates responsibility for compliance with fire and life safety regulations to the LDCFM at all UC campuses.

The DCFM program operational procedures mandate inspections for existing facilities, commonly referred to as Title 19 inspections. According to these procedures, the LDCFM or their designees are responsible for inspecting buildings, structures, and facilities. This includes specific state-mandated occupancy types, such as residential occupancies (dormitories), high-rise structures (buildings higher than six stories), and institutional occupancies (detention facilities, holding cells), which require annual inspections. The LDCFM or their designees are also tasked with inspecting specific components, including but not limited to fire protection systems (fire sprinkler systems, fire alarm systems, standpipe systems, etc.), fire extinguishers, and more.

Title 19 California Code of Regulations (CCR) § 574.1 states, “Fire extinguishers shall be manually inspected when initially placed in service. Thereafter extinguishers shall be manually inspected at least monthly by the building owner, occupant, or his/her authorized agent or electronically monitored. Fire extinguishers shall be inspected at more frequent intervals when circumstances require as determined by the Authority Having Jurisdiction.”

Title 19 CCR § 904 – 904.2 states that “water-based fire protection systems shall be inspected, tested, and maintained” by a licensed contractor in accordance with NFPA 25 (2011 edition) including Annexes A, B, C, D, and G as amended by the State of California (published as NFPA 25, 2013 California Edition). According to the Automatic Extinguishing Systems (AES) report form that originates from the OSFM’s office, the frequency of inspections is quarterly and/or annually.

In addition, State requirements also call for annual fire alarm and building inspections.

### Observation

In the context of this review and particularly in this section, high-rise structures and institutional occupancies were specifically chosen for further review to assess whether mandated inspections and testing were conducted, along with the adequacy of documentation. IAS conducted a thorough 100% review of high-rise and institutionally occupied structures, aligning with the identification provided by the ACFM for these specific types of buildings. Three structures were identified for this review. The third state-mandated occupancy type, residential occupancies, is covered separately under *Section V.1 American Campus Communities (ACC)* and *Section V.3 University Student Housing (Housing)*. The

following is a summary of the observations for high-rise and institutional occupancies.

#### Fire Extinguishers:

Mobile Fire Extinguisher Inc., a third-party vendor, was contracted to perform monthly fire extinguisher inspections of main campus facilities in 2023. Monthly fire extinguisher inspections performed in each building were documented and the monthly reports were provided to the CAFM. IAS reviewed the monthly fire extinguisher inspection reports for March, July, and October 2023 and note the following:

- The fire extinguisher inspections in one of the three state-mandated occupancy buildings were not performed and documented.
- In a second building, fire extinguishers in 76 rooms were not inspected in March 2023 because the rooms were locked or inaccessible; fire extinguishers in seven rooms were not inspected in July 2023 because there was no access to the 10th floor; and fire extinguishers in 11 rooms were not inspected in October 2023 because there was no access to the 10th floor or the fire extinguisher was removed from the classroom. IAS noted that there is no documentation of later attempts to inspect the fire extinguishers.
- In the third building, fire extinguishers in one room were not inspected in March 2023 because the room was locked or inaccessible.
- IAS was unable to determine the total number of uninspected fire extinguishers. The lack of documentation by Mobile, specifically the absence of recorded numbers of fire extinguishers in each room, and the absence of an independent inventory of fire extinguishers by EH&S, contributed to the inability to determine the comprehensive count of uninspected fire extinguishers.
- IAS also reviewed each non-state mandated building documented on the monthly fire extinguisher inspections reports and identified that fire extinguisher inspections in 24 buildings were not documented.

#### Fire Sprinkler Systems:

- Title 19 CCR § 904 requires quarterly inspections and annual testing of fire sprinkler systems as required by NFPA 25. However, IAS's review found that inspections were performed once a year during the annual testing but not quarterly as required in one of the three state-mandated occupancy types that require quarterly inspections. Two of the three state-mandated occupancy type buildings on campus do not have a sprinkler system.

- EH&S did not document its reviews of the 5-year sprinkler certification report to verify that NFPA standards are met. Therefore, IAS could not verify that EH&S reviews were properly or timely performed.
- The inspection dates are not documented on the fire sprinkler system inspection reports.
- The inspectors did not certify two of the fire sprinkler system inspection reports with their signatures or dates.

#### Fire Alarms:

- The inspection dates are not documented on the fire alarm inspection reports.
- The inspectors did not certify two fire alarm inspection reports with their signatures and/or dates.

Implementation of effective oversight, monitoring, and tracking, by the LDCFM as noted in the MOU between OSFM and the Regents, such as timely reviews when required, as well as proper documentation, would promote the timely, consistent, and efficient execution of inspections, testing, and reporting. This approach would ensure compliance with state requirements, develop consistent record-keeping practices, and verify that vendors fulfill their contractual obligations effectively.

### **Management Action Plans**

#### MAP 4: Management of Fire Extinguisher Compliance within Main Campus Facilities

The CAFM will review fire extinguisher inspection reports submitted by the contractor to ensure that all inspections were conducted promptly, properly documented, and include appropriate signatures and dates. Any discrepancies found during this review will be documented for follow-up action. EH&S FLS staff will conduct a separate review to confirm whether fire extinguisher inventories and Campus building information listed in the inspection reports are accurate and current. Any discrepancies identified will be communicated to the contractor for correction.

EH&S FLS staff will also conduct spot-checks on fire extinguisher tags during annual fire and life safety building inspections to verify that the Campus contractor is fulfilling their inspection obligations. These spot-checks will be electronically recorded.

Additionally, the LDCFM and Assistant Director of Fire & Life Safety will provide oversight by reviewing quarterly inspection reports to ensure that all inspections were conducted properly, in a timely manner, and adequately documented. This oversight will be documented for accountability.

**Due date: September 30, 2024****MAP 5: Management of Fire Sprinkler Systems within Main Campus Facilities**

The CAFM will establish and implement procedures to ensure thorough documentation of fire sprinkler inspection reports without findings and to verify completion, maintaining corresponding records. They will develop and implement protocols for fire sprinkler inspection reports, ensuring they are emailed, recorded, or retained as hard copies for audit trail purposes.

The LDCFM and Assistant Director of Fire & Life Safety will conduct quarterly reviews to ensure compliance with fire code requirements for record maintenance. Quarterly reports will be submitted by the CAFM to the LDCFM and Assistant Director of Fire & Life Safety for review and verification of inspection report accuracy and completeness according to the published schedule.

Furthermore, the CAFM will verify and document the presence of dates and signatures on all reports and will implement a quality control procedure to ensure inclusion of all necessary information in submitted reports. Quarterly reviews by the Assistant Director of Fire & Life Safety and LDCFM will confirm proper submission of required reports to Campus leadership.

Additionally, the CAFM will examine all documentation pertaining to 5-year certification and document their review to verify that NFPA standards were met.

**Due date: September 30, 2024****MAP 6: Management of Fire Alarm Systems within Main Campus Facilities**

The Campus Assistant Fire Marshal (CAFM) will develop and implement procedures to manage various aspects of fire alarm system inspections. Firstly, they will oversee the review of scheduled inspections that cannot be conducted at the required frequency due to unavoidable circumstances. The Assistant Director of Fire & Life Safety and the Lead Designated Campus Fire Marshal (LDCFM) will be involved in this review, and any delayed inspections will be documented.

Secondly, the CAFM will supervise the handling of virtual print (PDF) reports generated from the handheld devices utilized by the FLS staff once they are uploaded into the database. The CAFM will ensure that these reports are signed and filed as PDF copies, as field operation signatures are not captured by the reporting software, necessitating duplication in the office.

Lastly, the CAFM will submit quarterly reports to the LDCFM and Assistant Director of Fire & Life Safety for review and verification. These reports will be scrutinized to ensure the accuracy and completeness of inspection reports, aligning with the published inspection schedule.

**Due date: September 30, 2024**

### **3. University Student Housing (Housing)**

#### **Background**

As noted in *Section V.2 Main Campus Facilities - Background*, the LDCFM or their designees are responsible for inspections of fire protection systems (such as fire sprinkler systems, fire alarm systems, standpipe systems) and fire extinguishers for state-mandated facilities including residential occupancies.

Additionally, as noted in *Section V.2 Main Campus Facilities* regarding Title 19 fire extinguisher requirements, it is stated that fire extinguishers should be manually inspected at least monthly.

The current Title 19 MOU between EH&S and Housing, effective August 1, 2013, states that EH&S will:

- conduct fire alarm testing and inspections per NFPA 72 and 80 requirements and provide Housing with inspection reports every quarter;
- perform fire sprinkler testing and inspections per NFPA 25 requirements and provide Housing with inspection reports every quarter;
- provide oversight of 5-year certification testing, inspection, and repairs performed by outside contractors; and
- conduct annual building inspections per Title 19 requirements.

#### **Observation**

There is a lack of oversight to guarantee proper and timely fire extinguisher inspections as required by Title 19. The Assistant Fire Marshal explained that the absence of a business practice to track and monitor fire extinguisher inspections is because Housing, rather than EH&S, contracted with a vendor for these inspections. Although IAS confirmed that EH&S does check tags during annual building inspections to ensure extinguishers are up to date and documents any exceptions for follow-up, it is important to note that EH&S does not maintain an inventory of fire extinguishers. And because these spaces are considered campus properties, per the MOU between OSFM and the Regents, EH&S would still be responsible for verifying compliance with inspections.

EH&S did not document its reviews of the 5-year sprinkler certification report to verify that NFPA standards are being met. Consequently, IAS could not verify EH&S's oversight of 5-year certification review in accordance with the agreement.

The existing Title 19 MOU between EH&S and Housing was last signed in 2013. Notably, the agreement lacks specific terms outlining EH&S's responsibility for overseeing fire extinguisher inspections. As part of campus properties, EH&S is still responsible for verifying compliance with inspections whether or not they were outlined in the MOU between EH&S and Housing. IAS recommends an annual review of this agreement and suggests updating the terms when necessary.

Implementation of effective oversight, monitoring, and tracking, by the LDCFM as noted in the MOU between OSFM and the Regents, such as timely reviews when required, as well as proper documentation, would promote the timely, consistent, and efficient execution of inspections, testing, and reporting. This approach would ensure compliance with state requirements, develop consistent record-keeping practices, and verify that vendors fulfill their contractual obligations effectively.

### **Management Action Plan**

#### **MAP 7: Conduct Quarterly Reviews of Fire Extinguisher Inspections as Required by Code**

The CAFM will review monthly fire extinguisher inspection records and provide quarterly reports to housing management, confirming that required inspections are conducted. Additionally, they will submit quarterly reports to the LDCFM and Assistant Director of Fire & Life Safety, ensuring accuracy and submission of the housing quarterly reports.

EH&S FLS staff will conduct spot-checks during annual building inspections to verify the housing vendor's compliance with fire extinguisher inspection requirements and maintaining electronic records. They should perform a review to determine whether the fire extinguishers and buildings inventoried in the inspection reports are accurate and current. Any exceptions noted during the review will be forwarded to the contractor for update.

Moreover, the CAFM will develop and implement oversight systems to ensure compliance with 5-year sprinkler certifications. They also will establish procedures to ensure proper documentation of fire sprinkler inspection reports, maintain an audit trail, and verify the presence of dates and signatures on all reports.

The Assistant Director of Fire & Life Safety will collaborate with Student Affairs leadership to update the MOU with Campus Housing by July 31, 2024. EH&S FLS will initiate an update cycle of the MOU with Campus Housing every five years from the 2024 updated signature date (anticipated by July 31, 2024).

**Due date: September 30, 2024**

**Appendix A:**

In response to the management action plans (MAPs), EH&S management has furnished a detailed checklist delineating the steps they will take to execute their MAPs effectively. IAS will employ this checklist as a tool to monitor the implementation and completing of the MAPs.

<b>American Campus Communities (ACC)</b>		
<b>Fire Extinguishers</b>		
	<b>MCA 1: Conduct quarterly reviews of required fire extinguisher inspections as required by the MOU with ACC</b>	
		MCA 1.1.1 and 1.2.1: The Assistant Fire Marshal will review monthly fire extinguisher inspection records and submit quarterly reports to ACC management that the required Fire Extinguisher inspections are being conducted.
		MCA 1.1.2 and 1.7.1: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review and verify that the ACC quarterly reports are accurate and submitted per the MOU.
		MCA 1.1.3: EHS Fire and Life staff Safety will spot-check tags during the annual fire and life safety building inspections to ensure ACC's vendor is conducting the required fire extinguishers inspections. Records will reflect this action and be kept electronically.
		MCA 1.3.2: The Assistant Fire Marshal will develop and implement a quality control procedure to verify and document that all required information (e.g., dates, signatures, etc.) is included in submitted reports.
		MCA 1.4.1: The Assistant Fire Marshal will develop and implement a new report template that will update the reports from quarterly to monthly. The Assistant Director of Fire and Life Safety will contact the software vendor to have the software/reports changed to monthly from quarterly. The Assistant Fire Marshal will manually change the report from quarterly to monthly until the software vendor updates the software.
		MCA 1.5.1 and 1.6.1: The Assistant Fire Marshal will work with ACC management to publish a complete inventory of fire extinguishers for all ACC locations. The Assistant Fire Marshal will review and verify the inventory biannually. This allows us to ensure that each Fire Extinguisher is looked at quarterly per the Annual service agreement. Reports can be reviewed as requested.
		MCA 1.6.2: The Assistant Fire Marshal will verify quarterly that ACC fire extinguishers have been inspected through the ACC facility management through a verification email or other recordable method. A quarterly ACC Fire Extinguisher inspection scorecard will be drafted and submitted to the LDCFM and Assistant Director of Fire and Life Safety.
<b>Fire Sprinkler, Fire Alarm, and Building Inspections</b>		
	<b>MCA 2: Management of Fire Sprinkler, Fire Alarm, and Building Inspection within ACC</b>	
		MCA 2.1.1: The Assistant Fire Marshal will develop and implement a procedure to ensure that Fire Sprinkler, Fire Alarm, and Building Inspection reports without findings are documented to certify that they were conducted.

		MCA 2.1.2: The Assistant Fire Marshal will develop and implement a procedure to ensure that all Fire Sprinkler, Fire Alarm, and Building inspection reports are emailed or recorded or hard copies are kept for three years.
		MCA 2.1.3: The Assistant Fire Marshal will verify and record the Fire Sprinkler, Fire Alarm, and Building Inspection inspections and keep the records. The LDCFM and Assistant Director of Fire and Life Safety will review all Fire Sprinkler, Fire Alarm, and Building Inspection reports quarterly to ensure the required documents are maintained according to MOU requirements.
		MCA 2.2.1 and 2.3.1: The Assistant Fire Marshal will develop and publish annual Fire Sprinkler, Fire Alarm, and Building Inspection schedules and verify exceptions with the Assistant Director of Fire and Life Safety.
		MCA 2.2.2: The Assistant Fire Marshal will develop and implement a procedure to ensure that scheduled Fire Sprinkler, Fire Alarm, and Building Inspections that do not meet the regulatory required inspection frequency for un-avoidable reasons will be reviewed by the Assistant Director of Fire and Life Safety and LDCFM, and the delayed inspection will be communicated to ACC management.
		MCA 2.4.1: The Assistant Fire Marshal will develop and submit a quarterly scorecard outlining all 5-year certification obligations to the LDCFM and the Assistant Director of Fire and Life Safety and ACC management. The Assistant Fire Marshal will review all ACC documentation related to 5-year certification and complete the scorecard outlining inspection completion and compliance concerns.
		MCA 2.4.2: The Assistant Fire Marshal will record and recommend actions based on reports supplied by ACC Facilities Management related to required 5-year certifications. This will be an ongoing information exchange to ensure that their buildings are up to date.
		MCA 2.5.2: The Assistant Fire Marshal will develop and implement a procedure for reviewing Fire Sprinkler, Fire Alarm, and Building Inspection reports upon completion to ensure they are correctly completed and signed.
		MCA 2.5.3: The Assistant Fire Marshal will develop a procedure for keeping all applicable Fire Sprinkler, Fire Alarm, and Building Inspection records for three years.
		MCA 2.6.1: The Assistant Fire Marshal will develop a procedure to ensure that EHS Fire and Life Safety staff will transfer the PDA reports uploaded as a PDF and ensure that time, date, and signature are part of the reports.
		MCA 2.7.1: The Assistant Fire Marshal will develop and implement a procedure to email copies of the Fire Sprinkler, Fire Alarm, and Building Inspection reports to ACC Management for record-keeping purposes. The LDCFM and Assistant Director of Fire and Life Safety will review reports quarterly to ensure the required reports are being submitted to ACC management per MOU requirements.
		MCA 2.7.2: The Assistant Fire Marshal will develop a procedure to ensure that Fire Sprinkler, Fire Alarm, and Building Inspection reports are emailed or recorded and that hard copies are kept, providing an audit trail.
		MCA 2.7.3: The Assistant Fire Marshal will develop and implement a procedure to verify and record the inspections and keep the records for three years.

		MCA 2.8.1: The Assistant Fire Marshal will develop and implement a procedure to ensure that scheduled Fire Sprinkler, Fire Alarm, and Building inspections that do not meet the regulatory required inspection frequency for un-avoidable reasons will be reviewed by the Assistant Director of Fire and Life Safety and LDCFM, and the delayed inspection will be communicated to ACC management.
		MCA 2.8.2: The Assistant Fire Marshal will develop and implement a procedure to ensure that if the Fire Sprinkler, Fire Alarm, and Building Inspection are delayed/rescheduled, they will be communicated to all parties via email and documented in footnotes on reports.
<b>Inspection Reporting to ACC</b>		
	<b>MCA 3: Inspection Reporting to ACC</b>	
		MCA 3.1.1: The Assistant Fire Marshal will develop and implement a procedure to ensure that Fire Sprinkler, Fire Alarm, and Building Inspection reports will be emailed or recorded, and hard copies will be kept, providing an audit trail.
		MCA 3.1.2: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review/verify that ACC quarterly reports are accurate and submitted per the MOU.
		MCA 3.2.1: The Assistant Fire Marshal will develop and implement a procedure to ensure Inspection failures are communicated to ACC management and the Assistant Director of Fire and Life Safety.
		MCA 3.3: The Assistant Fire Marshal will develop a procedure to ensure that building inspections and fire extinguisher reports will be emailed, recorded, and delivered to ACC management per the MOU requirements.
		MCA 3.4: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review/verify that ACC quarterly reports are accurate and submitted per the MOU.
<b>Main Campus Facilities</b>		
<b>Fire Extinguishers</b>		
	<b>MCA 4: Management of Fire Extinguisher Compliance within Main Campus Facilities</b>	
		MCA 4.1.1 and 4.2.1: The Assistant Fire Marshal will review monthly fire extinguisher inspection records and submit quarterly reports to applicable unit leadership, DCFM and the Assistant Director of Fire and Life Safety to ensure that the required Fire Extinguisher inspections are being conducted.
		MCA 4.1.2, 4.4.2, and 4.5.1: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review/verify that fire extinguisher inspection reports are accurate and submitted per vendor contract requirements.
		MCA 4.1.3: EHS Fire and Life staff Safety will spot-check tags during the annual fire and life safety building inspections to ensure our Campus vendor is conducting the required fire extinguishers inspections. Records will reflect this action and be kept electronically.
		MCA 4.3.2, 4.4.1, and 4.5.1: The Assistant Fire Marshal will develop and implement a quality control procedure to verify and document that all required information is included in submitted reports (i.e., dates, signatures, etc.). The Assistant Director of Fire and Life Safety and LDCFM will review reports

		quarterly to ensure the required reports are being submitted to Campus leadership.
<b>Fire Sprinkler Systems</b>		
		<b>MCA 5: Management of Fire Sprinkler Systems within Main Campus Facilities</b>
		MCA 5.1 The Assistant Fire Marshal will develop and implement a procedure to ensure that Fire Sprinkler Inspection reports without findings are documented to certify that they were conducted.
		MCA 5.2.1 The Assistant Fire Marshal will develop and implement a procedure to ensure that all Fire Sprinkler inspection reports are emailed or recorded or hard copies are kept, providing an audit trail.
		MCA 5.3.1: The Assistant Fire Marshal will verify and record the inspections and keep the records. The LDCFM and Assistant Director of Fire and Life Safety will review quarterly reports to ensure the required records are maintained according to fire code requirements.
		MCA 5.3.2: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review/verify that inspection reports are accurate and complete to the published inspection schedule.
		MCA 5.4.1 The Assistant Fire Marshal will verify and document that dates and signatures are present on all reports.
		MCA 5.4.2: The Assistant Fire Marshal will develop and implement a quality control procedure to verify and document that all required information is included in submitted reports (i.e., dates, signatures, etc.). The Assistant Director of Fire and Life Safety and LDCFM will review reports quarterly to ensure the required reports are being submitted to Campus leadership.
<b>Fire Alarms</b>		
		<b>MCA 6: Management of Fire Alarm Systems within Main Campus Facilities</b>
		MCA 6.1.1: The Assistant Fire Marshal will develop and implement a procedure to ensure that scheduled inspections that do not meet the regulatory required inspection frequency for unavoidable reasons are reviewed by the Assistant Director of Fire and Life Safety and LDCFM, and the delayed inspection is recorded.
		MCA 6.2.1: The Assistant Fire Marshal will develop and implement a procedure to ensure the PDF of the PDA (hand-held) device reports after they have been uploaded into the database, and a PDF copy and file will be signed. The software utilized for reporting does not capture the signatures from the field operations so we will need to duplicate it on a PDF in the office.
		MCA 6.3.1: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review/verify that inspection reports are accurate and complete to the published inspection schedule.
<b>University Student Housing</b>		
		<b>MCA 7: Conduct Quarterly Reviews of Required Fire Extinguisher Inspections as Required by Code</b>
		MCA 7.1.1: The Assistant Fire Marshal will review housing's monthly fire extinguisher inspection records and submit quarterly reports to housing

		management that the required Fire Extinguisher inspections are being conducted.
		MCA 7.1.2 and 7.4.1: The Assistant Fire Marshal will submit a quarterly report to the LDCFM and Assistant Director of Fire and Life Safety Services to review/verify that housing quarterly reports are accurate and submitted.
		MCA 7.1.3: EHS Fire and Life staff Safety will spot-check tags during the annual Fire and Life Safety Building inspections to ensure the housing vendor is inspecting fire extinguishers per State Fire Code requirements. Records will reflect this action and be kept electronically.
		MCA 7.2.1: The Assistant Fire Marshal will develop and implement systems of oversight, monitoring, tracking, documentation, inspections, testing, and reporting to ensure compliance with five-year sprinkler certifications.
		MCA 7.2.2: The Assistant Fire Marshal will develop and implement a procedure to ensure that all Fire Sprinkler inspection reports are emailed or recorded or hard copies are kept, ensuring an audit trail exists.
		MCA 7.2.3: The Assistant Fire Marshal will verify and document that dates and signatures are present on all reports.
		MCA 7.3. The Assistant Director of Fire and Life Safety will work with Student Affairs leadership to update the current Memorandum of Understanding with Campus Housing by July 31, 2024.
		MCA 7.3.1 EHS Fire Life Safety will begin an update cycle of the MOU with Campus Housing every five years from the 2024 updated signature date (Anticipated by July 31st, 2024).