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October 25, 2013

**CONTROLLER MCGUIRE**

**Subject: Final Audit Report ANR Firearms Compliance Program Review – No. P13A010**

Attached please find the final report for: Audit Project No. P13A010: ANR Firearms Compliance Program Review. With the issuance of this final report, please destroy any previous draft versions. We very much appreciate the assistance provided to us by you and members of your staff during our review. If you should have any questions, please feel free to contact me at 510-987-9646 (e-mail: [Matthew.Hicks@ucop.edu](mailto:Matthew.Hicks@ucop.edu))



Matthew Hicks  
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Attachment

cc: Senior Vice President Vacca  
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UNIVERSITY OF CALIFORNIA  
ETHICS, COMPLIANCE AND AUDIT SERVICES  
OFFICE OF THE PRESIDENT  
AUDIT SERVICES

ANR FIREARMS COMPLIANCE PROGRAM REVIEW  
Audit No. P13A010  
September 2013

Work Performed by:  
Benjamin Wong, Auditor

# **Executive Summary**

## **Introduction**

As part of the 2013-14 annual audit plan, we have completed an audit of Agriculture & Natural Resources (ANR) firearms activities. Certain ANR Research and Extension Centers (RECs) and Cooperative Extension (CE) locations possess, store and use firearms. Firearms use at the RECs is largely for predator control, emergency euthanasia, and hunting. 4-H youth development programs provide shooting sports as one of the many activities at the CE. Shooting sports educate youth about safe handling of firearms and archery equipment among other benefits. Under the Gun Safe Schools Act, all firearms are usually prohibited on University property unless authorized by a responsible official. According to University of California (UC) policy, Chancellors and the Vice President of ANR have the authority to grant possession and use of firearms on University property.

## **Objectives and Scope**

The objectives of the audit were to determine if:

- Policies and procedures are conducive to accomplishing 4-H Shooting Sports and REC business objectives
- Firearms movement and storage procedures are adequate and efficient
- Firearms inventory is accurate and in compliance with University policy
- Hunting and shooting sports programs procedures are efficient and adequate

To accomplish these audit objectives, the following procedures were performed:

- Interviewed staff at Hopland REC and the Madera and Merced CE locations
- Reviewed relevant UC and external policies and procedures
- Reviewed Hopland public hunting documentation
- Reviewed Madera and Merced CE locations' shooting sports documentation
- Reviewed UC Davis (UCD) and ANR firearms inventory records
- Visited firearm storage facilities at Hopland REC and Madera CE location
- Verified and counted firearms stored at Hopland REC and Madera CE location
- Surveyed RECs and CE locations not visited regarding their internal controls and policies and procedures

## **Overall Conclusion**

Based on audit work performed, ANR firearms programs have maintained effective storage controls and management is cognizant of safety issues. However, we found opportunities for improvement in strengthening policies and procedures, updating inventory, and developing facility use agreements. ANR has developed detailed action plans that address each of the issues identified in the Opportunities for Improvement section which follows.

## **Opportunities for Improvement and Action Plans**

### **1. Strengthen Shooting Sports Policies and Procedures**

We reviewed REC and 4-H shooting sports policies and procedures and compared them with other organizations with similar activities; we noted the following areas are not included in REC and 4-H shooting sports policies and procedures:

- a) Adult/youth ratio
- b) Equipment transportation requirements
- c) Annual firearm inspection
- d) California Firearms Law requirements
- e) Circumstances requiring reporting, such as unintentional discharge
- f) First aid training

The inclusion of the above areas into the written policies and procedures would help management ensure the effectiveness and safety of firearm activities and compliance with relevant laws.

#### **Action Plan:**

ANR management will assess the needs and include additional areas in REC and 4-H shooting sports policies and procedures accordingly.

**Target Date:** March 2014

### **2. Update Firearms Inventory Records**

We reviewed the firearm inventory records for UCD ANR and ANR Environmental Health & Safety (EH&S) and noted the following –

- a) One firearm listed on EH&S inventory record was not on the UCD inventory record
- b) One air rifle on the UCD inventory record should not be recorded in the system
- c) Two firearms on EH&S inventory record were incorrectly disclosed as University owned

Additionally, we identified eight firearms at the Madera CE location which were not listed on any inventory records and six air rifles at the Merced CE location which were not accounted for on the local inventory database. All firearms at the Madera CE location are inventorial equipment per BUS-29, Management and Control of University Equipment.

#### **Action Plan:**

ANR management will work with local offices to determine the appropriate number of firearm inventorial equipment at each location and work with UCD Accounting to enter them into the UCD inventory system.

**Target Date:** March 2014

### **3. Establish REC Firearms Use Log**

During our visit at Hopland REC, we noted that records were not kept for firearm use. Since firearms are frequently used for predator control at this location, REC management felt it was often impractical to record firearm use purpose, date, and user information prior to access. However for prudent business practice, management should establish a log to track firearm use information after (or before, if feasible) access to prevent inappropriate use.

**Action Plan:**

Hopland REC will establish a log tracking firearm use with information such as date, purpose and user.

**Target Date:** December 2013

### **4. Revise Public Hunting Procedures**

We reviewed Hopland REC's 08/11/12 and 08/26/12 public hunt registration forms and authorization records and noted the following:

- a) One individual did not sign a hunt permit that waived the individual's right to file claim against the University
- b) One individual did not obtain appropriate authorization to possess and use a firearm on University property

It is a violation of The California Gun Free School Zone Act for an individual to possess a firearm on University property without written permission from the Chancellor or his/her designee.

**Action Plan:**

Hopland REC is developing a checklist for the hunt manager to use on hunting days when they check in the hunters to ensure waiver forms are completed and signed.

**Target Date:** This action has been completed prior to issuance of the report.

### **5. Reinforce Firearms Storage Procedures**

During our visits at the Hopland REC and the Madera CE location, we noted that the combinations for locks to the firearm safes are not changed when there is a change in personnel with access. Additionally, ammunition at the Madera CE location was not stored in a separate locked box inside the safe, and trigger lock keys were stored inside the safe. ANR REC firearms policy and procedures require that ammunition for firearms be maintained in a locked location separate from the firearm.

We were not able to inspect all the firearms at the Madera CE location because one safe had a combination lock that was low on batteries and could not be opened.

**Action Plan:**

ANR will include in the firearms policies and procedures that combination locks need to be changed whenever there is a change in personnel and trigger locks need to be stored separately from the firearms. Further, ANR will reinforce the policy requirement that ammunition must be stored separately in a locked box. Madera CE location will provide photographs of the firearms stored in the safe that was inaccessible during fieldwork verifying UCD inventory list accuracy.

**Target Date:** December 2013

**6. Execute Facility Use Agreement at CE Locations**

During our visits to the Madera and Merced CE locations, discussions with 4-H program representatives and the 4-H Advisor disclosed that the majority of the shooting sports are conducted at private properties. Execution of a required facility use agreement between UC and the private property owner has not been consistently performed at all CE locations. ANR management is aware of this inconsistency but has not yet implemented a consistent practice at all locations.

**Action Plan:**

ANR management will implement a consistent process at all CE locations to execute facility use agreements with private property owners when applicable.

**Target Date:** March 2014