



John Keel, CPA  
State Auditor

An Audit Report on

**Campus Safety and Security  
Emergency Management Plans  
at Texas Public Universities**

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### Overall Conclusion

Texas's 35 public universities (universities) have developed emergency management plans for various potential hazards. The concepts addressed in these plans and the implementation statuses of the plans differ among the universities. State requirements are unclear as to whether universities are required to adopt National Incident Management System (NIMS) standards, which are designed to provide a consistent approach to emergency management among differing agencies and institutions. Additionally, the State does not have emergency management requirements for higher education institutions or a central point of authority specific to emergency management at higher education institutions to standardize, coordinate, and monitor emergency preparedness at the institutions.

The 35 universities have identified dozens of potential hazards for which to plan a response, such as threats of violence, weather, health emergencies, and transportation accidents. Among the events affecting Texas public universities from January 2008 through August 2008 were a campus lockdown, a tropical storm, hurricanes, infectious disease cases, and a serious boating accident that resulted in a death.

The State's 35 public universities reported that 1,100 crimes were committed on or around their campuses in 2006. These reported crimes included 657 burglaries, 96 aggravated assaults, and 67 sex offenses. Because of the variety of potential hazards, it is important that universities take an all-hazard approach to emergency planning and perform campus-specific risk assessments, testing, and monitoring to increase the likelihood of an appropriate response in the event of an actual emergency.

#### Emergency Management

Emergency management is the continuous process of mitigating the effects of and preparing for emergencies and then responding and recovering from emergencies once they occur.

An emergency management plan outlines concepts of operations for coordinated efforts by all responders to perform emergency functions. According to the Governor's Division of Emergency Management, "It has been repeatedly demonstrated [that] pre-planning emergency operations saves time in getting operations underway, facilitates integrated effort, and helps ensure essential activities are carried out efficiently."

#### Texas Public Universities

For the fall 2007 semester, 497,195 students were enrolled at the state's 35 public universities, and 33,802 faculty were employed by these universities.

Sources: *Local Emergency Management Planning Guide*, Governor's Division of Emergency Management; and the Higher Education Coordinating Board.

This audit was conducted in accordance with Texas Government Code, Section 321.0134.

For more information regarding this report, please contact Sandra Vice, Assistant State Auditor, or John Keel, State Auditor, at (512) 936-9500.

## **Key Points**

**Key elements and implementation statuses of emergency management plans vary among universities.**

The universities have developed emergency management plans that differ in terms of concepts addressed. Auditors evaluated the universities' emergency management plans using 11 broad categories of state planning standards most applicable to higher education institutions. The majority of the plans reviewed contained the recommended elements for three categories: concept of operations, organization and assignment of responsibilities, and direction and control.

However, universities could improve their emergency planning activities in four categories: emergency management plan approval and implementation, identification of situations and assumptions, development and maintenance of the emergency management plan, and consistent identification of emergency readiness levels. In addition, the universities are at various stages of implementing their emergency management plans. While 30 universities have completed emergency management plans, only 9 of these plans have been approved by university executive management. Five universities' emergency management plans were still in draft form. In the event of an actual emergency, an approved emergency management plan that includes a standardized set of elements would allow multiple entities to work together and coordinate a response.

**Universities could improve their reporting of campus security and crime to better comply with the federal Clery Act.**

The federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) requires higher education institutions to disclose campus crime statistics and security information to current and prospective students and employees. The Clery Act also requires higher education institutions to publish annual security reports that describe their campus security policies and contain statistics regarding crime that occurred on and around campus. Texas universities self-report this information to the U.S. Department of Education. There is no central reporting point at the state level to receive, analyze, and monitor this information. For calendar year 2007:

- Two universities did not produce and distribute these required annual security reports.
- Seventeen universities did not include all required information in their annual security reports.
- Daily crime logs that auditors reviewed at two of the six universities visited did not contain all the elements required by the Clery Act.

**Universities could take additional steps to increase their preparedness for emergencies.**

Universities have taken steps to prepare for emergencies such as reviewing and updating their emergency management plans and implementing emergency notification systems. However, universities could take additional measures to increase their ability to effectively prepare for emergencies. Specifically, universities could:

- Include risk assessments in their emergency management plans.
- Provide emergency training to all personnel with a role in emergency response.
- Increase the frequency of emergency plan exercises.

**Universities have taken steps to mitigate their exposure to hazards.**

To reduce the risk or potential loss from emergency events, universities have implemented a number of mitigation activities. These include providing mental health services to the campus community, offering education and outreach programs, and implementing physical security measures around their campuses. Universities could enhance their mitigation efforts by training faculty, staff, and students on emergency protocol and offering outreach programs on how to identify students exhibiting at-risk behaviors. Auditors reviewed 20 previous reports on campus safety produced by organizations and universities in other states; 90 percent of these reports included a similar recommendation.

**Universities are not fully accessing emergency management resources currently available to them.**

A number of federal, state, and other resources are currently available to assist universities in their emergency planning efforts; however, some universities are not aware of or fully using these resources. For example, the U.S. Department of Homeland Security and the Governor's Division of Emergency Management provide tools and checklists for developing emergency management plans. Additionally, the Texas Engineering Extension Service and the Law Enforcement Management Institute of Texas provide emergency operations training, while the Texas School Safety Center acts as a clearinghouse for higher education-related safety information. However, emergency management personnel at the universities were not always aware of these resources.

**Other states have recommended or mandated new campus security measures.**

A number of universities, task forces, and state legislatures have reviewed the status of campus security and recommended or enacted a variety of different measures to improve campus safety at higher education institutions. Among the most common recommendations are recommendations for higher education institutions to:

- Establish campus-specific emergency management plans.
- Conduct regular training and exercises of their emergency management operations.
- Implement emergency notification systems to alert the campus community during an emergency.

### ***Explanation of Management Response***

The recommendations in this report are not directed to the 35 public universities included in this audit; as a result, auditors did not request management responses. To ensure the accuracy of reported information, auditors provided each university an opportunity to review the information about its emergency management plan, annual security report, and significant incidents. Auditors also requested and incorporated, as appropriate, technical comments from the Governor's Division of Emergency Management.

The recommendations in this report require legislative action to enact and could potentially affect all Texas higher education institutions. Therefore, the recommendations are directed to the Legislature for its consideration.

### ***Summary of Objective, Scope, and Methodology***

The objective of the audit was to determine if the State's public universities have designed and implemented campus safety and security emergency management plans that include ongoing risk assessment, monitoring, and testing of the plans to ensure an appropriate response in the event of an actual emergency.

The scope of the audit covered the current emergency management plans for Texas's 35 public universities and on-site reviews of emergency management programs at six universities.

The audit methodology included reviewing emergency management plans, surveying university personnel about their emergency management practices, reviewing annual security reports, conducting site visits at six public universities, reviewing recommendations from other reports about campus safety, and reviewing other states' laws regarding campus safety.