PROJECT SUMMARY

Overview

Tarleton State University has developed processes over environmental health, safety and security operations to provide reasonable assurance that a safe environment exists for students, faculty, and staff and that the University is in compliance with relevant laws, policies, regulations, and rules. However, the implementation of these processes has not been fully achieved due to control weaknesses in the areas of laboratory safety inspections, employee safety training, and long-term management of chemical storage. The University has strengthened its processes and controls to promote complete and accurate Clery Act reporting.

Environmental health and safety is under the responsibility of the Risk Management & Safety Office while security is under the responsibility of the University Police Department. The Risk Management and Safety Office has four full-time employees and a fiscal year 2011 operating budget of approximately $322,000. The University Police Department has 13 full-time employees and a fiscal year 2011 operating budget of approximately $782,000.

Summary of Management’s Response

Tarleton State University values the review that has been performed and feels that improvement has been achieved in many areas of environmental, health, safety and security since the previous audit. The Office of Risk Management and Safety (RMS) has taken preliminary actions to implement processes to improve in the areas of laboratory safety inspections, employee safety training, and chemical storage and management as documented as observations by the audit team. RMS staff will continue to foster its current
relationships with applicable academic and non-academic departments to ensure this improvement is achieved.

Scope

The review of environmental health, safety and security operations at Tarleton State University focused on the areas of fire and life safety, laboratory safety inspections, student and employee safety training, Clery Act reporting, chemical administration, University-sponsored camps, student activities, and student and faculty international travel. Transactions and activities related to these areas were reviewed for the period March 1, 2010 through May 31, 2011. Fieldwork was conducted from June 2011 to August 2011.
Observations, Recommendations, and Responses

1. Laboratory Safety Inspections

Observation

The university laboratory safety inspection process requires improvement to ensure that teaching and research laboratories remain safe and that all laboratory safety issues are identified and addressed in a timely manner. Comprehensive safety inspections of the university’s teaching laboratories were not carried out by the Risk Management and Safety Office during the audit period to monitor compliance with safety protocols. In addition, university departments were not performing self-inspections of their labs nor reporting results to the Risk Management and Safety Office in accordance with University laboratory safety program procedures. This situation has been largely due to the year-long vacancy of the environmental safety technician position which conducts these lab safety inspections. This safety technician position has been vacant at times during three out of the last six years. The lack of an effective laboratory safety inspection process could lead to serious injuries and property damage as potential hazards and risks are not detected and corrected in a timely manner. A&M System Regulation 24.01.01 states that each component with identified harmful exposures is to develop a monitoring program that includes the evaluation and written communication of results, with appropriate corrective actions.

Prior to the environmental safety technician vacancy, the Risk Management and Safety Office met with departments to reinforce good laboratory safety practices. In lieu of formal laboratory safety inspections, the Risk Management and Safety Office included some lab inspection coverage in its fire and life safety inspections. However, there was no formal follow-up of the inspections to ensure that deficiencies identified were addressed in a timely manner. It should be noted that the safety technician vacancy was filled just prior to the start of the audit and steps were underway during the audit to strengthen the inspection process.

Recommendation

Strengthen the laboratory safety inspections process by:
1. Laboratory Safety Inspections (cont.)

- Developing a risk-based laboratory safety inspection schedule for the various laboratories, shops, and related facilities. Determine the inspection frequency necessary to ensure a safe working environment. Establish and adhere to a schedule for the performance of these inspections. In scheduling and staffing the inspection process, factor in contingencies for staff turnover so that inspections are consistently carried out.

- Strengthening procedures for documenting inspection results and providing reports to appropriate personnel including the respective department head, dean (as necessary) and University management.

- Ensuring that departments carry out self-inspections of laboratories and report results to the Risk Management and Safety Office in accordance with University laboratory safety program procedures.

- Implementing a follow-up inspection process that includes formal tracking and monitoring of the implementation of inspection report recommendations to ensure appropriate steps are taken to correct the identified deficiencies in a timely manner.

- Tracking safety deficiencies to identify trends and areas of additional safety training needs.

**Management’s Response**

_Tarleton’s Office of Risk Management and Safety (RMS) will develop a comprehensive risk-based review process to identify the appropriate inspection level of applicable laboratories, shops and related facilities. This process will include the development and implementation of a uniform inspection checklist to be used for academic self-inspections and, additionally, by RMS personnel. This process will be developed and implemented no later than May 31, 2012._

_Documented RMS and self-inspections will be forwarded to the applicable department head, director, and/or manager with discrepancies and follow-up inspections submitted to the dean of the respective academic college, and to the vice president as warranted._

_Beginning spring 2012, web-based tracking tools of the inspection process will be explored, and an appropriate system identified and purchased, which will serve as the formal tracking mechanism._
1. Laboratory Safety Inspections (cont.)

Applicable inspections performed following the revised process will be completed by May 31, 2012.

The laboratory inspection program will be a collaborative effort between the key departments (Chemistry, Biology, Environmental and Agricultural Management, and RMS) to ensure consistency and to sustain efforts during staffing and organizational changes.

2. Employee Safety Training

Observation

A review of training records for newly hired Physical Facilities employees indicated that three of eight (38%) employees did not receive timely hazard communication training. Two employees were hired in late 2010 and subsequently after auditor inquiry in June 2011, the training was completed. The third employee was trained approximately 10 weeks after hire. Physical Facilities supervisors did not consistently require employees to attend training. The Risk Management and Safety Office was not sufficiently monitoring the process to ensure that employees with potential exposure to hazardous chemicals and/or blood borne pathogens received timely training. The lack of an effective process to identify and provide hazard communication training results in the increased risk of personal injury and property damage. The University’s Hazardous Communication Program requires departments with jobs where hazardous chemicals are routinely used or handled to provide and/or make available chemical training sessions to employees at least annually. In addition, the department is to provide training to new or newly assigned employees prior to their working with or in a work area containing hazardous chemicals.

Recommendation

Enhance monitoring controls of the employee safety training to ensure that those employees who could be potentially exposed to hazardous chemicals and/or blood borne pathogens, receive safety training in a timely manner (prior to initial exposure to these chemicals and/or pathogens).

Use the A&M System TrainTraq training system to provide hazard communication and blood borne pathogen training to enhance the University’s ability to monitor and track employee safety training for timely completion. For instance, determine a specific time period (e.g. within two days of hire date, etc.) for hazard communication and blood borne pathogen training to be completed following a new employee’s hire date, and enter the corresponding due dates for
2. Employee Safety Training (cont.)

Chemical storage facilities have excess and unused chemicals.

Management’s Response

Tarleton’s Office of Risk Management and Safety will implement a process to monitor employee changes to ensure applicable new employees receive timely training through a collaborative effort between RMS and the Department of Human Resources.

The Computer Help Desk will notify RMS by email as a work request for network access is completed by their department. This action will provide a timely notification so that applicable training can be assigned to the employee by RMS.

RMS will be notified by Human Resources on a frequent basis (weekly and/or monthly) as new employees begin their employment at Tarleton as an additional monitoring process. This listing will include full-time, non-budgeted, adjunct instructors and student employees. A reminder will be sent to employees that have not completed the training by the specified timeframe along with RMS and the applicable supervisor being notified so that appropriate follow-up measures can take place.

This change is currently implemented and being monitored to ensure that various employee classifications are captured by this process.

RMS has initiated discussions with Human Resources to assign applicable hazard communications and blood borne pathogens training to employees through TrainTraq. By May 31, 2012, Tarleton will have implemented the necessary changes to ensure the stated training is deployed to all applicable employees.

3. Chemical Storage

Observation

Chemical storage processes within the University require improvement to ensure hazardous chemicals are properly stored and maintained. A review of the Chemistry Department's chemical storage facilities (particularly, the Chemistry Stockroom in the Science Building) indicated that large amounts of possibly excess and unused chemicals were being stored. These facilities included chemicals stored in containers with missing or faded labels, chemicals in deteriorated containers, and chemicals that
were old and had not been used in several years. Management does not have a formal plan for the long-term management of stored chemicals including tracking the age and most recent use of chemicals, and ensuring the timely disposal of old or unused chemicals. Inadequate chemical storage processes increase the risk of injury to students, faculty, and staff and place the University in potential noncompliance with federal and state requirements. The University’s chemical safety program states that chemicals should be properly sealed, labeled, and stored in compatible containers.

**Recommendation**

Strengthen the management of stored chemicals by:

- Reviewing all stored chemicals (especially those located in the Chemistry Department storage areas) to ensure they are maintained in appropriate containers with proper labeling, including date of purchase or most recent use to assist in determining timely disposal.

- Require all departments with large volumes of chemicals (especially Biology and Chemistry) to annually review inventories and carry out appropriate disposal of old, unused chemicals.

**Management’s Response**

*By May 31, 2012, Tarleton’s Office of Risk Management and Safety will implement a process to perform a risk review of key departments such as Chemistry, Biology, Agricultural Science, etc. and establish criteria to evaluate chemical inventories annually in an effort to minimize the volume of chemicals stored and to improve safety within the laboratories.*

*Risk Management and Safety will request each applicable department to perform an annual internal evaluation of their chemical inventories, no later than August 31, 2012. Inventoried chemicals will be evaluated and identified for disposal based on the following criteria:*

- **Age of chemical (20 years or older)**
- **Condition of container**
- **Label condition (missing or illegible)**
3. Chemical Storage (cont.)

- Need (Is the chemical needed for future lab course offerings or research activities within the next 2 years?)

- Is chemical substitution an efficient and viable approach to an existing, more hazardous chemical?

- If efficient, can micro-scale chemistry techniques be incorporated for certain laboratory activities?

- Can mercury-based equipment, such as thermometers, be replaced with alcohol or petroleum filled devices?

- Has the shelf life of the chemical been exceeded?

Once the chemical inventories have been evaluated each department will forward a completed Waste Disposal Form to RMS for processing and subsequent disposition.
BASIS OF REVIEW

Objective

Review and assess the University's controls and processes over campus safety and security to ensure that they provide reasonable assurance that a safe environment exists for students, faculty, and staff. Also, determine that the University is in compliance with laws, policies, and regulations relevant to campus safety and security.

Criteria

Our audit was based upon standards as set forth in the System Policy and Regulation Manual of the Texas A&M University System; Tarleton State University Rules and procedures; the Treadway Commission’s Committee of Sponsoring Organization’s Internal Control – Integrated Framework (COSO); and other sound administrative practices. This audit was conducted in conformance with the Institute of Internal Auditors’ “International Standards for the Professional Practice of Internal Auditing.”

Additionally, we conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Tarleton State University is committed to a campus environment that protects the safety and environment of the students, employees, and visitors. The Risk Management & Safety Office and University Police Department comprise the two most significant elements of the environmental health, safety and security operations at Tarleton State University. The mission of the Risk Management & Safety Office is to provide a safe and healthy environment through programs designed to ensure the safety of employees, protection of property, and compliance with state and national regulations and standards. The mission of the University Police Department is to provide a safe and secure learning, living, and working environment through the delivery of professional police service.
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