PROJECT SUMMARY

The Texas A&M University System Office of Safety needs to improve the guidance and monitoring it provides to A&M System members on emergency management. Generally, System members have processes in place for emergency management and notification that provide reasonable assurance that members are in compliance with laws, policies, and regulations. Areas identified as requiring improvement by the System Office of Safety are the review and update of the System policy and regulation related to emergency management and ensuring universities are complying with emergency management reporting requirements.

Emergency management plans are designed to establish policies, procedures, and organizational structure for responding to emergencies. Plans should be entity-specific and should take an all-hazards approach which encourages effective response to any disaster or emergency.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. Review of Emergency Management System Policy and Regulation

Observation

System Policy 34.07, Emergency Management and System Regulation 34.07.01, Emergency Management Plan for System University Campuses have not been updated for changes in recent state laws and statutes, do not specify the appropriate responsible System Office, and have exceeded the required review dates.

The System policy and regulation related to emergency management have not been updated to include the following recent changes in state statutes. Texas Education Code 51.217, Multihazard Emergency Operations Plan; Safety and Security Audit, amended and effective September 1, 2011, applies to all...
System members and states, “The plan must provide for the implementation of a safety and security audit.” Additionally, Texas Education Code 51.218, *Emergency Alert System*, effective June 17, 2011, applies to all System members and states, “Each institution of higher education shall establish an emergency alert system for the institution’s students and staff, including faculty. The emergency alert system must use email or telephone notifications in addition to any other alert method the institution considers appropriate to provide timely notification of emergencies affecting the institution or its students and staff.” There is currently no System policy or regulation in place providing guidance to members on emergency notification systems.

System Policy 34.07 was due to be reviewed on December 5, 2010, 16 months ago, and System Regulation 34.07.01 was due to be reviewed on June 2, 2011, 11 months ago. The System policy and regulation reference the System Office of Risk Management and Safety as the contact office, but the Office of Safety no longer reports to the Office of Risk Management. Additionally, while System Policy 34.07 applies to all System members, System Regulation 34.07.01 only applies to the universities. However, there are certain elements in System Regulation 34.07.01 that would be beneficial for the System agencies and Health Science Center including Section 1 – Emergency Management Plan Essential Elements and Section 4 – Annual Plan Submission and Reporting.

Organizational changes and a lack of defining responsibilities between the Office of Risk Management and the Office of Safety have delayed the review and update of the System policy and regulation related to emergency management. System Policy 01.01, *System Policies, Regulations, and Member Rules and Procedures*, requires each policy and regulation to be reviewed at least every two years. Without current policies and regulations that provide appropriate guidance to members and incorporate changes to state laws and statutes, the risk of non-compliance by System members is increased. According to System Policy 01.01, System policies guide members by creating administrative structures, setting priorities, delegating authority, assigning responsibility, ensuring accountability, and defining reporting requirements.

**Recommendation**

Review and update the System policy and regulation related to emergency management. Ensure that the System policy and regulation specify the responsible System office and incorporate, as needed, recent changes to applicable laws and statutes and any
additional emergency management activities to ensure appropriate guidance to all member universities and agencies. Clarify emergency management reporting requirements and reporting responsibilities.

Management’s Response

Management concurs with the recommendations of the audit report. The System Office of Safety has begun efforts to review and update System Policy 34.07, Emergency Management, and System Regulation 34.07.01, Emergency Management Plan for System University Campuses. These revisions will include, at a minimum, updates of the responsible System office, recent changes to applicable laws and statutes, and guidance to all member universities and agencies. In addition, these revisions will clarify emergency management reporting requirements and responsibilities.

Target implementation date: September 30, 2012 for submission of proposed revisions to the policy/regulation review process.

2. University Emergency Management Reporting

Observation

The System Office of Safety is not monitoring and obtaining required member university emergency management reports. System Regulation 34.07.01 states that these submissions shall be made through the System Office of Risk Management and Safety; however, organizational changes and a lack of defining responsibilities between the Office of Risk Management and the Office of Safety have led to a lack of monitoring of emergency management reporting.

Additionally, the System has not updated the central point of contact for notification by universities as exercises or actual emergencies occur. Monitoring of emergency management plans and reporting ensures that members have emergency management plans in place in the case of an emergency. It also decreases the risk that members are in non-compliance with applicable laws, policies, and regulations.
Recommendation

Develop a mechanism to monitor the annual submission of emergency management plans and the submission of tests and exercises as required by System Regulation 34.07.01.

Management’s Response

Management concurs with the recommendations of the audit report. The System Office of Safety will develop a system for reminding System members of their responsibilities, according to System Regulation 34.07.01, to submit copies of their emergency management plans, log receipt of the submissions and report on compliance annually to the Chancellor. Additionally, the system developed will be used to periodically remind, log receipt, and report on tests and exercises as required in the regulation.

Target implementation date: November 30, 2012.

BASIS OF REVIEW

Objective and Scope

The overall objective was to review and assess the A&M System’s processes for crisis management response and notification to determine that the A&M System members are in compliance with laws, policies, regulations, and rules relevant to crisis management response.

The review of emergency notification processes focused on the System Offices’ compliance with the System policy and regulation related to emergency management and responsibilities therein. A survey was conducted of System members asking specifically about the existence and content of each member’s emergency management plan and processes in place for emergency notification. The members’ emergency management plans were not tested in detail. The audit period focused primarily on activities from January 1, 2011 to December 31, 2011. Fieldwork was conducted from March to April 2012.

Criteria

Our audit was based upon standards as set forth in the System Policy and Regulation Manual of the Texas A&M University System; the Texas Education Code Sections 51.217 and 51.218;
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

Emergency management plans are designed to establish policies, procedures, and organizational structure for responding to emergencies. Plans should be entity-specific and should take an all-hazards approach which encourages effective response to any disaster or emergency.

Guidance on emergency management is provided to members through System Policy 34.07, Emergency Management and System Regulation 34.07.01, Emergency Management Plan for System University Campuses. The purpose of System Policy 34.07 “is to ensure each system member has a plan and that the plan is sufficient to protect human life and property under the control of each system member.” System Regulation 34.07.01 “is designed to provide a consistent approach to campus emergency management.”

Guidance on emergency management is provided by the State of Texas within the Texas Education Code. Texas Education Code Section 51.217, Multihazard Emergency Operations Plan; Safety and Security Audit, effective September 1, 2009, states, “An institution shall adopt and implement a multihazard emergency operations plan for use at the institution. The plan must address mitigation, preparedness, response, and recovery.” Texas Education Code 51.218, Emergency Alert System, effective June 17, 2011, applies to all System members and states, “Each institution of higher education shall establish an emergency alert system for the institution’s students and staff, including faculty. The emergency alert system must use email or telephone notifications in addition to any other alert method the institution considers appropriate to provide timely notification of emergencies affecting the institution or its students and staff.”
The mission of the Office of Safety is to lead the System in the development of efficient and effective safety programs, including occupational health and safety, public safety and security, fire and life safety, environmental stewardship, compliance, and emergency preparedness that together encourage and promote a culture of safety. The Office of Safety has four full-time employees that report to the A&M System Chancellor through the Chief Safety Officer, and a fiscal year 2012 operating budget of approximately $384,000.
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