PROJECT SUMMARY

Overview

Overall, the controls over environmental health, safety and security processes at Texas A&M University - Texarkana are generally in compliance with relevant laws and policies and provide reasonable assurance that a safe and secure environment exists for students, faculty, staff, and visitors except in the area of university-sponsored camps and youth programs. Significant weaknesses were identified in the safety and security processes associated with university-sponsored youth camps and programs. Opportunities for improvement were also noted in the areas of development of university rules and procedures for health and safety, and monitoring new employee safety training.

The university created an Environmental Health and Safety Department (EHS) and hired their first EHS Officer in September 2012. Our review indicated that processes have been developed for student safety training, hazardous chemical inventory and storage, safety inspections, and Clery Act reporting.

Summary of Significant Results

Camps and Youth Programs for Minors

The university does not provide adequate guidance and monitoring to ensure university-sponsored camps and programs for minors are providing a safe environment for workers and participants. Camp sponsors were unaware of A&M System requirements for administering camps and youth programs and have a general lack of knowledge of the related records retention requirements. Weaknesses in procedures, criminal conviction and sex offender background checks, child protection training, and document retention have contributed to the noncompliance with the A&M System regulation for camps and programs for minors.
Summary of Management's Response

Texas A&M University – Texarkana’s administration is in agreement with the recommendations as set forth from the A&M System Internal Audit Department’s review of environmental health, safety and security processes.

The university acknowledges that further improvement to its rules, programs and procedures are needed to assure adequate guidance and monitoring for a safe environment for participants and workers of camps and youth programs for minors. The university is taking necessary actions to improve and strengthen these processes and procedures. The position for an Environmental Health and Safety Officer was filled on September 24, 2012. Since the audit period, many of the observations concerning camps and programs for minors have been addressed. All recommendations will be implemented by August 31, 2014.

Scope

The review of environmental health, safety, and security processes at Texas A&M University - Texarkana focused on safety training, safety inspections, youth programs and camps, hazardous chemical administration, and Clery Act reporting. The audit period focused primarily on activities from September 1, 2012 to May 31, 2013. Fieldwork was conducted from June to July, 2013.
OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. Camps and Youth Programs for Minors

Observation

The administration of camps and programs for minors needs improvement.

Administration and oversight of university-sponsored camps and programs for minors (camps) require significant improvement to ensure all camps are operating in compliance with applicable rules and standard administrative procedures. A review of the camps held during fiscal year 2012 included weaknesses in child protection training, criminal conviction and sex offender background checks, and proper records retention.

Three of 24 (13%) selected camp personnel did not complete child protection training prior to the start of the camp. The training was not taken until after the camp was over. A&M System Regulation 24.01.06 requires that all individuals hired or assigned to an employee or volunteer position involving contact with minors at a camp and program for minors are required to complete child protection training prior to the employees’ or volunteers’ interaction with minors. Two of 24 (8%) selected camp volunteers did not receive a criminal conviction and sex offender background screening. The regulation also requires that criminal conviction and sex offender background checks be conducted on all individuals hired or assigned to employee or volunteer positions involving contact with minors at a camp and program for minors.

Camp rosters, liability waivers, and medical treatment authorization and emergency contact information were not retained for one of the three camps conducted during fiscal year 2012. Twenty-two of 25 (88%) selected participants from the other two camps did not have the original liability waivers on file. Copies of the documents were retained, but the original documents were not available. Without properly completed and maintained camp documentation to facilitate monitoring, there is an increased risk of personal injury to a minor due to the lack of medical treatment authorizations.

The university has not developed University Procedure 24.01.06.H0.01 Camps and Programs for Minors (see Rules and Procedures observations below) to provide guidance and oversight for camps. The university does not have a monitoring mechanism in place to ensure that all volunteers (including university employees) participating in university-sponsored camps...
and youth programs receive criminal conviction and sex offender background checks, and complete the required child protection training. In addition, the university is not providing camp personnel with adequate training to ensure they understand the A&M System requirements for administering camps and youth programs, and the related records retention requirements. Without providing additional guidance and monitoring for camps, the university is at an increased risk of personal injury to a minor.

**Recommendation**

Develop university procedures for the administration and operation of all university-sponsored camps and programs for minors including requirements for the use of standardized forms, background screenings, and records retention.

Provide training for camp personnel to ensure they understand A&M System requirements for administering university-sponsored camps and youth programs.

Develop a monitoring process to ensure that all volunteers (including university employees) at university-sponsored camps and youth programs receive criminal conviction and sex offender background screening, and complete the required child protection training prior to contact with minors.

Comply with the A&M System Records Retention Schedule regarding background screening results, liability waivers, and other required camp documentation.

**Management’s Response**

*The university is taking necessary steps to improve and strengthen controls over camps and youth programs. Procedures and forms have been developed to provide guidance for administration and operation of camps and youth programs. University Procedure 24.01.06.H0.01 has been developed and is in the process of administrative approval. The university has established a process to ensure training for both the university employees and volunteers involved in camps and youth programs. The camp administrator has responsibility for monitoring camps and youth programs to ensure that they are in full compliance with requirements including timely background screening and records retention. Full implementation of procedures and monitoring will be completed by June 20, 2014.*
2. Rules and Standard Administrative Procedures

Observation

The university has not developed and published rules and procedures related to health and safety that are required by A&M System policies and regulations. System Policy 01.01, System Policies, Regulations, and Member Rules and Procedures require system member chief executive officers (CEOs) to establish system member rules and procedures when required by a policy or regulation. The following health and safety related rules and procedures have not been completed:

- Procedure 24.01.06.H0.01 Camps and Programs for Minors, required by System Regulation 24.01.06 Camps and Programs for Minors
- Rule 13.04.H1 Student Travel, required by System Policy 13.04 Student Travel
- Rule 34.02.01.H1 Drug and Alcohol Abuse and Rehabilitation Programs, required by System Regulation 34.02.01 Drug and Alcohol Abuse and Rehabilitation Programs

The development of university rules and procedures required by the A&M System policy has not been a priority. The lack of documented rules and procedures that are required by A&M System policy increases the risk that important procedures and guidelines will be bypassed, incompletely performed, or inappropriately handled.

Recommendation

Complete the development of health and safety related university rules and procedures that are required by A&M System policy.

Management’s Response

The university recognizes the significance of having rules and procedures in place to guide the operation of the university. Currently, Rule 13.04.H1, ‘Student Travel’ (submitted to the A&M System Office of General Counsel on June 24, 2012) and 34.02.01.H1, ‘Drug and Alcohol Abuse and Rehabilitation’ (submitted to the A&M System Office of General Counsel on November 1, 2012) are in the review process. Procedure 24.01.06.H0.01 ‘Camps and Programs for Minors’ is in the process of administrative approval.
2. Rules and Standard Administrative Procedures (cont.)

| Implementation of new rules and procedures related to health and safety is expected by August 31, 2014. |

3. New Employee Safety Training

Observation

The university does not have a mechanism in place to identify and provide hazard communication (HazCom) and bloodborne pathogens (BBP) training for newly hired employees in applicable positions. Newly hired employees who have the potential for exposure to hazardous chemicals, such as university health services and police staff, are required to complete HazCom training before performing functions which may cause exposure. In addition, newly hired employees in job classifications identified as a risk for occupational exposure to bloodborne pathogens are required to receive BBP training prior to initial assignment to tasks where occupational exposure may occur. A complete turnover of Human Resources personnel has delayed the establishment of a process to identify new employees that will require HazCom or BBP training. The risk of injury to employees from exposure to chemicals or bloodborne pathogens due to improper understanding, handling, use, or storage of those substances is increased when timely training is not provided.

Recommendation

Develop monitoring controls of the employee safety training for new hires to ensure that employees who could be potentially exposed to hazardous chemicals and/or bloodborne pathogens receive safety training prior to initial exposure to these chemicals and/or pathogens. Consider using the automated feature in TrainTraq to establish position training requirements, due dates, notifications, and monitoring.

Management’s Response

The university has developed a new hire committee to identify and address areas of need for the proper orientation and training of new employees. Implementation of the new hire orientation will include automatic assignments through TrainTraq of additional training that is necessary to assure employees in sensitive and special needs areas are receiving specialized training (HazCom and BBP) as required. Monitoring controls of the employee safety training for new hires will be implemented by January 31, 2014.
BASIS OF REVIEW

Objective

The objective of the audit was to review the controls over environmental health, safety and security to determine if the university is in compliance with laws and policies, and provide reasonable assurance that a safe and secure environment exists for students, faculty, staff, and visitors.

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 U.S. Department of Education’s The Handbook for Campus Safety and Security, 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

The Environmental Health and Safety Department and the University Police Department, reporting to the Vice President for Finance and Administration, are responsible for oversight of the safety and security functions at Texas A&M University – Texarkana and ensuring a safe and secure learning and working environment for faculty, staff, students, and visitors. The College of Science, Technology, Engineering and Mathematics also provides expertise and monitoring of student laboratory safety training and hazardous chemical inventory and storage. The university has approximately 1900 students and 200 employees on a 375-acre campus that contains four buildings.
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