PROJECT SUMMARY

Overview

4-H youth program safety documentation and employee safety training processes at Texas A&M AgriLife Research (AgriLife Research) and Texas A&M AgriLife Extension Service (AgriLife Extension) require significant improvement to ensure that a safe environment exists for 4-H youth participants and Agency employees. Opportunities for improvement were also noted in the areas of safety inspections, environmental management system, and written operating procedures for environmental health and safety processes. Preparation of a comprehensive risk assessment to identify and analyze safety risks and the corresponding controls and resources needed to mitigate these risks is needed to address most of the issues identified in this report. Our review of the administration of hazardous chemicals located outside of Brazos County indicated that the chemicals are properly inventoried and safely stored in accordance with Agency procedures.

Summary of Significant Results

4-H Youth Program Safety Documentation

Documentation for selected 4-H youth events hosted by AgriLife Extension was not adequate to facilitate monitoring and ensure compliance with youth safety requirements. Required liability waiver and medical treatment authorization forms were not available for a large percentage of youth participants tested. In addition, documentation of required background checks was not consistently available for adult volunteers tested. Without adequate safety documentation and oversight there is an increased risk of injury to youth event participants and corresponding liability to the Agency.
Safety Training

Current processes do not ensure that all employees receive the necessary safety training in a timely manner. Testing indicated that a significant number of employees (30%) with potential exposure to hazardous chemicals and substances did not complete hazardous communication training in a timely manner. Four of the employees have never completed the training and the remaining 15 employees completed the training an average of 196 days after their hire date. In addition, occupational safety training for employees is not formally identified and documented to provide assurance that employees complete all necessary safety training based on potential work hazards related to their job responsibilities. Lack of timely safety training increases the risk of serious injury to employees resulting from workplace hazards.

Summary of Management’s Response

We agree with the auditor’s recommendations. Implementation of some of these recommendations has already begun, however, as noted, some will take longer to put in place and some will require further analysis. The Agencies are committed to ensuring the safety of all employees, volunteers and camp participants as well as compliance with all safety requirements.

Scope

The review of environmental health and safety and 4-H youth program safety focused on AgriLife Research and AgriLife Extension locations outside of Brazos County and included environmental health and safety processes related to safety inspections, hazardous chemical administration, employee safety training, and 4-H youth program safety. The audit period focused primarily on activities from September 2011 to August 2012. Fieldwork was conducted from December 2012 to February 2013.
OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. 4-H Youth Program Safety Documentation

Observation

Safety documentation related to 4-H youth events hosted by AgriLife Extension requires significant improvement to better facilitate monitoring and ensure the safety of youth participants. The following weaknesses and instances of non-compliance in youth event safety documentation and processes were noted for thirty-three 4-H youth events tested in twelve districts and three statewide programs:

- Liability waiver and medical treatment authorization forms were not available for 237 of 304 (78%) youth participants.
- Documentation indicating that criminal conviction background checks were completed was not available for 18 of 112 (16%) volunteers involved with these events.

A&M System regulations and AgriLife Extension procedures related to camps and programs for minors require 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. In addition, AgriLife Extension 4-H Youth Development & Program Guidelines require completed waiver, indemnification, and authorization for medical care forms for each 4-H youth event. In some cases, it was indicated that these required safety forms and documentation were prepared but not retained by employees overseeing the 4-H youth event.

Further monitoring is needed to ensure all safety requirements are being followed for these events especially due to the number of youth participants involved. Without properly completed safety forms and documentation to facilitate monitoring, there is an increased risk of personal injury to a minor due to lack of medical treatment authorizations and inadequate screening of volunteers for youth programs. The recent implementation of the 4-H Connection online program will help facilitate increased monitoring and documentation of many of these safety requirements.
Recommendation

1. 4-H Youth Safety Documentation (cont.)

Ensure all employees involved with youth events are trained and knowledgeable of youth safety requirements.

Increase monitoring to ensure all youth safety requirements are properly followed for 4-H events including required forms and waivers as well as required background checks for adults involved with these events.

Maintain all safety-related documentation in accordance with A&M System records retention requirements and ensure personnel are aware of these requirements.

Continue current efforts to increase the use of the 4-H Connection online program.

Management’s Response

Texas A&M AgriLife Extension Service will ensure that all employees involved in youth events are trained and knowledgeable of youth safety requirements. In addition all volunteers that are assisting in multi-day or overnight events, where they are chaperoning or have full supervisory duties over youth kept apart from their parent(s) or legal guardian(s) will receive child abuse training.

Monitoring will be increased to ensure all youth safety requirements are being properly followed and required documentation is retained according to A&M System records retention requirements including liability waivers, medical treatment authorization forms, and required background checks. The required forms were being completed but in the past were not being maintained by our office in all cases. 4-H Specialists are now keeping copies of all liability waivers and medical treatment authorizations for a period of two years. Additionally, all liability forms are now completed online using the enrollment system (4-H Connect). Implementation date: February 28, 2013.

Efforts will continue to be made to increase the use of the “4-H Connect” program.
2. Safety Training

Observation

Current processes do not ensure that all employees receive the necessary safety training in a timely manner.

Testing of employee hazardous communication (HazCom) training at three AgriLife Research and AgriLife Extension Centers indicated that 19 of 63 (30%) employees required to take this training did not complete the training in a timely manner. Four of the employees have never completed the training and the remaining 15 employees completed the training an average of 196 days after their hire date. Nine of these employees took the training during the audit fieldwork in December 2012. The responsibility for employee safety training lies primarily with each AgriLife Research and AgriLife Extension location and increased monitoring and enforcement is needed to ensure all employees receive appropriate safety training prior to the use or exposure to workplace hazards. In addition, the A&M System’s TrainTraq system is used by AgriLife Research and AgriLife Extension for this required training; however, employees were not consistently assigned this training within the system at the time of their employment. Occupational safety training for employees at the Centers was also not formally identified based on the employee’s specific duties and job responsibilities and was not consistently documented to provide assurance that employees completed all necessary safety training.

The Texas A&M AgriLife Research and AgriLife Extension Hazard Communication Program states that employee education and training are essential components of the program and training of new or newly assigned employees will be given before the employee works with or handles hazardous chemicals. The Texas A&M System Risk Management Standard for Agriculture and Forestry Safety states employees involved in agriculture and forestry programs are exposed to a wide range of potential hazards such as the operation and transport of mechanized equipment and the application of pesticides and chemicals. The standard also requires that documented training be provided to employees related to safe operating procedures for identified hazards.

Recommendation

Increase monitoring and enforcement of safety training requirements at the AgriLife Research and AgriLife Extension Centers to ensure that all employees with potential exposure to hazardous chemicals receive safety training prior to initial exposure to these chemicals. Assign this training to new
2. Safety Training (cont.)

A formal risk assessment is needed to identify, analyze, and address safety risks.

employees that require such training in the TrainTraq system at the time the employee is hired and set due dates to utilize the automated features within the system to help monitor and track employee safety training for timely completion.

Identify and document the occupational safety training needs for each AgriLife Research and AgriLife Extension employee based on their specific duties and job responsibilities. Ensure the employee completes the required safety training and that documentation is retained in accordance with the A&M System records retention requirements.

Management’s Response

A safety training form will be developed for use at all off-campus AgriLife Research and Extension Centers. The form will be utilized during new employee orientation and will be used to track all safety training for employees. Hiring supervisors will complete the form prior to employee orientation to allow time for TrainTraq assignments. Any online training not within TrainTraq will be coordinated and assigned through AgriLife EHS. Applicable trainings will be completed prior to the use of or exposure to anticipated workplace hazards. Once the form is complete it will be placed in the assigned Laserfiche training folder. The assigned training folder will centralize all trainings and allow for increased monitoring. A standard operating procedure will be developed to standardize and document trainings across all off-campus AgriLife Research and Extension Centers. Implementation date: August 31, 2013.

3. Safety Risk Assessment

Observation

Completion of a formal risk assessment and analysis is needed to identify and analyze the environmental health and safety risks at all AgriLife Research and AgriLife Extension locations and the corresponding resources needed to address these risks. AgriLife has multiple locations related to its research and extension activities including 13 district Centers plus satellite offices, the Brownwood Center, and the Fort Stockton Office which are geographically dispersed throughout the state. Although extra duty safety officers (32 safety officers) have been assigned at each location, there are only 1.8 full-time equivalent AgriLife Environmental Health and Safety Office (EHS) staff members to provide oversight and support for the safety personnel and processes at these locations. A formal risk assessment will
3. Safety Risk Assessment (cont.)

provide management with the means to determine if adequate controls and resources are in place to effectively address the identified environmental health and safety risks for all locations and activities. The lack of available EHS staff resulted in several of the issues identified in this report such as the frequency of environmental health and safety inspections, follow-up inspections, reviews of safety training, and the development and maintenance of an environmental management system.

The Treadway Commission’s Committee of Sponsoring Organization’s “Internal Control - Integrated Framework” states that the process of identifying and analyzing risk is an ongoing iterative process and is a critical component of an effective internal control system. Along with assessing risks, management should identify and put into effect actions needed to address the risks including control activities to help ensure that the actions are carried out properly and in a timely manner. In addition, the “Environmental Management Guide for Colleges and Universities” published by the Environmental Protection Agency recommends a systematic approach to providing a healthy and environmentally sustainable campus. This approach includes identification of risk factors and compliance requirements as part of the planning process.

Recommendation

Prepare a formal risk assessment to identify and analyze environmental health and safety risks related to research and extension activities at all AgriLife Research and AgriLife Extension Service locations and the corresponding controls needed to address these risks. This approach should be documented and discussed with upper management. Utilize this risk assessment to assess the number of EHS personnel needed to effectively oversee and administer environmental health and safety controls and operations.

Management’s Response

The Agencies will continue to prepare an annual agency-wide enterprise risk plan, which includes consideration of environmental health and safety risks. This plan is discussed at all employee levels, with decisions ultimately being made by upper management. The plans are then submitted to the A&M System Risk Management and Benefits Administration Office. Additionally, the Management Review Team has completed a risk matrix on each reviewable unit within the agencies. An analysis will be performed to include environmental health and safety in the matrix. Implementation date: November 30, 2013.
3. Safety Risk Assessment (cont.)

Additionally, a cost-benefit analysis will be performed to examine the possibility of increasing the number of EHS personnel needed to oversee and administer environmental health and safety controls and operations based on the results of the environmental health and safety risk assessment processes above. The results of this review will be presented to upper management for consideration. Completion of cost-benefit analysis: December 31, 2013.

4. Safety Inspections

Observation

Safety monitoring processes need improvement to ensure facilities and laboratories remain safe.

Testing at three AgriLife Centers determined that 34 of 190 (18%) prior safety deficiencies identified during safety inspections had not been corrected or were not in the process of being corrected. The following deficiencies were noted in the safety monitoring processes:

- Scheduling and frequency of safety inspections are not based on the associated safety risks with higher safety risk facilities requiring more frequent inspections.
- Safety deficiencies noted are not separately rated based on the severity of the deficiency and no implementation date is included in which the deficiency is required to be corrected.
- No ongoing status update is provided by the Centers to indicate the progress made in addressing safety deficiencies identified.
- A formal follow-up safety inspection process is not in place to ensure safety deficiencies are addressed in a timely manner.

Detailed inspections of fire/life safety, lab safety, shop safety, and agricultural safety and pollution prevention are conducted and significant safety deficiencies noted are addressed at the time of inspection. Inspection results are then documented and reported to management. However, due to resource and time limitations of EHS staff, these inspections have primarily been coordinated with AgriLife Management Review Team (MRT) visits to Centers located outside of Brazos County and a follow-up inspection process has not been implemented. Texas A&M System Supplemental Risk Management Standards requires periodic sampling and follow-up evaluations when monitoring results indicate a risk of potentially harmful occupational exposures. Prioritization of safety deficiencies with assigned implementation dates allow these deficiencies to be tracked and monitored through follow-up inspections.
### Recommendation

**4. Safety Inspections (cont.)**

Management should direct personnel to address all safety deficiencies noted during inspections in a timely manner.

Improve the current safety inspection process by preparing a risk-based safety inspection schedule to determine the inspection frequency necessary to ensure a safe working environment. Also assess and rate the associated risk of safety deficiencies identified during inspections and set the required implementation date for corrective actions based on the corresponding risk.

Develop and implement a follow-up inspection process to include formal tracking of all safety deficiencies identified including regular status updates of corrective actions taken and scheduled follow-up visits based on the stated implementation dates to ensure appropriate corrective actions have been taken.

### Management’s Response

Management will direct personnel to address safety deficiencies noted during inspections in a timely manner.

As mentioned above, a cost-benefit analysis will be performed which will initially include the cost of inspecting all facilities once every 18 months to increase the frequency of inspections. Until a decision is reached, we will continue to inspect all facilities on a regular basis. The inspection reports resulting from these reviews will subsequently serve as a risk assessment going forward and follow-up inspections, or more frequent full inspections, will be scheduled as needed based on the perceived risks resulting from these inspections.

Safety inspections will continue to be conducted using the iForms application. Items listed in the inspection will be categorized as “Significant Deficiency”, “Deficiency” and “Item of Concern.” All significant deficiencies will be addressed at the time of inspection or shortly thereafter. All other deficiencies will include a time frame for correction and a formal follow-up process. This process will entail an additional status report 30 days after the initial response to the report with photos documenting that the deficiency has been corrected. Implementation date: December 31, 2013.
5. Environmental Management System

Observation

An environmental management system has not been formally developed as required.

An environmental management system to manage the Agency's environmental programs in a comprehensive, systematic, planned and documented manner has not been formally developed for AgriLife Research and AgriLife Extension in accordance with A&M System Policy 24.01, Risk Management. This policy requires that each System member develop an environmental management system that identifies significant environmental interfaces and manages these on a priority basis. In addition, the Environmental Protection Agency’s “Environmental Management Guide for Colleges and Universities” states that using an environmental management system will allow schools to take a more holistic view of their campus and work together to improve their overall environmental performance. EHS staffing has not had sufficient time available to devote towards formally developing and sustaining an environmental management system.

Recommendation

Commit the ongoing resources needed to develop and maintain an environmental management system for AgriLife in compliance with A&M System policy and regulations.

Management’s Response

Parts of the environmental management system are in place and work continues in other areas. One priority has been to improve fuel storage at all facilities. This has been accomplished in several phases by replacing old aboveground fuel tanks with new double-walled tanks. Other initiatives include implementation of Spill Prevention Control and Countermeasure Plans (SPCC), recycling, and environmental permit coordination and tracking. An environmental management committee will be appointed as required by System Policy 24.01 and a formally documented plan that addresses all relevant environmental areas will be developed. The committee and documented plan will be in place by August 31, 2013.
6. Written Operating Procedures

Observation

Standard operating procedures have not been fully developed to support safety processes performed by EHS.

The EHS Office does not have a comprehensive set of internal operating procedures to support safety processes related to environmental health and safety inspections, follow-up inspections, and employee safety training. Although some procedures have been developed, there has not been sufficient time available for EHS to prepare operating procedures for all safety processes. Without detailed internal operating procedures, safety processes may not be effectively implemented. The Treadway Commission’s Committee of Sponsoring Organization’s “Internal Control - Integrated Framework” states that control activities involve development of procedures to affect established policies.

Recommendation

Develop and implement comprehensive written internal operating procedures in the above areas. Ensure these procedures are easily assessable and updated as needed in a timely manner.

Management’s Response

Written procedures will be developed to address inspections, follow-up inspections, and employee safety training. Implementation date: December 31, 2013.
BASIS OF REVIEW

Objective

Review governance and risk management processes and controls at Texas A&M AgriLife Research and the Texas A&M AgriLife Extension Service to determine if selected environmental health and safety functions at decentralized locations are operating effectively to better ensure that a safe environment exists and that the Agencies are in compliance with laws and policies.

Criteria

Our audit was based upon standards as set forth in the System Policy and Regulation Manual of the Texas A&M University System; Texas A&M AgriLife Research and Texas A&M AgriLife Extension Service Procedures; Texas A&M AgriLife Extension 4-H Youth Development & Program Guidelines; the Treadway Commission’s Committee of Sponsoring Organization’s Internal Control – Integrated Framework; federal and state laws; 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

AgriLife Research and AgriLife Extension have 13 district Centers plus satellite offices, the Brownwood Center, and the Fort Stockton Office which are geographically dispersed throughout the state. Each location has assigned an extra duty safety officer. The AgriLife Environmental Health and Safety (EHS) Office oversees environmental health and safety processes and personnel at these locations. The EHS Office has 1.8 full time equivalent staff members and an annual operating budget of approximately $150,000. AgriLife Extension’s 4-H and Youth Development Office has a staff of 36 that administers the Agency’s 4-H and youth development program in Texas which serves approximately 600,000
youth per year and as many as 30,000 adult volunteers to run events and camps.

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