PROJECT SUMMARY

Overview

The management processes for the Administration and Custodial Services’ areas within Texas A&M University’s Facilities Services provide reasonable assurance that resources are used in an efficient and effective manner and in compliance with laws, policies, regulations and procedures, except in two custodial safety training areas. The current training process does not ensure that custodial employees receive bloodborne pathogen (BBP) and asbestos awareness training timely after hire. Additionally, custodial employees are not receiving the required BBP recurring training timely. Because of the nature of custodial employees’ duties, all custodians must take BBP training annually. Opportunities for improvement were also noted in the areas of inventory processes and custodial supervisory training.

Summary of Significant Results

Custodial Safety Training

Adequate controls are not in place over two of the employee safety training programs to ensure that necessary safety training is completed in a timely manner. New employees potentially exposed to bloodborne pathogens and asbestos containing materials did not receive training timely after hire and annual recurring BBP training was not taken timely by current employees. Safety training is an important preventative control to ensure the safety of all affected employees.
Summary of Management’s Response

Efforts are underway to address the custodial safety training, inventory control and supervisory training recommendations. Additional detail is provided within the individual audit responses.

Scope

The review of processes and controls in place within Facilities Services - Administration and Custodial Services focused on the areas of training, inventory, the complaint and grievance process, custodial employee efficiencies and custodial staff interviews. Activities related to these areas were reviewed for the period of September 1, 2010 through August 31, 2011. Fieldwork was conducted from October through December, 2011.
OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. Custodial Safety Training

Observation

Initial and annual safety training courses were either incomplete or untimely.

Significant rates of non-compliance were identified regarding bloodborne pathogens and asbestos awareness training requirements according to the Texas Health and Safety Code and University procedures. Processes do not ensure that custodial employees whose occupational duties create a reasonable expectation for exposure to blood or other potentially infectious materials are receiving formal bloodborne pathogen training prior to initial assignment of tasks where exposure may occur or on an annual basis. In its assessment of potential for exposure, the Office of Research Compliance and Biosafety determined that all University custodians have potential occupational exposure and therefore must have BBP training. This is a requirement of Texas A&M Standard Administrative Procedure 24.01.01.M4.01 Bloodborne Pathogens Exposure Control. Eight of nine (89%) employees sampled did not receive BBP training timely after hire while 13 of 21 (62%) did not receive annual refresher training within one year of the employee’s previous training. In addition, a Facilities Services’ standard operating procedure requires that asbestos awareness training be completed within the first 60 days of employment for all new employees that may come into contact with asbestos containing materials. Asbestos awareness training was not taken by 12 of 29 (41%) employees within 60 days of hire. Employees who have exposure to bloodborne pathogens or asbestos without the proper training increase the risk of employee injury, facility damage, and non-compliance with standard administrative and operating procedures, the Texas A&M Bloodborne Pathogens Exposure Control Plan (BPECP), and the Texas Health and Safety Code.

Texas A&M Standard Administrative Procedure 24.01.01.M4.01 includes guidance that “Employing departments are responsible for ensuring compliance with the provisions of this SAP and the Texas A&M University BPECP.” BBP training for new hires is currently only available in a classroom setting offered by the Biosafety Occupational Health Program in the Office of Research Compliance and Biosafety. This training is not held frequently enough to address the hiring needs of Custodial Services. Annual training reminders can be sent electronically through a group
1. Custodial Safety Training

(function in the TrainTraq system. It was noted the majority of employees identified as being delinquent for annual BBP refresher training had not been assigned to the appropriate group function in TrainTraq by the Office of Research Compliance and Biosafety. In regard to asbestos training, management did not monitor and provide training to the identified custodians timely, offering it past the due date.

**Recommendation**

Ensure employees receive training, particularly BBP and asbestos awareness training, as required according to the Texas Health and Safety Code and University requirements. Enhance monitoring controls to ensure trainings, both initial and recurring and including those provided by units other than Facilities Services, are taken as required.

**Management’s Response**

All Custodial Services’ employees are now in compliance with all required safety training. The Office of Research Compliance and Biosafety has committed to offering bloodborne pathogen training at least once a week. Facilities Services will give notice to the Office of Research Compliance and Biosafety’s Occupational Health Program of training needs at least two days before training is required. The Office of Research Compliance and Biosafety will enter training completion verification for each employee into TrainTraq. The Facilities Services Training Office will monitor TrainTraq to ensure compliance for initial and recurring training requirements.

Asbestos awareness training has been incorporated into all custodial new hire training, thereby assuring that all new custodians receive training within the required 60-day time frame. The Facilities Services Training Office will enter employee completion verification into TrainTraq and monitor that all new employees have had asbestos awareness training in a timely manner.

As an additional control, the Facilities Services Training Office will develop a monthly report to monitor training compliance. This report will be reviewed by executive staff with other regularly scheduled reports beginning in June 2012. Supervisors have been advised that new employees may not perform any tasks that could possibly expose them to bloodborne pathogens or asbestos until training is complete.

**Target date:** June 30, 2012.
2. Consumable Supply Inventory

Observation

Controls over consumable supply inventory require improvement.

Test counts of consumable supply inventory for Custodial Services could not be performed as inventory listings are not maintained. Use of consumable supplies is tracked on an issuance log by each crew supervisor. Comparisons between crew issuance logs and purchases are not performed as logs are simply maintained by the crew supervisor and not submitted to upper management. In addition, the logs do not accurately reflect the current types, sizes, and quantities of consumable supplies routinely ordered. It was also noted that, while a listing of crew quarters where inventory is kept is documented, it is not known by management where inventory may be maintained outside of these areas as well. Purchases are monitored on a monthly basis to identify unusual trends; however, without comparing to actual usage, excess purchases would not be identified. Fiscal year 2011 purchases totaled approximately $1.3 million while inventory on hand at the end of fiscal year 2011 was approximately $240,000.

Tracking of custodial consumable supply inventory can be difficult due to the rapid turnover of supplies; however, without proper controls, assurance cannot be gained that consumable inventory is adequately protected and monitored for misuse. Proper inventory controls ensure that inventories are secured physically and periodically counted and compared with amounts shown on control records. Due to the recent Facilities Services organization changes and continual expansion of cleanable space with relatively a constant number of custodial employees, Facilities Services’ management has not been able to implement stronger inventory controls outside of monitoring of purchases.

Recommendation

Update the issuance logs to reflect the current types, sizes and quantities of consumable inventory routinely ordered. Ensure issuance logs from each custodial crew are submitted to Custodial Services’ management monthly and perform reconciliations between the issuance logs and purchases on a monthly basis for reasonableness. Ensure the listing of inventory locations within crew quarters is accurate and include any other locations where crews may be housing inventory.

Identify controls which would allow for performance of inventory spot checks such as establishing a maximum and minimum number of
2. Consumable Supply Inventory (cont.)

items to be held on shelves or electronic inventory tracking mechanisms. Consider implementing these types of controls to further reduce risks of misappropriation associated with consumable supply inventory.

Management’s Response

Custodial management has inventoried all locations where crews are storing inventory. The over 600 current locations will be reviewed by management to determine whether inventory can be consolidated into fewer locations, allowing for greater control and security.

Management will update the issuance logs to reflect the current types, sizes, and quantities of consumable inventory routinely ordered. A beginning inventory count will be conducted to create a baseline for future reconciliations. Issuance logs for each location will be submitted monthly and Custodial Services’ management will reconcile the logs with purchases on a monthly basis for reasonableness.

Management will review options and implement mechanisms which will allow for the performance of inventory spot checks. Management will review the costs versus benefits of other controls to further reduce risks of misappropriation associated with consumable supply inventory.

Target date: December 31, 2012.

3. Custodial Supervisory Training

Observation

A formal supervisory training program is not in place for employees in custodial supervisory positions.

Custodial employees in supervisory positions are required to take the University’s Positive Performance Management for Supervisors training; however, no other supervisory training is required. The Texas A&M Department of Human Resources offers several supervisory training courses at no cost. These courses could further enhance the supervisory and managerial skills of those employees in custodial supervisory positions potentially resulting in greater knowledge of managerial processes and improved relationships between supervisors and subordinates.
Recommendation

3. Custodial Supervisory Training (cont.)

Consider requiring additional supervisory training, such as supervisory courses offered through the Texas A&M Department of Human Resources, to further enhance supervisory and managerial skills of employees in custodial supervisory positions.

Management's Response

In order to further enhance supervisory and management skills of employees in custodial supervisory positions, the Facilities Services Training Office and Custodial Services' management have agreed on a list of core courses for supervisors. These courses are currently offered online and by Employee and Organizational Development staff. The Facilities Services Training Office has scheduled a series of required courses for all custodial supervisors to be completed by September 2012.

Core courses will be reviewed annually by the Facilities Services Training Office and Custodial management to fulfill current and future needs. The Facilities Services Training Office will make initial course assignments through TrainTraq. During the annual performance evaluation process, additional training requirements will be identified specific to each supervisor’s needs. Custodial management and the Facilities Services Training Office will monitor training and provide a status report to Facilities Services management on a quarterly basis.

Target date: September 30, 2012.
BASIS OF REVIEW

Objective

The objective of the audit was to review the processes and controls in place within the Facilities Services - Administration and Custodial Services division to determine if resources are used efficiently and effectively and in compliance with laws, policies, regulations and rules.

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 Health and Safety Code, Texas A&M Rules and Procedures, Texas A&M Facilities Services’ Standard Operating Procedures, 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

Facilities Services - Administration and Custodial Services is comprised of the following areas: Accounting, Custodial Services, Information Management Services, Personnel and Payroll, Policy and Leave Administration, and Training. These areas perform functions that support the employees and day-to-day operations of Facilities Services. Custodial Services provides cleaning services for 312 facilities on the University campus (approximately 12.6 million gross square feet), helping to maintain a healthy, safe, attractive learning environment for students, faculty, and staff. Administrative and Custodial Services employs approximately 30 people in the Administrative area and approximately 340 people in the Custodial Services area. The fiscal year 2011 Administrative and Custodial Services operating budget totaled approximately $15.4 million.
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