Overall Conclusion

Texas A&M University at Galveston needs to significantly improve its procedures and monitoring processes related to student safety, employee safety training, and campus safety inspections to ensure that a safe environment exists for students, faculty, staff and visitors.

Coordination of health and safety areas between the Galveston campus and Texas A&M University’s Environmental Health and Safety (EHS) Office may provide an opportunity for support and monitoring to help reduce the university’s current safety risks. Opportunities for improvement were also noted in the development of hazardous communication programs, small class size justifications, and institutional student scholarship documentation.

The Galveston campus works with the local community in maintaining an emergency response and business continuity plan. Controls and monitoring processes have been established to provide assurance that the Texas Maritime Program operations are in compliance with federal regulations.

Summary of Significant Results

Student Safety

Safety procedures and monitoring processes need to be significantly improved in key student safety risk areas in order for the university to demonstrate its diligence in providing a safe environment for its students, faculty, and staff. These areas of risk include student laboratory safety training, student club sports, and student travel. Adequate safety procedures and monitoring are essential to ensure students are informed on the hazards related to laboratory safety, high risk sports, and travel in order to reduce their risk of injuries. Additionally, supporting documentation should be maintained in compliance with A&M System and state records retention standards.
Employee Safety Training

Significant improvements are needed in employee compliance with required laboratory safety training and bloodborne pathogen (BBP) training to ensure the university's safety programs are operating effectively. A&M System regulations require documented training on laboratory health and safety hazards. A&M System regulations as well as state and federal regulations require BBP training for certain employees who are at risk of exposure to blood and body fluids. The risk of injury to employees from exposure to laboratory hazards or bloodborne pathogens due to improper understanding, use, or storage is increased when timely training is not provided.

Campus Safety Inspections

Improvements are needed in fire and life safety inspection processes as well as the follow-up procedures for laboratory safety inspections. The Galveston campus does not have a comprehensive fire and life safety inspection program that includes all buildings on campus. In addition, there is no documentation of the laboratory safety inspection follow-up efforts to demonstrate that deficiencies identified are resolved in a timely manner. Without effective fire and life safety and laboratory follow-up programs, there is a greater risk of property damage and injury to students, faculty, staff and visitors.

Summary of Management’s Response

Management agrees with the recommendations made in this report. We are committed to satisfactorily addressing the issues and have developed or enhanced procedures to address these issues. Additional detail is provided within the individual audit response.
Detailed Results

1. Student Safety

Safety procedures and monitoring processes need to be significantly improved in key student safety risk areas in order for the university to demonstrate its diligence in providing a safe environment for its students, faculty, and staff.

Laboratory Safety Training

Current processes do not ensure that students receive the necessary laboratory safety training in a timely manner. Although there is evidence that students are receiving some level of laboratory safety training, documentation and monitoring of this training is limited. Six of 15 (40%) laboratory students tested did not complete lab safety training in a timely manner. Five of these students did not have evidence of completing safety training and one student completed training 56 days after the class start date. A review of all students enrolled in Marine Biology, Marine Science, and Marine Systems Engineering departments’ laboratory courses showed that 1,013 of 1,808 (56%) students enrolled did not complete a laboratory safety acknowledgement form to signify completion of laboratory safety training.

When students register for a laboratory course, the student information system (Banner) automatically refers them to the required training and completion of a laboratory safety acknowledgement form. However, the reports from the Banner system documenting students’ completion of the acknowledgment forms were not reviewed and monitored to ensure all students completed the necessary training prior to participating in laboratory activities. Student laboratory safety training is important as it provides students information on the physical and chemical hazards in the laboratory and reduces the risk of injuries.

Student Club Sports

Improvements are needed to ensure students participating in high risk club sport activities have received the required training prior to participating in the sport and that documentation is retained in accordance with the A&M System records retention policy. Eight of 16 (50%) student club participants reviewed lacked supporting documentation for required safety procedures. Three participants did not have documentation that required swim tests had been completed, two participants did not have documentation that the required rowing team training video had been completed, six participants were missing liability waiver and release
forms, and one participant did not have documentation of the required diving certification or diving insurance.

There is a lack of monitoring controls to ensure required safety training is completed before the student is permitted to participate on the club sport team. Documentation of safety training and required liability waivers are not retained in compliance with the A&M System records retention policy (two years). Without properly completed and maintained documentation to facilitate monitoring there is an increased risk that students are not properly trained to prevent injuries. In addition, the university is at risk of not having the supporting documentation to demonstrate that students were made aware of and accepted the risks related to club sports prior to their participation.

**Student Travel**

**Documentation is incomplete to ensure that required student travel procedures were followed.** Six of ten (60%) student trips reviewed lacked supporting documentation for travel procedures as required by university standard operating procedures. Four trips did not have certification that drivers of large capacity vans had completed training as required, two trips were missing liability waiver and release forms, and two trips were missing emergency contact information. Student travel associated with academic departments has not been formally addressed by management at the Galveston campus. A student travel process exists for travel associated with student activities, but academic departments did not use these documentation procedures for academic student travel. Current student travel procedures do not include records retention requirements for student travel documentation. Without a monitoring process to ensure that student travel procedures are followed, the risk of potential travel-related injuries, noncompliance with A&M System regulations, and financial liability to the university is increased.

**Recommendation**

Develop comprehensive safety procedures, and monitoring and oversight processes over student laboratory safety training, student club sports, and all student travel programs to ensure that safety training is completed by students as required and adequately documented. Provide training to employees to ensure they understand club sport safety, student travel procedures, and records retention requirements. Include records retention requirements in all safety procedures and retain documentation in compliance with the A&M System Records Retention Schedule.
Management’s Response

Management will implement the following changes to improve student safety processes:

- The reports from the Banner system documenting students’ completion of training acknowledgement forms will be reviewed and monitored to ensure all students completed the necessary training prior to participating in laboratory activities. On the 5th class day, a consolidated report from the Banner system will be used by the EHS Office to monitor for compliance. Procedures will be reviewed and updated as necessary. Full implementation will be in place by January 30, 2015.

- New processes are being developed for sports club documentation, records retention, and oversight. Coaches have been instructed on student safety training requirements for club sports and maintaining appropriate documentation in compliance with records retention requirements. The Associate Director of the Recreational Sports program will verify safety training documentation and ensure records retention compliance. Procedures will be reviewed and updated as necessary. Full implementation will be in place by January 30, 2015.

- The Galveston campus will follow the same standard administration procedures as Texas A&M for student travel and will form a permanent oversight committee on student travel to keep all departments current on all related policies and procedures. At the beginning of each semester, the committee will meet with the applicable faculty, staff, and graduate teaching assistants to review student travel policies, procedures, and compliance requirements. Documentation to ensure compliance with driver training certifications, waiver and release forms, and emergency contact information requirements will be retained in accordance with records retention requirements. Procedures will be reviewed and updated as necessary. Full implementation of these procedures will be in place by September 30, 2015.

2. Employee Safety Training

Significant improvements are needed in employee compliance with required laboratory safety training and bloodborne pathogen (BBP) training to ensure the university’s safety programs are operating effectively.
Employee Laboratory Safety Training

Laboratory safety training for new employees is not provided in a timely manner. Four of 12 (33%) employees did not complete laboratory safety training in a timely manner. Two faculty employees hired on September 1, 2013 and November 1, 2013 have not received training and two employees completed safety training 158 and 216 days after their hire date. Employee laboratory safety training is decentralized at the department level with little monitoring to ensure that training is completed in a timely manner. Currently, departments are required to provide safety training to new employees and provide names of graduate students teaching laboratory courses to the campus safety officer for training. A&M System regulations require laboratory safety training be provided and documented for faculty, staff, and students. Lack of safety training and inadequate documentation increases potential liability to the university in the event of a safety-related injury and can result in noncompliance with A&M System regulations and state laws.

BBP Control Plan and Training

Written procedures have not been developed for a BBP exposure control plan to provide guidance regarding occupational risks and specific precautionary control measures needed to manage and minimize potential exposure to bloodborne pathogens. Employees in positions requiring BBP training had not received the training as required by A&M System regulations as well as state and federal law. Monitoring procedures are not in place to ensure that all employees get the necessary training before potential exposure to hazards. 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. Without an effective plan or training for the bloodborne pathogens, the university is at a higher risk for employee accidents related to contamination by substances which are biological in nature.

Recommendation

Develop a process to ensure newly hired employees with laboratory responsibilities receive safety training in a timely manner. Establish a BBP exposure control plan for the Galveston campus or add Galveston campus positions to the Texas A&M University BBP exposure control plan. Develop monitoring procedures to ensure that all employees with potential exposure to laboratory hazards and bloodborne pathogens receive training prior to initial exposure.
Management’s Response

Employee Laboratory Safety Training
We will implement changes to improve laboratory safety training for employees by working with the EHS Office in College Station to coordinate safety procedures and compliance controls. We will identify persons needing safety training and ensure that they receive it prior to working in the laboratory, including new hires as they attend orientation. Where possible, we will use TrainTraq to record and track training. Anticipated completion date: September 30, 2015.

BBP Control Plan and Training
To improve compliance, we will adopt the Texas A&M BBP manual and train persons in the following areas: campus police, all athletic facility staff, Sea Camp professional staff, and Residence Life professional staff as identified by the Texas A&M Office of Research Compliance. Training will be onsite and recorded in TrainTraq. Exposure health monitoring will be completed via a third-party vendor (UTMB). All records will be imaged and retained by EHS Office according to retention rules and privacy laws. Anticipated completion date: January 30, 2015.

3. Campus Safety Inspections

Significant improvements are needed in fire and life safety inspection processes as well as the follow-up procedures for laboratory safety inspections.

Fire and Life Safety Inspections

The university does not have a comprehensive fire and life safety inspection program that includes all buildings on the Galveston campus. The Galveston campus conducts several levels of fire and life safety inspections in student residence halls and apartment facilities. However, the remaining 22 buildings on the Galveston campus have not had a comprehensive fire and life safety inspection. Currently, the university has not identified and addressed fire and life safety deficiencies through comprehensive inspections of facilities. Management has asserted that they have relied on third-party inspections of various aspects of fire and life safety. These include the insurance company and contracted vendor inspections of fire alarms, extinguishers, and sprinkler systems. These inspections are conducted for specific purposes and may not cover all necessary fire and life safety risks. Without a comprehensive fire and life safety inspection program, the university may not be aware of potential hazards in its campus facilities which could impact the ability to provide a safe environment for its students, faculty, staff and visitors.
Laboratory Safety Inspection Follow-ups

There is no formal follow-up documentation or tracking of laboratory safety deficiencies identified during routine laboratory safety inspections to ensure that all are addressed in a timely manner. Currently, the university’s Safety Office laboratory safety inspection program provides reports to departments responsible for the laboratory and it is that department’s responsibility to oversee the resolution of any safety deficiencies identified. However, there is no documentation of any follow-up efforts by the Safety Office to demonstrate that deficiencies identified are resolved in a timely manner. As a result, there may not be adequate assurance that departments have resolved all noted laboratory safety deficiencies in a timely manner resulting in an increased risk of injury to students and employees, as well as property damage.

Recommendation

Develop a risk-based fire and life safety inspection schedule for the Galveston campus facilities to determine the inspection frequency necessary to ensure a safe living, teaching, and working environment. Develop and implement comprehensive written procedures for fire and life safety inspections, and laboratory safety inspections including follow-up inspection procedures. Implement a formal tracking and monitoring process of laboratory safety deficiencies noted during Safety Office inspections and document the follow-up inspection resolution of these safety deficiencies to ensure they are resolved in a timely manner.

Management’s Response

Fire and Life Safety Inspections

We will adapt and adopt the Texas A&M EHS manual for fire and life safety. All EHS inspections will be documented and follow-up procedures created to ensure re-inspection compliance. These inspection reports will be imaged by the EHS Office and retained according to university records retention procedures. Anticipated completion date: September 30, 2015.

Laboratory Safety Inspection Follow-ups

We will update the Galveston campus’ laboratory safety inspection procedures to create a tracking and follow-up inspection procedure. This will create reports identifying deficiencies and corrective actions accomplished. The EHS Office will document all inspection reports and they will be imaged by the EHS Office and retained according to records retention procedures. Anticipated completion date: September 30, 2015.
4. **Hazardous Communication Program**

Work area and workplace implementation plans have not been developed as required in the Galveston campus’ Chemical Laboratory Safety and Hazardous Communication Compliance Manual. Three of five (60%) classroom laboratories did not have a workplace or work area implementation plan. Monitoring procedures are not in place to ensure that workplace or work area implementation plans are developed to address the requirements of the campus Hazard Communication Program. These work area and workplace plans are required by the Galveston campus in addition to A&M System requirements. Without adherence to requirements in the manual, the Galveston campus may be exposed to additional risks of liability should injuries occur.

**Recommendation**

Review the workplace and work area implementation plan requirements in the Chemical Laboratory Safety and Hazardous Communication Compliance Manual to determine if these requirements should be changed. Establish procedures to monitor and enforce requirements established in the Chemical Laboratory Safety and Hazardous Communication Compliance Manual.

**Management’s Response**

*We will update the Galveston campus’ HazCom plan to include formal procedures to audit each laboratory space annually for compliance with the Chemical Laboratory Safety and Hazardous Communication Compliance Manual. We will document these inspections and the follow-up to ensure that each laboratory that is deficient has taken corrective action. The reports generated will be imaged by the EHS Office and retained according to university records retention procedures. Anticipated completion date: January 30, 2015.*

5. **Small Class Size**

A formal small class size monitoring function is not in place to ensure that courses that do not meet minimum class size requirements have appropriate justifications for continuation. Two of ten (20%) small class courses tested did not have evidence of department head justification or management approval. Procedures were not in place for documenting department head justification and management approval of small classes. Justification was often obtained informally. Without a formal monitoring function there is an increased risk that courses not meeting minimum enrollment requirements will continue to be held which could result in an inefficient use of resources.
Recommendation

Establish procedures to document department head justification and management approval of small class sizes.

Management’s Response

Enrollment Services will implement a new procedure which will require written documentation of requests from department heads, as well as written documentation of management approval. Anticipated completion date: January 30, 2015.

6. Institutional Scholarships

The ranking and selection of eligible students for scholarship awards is not documented. Departments nominate students to the Scholarship & Awards Committee to be considered for institutional scholarships; however, these selection processes are not documented. The Scholarship & Awards Committee members vote on scholarship awards, but student rankings or other support for award decisions is not documented. There are no procedures in place for formal documentation of student nomination, selection, or scholarship awards. Without procedures to lead departments, the risk is increased that the university cannot demonstrate that scholarship award decisions were made on an objective basis and met donor intent and that records are retained to support scholarship awards.

Recommendation

Develop procedures to provide guidance to departments and the Scholarship & Awards Committee for the scholarship award process. Ensure that documentation is maintained to support award decisions.

Management’s Response

To improve documentation, the Galveston campus’ Scholarships and Awards Committee kept minutes of the scholarship selections for the 2014 – 2015 cycle. The committee documented how each nominee and/or recipient met the scholarships’ criteria, the proceedings from the committee votes, etc. This selection cycle incorporated a new electronic system to assist in matching scholarship criteria with qualified candidates. The Financial Aid Office developed and implemented a “Conflict of Interest and Confidentiality Statement” and “Subcommittee Selection Process Form” that documents scholarship selection processes used by committee members and their respective departmental subcommittee members. Beginning
with 2015 – 2016, the committee will develop guidelines, identifying the committee’s selection standards for the upcoming cycle, including a discussion of student disciplinary issues, prior receipt of scholarship awards, etc. A formal training over guidelines and best practices will be held prior to the 2015 – 2016 cycle. Anticipated completion date: September 30, 2014.
Basis of Review

Objective and Scope

The overall objective of this audit was to review and assess selected management control processes at Texas A&M University - Galveston to determine if resources are used efficiently and effectively and in compliance with applicable laws and policies.

The review of selected management controls at Texas A&M University – Galveston focused on laboratory safety training, fire and life safety inspections, laboratory safety inspections, hazard communication program, student travel, student club sports, training ship crew certifications and safety training, institutional scholarships, facility maintenance, small academic class size, and graduation process. The audit period focused primarily on activities from January 1, 2013 to December 31, 2013. Fieldwork was conducted from December 2013 to February 2014.

Criteria

Our audit was based upon standards as set forth in the System Policy and Regulation Manual of the Texas A&M University System 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.
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