

University Risk and Compliance

Program Review

August 1, 2005

University Risk and Compliance

- Safety and Security
 - Environmental Health and Safety
 - Police Department
- Enterprise Risk Management
- Compliance Program
- Management Advisory Services
- Rules and SAPs
- Audit Liaison
- Fraud Contact
- Customer Service
- Camps and Enrichment Programs (transfer out Sept 2005)
- Insurance (transferred out June 2005)

University Risk and Compliance

Safety and Security

- Environmental Health and Safety
- University Police Department

University Risk and Compliance

Safety and Security

- Environmental Health and Safety
 - Promote a healthy and safe environment for the University community
 - Five major groups
 - 1) Occupational Safety and Health
 - 2) Environmental and Hazardous Waste Management
 - 3) Fire and Life Safety
 - 4) Radiation Safety
 - 5) Agricultural Safety

University Risk and Compliance

Safety and Security

Environmental Health and Safety

Group 1. Occupational Safety and Health

- Asbestos (new)
- Indoor Air Quality
- Occupational Health/Sanitation (new)
- Occupational Safety – Injury and Illness Prevention (new)

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Safety and Security

Environmental Health and Safety

Group 2. Environmental and Hazardous
Waste Management

- Environmental Management (new)
- Hazardous Waste Collection and Disposal
- TAMU-Galveston support (new)

University Risk and Compliance

Safety and Security

Environmental Health and Safety

Group 3. Fire and Life Safety

- Building Plan Reviews
- Fire Safety Inspections - Residence Halls, Campus Buildings, Fire Safety Systems (new)
- Fire Extinguisher and Fire Hydrant Inspections and Testing
- Natural Gas Systems Maintenance Oversight (new)
- Special Events Emergency Support (new)
- Building Evacuation Plans

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Safety and Security

Environmental Health and Safety

Group 4. Radiation Safety

- Radioactive Material Licensing and Safety
- Radiation Producing Device Registration and Safety (accelerators, x-ray machines)
- Laser Safety
- Magnetic Safety (MRI/NMR Safety)

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Safety and Security

Environmental Health and Safety

Group 5. Agricultural Safety

- Agricultural Safety (TAES/TCE Safety Officer)
- Shipping of Hazardous Materials (new)

University Risk and Compliance

Special Areas of Emphasis for Safety

- Fire and Life Safety – 10 year, \$33M plan to improve fire safety on the TAMU campus
- Fire Safety Systems Inspections
- Natural Gas Maintenance Plan
- Environmental Management System
- TAMU-Galveston Safety Program
- Occupational Health and Sanitation
- Select Agent Program
- Injury and Illness Prevention
- Laser and Magnetic Field Safety
- Transportation of Hazardous Materials

University Risk and Compliance

Safety and Security

University Police Department

- Provide professional law enforcement and security services to promote a safe and secure campus environment for students, faculty, staff, and visitors
- Two major areas
 - 1) Field Operations
 - 2) Criminal Investigations and Support Services

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Safety and Security

University Police Department – Field Operations

- Patrol – responding to calls for service, response to alarms and enforcing state criminal and traffic laws
- Security – providing security services by patrolling university property and staffing fixed posts and facilities such as the residence halls, veterinary medical complex and the George H.W. Bush Presidential Library and Museum
- Communications – central dispatching point for all calls for assistance, monitors 911, and campus alarm system

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Safety and Security

University Police Department – Criminal Investigations and Support Services

- Criminal Investigations – investigation of criminal offenses
- Crime Prevention – security and safety programs (new Community – Oriented Police Services in University Apartments, North and South Residence Halls)
- Records – data entry services, filing, and storage of all police reports and records

University Risk and Compliance

University-wide Risk Management

Implement an enterprise-wide risk management process designed to identify and assess risks and related mitigating activities

University Risk and Compliance

• Implementation Strategy

- Introduce the University-wide risk management program and establish a common risk language
- Perform risk assessments (Risk Mgt. Discussion Group)
 - Identify risks
 - Rank risks (probability and impact)
- Identify mitigating activities
 - Actions, procedures, and processes used to manage risks (limit, avoid, accept, share)
 - Identify accountable/responsible person/position
 - Duties are known and periodically evaluated
- On-going monitoring
- Report results and any gaps to the President and Provost

University Risk and Compliance

- **Risk Management Discussion Group**
 - Members were selected to provide a University-wide perspective
 - Actions
 - Identified major risks facing the University
 - Identified mitigating activities for the top risks (high probability/high impact)
 - Identified accountable/responsible person for the mitigating activities

University Risk and Compliance

University-wide Risk Management

- Risk assessment schedule (Tier I)
 - Provost's Office
 - President's Office
 - Research
 - Student Affairs
 - Athletics
 - Athletic Compliance
 - Facilities
 - Finance
 - Governmental Affairs
 - Faculty Senate
 - Communications
 - Assessment and Diversity
 - Development
- Implementation Tools
 - Excel spreadsheets linked with macros - developed by David B. Crawford, UT
 - Optionpower voting software and touch pad equipment (anonymous ranking of impact and probability)

University Risk and Compliance

Compliance Program

Implement an effective compliance program to

- support a culture of accountability
- demonstrate commitment and due diligence to compliance
- expect ethical conduct as the norm

University Risk and Compliance

Compliance Program

- Effective Compliance Program Components

(Based on Federal Sentencing Guidelines)

- Assign overall program coordination at high level with direct access to executive management
- Have standards to deter and detect misconduct (i.e., formal policies and rules, network of compliance expertise)
- Care in delegation of authority (demonstrate integrity and ethical conduct)
- Provide on-going education and training
- Monitor, assess, and provide system for employees to report or seek guidance on compliance issues without fear of retaliation (i.e., hotlines)
- Enforce consistency and use appropriate discipline and incentives
- Periodically assess program effectiveness and report compliance status to executive management

University Risk and Compliance

Compliance Areas (not all inclusive)

- Health and Safety
 - EPA, FAA
 - Hazardous Materials
 - State Fire Marshal
 - Clery Act
- Privacy
 - FERPA
 - HIPPA
 - GLB
- Employment/Non-Discrimination
 - FLSA
 - FMLA
 - COBRA
 - ADA
- Tax Codes (Federal & State)
- Student Financial Aid
- NCAA
- Immigration (SEVIS, Visas)
- IP – Patents and Copyrights
- Research
 - Responsible Conduct of Research
 - Research Integrity
 - Human Subjects
 - Animal Care
 - Biosafety
 - Grant/Contract administration
 - Patriot Act
- State of Texas
 - Public Information Act
 - IT - Dept Information Resources
 - Procurement
 - Record Retention
 - Reporting, Financial & Other
- University (Rules & SAPs)
 - Travel
 - Leave
 - Conflicts of Interest

University Risk and Compliance

- **Compliance Program**
 - Emerging issues
 - Training and education
 - Ethics Contact
 - Hotline
 - Best practices
 - Compliance Team(s)
 - Executive management reporting

University Risk and Compliance

- **Management Advisory Services**
 - Business process improvement, organizational structures, compliance, control structures, management analyses
 - Committees and consultations
 - Allegations
 - Internal controls

University Risk and Compliance

- **Rules and SAPs**

- Facilitate and track new and revised rules and SAPs
- Disseminate information via Web page, Aggie Hotline, Distribution A

- **Audit Liaison**

- Internal and external audits and other reports
- Tracking forms (System audits, TAMU reports)
- Audit Committee books and preparation

- **Fraud Contact**

- Fraud prevention and risk assessment program

- **Customer Service**

- Respond to inquiries
- Prepare biennial report