

OCCUPATIONAL HEALTH AND SAFETY

**CALIFORNIA STATE UNIVERSITY,
LOS ANGELES**

**Audit Report 07-32
February 6, 2008**

Members, Committee on Audit

Raymond W. Holdsworth, Chair
Kenneth Fong, Vice Chair
Herbert L. Carter George G. Gowgani
Melinda Guzman William Hauck
Glen O. Toney

Staff

University Auditor: Larry Mandel
Audit Manager: Michael Zachary
Internal Auditor: Parvena Sandhu

**BOARD OF TRUSTEES
THE CALIFORNIA STATE UNIVERSITY**

CONTENTS

Executive Summary	1
Introduction.....	2
Background	2
Purpose.....	3
Scope and Methodology	4

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Employee Health and Safety Training	5
Tracking of Training Requirements.....	5
Training Records and Procedures	6
Student Health and Safety Training.....	7

APPENDICES

APPENDIX A:	Personnel Contacted
APPENDIX B:	Campus Response
APPENDIX C:	Chancellor's Acceptance

ABBREVIATIONS

CCR	California Code of Regulations
CSU	California State University
CSULA	California State University, Los Angeles
EHS	Environmental Health and Safety
EHSTP	Environmental Health and Safety Training Program
EMMPM	Employee Medical Monitoring Program Manual
EO	Executive Order
IIPP	Injury and Illness Prevention Program
MIIPP	Model Injury and Illness Prevention Program
OHS	Occupational Health and Safety
OSHA	Occupational Safety and Health Administration
RM/EHS	Risk Management and Environmental Health and Safety

EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2005, the Board of Trustees, at its January 2007 meeting, directed that *Occupational Health and Safety* (OHS) be reviewed. Occupational Health and Safety was last audited in 1997.

We visited the California State University, Los Angeles campus from October 29, 2007, through December 7, 2007, and audited the procedures in effect at that time.

In our opinion, internal administrative and operational controls governing OHS were, for the most part, adequate. However, procedures for tracking employee health and safety training and training requirements and maintenance of employee and student health and safety training records needed improvement.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

EMPLOYEE HEALTH AND SAFETY TRAINING [5]

A comprehensive system for tracking health and safety training had not been completed. The campus had not yet completed either campus-wide or departmental training matrices or any such similar system for tracking health and safety training for every department. Individual and new hire employee health and safety training procedures and recordkeeping needed improvement. Specifically, the art, biology, and chemistry departments did not always maintain individual training records for employees. Further, the campus was unable to find evidence of health and safety training for 3 of 20 new hire employee records sampled and none of the departments was able to show evidence of proactive follow-up activities to ensure that employees who missed training were subsequently trained.

STUDENT HEALTH AND SAFETY TRAINING [7]

Evidence of student health and safety training was not always maintained. The art and biology departments did not maintain individual health and safety training records for the students tested and none of the departments tested showed evidence of proactive follow-up activities to ensure that students who missed training were subsequently trained.

INTRODUCTION

BACKGROUND

Senate Bill 198: Injury and Illness Prevention Program (IIPP) was passed and chaptered into the Insurance and Labor Codes on October 2, 1989. Regulations amending the General Industrial Safety Orders in the California Code of Regulations were adopted on December 13, 1990, and incorporated into Title 8, Industrial Relations, §3203, IIPP. Beginning July 1, 1991, Section 3203 required employers to establish, implement, and maintain a written IIPP with specified elements including substantial compliance criteria for use in evaluating an employer's IIPP.

In June 1991, the California State University (CSU) developed and distributed a *Model Injury and Illness Prevention Program* (MIIPP) to each campus. The model program was designed to serve as an umbrella and incorporated elements of a myriad of individual health and safety programs required by state and federal law. It was designed to integrate existing campus health and safety regulations and future safety-related mandates that may arise. The intent of the MIIPP was to facilitate identification and evaluation of workplace hazards; correct unsafe conditions; communicate between the university and its employees, students, and the general public on matters concerning health and safety; educate and train employees; develop compliance strategies; document safety and health-related activities; and identify the person or persons responsible for administering the program.

To expand further health and safety program awareness and compliance, the CSU developed and distributed additional health and safety guidance and policy resources. In July 1996, a *Sample Employee Medical Monitoring Program Manual* (EMMPM) was distributed to assist campuses in understanding and complying with applicable health, safety, and environmental laws and regulations. The *Sample EMMPM* was prepared in response to campus requests for guidelines to be used in developing local campus-specific medical monitoring programs. The manual provides suggested methods and exam protocols to help facilitate safe employee job placement, satisfactory maintenance of employee health, and implementation of effective hazard control methods on individual campuses. In April 1997, a *Sample Environmental Health and Safety Training Program* (EHSTP) was distributed to assist campuses in the area of environmental health and safety training. The objectives of the Sample EHSTP were to identify required and recommended environmental health and safety training, provide mechanisms to ensure that such training is completed, document safety training, make training-related records and reports available to managers and regulatory agencies, and provide a mechanism to ensure continuous improvement of campus safety training programs.

In August 1999, health and safety checklists for on- and off-campus activities were distributed to supplement existing campus, college, or department procedures. These checklists were subsequently included in Executive Order (EO) 715, *California State University Risk Management Policy*, dated October 27, 1999. EO 715 states that each president shall develop and implement campus risk management policies and procedures. In addition to the aforementioned checklists, the EO includes risk management guidelines for electrical safety.

PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of *Occupational Health and Safety (OHS)* and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- ▶ Administration of OHS incorporates a defined mission, stated goals and objectives, clear lines of organizational authority and responsibility, and an effective safety and health committee.
- ▶ The IIPP and OHS policies and procedures are current, comprehensive, compliant with relevant laws and regulations, and adequately communicated.
- ▶ Selected departments had implemented inspection procedures to identify and evaluate workplace hazards and unsafe conditions and work practices, and to report inspection results to appropriate regulators, department chairs, and the environmental health and safety office.
- ▶ Occupational injuries and illness are adequately investigated and accurately reported.
- ▶ Recordkeeping procedures for health and safety inspections are adequate; and noted deficiencies from inspections and accidents are prioritized and resolved.
- ▶ Health and safety training has been provided to selected employees in accordance with specific job requirements; and appropriate training records are maintained.
- ▶ Health and safety training has been provided to students whose areas of study present potential hazards; and appropriate training records are maintained.
- ▶ The employee medical monitoring program is adequate, includes identification of all affected employees, and incorporates effective monitoring and recordkeeping procedures.

SCOPE AND METHODOLOGY

The proposed scope of the audit, as presented in Attachment B, Audit Item 2 of the January 23-24, 2007, meeting of the Committee on Audit, stated that OHS includes oversight of the campus IIPP, job and workplace conditions, employee health examinations and medical monitoring, health and safety training, work-related accidents, and programs for complying with federal and state occupational regulations. Potential impacts include injury of staff, faculty, and students; non-detection of work-related illnesses; regulatory fines and sanctions; litigation; and excessive workers' compensation costs.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect from January 2006 through the date of audit, along with limited testing of calendar year 2005 records.

We focused primarily upon the internal administrative, compliance, and operational controls provided by the campus-wide IIPP and related management activities. Most of our work involved the EHS office and four selected departments: art, biology, chemistry, and physical plant/facilities.

Specifically, we reviewed and tested:

- ▶ The OHS organization and safety and health committee.
- ▶ Health and safety policies and procedures and the campus IIPP.
- ▶ Communication of pertinent IIPP and other health and safety information.
- ▶ Health and safety programs, policies, and inspections for selected departments.
- ▶ Occupational illness and injury investigation and recordkeeping, and Cal/OSHA reporting.
- ▶ Employee and student health and safety training.
- ▶ The medical monitoring program and recordkeeping.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

EMPLOYEE HEALTH AND SAFETY TRAINING

TRACKING OF TRAINING REQUIREMENTS

A comprehensive system for tracking health and safety training had not been completed.

The campus had not yet completed either campus-wide or departmental training matrices or any similar such system for tracking health and safety training for every department. We noted that a listing of health and safety training requirements for art, biology, chemistry, and facilities had not been developed and maintained, although the risk management and environmental health and safety office (RM/EHS) maintained documentation identifying the required training for different job classifications. Additionally, the campus was unable to provide training matrices or similar documentation showing the accomplishment of health and safety training goals for the art, biology, chemistry, and facilities departments.

Title 8 California Code of Regulations (CCR) §3203 states that the state agency should provide training and instruction, and records of the steps taken to implement and maintain the (training) program shall include documentation of safety and health training required for each employee.

The California State University (CSU) *Sample Environmental Health and Safety Training Program* states that for employees, their supervisor should complete a job evaluation profile to identify safety training requirements and recommendations, review and update each employee's training profile annually, include safety training requirements in annual employee training plans and performance evaluations, and assess completion in annual performance and progress reviews.

The director of academic support for academic affairs and the RM/EHS director stated that the campus had already identified the health and safety training requirements and provided the necessary training to the employees; however, documentation for the process was not always maintained.

Failure to adequately track employee health and safety training requirements and related employee training increases the risk that training would be inadequate, inconsistently applied, and overlooked.

Recommendation 1

We recommend that the campus complete campus-wide or departmental training matrices or any similar such system for tracking health and safety training requirements and related training for each employee.

Campus Response

We concur. By June 2008, California State University, Los Angeles (CSULA) will complete a campus-wide training matrix for tracking health and safety training requirements for each employee.

TRAINING RECORDS AND PROCEDURES

Individual and new hire employee health and safety training procedures and recordkeeping needed improvement.

To test employee health and safety training practices, we selected ten employees from each of the art, biology, chemistry, and facilities departments, and requested corresponding individual health and safety training records. Although the facilities department was able to provide all the individual health and safety training records for employees, our review disclosed that:

- ▶ The art, biology, and chemistry departments did not always maintain individual training records for employees.
- ▶ In addition to the tests above, we reviewed a separate human resources sample of 20 new hire health and safety training records for employees hired from January 2006 through October 2007. We noted that initial health and safety training records for campus new hires was not always adequately maintained. The campus was unable to find evidence of health and safety training for 3 of the 20 employees tested.
- ▶ None of the departments was able to show evidence of proactive follow-up activities to ensure that employees who missed training were subsequently trained.

Title 8 CCR §3203 states, in part, that the state agency should provide training and instruction, and records of the steps taken to implement and maintain the (training) program shall include documentation of the safety and health training required for each employee and new employee, including employee name or other identifier, training dates, type(s) of training, and training providers. This documentation shall be maintained for at least one year.

The director of academic support for academic affairs stated that although training did occur, training records were not maintained. The human resources management director and RM/EHS director stated that new employees are required to attend the new hire orientation training that includes the health and safety training. They further stated that the absence of documentation maintained for the training was an oversight and only occurred in isolated instances.

The absence of strong procedures and failure to maintain employee health and safety training records increase the risk that training could be overlooked, increase the potential for regulatory sanctions, and limit the campus' defense in liability cases.

Recommendation 2

We recommend that the campus strengthen employee training procedures and maintain employee health and safety training records on file, and available, for at least one year.

Campus Response

We concur. CSULA has modified its procedures to maintain employee health and safety training records on file for at least one year.

STUDENT HEALTH AND SAFETY TRAINING

Evidence of student health and safety training was not always maintained.

Utilizing summer 2007 class schedules and rosters, we selected 30 students from the art, biology, and chemistry departments and requested corresponding training records to determine whether classroom and laboratory health and safety training had been performed and if recordkeeping was adequate. Although the chemistry department was able to provide all the student health and safety training records, our review disclosed that:

- ▶ The art and biology departments did not maintain individual health and safety training records for the students tested.
- ▶ None of the departments tested showed evidence of proactive follow-up activities to ensure that students who missed health and safety training were subsequently trained.

The CSU Model Injury and Illness Prevention Program (MIIPP) §7.5 states that it is the responsibility of deans, directors, department chairs, and department heads to develop departmental procedures to ensure effective compliance with the Injury and Illness Prevention Program and other university health and safety policies as they relate to operations under their control. Specific areas include employee and student education and training, identification and correction of unsafe conditions, and recordkeeping. Additionally, the MIIPP states that it is the responsibility of management to develop and implement an education and training program designed to instruct employees and students in general safe work practices.

The director of academic support for academic affairs stated that although the training did occur, due to faculty turnover, the training records were not maintained.

Failure to maintain student health and safety training records increases the risk that health and safety training could be overlooked and limits the campus' defense in liability cases.

Recommendation 3

We recommend that the campus strengthen procedures to maintain student health and safety training records.

Campus Response

We concur. CSULA has sent reminder notices to faculty reiterating its procedures in maintaining student health and safety training records on file for a minimum of at least one year.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
James M. Rosser	President
Diana Avila	Personnel Coordinator, Human Resources Management
Kevin Brady	Director, Risk Management and Environmental Health and Safety (RM/EHS)
Vickie Chau	Administrative Manager of General Services, Facilities Services
John Ferris	Director, Facilities Services
Tim Frazee	Associate Director, Facilities Services
Steven Garcia	Vice President of Administration and Finance and Chief Financial Officer (At time of review)
Tanya Ho	University Internal Auditor
Yuet Lee	Associate Vice President for Administration and Finance
Christine Leung	Senior Internal Auditor
Todd McIntyre	Health and Safety Coordinator, RM/EHS
Sal Membreno	Director, Academic Support, Office of Academic Affairs
George Pardon	Interim Vice President of Administration and Chief Financial Officer
Lisa Sanchez	Director, Human Resources Management
Greg Sandoval	Staff, University Police
Jeffrey Tipton	Director and Medical Chief of Staff, Student Health Center
Obie Valdez	Administrative Assistant, RM/EHS
Susan Varela	Employment Services Manager, Human Resources Management
Denise Watson-Cross	Workers' Compensation Coordinator, RM/EHS



CALIFORNIA STATE UNIVERSITY, LOS ANGELES

OFFICE OF THE PRESIDENT

March 3, 2008

RECEIVED
UNIVERSITY AUDITOR

FEB 29 2008

THE CALIFORNIA STATE
UNIVERSITY

Mr. Larry Mandel, University Auditor
Office of the University Auditor
Office of the Chancellor – The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802-4210

Re: *University's Response to Recommendations Contained in Report Number 07-32
Occupational Health and Safety - CSULA*

Dear Mr. Mandel:

Attached are the University's responses to the recommendations contained in Report Number 07-32, Occupational Health and Safety.

Please contact Tanya Ho, University Internal Auditor, at (323) 343-5102, if you wish to discuss any matter contained herein.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Rosser".

James M. Rosser
President

Attachment

cc: (with attachments)
George Pardon, Interim Vice-President for Administration and Chief Financial Officer
Yuet Lee, AVP for Administration and Finance
Tanya Ho, University Internal Auditor

OCCUPATIONAL HEALTH AND SAFETY

CALIFORNIA STATE UNIVERSITY, LOS ANGELES

Audit Report 07-32
February 6, 2008

EMPLOYEE HEALTH AND SAFETY TRAINING

TRACKING OF TRAINING REQUIREMENTS

Recommendation 1

We recommend that the campus complete campus-wide or departmental training matrices or any similar such system for tracking health and safety training requirements and related training for each employee.

Campus Response

We concur. By June 2008, CSULA will complete a campus-wide training matrix for tracking health and safety training requirements for each employee.

TRAINING RECORDS AND PROCEDURES

Recommendation 2

We recommend that the campus strengthen employee training procedures and maintain employee health and safety training records on file, and available, for at least one year.

Campus Response

We concur. CSULA has modified its procedures to maintain employee health and safety training records on file for at least one year.

STUDENT HEALTH AND SAFETY TRAINING

Recommendation 3

We recommend that the campus strengthen procedures to maintain student health and safety training records.

Campus Response

We concur. CSULA has sent reminder notices to faculty reiterating its procedures in maintaining student health and safety training records on file for a minimum of at least one year.


THE CALIFORNIA STATE UNIVERSITY
 OFFICE OF THE CHANCELLOR

BAKERSFIELD

April 7, 2008

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

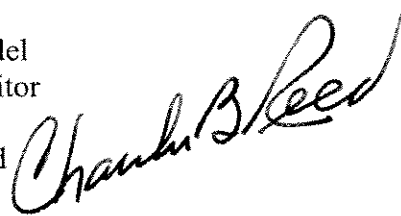
EAST BAY

FRESNO

TO: Mr. Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed
Chancellor



HUMBOLDT

LONG BEACH

SUBJECT: Draft Final Audit Report 07-32 on *Occupational Health and Safety*, California State University, Los Angeles

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of April 7, 2008, I accept the response as submitted with the draft final report on *Occupational Health and Safety*, California State University, Los Angeles.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/jt

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Ms. Tanya Ho, University Internal Auditor
Mr. George Pardon, Interim Vice President, Administration and
Chief Financial Officer
Dr. James M. Rosser, President

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS