



AUDIT REPORT

OF

SAFETY

Audited by:

Andrew S. Groover, M.Ed., CPA, CIA, CICA, CISA, CFE
District Director of Internal Audit

May 26, 2017
Report No. 17-01



DATE: May 26, 2017

TO: Dr. Neil Matkin, President
Members of the Board of Trustees

FROM: Andrew S. Groover, M.Ed., CPA, CIA, CICA, CISA, CFE
District Director of Internal Audit *AG*

RE: Audit Report of Safety

Our internal audit report of Safety follows. We appreciate the cooperation and assistance provided to us by Ken Lynn, Dr. Bill King, and Bill Taylor and their staff during the audit.

A follow-up audit will be conducted in approximately six months.

C: Ken Lynn, Chief Financial Officer
Dr. Bill King, Executive Director of Facilities
Bill Taylor, Chief of Police
Ed Leathers, Executive Director of Safety, Security, Facilities & Construction
Tom Delamater, Chief Public Relations Officer

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Executive Summary

An audit was conducted of Collin College's compliance with CGC (Legal) and CGC (Local) – Safety Program, Emergency Plans and Alerts. Our audit determined that overall, there is compliance with CGC (Legal) and CGC (Local) – Safety Program, Emergency Plans and Alerts.; however, we have made recommendations to improve compliance.

Overview

The College's safety policies CGC (Legal) and CGC (Local) – Safety Program, Emergency Plans and Alerts refer to specific State of Texas statutes. Texas Education Code 37.108 – Multihazard Emergency Operations Plan; Safety and Security Audit requires that public junior colleges adopt and implement a multihazard emergency operations plan that addresses mitigation, preparedness, response, and recovery. The plan also must provide for district employee training in responding to an emergency, measures to ensure coordination with the Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency, and the implementation of a safety and security audit as required by Subsection (b).

Subsection (b) of TEC 37.108 requires that at least once every three years, a public junior college conduct a safety and security audit of the district's facilities. The junior college shall report the results of the safety and security audit to the district's board of trustees and to the Texas School Safety Center (TxSSC). The TxSSC is an official university-level research center at Texas State University. The TxSSC is tasked in [Chapter 37 of the Texas Education Code](#) and the Governor's Homeland Security Strategic Plan with key school safety initiatives and mandates. Specifically, the TxSSC serves as a clearinghouse for the dissemination of safety and security information through research, training, and technical assistance for K-12 schools and junior colleges throughout the state of Texas.

Texas Education Code 51.218 Emergency Alert System requires that each public junior college establish an emergency alert system for the district's students and staff, including faculty. The emergency alert system must use e-mail or telephone notifications in addition to any other alert method the district considers appropriate to provide timely notification of emergencies affecting the district or its students and staff. At the time a student initially enrolls or registers for courses or a staff member begins employment, the institution is required to obtain a personal telephone number or e-mail address from the student or staff member to be used to notify the individual in the event of an emergency and register the student or staff member in the institution's emergency alert system.

Health and Safety Code 791.002 – Fire Escapes Required requires that buildings be properly equipped with fire escapes for proper egress.

Audit Objective

The objective of our audit was to determine compliance with CGC (Legal) and CGC (Local) – Safety Program, Emergency Plans and Alerts.

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Scope

The scope of our audit was fiscal years 2015-2017 through February 2017. Testing was performed on a sample basis.

Methodology

We utilized the *International Standards for the Professional Practice of Internal Auditing* as guidance for conducting the audit.

We reviewed to determine the following:

- Compliance with Texas Education Code 37.108 (a).
- Compliance with Texas Education Code 37.108 (a)(1), (a)(3), and (a)(4).
- Compliance with Texas Education Code 37.108 (b).
- Compliance with Texas Education Code 37.108 (c).
- Compliance with Texas Education Code 51.218.
- Compliance with Health and Safety Code 791.002.

Summary of Results

We have made recommendations related to:

- Improving compliance with Texas Education Code 37.108 (b).
- Testing the Emergency Alert System periodically to ensure operability.
- Reviewing and updating the Emergency Operations Plan periodically to ensure it is kept current.
- Improving compliance with Texas Education Code 37.108 (a)(1), (a)(3), and (a)(4).

The detail audit results and management's responses follow.



Andrew S. Groover, M.Ed., CPA, CIA, CICA, CISA, CFE
District Director of Internal Audit

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Audit Results and Management's Responses

Texas Education Code 37.108 (b) states:

(b) At least once every three years, each school district or public junior college district shall conduct a safety and security audit of the district's facilities. To the extent possible, a district shall follow safety and security audit procedures developed by the Texas School Safety Center or a comparable public or private entity.

We determined that the safety and security audit that covered fiscal years 2013, 2014, and 2015 was not comprehensive. It only consisted of completing the required questionnaire from the Texas School Safety Center. Per the Texas School Safety Center, the completion of the questionnaire should be a summary of the audit that was completed; details of the safety and security audit should reside with the institution. There were no detail procedures performed for the safety audit. The Texas School Safety Center provides checklists to be utilized when conducting the safety audit as well as a Higher Education Safety and Security Audit Guide. The next three-year audit should cover fiscal years 2016, 2017, and 2018.

1) We recommend that management improve compliance with Texas Education Code 37.108 (b).

Management's Response:

Management concurs with the finding. After reviewing the file documents and the completed checklist from the reporting period ended 2015, it is apparent that a good faith effort to comply with the reporting requirement was made and that additional improvements are needed.

Responsibility for completing the safety and security audit for the 2018 reporting period has been assigned to the Chief of Police and staff.

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Texas Education Code 51.218 states:

Each institution of higher education, including each college district, shall establish an emergency alert system for the institution's students and staff, including faculty. The emergency alert system must use e-mail or telephone notifications in addition to any other alert method the institution considers appropriate to provide timely notification of emergencies affecting the institution or its students and staff.

An Emergency Alert System has been established by Collin College; however, it is not periodically tested to ensure operability. Periodic testing of the Emergency Alert System ensures that the system will operate as designed in the event that a situation arises requiring notification to faculty, staff, and students.

2) We recommend that the Emergency Alert System be periodically tested to ensure operability.

Management's Response:

Management concurs with the recommendation. Collin College has an Emergency Alert System that includes notification of the President or his designee; notification of the Chief Public Relations Officer; and from there notification of the Director of Communications and Marketing. College-wide alerts are then communicated via CougarAlert (utilizing Cougar mail, Facebook, Twitter and text messaging) and the Collin College website. Calls are also made to area television and radio outlets.

The college will initiate testing of the Emergency Alert System during the summer of 2017 and will test the system annually thereafter.

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Texas Education Code Sec. 37.108 (a) states:

(a) Each school district or public junior college district shall adopt and implement a multihazard emergency operations plan for use in the district's facilities.

An Emergency Operations plan has been established by Collin College; however, there is not a process in place to ensure that the Emergency Operations Plan is periodically reviewed and updated.

3) We recommend that management implement a process to ensure the Emergency Operations Plan is periodically reviewed and updated to ensure it is kept current.

Management's Response:

Management concurs with the recommendation. The police department is responsible for the College's Emergency Operations Plan and the current Emergency Management **and** Procedures Manual was developed several years ago to meet this responsibility. Although it addresses many of the issues needed in an Emergency Operations Plan, it does not include Incident Command System (**ICS**) and National Incident Management System (**NIMS**) processes or use a comprehensive all hazards approach to Emergency Operations.

For Emergency Operations to be effective and conform to contemporary best practices, it should be developed as an on-going process of planning, training for individuals regarding the plan and their responsibilities in an emergency, and operational management during an emergency. For this to occur, the College should establish a position of Director of Emergency Management. This is actually a component of the comprehensive safety plan developed over the past year for consideration by the Board of Trustees in the near future. The Director of Emergency Management would have responsibility for developing a comprehensive all hazards Emergency Operations Plan incorporating the Incident Command System (ICS) and the National Incident Management System (NIMS) processes as functional elements. The Director of Emergency Management would constantly review the laws affecting emergency management and the best practices in use by other institutions of higher education to ensure that the Collin College Emergency Operations Plan was up to date and meets the highest standards. If approved by the Board of Trustees, the College would move forward to recruit and hire a Director of Emergency Management this fall in FY18. It will take approximately one year for the Director of Emergency Management to update and develop the new all hazards Emergency Operations Plan. From that point forward, the Plan would be dynamic with updates as needed to meet current standards with annual audits to verify compliance with the requirements of Texas Education Code Sec. 37.108 (a).

Further, the Director of Emergency Management would conduct training for the members of the College with responsibilities during emergencies so the Emergency Operations Plan can be utilized effectively when needed. When emergencies required the coordination of more than two elements of the College or the integration with resources from outside the College, the Director of Emergency Management would function as the emergency manager for the incident/action.

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Texas Education Code Sec. 37.108 (a)(1), (a)(3), and (a)(4) state:

(a) Each school district or public junior college district shall adopt and implement a multihazard emergency operations plan for use in the district's facilities. The plan must address mitigation, preparedness, response, and recovery as defined by the commissioner of education or commissioner of higher education in conjunction with the governor's office of homeland security. The plan must provide for:

(1) district employee training in responding to an emergency;

(3) measures to ensure coordination with the Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency.

(4) the implementation of a safety and security audit.

District employee training related to Emergency /Safety Procedures is provided at new employee orientation. These Emergency /Safety Procedures are also posted throughout the College; typically, in breakrooms. Employees also view an active shooter video during new employee orientation to understand how to react if such a situation should arise. There is also a copy of the Emergency Management Plan on the MyWorkplace tab under Crisis Response in CougarWeb. However; per the Texas School Safety Center, the Emergency Operations Plan should include who needs to be trained in what and at what level. The Emergency Operations Plan does not include this information. The National Incident Management System (NIMS) offers several position specific trainings which could be utilized.

The Emergency Plan does not provide for measures to ensure coordination with the Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments in the event of an emergency. Memorandums of Understanding could be obtained from Department of State Health Services and local emergency management agencies, law enforcement, health departments, and fire departments to ensure proper coordination.

The Emergency Plan also does not provide for the implementation of a safety and security audit.

4) We recommend that management improve compliance with Texas Education Code 37.108 (a) (1), (a) (3), and (a) (4).

Management's Response:

Management concurs with the recommendation. A comprehensive safety plan is currently being developed for the College and is expected to go to the Board of Trustees soon. The plan

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includes a position for a Director of Emergency Management. This position would not only develop and maintain the Emergency Operations Plan, but would also be responsible for the coordination of measures taken by Collin College with local, state and federal agencies providing emergency services locally and regionally. This would include the development or updating of memorandums of understanding with these agencies and actual coordination of services in emergencies. It is anticipated that this position would be included in the police department as part of the College first responder operations.

The comprehensive safety plan for the College also includes a Safety Director position that would have College wide responsibility for compliance with federal and state safety regulations. This would include laboratory safety, OSHA, and other regulations involving safety with which the College must comply. The Safety Director would also be responsible for conducting the Texas State School and Safety Audit and submitting the audit report to the State of Texas School Safety Center every three years. Although the audit would only be submitted every three years, the Safety Director would continuously monitor the requirements and ensure that the College was always in full compliance.