



Ethics and Compliance Plan

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Executive Summary

Ethics and compliance are two essential elements of organizational survival and growth. Properly integrating a culture of ethics and compliance into overall Texas A&M University System (TAMUS) operations, efficiency and efficacy become transparent by-products of effective management. Identifying, prioritizing, understanding and mitigating potential compliance risks is an essential tool of institutions as they steer their organizations to meeting strategic goals.

As evidenced across the nation, institutions of higher education are saddled with similar compliance risks such as campus safety and security, emergency response practices, foreign travel risks, a myriad of research-related risks, and data privacy and security. The following Ethics and Compliance Plan for 02/01/15 through 01/31/16 has been developed based on identified compliance risks facing Texas A&M University at Galveston (TAMUG). The process for ethics and compliance risk identification is a collaborative effort of the compliance committee at TAMUG, along with input from our parent campus (TAMU) as well as our system compliance group to ensure that key compliance risks facing TAMUG are identified and a plan for mitigating them is established.

The compliance plan has been developed with key leadership (see attached Compliance Committee) and reviewed by TAMUS to gain feedback for improvement of reporting and measurement of risks facing TAMUG. The plan incorporates campus-wide risks with specific departments' risk mitigation plans for the next compliance year.

The attached plan identifies the objective, mitigation plan, and metrics that outline the monitoring elements and project management by the Ethics and Compliance Committee.

Overview

The following compliance risks have been identified for areas of risk that pose potential concerns to the university. The seriousness of such risks, coupled with the complexity of Texas A&M University at Galveston (TAMUG) in its administrative and academic operations, and its relationship with Texas A&M University (TAMU) as a branch campus, lend itself to developing strategies that may span several years and/or are multi-faceted in approach. The risks listed bear equal attention with a goal of addressing these by next compliance plan cycle.

1. Compliance Risks

Student Laboratory Safety

Objective

Compliance with Texas A&M Risk Management Programs Rule 24.01.01 to develop comprehensive safety procedures for monitoring and oversight of processes regarding student laboratory safety training to ensure that safety training is completed as required and training is adequately documented. Provide training to responsible employees to ensure they understand laboratory safety inspection procedures and records retention requirements. Include records retention requirements in all safety procedures and retain documentation in compliance with the Texas A&M University System (TAMUS) Records Retention Schedule.

Mitigation Plan

Reports from the Compass 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 Compass system will be used by the Environmental Health & Safety Office (EHS) to monitor for compliance.

Metric: Reports are on file and marked and signed "reviewed" by the Lab Safety Coordinator.

Procedures will be reviewed annually and updated as necessary.

Metric: Annual review process will be documented and sent to the Compliance Office.

Full implementation will be in place by January 30, 2015.

Metric: Implementation deadline met and follow-up audit with no findings.

Student Travel – Includes Student Club Sports Travel Safety and all other Student Travel Programs

Objective

Compliance with Texas A&M (TAMU) Student Travel Rule 13.04.99 M1 to provide proper training to employees to ensure they understand club sport safety, student travel, travel procedures and records retention requirements. Include records retention requirements in all

safety procedures and retain documentation in compliance with the TAMUS Record Retention Schedule.

Mitigation Plan

Student travel task force will be created to address weaknesses and recommend mitigating plan.

Metric: Task force formed and reports to Vice President for Academic Affairs have been forwarded and approved by Vice President for Academic Affairs

Testing of the recommended processes will take place in the spring semester (2015) using 1-2 Department(s) that usually support travel activities and/or 1-2 individual Faculty who consistently use travel in their courses.

Metric: Testing is completed and report of testing submitted to Vice President for Academic Affairs and Compliance Office.

During the spring 2015, the task force will gather data on the efficiency of the online submission and form archiving/retrieval and will correct/adjust the process based on issues discovered.

Metric: A report of the committee findings will be forwarded to the Vice President for Academic Affairs and Compliance Office.

Roll out new procedures as vetted and approved over the summer 2015 with full implementation by start of fall 2015.

Metric: Survey identified departments with student travel for knowledge and utilization of processes. Follow up audit with no findings.

The task force will remain active 1-2 years to evaluate the processes implemented (at least once per semester) and recommend any new changes to process and procedures.

Metrics: A report from the task force will be sent to the Vice President for Academic Affairs each semester during this time period.

Employee Safety Training

Objective 1

Compliance with Texas A&M Risk Management Programs Rule 24.01.01 to develop a process to ensure newly hired employees with laboratory responsibilities receive safety training in a timely manner. Develop monitoring procedures to ensure that all employees with potential exposure to laboratory hazards receive training prior to initial exposure.

Mitigation Plan

By January 19, 2015:

Identify employees who will be required to receive initial lab safety training through the Train Traq system or 3rd party vendor training (completion certificate will be entered into the Train Traq transcript)

Metric: Documented list of employees by department will be in file administered by Safety Coordinator.

Require all existing lab employees to perform this initial lab safety training.

Metric: Training will be documented in Train Traq and an aged list of training will be reviewed by Safety Coordinator and filed.

Add to the new hire orientation checklist administered by Human Resources (HR), the requirement for this training prior to the start of work for new hires.

Metric: All new hires in positions requiring this training will be required to take training as part of orientation process prior to starting work in the department and will be documented in Train Traq.

Objective 2

Compliance with TAMUS Rule 24.01 Risk Management and TAMU SAP 24.01.01.M4.01 Blood Borne Pathogens Exposure Control to establish a Blood Borne Pathogen (BBP) exposure control plan for the Galveston campus or add Galveston campus positions to the Texas A&M University (TAMU) BBP exposure control plan. Develop monitoring procedures to ensure that all employees with potential exposure to blood borne pathogens receive training prior to possible exposure.

Mitigation Plan

By January 19, 2015:

Identify employees who will be required to receive blood borne pathogen training in Train Traq system or by 3rd party vendor with the completion certificate entered into the Train Traq transcript.

Metric: Documented list of employees by department will be in file administered by Safety Coordinator.

Require all existing employees to perform initial training.

Metric: Training will be documented in Train Traq and an aged list of training will be reviewed by Safety Coordinator and filed.

Add to the new hire orientation checklist administered by HR, the requirement for this training prior to the start of work for new hires entering identified positions.

Metric: All new hires in positions requiring this training will be required to take training as part of orientation process prior to starting work in the Department and will be documented in Train Traq.

Laboratory Safety Inspections

Objective

Compliance with TAMUS Rule 24.01 Risk Management and TAMU SAP 24.01.01.M4 Environmental Health and Safety Programs to develop a process to ensure all labs are properly inspected, any findings are corrected in a timely manner, and monitoring activities developed to control proper follow up.

Mitigation Plan

Annually in December:

Labs will be inspected by TAMUG Environmental Health and Safety (EHS) office.

Metric: A log of Lab Inspections and Findings will be kept on file by the Safety Coordinator.

Prepare a report for each lab identifying any deficiencies, time period allowed for correction and the re-inspection date.

Metric: A copy of each report will be given to the appropriate department head, the Compliance Office and a copy will be kept in the Safety Coordinator's Office.

Failure to correct the deficiency will result in a compliance report sent to the compliance office for enforcement.

Metric: Compliance Office will send out first notice of non-compliance copying the Vice President for Academic Affairs. Copies of notices will be maintained in Compliance Office. Goal of Less than 10 deficiency notices in all labs on first inspection and zero deficiency notices upon re-inspection.

Campus Safety Inspections

Objective

Compliance with TAMUS Rule 24.01 Risk Management and TAMU SAP 24.01.01.M7 Fire and Life Safety Compliance to 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 as well as comprehensive written procedures for fire and life safety inspections

Mitigation Plan

Hire Occupational Health and Safety Inspector before end of fall 2014 semester to address above goal.

Metric: Hire is in place.

Inspect and repair if needed, all fire hydrants and Fire Detection Center (FDC) building connections.

Metric: Documentation on file backing up Work Order Request and Approval for said work.

Written procedures will be completed by January 19, 2015.

Metric: Procedures are documented and filed in Occupational Health and Safety Inspector's Office.

Implementation of written procedures will be completed during the spring 2015 semester.

Metric: A report of full implementation will be forwarded to the CEO and the Compliance Office.

Upgrade building signage regarding fire and life safety.

Metric: A full report of fire and life safety signage will be forwarded to CEO and the Compliance Office (may be combined with report above).

Provide training to building occupants via a building proctor process.

Metric: Training will be documented for all identified building responsible parties. If possible training will be entered into Tran Traq.

Enhance EduSafe mobile app for cell phones.

Metric: Roll out version 2.0 spring of 2015

Hazardous Communication Program

Objective

Compliance with TAMUS Rule 24.01 Risk Management and TAMU SAP 24.01.01.M2 Hazard Communication to 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.

Mitigation Plan

Review and update overall campus Hazardous Communication (HAZCOM) plan by January 19, 2015.

Establish procedures to monitor and enforce requirements established in the Chemical Laboratory Safety and Hazardous Communication Compliance Manual

Metric: A report of the review and recommended processes will be forwarded to the CEO and the Compliance Office.

As part of the annual lab inspection process (described above) notify lab coordinators and department heads that their HAZCOM lab specific plans must be updated and reviewed by prior to completion of the annual inspection process.

Small Class Size

Objective

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

Mitigation Plan

Enrollment Services will discuss tracking of small classes with the Registrar's Office in College Station to ensure alignment with the main campus. Full implementation of the new procedure will be in place by the start of fall semester 2015.

Metric: Small Class Size justification and approval will be documented and kept on file in Admissions and Records Office.

Institutional Scholarships

Objective

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.

Mitigation Plan

Create task force/committee to review and revise procedures and document them.

Metric: Committee Report will be forwarded to the CEO and Compliance Office.

Ensure all Scholarship Committee members have assigned Train Traq training completed by the end of fall 2014 semester.

Metric: Identified employees who are required to take training will be listed in Train Traq and an aged report will be reviewed by Financial Aid and kept on file.

Committee will meet in January 2015 to start process in February.

Metric: Committee notes will be kept on file.

Identification of Foreign Travel for Compliance with Export Control Regulations

Objective 1

To be in compliance with TAMUS Policy 15.02 and TAMU Rule 15.02.99.M1, all University employees must follow U.S. export control laws and regulations. Training is routinely provided for researchers. A potential area of concern is employees traveling internationally.

Mitigation Plan

Develop procedures to identify all employees planning to travel to international locations on University business.

Metric: Concur report of employees with international travel pre-trip authorization will be sent to Research and Graduate Studies Office (RGSO).

Objective 2

Develop training materials and resources (e.g., University Export Control Manual) that address export control red flags as related to international travel and send to all identified travelers.

Metric: Copy of material sent to employees will be sent to appropriate department head and the Compliance Officer. This can be compared to those submitting travel reports in Concur.

Compliance with Federal and State Mandates

Objective

Campus-wide live “mock” emergency, involving key personnel and representatives from all local responding agencies.

Mitigation Plan

Due to the complexity of a live drill at TAMUG, in the city of Galveston, the TAMUG Police Department recommends a collaborative effort. TAMUG will attempt to coordinate a drill which includes the University of Texas Medical Branch (UTMB), TAMUG, and the various outside agencies, including Galveston Police Department, Galveston Fire Department, Galveston Emergency Management System, The Port Police, and the Galveston County Sheriff’s Office, and media that would respond to any given emergency at those campuses. By developing and coordinating a drill of this nature, TAMUG will reduce possible endless drilling that local agencies are asked to participate in and provide a challenge worth practicing. If this is not possible, TAMUG may fall back to previous plan to organize a drill just for TAMUG.

Metrics: In order to develop and coordinate a drill of this magnitude, we will have to partner with several agencies. A drill of this size, in order to be considered worthwhile, must involve a credible threat that could happen or has happened in the past. These drills are inherently complicated and potentially dangerous, so planning must be thorough and safety of all involved must be thoroughly considered. An undertaking of this size will take a full year to plan and organize. Recommendation is to consider early 2016 to hold this drill with an emphasis on spring break when our students are mostly away. Recommendation is that drill #1 will be followed by second drill in the summer of 2017, when students are on campus can be added to the drill. We anticipate this schedule will also allow UTMB to be compliant with the Clery Act.

2. Progress Reports

Status reports on the agreed upon metrics will be provided on a quarterly basis to the CEO's Compliance Officer and Executive Team as well as to the Audit Committee and the Board of Regent's Compliance and Audit Committee.

3. Summary

This next fiscal year will continue to be a challenge for the Ethics and Compliance Office as resources will be stretched thin from both a TAMUS and campus/location perspective. Unfortunately, in this type of environment, the activities of auditing and monitoring to assure that control and/or system mechanisms are in place are decreased due to priority needs elsewhere for available resources. The ability to focus on core values and targeted risk focus areas will be a primary objective and one that will need leadership support to assist in achieving positive outcomes.



Robert Smith III
CEO Texas A&M University Galveston

Date



Janet Smalley
System Ethics and Compliance Officer

Date

