Compliance Plan

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Executive Summary

Compliance is essential to organizational survival and growth. When a culture of compliance is properly integrated into overall A&M System operations, efficiency becomes a transparent by-product of effective management. Identifying, prioritizing, understanding and mitigating potential compliance risks is an essential tool institutions should utilize as they steer their organizations to meeting strategic goals.

Institutions of higher education are saddled with compliance risks such as campus safety, accuracy in government reporting, data privacy and security and a myriad of research-related risks. The following *Texas A&M Galveston Campus (TAMUG) Compliance Plan* for the period 02/01/14 thru 01/31/15 has been developed based on identified compliance risks facing the Galveston campus. The process for compliance risk identification is a collaborative effort of the compliance team at TAMUG to ensure that key compliance risks facing TAMUG are identified and a plan for mitigating them is established.

This draft plan has been developed internally with key leadership at the campus (see attached membership listing of Compliance Committee members) as well as A&M System leadership to gain feedback and a better understanding of the risks facing all TAMUG locations and/or risk areas such as training vessels and boat basins. A copy of our plan is also forwarded to our parent campus’ (TAMU) Compliance Office.

The attached draft plan identifies TAMUG’s compliance goals and includes metrics that outline the monitoring elements and project management by Compliance Committee.
Overview

Potential Compliance Risks

A comprehensive list that includes, but may not be limited to, potential compliance risks has been identified and prioritized for focus during the next compliance period. It incorporates areas identified as risks during the past fiscal year but continues to pose potential concerns to the University or should be a part of TAMUG’s compliance plan indefinitely due to our specific mission. The seriousness of the risk and the complexity of such risk identification and mitigation activities, coupled with the complexity of the Texas A&M University (TAMUG) Galveston Campus in its administrative and academic operations and its relationship with Texas A&M as a branch campus, lend itself to developing strategies that may span several years, may remain on our plan indefinitely and/or are multi-faceted in approach.

The following list outlines our top eight potential compliance risks as identified by the Compliance Committee and Texas A&M Galveston Campus leadership; review of current literature and discussions with compliance leadership at the main campus and with system compliance leadership; and review of internal, current risk-related issues and mitigation plans. The Compliance Officer will work collaboratively with compliance leadership to assist in the identification of related processes or issues; development and implementation of monitoring tools and related process protocols; and evaluation; monitoring activities designed to determine the effectiveness of the activity.

The risks listed below are not presented in any priority order, but are randomly listed and bear equal attention with a goal of addressing these by next compliance plan cycle. Further detail on planned mitigation activities by the campus will be provided as periodic updates on the metrics are available.

Campus Safety & Security (Included in Strategic Risk #6 of TAMUG Risk Matrix)

Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary

Objective 1: Campus emergency preparedness

Metric: Continue to conduct yearly desktop drills and adopt findings. Purchase first responder and incident command center equipment. Continue to train Waterfront Staff and Resident Life staff to be Galveston County Office of Emergency Management (GCOEM) Civilian Emergency Response Team (CERT) certified.

Objective 2: Review preparedness plan annually to determine if it adequately addresses current climate regarding acts of violence or other disruption to campus activities.

Metric: Provide monitoring of campus process and evaluate effectiveness to meet challenges of student, employee, and visitor safety from acts of violence and/or intolerance. Utilize annual Clery Report process to monitor.

Objective 3: Study and/or establish a 24 hour dispatch office in the Campus Police Department to enhance and centralize communication on campus for a more efficient emergency response and a safer campus.
**Metric:** Provide necessary funding and staffing on a 24 hour basis, allowing around the clock monitoring of campus phones, access to security cameras and communication with Police officers, University officials and outside callers. More accurate and complete call statistics and customer satisfaction surveys will be used to monitor.

**Objective 4:** Establish training objectives beyond TCLEOSE continued education requirements, specifically designed for university law enforcement.

**Metric:** Provide necessary funding and time needed to remain current and operational. Review training files and Texas Commission on Law Enforcement Officer Standards and Education (TCLEOSE) licensing goals to monitor police force. Police chief should be monitored independently.

**New Objectives**

**Objective 5:** Review Lab Safety Acknowledgement (LSA) Process

**Metric:** Annual audit review of lab courses as to LSA requirements.
**Metric:** Develop written procedures for lab inspections and other monitoring activities.

**Objective 6:** Reevaluate Health & Safety manual & update campus compliance areas; and update Health & Safety Website.

**Metric:** Annual review of Health & Safety Manual and distribution to campus.
**Metric:** Develop website.

**Diverse Community - (Included in Strategic Risk #7 of TAMUG Risk Matrix)**

**New Objectives**

**Objective 1:** Cultivate a campus culture of community - Reenergize the Diversity Committee to include a broad group of activities, training, and learning opportunities regarding respect for all within the community.

**Metric:** Number of times committee meets. Committee outcomes and reports to leadership team.

**Federal Relations -Texas Maritime Academy (Included in Strategic Risk #1 of TAMUG Risk Matrix)**

Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary

**Objective 1:** Exceed the compliance requirements of the U. S. Coast Guard for standards, training, compliance and watch training.
**Metric:** Annual and biannual audit with the U.S. Coast Guard (USCG) and Maritime Administration Department (MARAD). Last compliance audit with MARAD resulted in an excellent rating and we were considered the best of the maritime academies for documentation.

**Texas Maritime Academy Training Ship – The General Rudder (Included in Operational Risk #2 of the TAMUG Risk Matrix)** – Risk related to injury or death on General rudder training ship or other training ship or cruises.

**Objective 1:** Meet the operational and regulatory requirements of the American Bureau of Shipping (ABS), USCG and MARAD for the Training Ship General Rudder.

**Metric:** All three agencies conduct annual inspections of the lifesaving, firefighting and operational equipment for continued certification.

**Waterfront Operations (Included in Operational Risk #1 of TAMUG Risk Matrix)** – Compliance objectives related to risk of injury or death on small vessels or diving operations.

**Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary**

**Objective 1:** Continue monitoring compliance with USCG regulations regarding 46CFR subchapter T small vessel regulations.

**Metric:** Pass and complete annual USCG inspection on topside equipment, safety gear and crew training. Pass and complete bi-annual out of water dry dock and hull exam including topside exam.

**Objective 2:** Continue monitoring compliance with the TAMUG Waterfront Operations Safety Management and Operations Plan

**Metric:** Quarterly review with the Waterfront Operations Board of advisors and regular audits of operator certification paperwork. Conduct annual procedure implementation reviews in accordance with section 20.02 of plan.

**Diving Program (Included in Operational Risk #1 of TAMUG Risk Matrix)** – Compliance objectives related to risk of injury or death on small vessels or diving operations.

**Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary**

**Objective 1:** Compliance with American Academy of Underwater Science (AAUS) and industry regulations regarding (Ref. 29 CFR Part 1910) OSHA Scientific Diving Exemption.
**Metric:** Pass and complete annual Dive Safety Officer (DSO) inspection on all relevant equipment, safety gear and diver training. Pass and complete annual DSO procedures review to ensure compliance.

**Objective 2:** Compliance with TAMUG Diving Safety Manual

**Metric:** Annually review with the Diving Control Board the regular audits of personnel certification paperwork. Conduct annual procedure implantation reviews in accordance with TAMUG Diving Safety Manual.

**Objective 3:** Dive Safety Campus emergency preparedness

**Metric:** Conduct yearly walkthrough drills and make corrections. Upgrade first responder equipment and training. Training two dive program staff as Emergency Medical Technician/Diving Medical Technician (EMT/DMT) for national certification.

**Objective 4:** Be in compliance with current industry standards concerning life support equipment maintenance.

**Metric:** Train all appropriate staff members in maintenance procedures authorized by Office of Emergency Management (OEM).

**Campus Infrastructure (Included in Strategic Risk #4 and Operational Risk #3 of TAMUG Risk Matrix)** – maintain infrastructure growth and improvement toward the goal of a sound infrastructure.

Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary

**Objective 1:** Continue to identify risks to buildings and infrastructure being mindful of the impact of a coastal environment to include deteriorating facilities, magnitude of deferred maintenance and utility or operations interruptions

**Metric:** Number of interruptions of service due to risk. The number of safety incidents related to this specific risk and mean down time.

**New Objectives**

**Objective 1:** Develop deferred maintenance plan and identify any capital requirements that may be needed to support plan along with funding.

**Metric:** Analyses by SSC Corporation and by Consultants. Report Developed.

**Objective 2:** Develop process of planning for infrastructure needed to support campus growth.
**Metric:** Reenergize Space Committee to review space needs both current and future and make recommendations to campus leadership.

**Objective 2:** Monitor compliance of outsourced service to vendor contract.

**Metric:** Contract liaison in concert with VP for Finance will develop processes for proper handling and payment of work orders according to contract.

**Data Privacy and Security (Included in Operational Risk #4 of TAMUG Risk Matrix) – Confidentiality of data and security of IT systems.**

**Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary**

**Objective 1:** Data privacy and security efforts meet regulatory requirements and increased awareness and education occurs on internal policies and procedures.

**Metric:** Control mechanisms are in place for the protection of students, faculty, and administrative staff from privacy/security breaches and appropriate mitigation activities instituted, such as policies and procedures, educating staff, reporting breaches and enforcing administrative actions as appropriate. Utilize Information Security Assessment, Awareness and Compliance System (ISAC) reporting system or monitor. Use required TAMU security training and TrainTrac reporting to ensure all personnel are properly educated.

**Culture of Ethics and Compliance – incorporating the University’s Statement of Ethical Values and Standards of Ethical Conduct should be universally accepted as the “right thing to do”**.

**Objectives that will recur on TAMUG’s Compliance Plan with goal of continuous review and improvement if necessary**

**Objective 1:** Appropriate level of location leadership is actively engaged and demonstrates commitment to System-wide and campus/laboratory / Texas A&M University Galveston Campus ethics and compliance activities.

**Metric:** TAMUG’S personnel at each location will demonstrate awareness of ethics and compliance program without fear of retaliation or retribution through communication and reporting of potential compliance issues. Location communication supports culture of ethics and compliance as evidenced by participation in mandated compliance and other activities. Utilize required ethics training to educate personnel and TrainTrac reporting to monitor compliance. Establish compliance website.

Status reports on the agreed upon metrics will be provided on a periodic 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.
Summary

This next fiscal year will continue to be a challenge for Compliance Office as resources will be stretched thin from both an A&M System 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 Campus  
Superintendent of the Texas Maritime Academy Galveston  
VP Texas A&M University

Janet Smalley  
System Ethics and Compliance Officer

Date