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Audit Report

Performance Audit of EMPLOYEE SAFETY

July 26, 2011

Office of the City Auditor
Austin, Texas

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City of Austin

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Date: July 26, 2011

To: Mayor and Council

From: Kenneth J. Mory, City Auditor

Subject: Performance Audit of Employee Safety

I am pleased to present this audit report on Employee Safety. This audit was conducted as part of the Office of the City Auditor's FY11 Strategic Plan. We focused this audit on safety systems in place at Austin Water Utility, Parks and Recreation Department, and Public Works Department.

We found that job-related injury incidents are not consistently investigated or communicated to departmental safety offices, which may limit departments' ability to prevent future occurrences of the same incidents. We also identified non-compliance with safety requirements at worksites and noted that safety training requirements have been defined, but training is not consistently enforced or tracked. These conditions may increase employee injuries in the field and associated costs to the City. Lastly, we noted improper storage of chemicals at a Parks and Recreation Department facility.

Based on our work, we recommended that the directors of the three audited departments design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper protective equipment use, injury incidents and injury investigation reporting, and employee safety training. We also recommend that the director of the Parks and Recreation Department address the identified chemical storage issue.

We appreciate the cooperation and assistance we received from staff in the Parks and Recreation Department, the Austin Water Utility, and the Public Works Department during this audit.

cc: City Manager
Assistant City Managers
Parks and Recreation Department Director
Austin Water Utility Director
Public Works Department Director
Human Resources Department Director
Public Information Officer

COUNCIL SUMMARY

This report presents the results of the Employee Safety Audit. This audit was conducted as part of the Office of the City Auditor's FY11 Strategic Audit Plan. Our objectives were to:

- Identify and assess the safety systems in place for reducing the number and severity of on-the-job accidents and injuries for selected departments --Austin Water Utility (AWU), Parks and Recreation Department (PARD), and Public Works Department (PWD);
- Determine whether the selected departments are complying with applicable worker safety requirements.

We found that:

- Job-related injury incidents are not consistently investigated or communicated to departmental safety offices, which may limit departments' ability to prevent future occurrences of the same incidents.
    - We reviewed a random sample of worker injury incidents for each department and observed that not all injury incidents were investigated and investigation results were not consistently communicated to safety office staff.
    - In one department, PWD, procedures require investigation for only a subsection of the injury incidents.

- We also identified non-compliance with safety requirements at worksites, which may increase employee injuries in the field and associated costs to the City. We performed site visits at sixteen City worksites; and observed cases of non-compliance with personal protective equipment, proper signage/barricades, worksite flaggers, and working area organization requirements.

- While safety training requirements have been defined, training is not consistently enforced or tracked, which may lead to higher employee injury rates. Our review of selected training requirements for each department revealed cases of non-compliance.
    - AWU – Only 11% (or 3 of 27) of the sampled employees were in compliance with applicable training requirements.
    - PARD - Only 18% (or 4 of 22) of the sampled employees were in compliance with the PARD New Employee Safety Orientation training and 9% (or 2 of 22) were in compliance with reviewed trainings.
    - PWD – 96% (or 22 of 23) sampled employees were in compliance with training requirements for selected safety trainings.
- Although not part of our initial scope, in one case we identified one issue regarding improper storage of chemicals at a PARD facility.

We made four recommendations, one to each department to implement a system to ensure that employees at all levels are accountable for their safety responsibilities and one additional recommendation to the PARD director regarding storage of chemicals.

ACTION SUMMARY
EMPLOYEE SAFETY AUDIT

Recommendation Text	Management Concurrence	Proposed Implementation Date
1. The Director of the Austin Water Utility should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.	Concur	December 2011
2. The Director of the Parks and Recreation Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.	Concur	December 2011
3. The Director of the Public Works Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.	Concur	October 2012
4. The Director of the Parks and Recreation Department should ensure that: a. the chemicals observed during this audit at the PARD facility are stored in accordance to the applicable Material Safety Data Sheet specifications; and b. future such observations by the Safety Officer are immediately reported to the Director.	Concur	Implemented

ACTION SUMMARY
HEARTLOVER'S PETTY AUDIT

	Recommendation	Management Concurrence	Proposed Implementation Date
1	The Director of the Austin Water Utility should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury prevention and injury or exposure reporting, and employee safety training.	Concur	December 2011
2	The Director of the Parks and Recreation Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities, including proper PPE use, injury prevention and injury reporting, and employee safety training.	Concur	December 2011
3	The Director of the Pool & Aquatics Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury prevention and injury reporting, and employee safety training.	Concur	December 2011
4	The Director of the Parks and Recreation Department should ensure that a. the chemicals observed during this audit at the PARD facility are stored in accordance to the applicable Material Safety Data Sheet specifications, and b. future and observations by the Safety Office are immediately reported to the Director.	Concur	Immediately

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BACKGROUND

According to the Texas Labor Code, each employer in the State of Texas has the duty to provide a safe workplace. Specifically, employers should:

- Provide and maintain employment and a place of employment that is reasonably safe and healthful for employees;
- Install, maintain, and use methods, processes, devices, and safeguards, including methods of sanitation and hygiene, that are reasonably necessary to protect the life, health, and safety of the employer's employees; and
- Take all other actions reasonably necessary to make the employment and place of employment safe.

In the City of Austin, management of employee safety activities is neither fully decentralized nor centralized. There is a Corporate Safety Office located in the Human Resources Department, which currently provides injury information, regulation updates to departments, and consulting services and training (upon request). Also, a number of departments independently manage their safety programs. Handling of injury claims is centrally managed by the Workers' Compensation Division of the Human Resources Department. Exhibit 1 shows the Corporate Safety Office responsibilities.

EXHIBIT 1
Corporate Safety Office Responsibilities

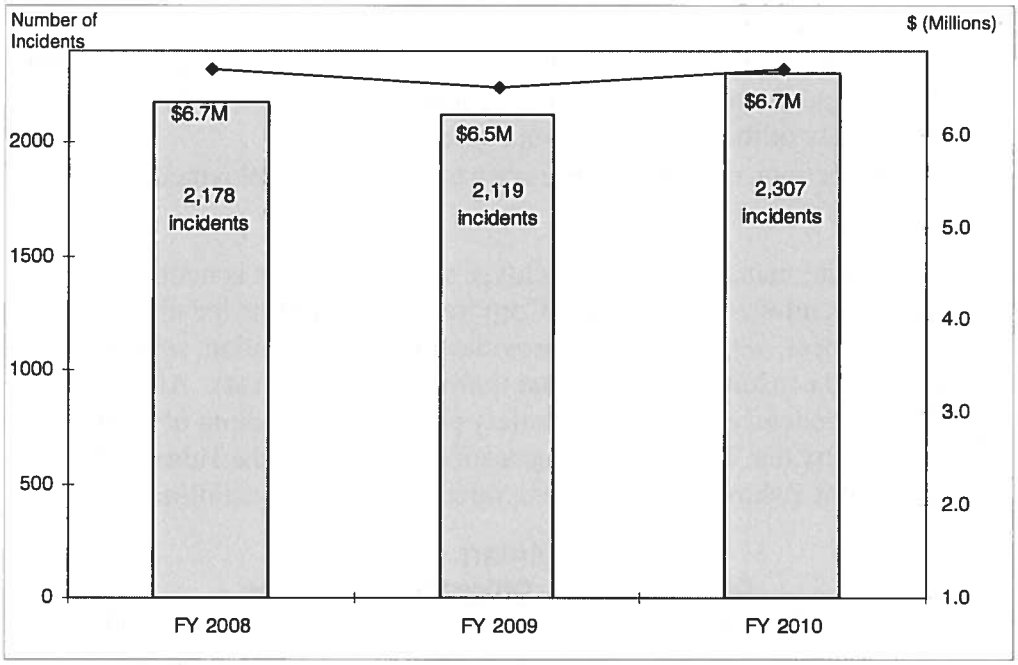
Corporate Safety Office Responsibility	OCA's Observations
Administering a Citywide Safety Program	The Administrative Risk Management Manual (1992) directs the Corporate Safety Office to maintain an active, current, and effective Safety Program. The Corporate Office staff asserted that they have recently received a mandate to develop a Citywide Safety Management System (SMS). This requirement is also reflected in their current year performance reviews. The SMS will provide a framework for a Citywide safety program that can be used as is or tailored by departments to meet their specific needs.
Providing loss data to department management and upper management	Provides quarterly injury reports to City departments and upper management.
Providing safety-consulting services to departments	Provides consulting services to departments upon request.
Coordinating Citywide loss control efforts with departments	For large departments this role is performed by the departments themselves. The Safety Office, upon request, provides services like ergonomics and area assessments to smaller departments.
Developing, updating, and disseminating safety standards and performance measures	5 Risk Management Program Manuals were developed; • Volumes I, II, and III - developed in 1992 • Volume IV and V – developed in 2003 The Corporate Safety Office staff, departmental safety staff, and departmental safety liaisons indicated that the manuals need updating to reflect current requirements and practices. Only the Driver Safety Program Manual (Volume IV) has been updated to date.
Assisting in the coordination of safety training	Assistance is provided upon request.

SOURCE: Safety Office Website (6/9/2011), Safety Staff, and Departmental liaisons survey (March 2011)

During fiscal years 2008 to 2010 City of Austin employees filed an annual average of 2,201 injury claims, which resulted in an average financial cost to the City of $6.6 million

per year. Exhibit 2 shows Citywide injury claims and injury claim costs in the last three years.

EXHIBIT 2
City Employee Injury Claims and Injury Costs During FYs 2008 to 2010



SOURCE: Safety Office Injury Reports, April 2011.

For this audit, we reviewed worker safety programs and activities related to the Parks and Recreation Department (PARD), Austin Water Utility (AWU), and Public Works Department (PWD). Exhibit 3 shows worker safety information related to these three departments in the last three years.

EXHIBIT 3
Departmental Employee Injury Data and Associated Costs (FYs 2008 to 2010)

AUSTIN WATER UTILITY	FY2008	FY2009	FY2010
Number of injuries	120	168	178
Injury Claims Cost	$662K	$825K	$827K
Department LTIR*	3.4	3.3	3.0
Industry LTIR*	1.6	1.6	2.7

PARKS & RECREATION DEPT	FY2008	FY2009	FY2010
Number of injuries	79	87	96
Injury Claims Cost	$254K	$246K	$347K
Department LTIR*	1.0	1.2	2.7
Industry LTIR*	1.5	1.5	1.2

PUBLIC WORKS DEPT	FY2008	FY2009	FY2010
Number of injuries	54	64	54
Injury Claims Cost	$350K	$392K	$274K
Department LTIR*	1.5	1.7	2.2
Industry LTIR*	2.3	2.3	1.8

These three departments were selected based on a combination of concerns expressed by their respective executive management and increasing number of incidents and related expenses.

The cost of injuries from these three departments combined exceeded $1.2M per year for FY08 –FY09.

* Lost Time Injury Rate (LTIR) measures the number of lost time injuries occurring during the year per the equivalent of 100 employees.

SOURCE: Safety Office Injury Reports and City Budget Documents for respective departments.

OBJECTIVES, SCOPE, AND METHODOLOGY

This audit was conducted as part of the Office of City Auditor's FY11 Service Plan, as presented to the City Council Audit and Finance Committee.

Objectives

Our objective for selected departments was to:

- Identify and assess the safety systems in place for reducing the number and severity of on-the-job accidents and injuries.
- Determine whether selected departments are complying with applicable requirements.

Scope

The audit focused on:

- Current activities of the Corporate Safety Office within the Human Resources Department
- Current worker safety activities in three City departments: Austin Water Utility, Parks and Recreation Department, and Public Works Department; and
- Employee injury data for FY 2010 and FYTD 2011 (May).

Methodology

To accomplish our audit objectives, we performed the following steps:

- Conducted interviews with Safety staff;
- Analyzed applicable laws and regulations;
- Obtained and reviewed best practices information and compared departmental activities to OSHA best practices;
- Conducted observations of employee safety techniques used in the field;
- Analyzed injury data for selected departments and training information from City tracking systems;
- Administered a survey of City departmental liaisons regarding their departmental safety programs and operational relationship with the City Corporate Safety Office;
- Administered a survey of division managers, supervisors, and superintendents in the three departments regarding their respective departmental safety programs; and
- Tested a random sample of employees who had reported injuries in FY 2010 to FYTD 2011 for each of the departments and determined their compliance with selected departmental required safety training.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

AUDIT RESULTS

Based on Federal Occupational Safety and Health Administration (OSHA) guidelines, effective management of worker safety and health is vital in reducing the extent and severity of work-related injuries and related costs. OSHA promulgates four key components of an effective worker safety program.

EXHIBIT 4
Safety and Health Management System Components

- **management commitment and employee involvement** (to ensure provision of motivation, necessary resources and workers' commitment to safety);
- **worksite analysis** (to detect current and potential hazards);
- **hazard prevention and control** (to prevent, correct, or control identified potential hazards); and
- **safety and health training** (to develop the knowledge and skills needed).

SOURCE: U.S. Department of Labor, Occupational Safety & Health Administration.

The four elements are interrelated and a failure in one may impact all the other elements. Although the City of Austin does not fall under the jurisdiction of OSHA, management for the three departments examined indicated that they use OSHA regulations as a reference source for the development of their employee safety programs.

In this audit we found that management for each of the three departments reviewed has developed a safety and health program structure to address worker safety issues; however, each program reviewed lacks some elements of OSHA best practices.

Finding 1: We identified non-compliance with safety requirements at worksites, which may increase employee injuries in the field and associated costs to the City.

Per OSHA, when exposure to hazards cannot be engineered completely out of normal operations or maintenance work, and when safe work practices and other forms of administrative controls cannot provide sufficient additional protection, a supplementary method of control is the use of personal protective equipment (PPE).

The three departments reviewed have developed policies and procedures related to PPE. Specifically, departmental policies detail the following requirements for employees:

- Wearing PPE, such as clothing, gloves, hard hats, eye protection, hand protection, safety shoes, and hearing protection when designated by job description.
- Properly storing materials and supplies.
- Operating vehicles in a safe manner.

Based on interviews with departmental safety staff and surveys of supervisors, superintendents, and division managers in the three departments reviewed, management is committed to ensuring that employees are provided with all the necessary PPE and worksite equipment. However, during our worksite visits we noted that while employees in the three departments generally comply with the requirement for safety shoes and reflective shirts, they do not consistently wear all required PPE. In all non-compliant cases observed, employees had the necessary PPE and equipment on site.

Exhibit 5 summarizes the results of our observations[1] during site visits performed at five AWU worksites, eight PARD worksites, and three PWD worksites.

EXHIBIT 5
Observed Compliance with Applicable PPE Worksite Requirements

Compliance With PPE	AWU	PARD	PWD
Eye Protection	**19%**	**43%**	**46%**
Ear Protection	**11%**	**10%**	**0%**
Head Protection	**50%**	**18%**	**40%**
Hand Protection	81%	100%	94%
Foot Protection	100%	100%	89%
Reflective Shirts/vests	94%	85%	100%

SOURCE: OCA observations of PARD, PWD, and AWU worksites, May 2011.

We also observed cases of non-compliance with:

- Proper signage/barricades at two AWU and six PARD worksites.
- Requirements for flaggers at two AWU worksites.
- Requirement for an organized, clean working area at one PARD worksite.

Based on interviews with safety staff, departments have not developed sufficient controls to hold employees and supervisors accountable for proper PPE use. For example, departmental policies for the three departments place the responsibility on supervisors to ensure compliance with safety requirements. On the other hand, only a few Success Strategy Performance Reviews (SSPR) for supervisors and superintendents include accountability measures that directly address compliance with PPE use.
Similarly, the Corporate Safety Office has not established a system to ensure accountability for safety at the department level. Measuring employee health and safety performance at all levels could also promote a stronger safety culture.

The benefits gained by wearing PPE include possible prevention of injuries and potentially minimizing the severity of an injury, should an injury occur. For example, wearing hearing protection reduces the likelihood of hearing damage when the ear plugs or muffs are appropriate for the kind of noise exposure and they are used properly. While departments do not systematically track information about whether lack of PPE utilization resulted in injury incidents, the three departments reviewed had over 300 injuries costing the City over $1.3M in FY10. Some of these incidents and their related costs may have been preventable through appropriate use of PPE. Failure of employees

[1] Percentages reflect compliance based on the number of people subject to PPE requirements

to comply with all required work safety policies and procedures increases the risk of employee injuries and associated costs, which will eventually hinder the departments from achieving the goals of their respective worker safety programs and can adversely impact departmental operations.

Finding 2: For two of the departments reviewed, job-related injury incidents[2] were not consistently investigated or communicated to departmental safety offices, which may limit these departments' ability to prevent future occurrences of the same incidents.

As shown in the Exhibit 4, one key component of a health safety management system is worksite analysis. Within this component OSHA calls for analysis of accident records. Specifically, per OSHA:

- All worker injury incidents, whether near miss or an actual injury-related event, should be investigated.
- All worker injury investigations should:
  - be conducted by the supervisor in charge of the area and/or activity
  - have employee involvement
  - have the participation of the person in charge of safety
- Worker injury investigative reports should recommend preventive action

Based on our review of a sample of incidents in each of the three departments reviewed, we noted that worker job related incidents in 2 of the departments are not consistently investigated or communicated to departmental safety offices. In addition, worker injury investigations for PWD are investigated by the Safety Office staff, but not conducted by supervisors in charge of the respective area and/or activity, a desired best practice. Exhibit 6 summarizes the results of our analysis of a random sample of 23 worker injury incidents for each department.

EXHIBIT 6
Not all Injury Investigation Reports On File For Sampled Incidents

Components Tested	AWU	PARD	PWD
Injuries investigated and results communicated to departmental safety offices	2 of 23 (9%)	21 of 23 (91%)	14 of 23 (61%)

SOURCE: OCA analysis of PARD, AWU, and PWD worker injury records, May 2011.

Inconsistencies in the investigation of injuries may be attributable to a lack of monitoring or inadequate procedures for holding supervisors accountable for not conducting or communicating incident investigations. While AWU and PARD have developed procedures requiring all injuries to be investigated and results to be communicated to the safety offices, departmental safety staff has indicated that they have no means to ensure that these provisions are consistently followed. PWD procedures do not require investigation for all injuries, only those which result in a claim (medical and lost time).

[2] An incident is an unplanned, undesired event that adversely affects completion of a task. Incidents may result in medical claims, time lost claims, or no claim.

The primary purpose of incident investigation is to prevent future occurrences and provide information to management that can be used to update and revise departmental programs for hazard prevention and control. The absence of such information may hamper the departments' ability to reduce the number of injuries and associated costs. While data was not available to tie conducting investigations to reductions in future similar occurrences, the three departments reviewed had over 300 injuries, some of which may have been preventable.

Finding 3: While safety training requirements have been defined, for two of the three departments, training was not consistently enforced or tracked, which may lead to higher employee injury rates.

According to OSHA guidelines, training is the backbone of a safety health system; specifically, for management to lead, personnel to analyze the worksite for hazards, and hazards to be eliminated or controlled, everyone must be trained. Training allows employees to understand the hazards they may be exposed to and how to prevent harm to themselves and others. In addition, it sets management's expectations related to safety.

All three departments reviewed have identified and developed some safety training requirements. However, our review of selected training records revealed numerous cases of non-compliance with training requirements.

- For AWU, we tested whether all Pipeline Technicians within a sub-division of Pipeline Operations had received three required safety-related trainings and observed that only 11% (or 3 of 27) employees were in compliance with the three required trainings (confined space, traffic control, and driving safety).

- For PARD, we reviewed 22 training records for employees who filed injury claims in the scope period, and determined that the majority of those employees were not current on required safety trainings. Specifically, based on our review of employees' training records, only 18% (or 4 of 22) of employees were in compliance with PARD New Employee Safety Orientation and 9% (or 2 of 22) were in compliance with the Outdoor Safety annual refresher.

  We also noted that of the 22 employees sampled, 10 were seasonal or temporary employees and none of them had received any training. PARD employs additional seasonal and temporary employees during the summer season in order to meet the staffing levels for managing various summer programs. Injury trends in the past three years showed a spike in the number of injuries during the summer months.
  - We reviewed injuries for the summer of FY2010 and found that 61 percent of injuries had been incurred by seasonal or temporary employees.
  - These injuries resulted in a total cost to the City of approximately $31,000.

PARD Safety Office staff asserted that generally seasonal employees are not provided with any safety training with exception of those employed in areas such as aquatics and childcare.

- For PWD we reviewed training records for 23 PWD employees who filed injury claims in June 2010 and in March 2011, and found that 96% (or 22 of 23 employees) were in compliance with sampled trainings (new employee safety orientation, defensive driving, OSHA training).

Not all departments monitor employees' compliance with required training. Further, while all three departments have policies and procedures that detail training requirements, these policies are not fully enforced. While departmental policies for the three departments place the responsibility on supervisors to ensure that employees are trained, only a few Success Strategy Performance Reviews (SSPR) for supervisors and superintendents include performance accountability measures that directly address compliance with training requirements. In addition, safety staff reported that supervisors sometimes prioritize meeting work deadlines over requiring attendance at safety trainings. Further, as mentioned above, the Corporate Safety Office has not established a system to ensure accountability for safety training at the department level.

Without tracking and enforcing employee safety training, management does not have assurance that all employees receive the necessary training. Without the knowledge and skills needed to understand workplace hazards and safe procedures, employees may be exposed to a higher risk of injuries and the City may be exposed to higher injury-related costs. Although we are not able to quantify injury costs relating to non-compliance with safety training requirements due to the absence of applicable data, the cost of injuries from the three departments combined exceeded $1.2M per year for FY08 –FY10. Training efforts that help to reduce workplace injuries could help reduce these costs.

Finding 4: Although not part of our initial scope, at one PARD facility we identified one issue regarding inappropriate storage of chemicals.

During our visit to one PARD facility we observed chemicals stored in the yard. One of the chemicals, according to the applicable Material Safety Data Sheet:

- Should be stored away from oxidizers because of the potential for explosion.
- Should be stored in a secondary container and away from direct sunlight.
- May be harmful to people if inhaled or ingested.
- "No smoking" signs should be posted in the storage and use areas.

We noted that this chemical was stored in the same area with oxidizers posing a potential risk of explosion. In addition, despite the fact that there is an employee break area very close to the chemical storage area, no signs prohibiting smoking in the storage area had been posted. We also noted that one of the bags containing the chemical, was torn and the chemical had spilled on the ground this. Because this yard is frequented by employees, there is a potential risk that employees could inhale this chemical.

Safety office staff explained that the observed chemical have been stored at this location for some time and that the safety office staff, because of the hazard posed by this chemical, had communicated to the facility staff the need to find appropriate storage for this chemical.

Recommendations:

The recommendations listed below are a result of our audit effort and subject to the limitation of our scope of work. We believe that these recommendations provide reasonable approaches to help resolve the issues identified. We also believe that operational management is in a unique position to best understand their operations and may be able to identify more efficient and effective approaches and we encourage them to do so when providing their response to our recommendations. As such, we strongly recommend the following:

1. The Director of the Austin Water Utility should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.

MANAGEMENT RESPONSE: Concur
The Austin Water Utility has created a Safety Enhancement Team that will consist of staff at all levels of the organization working towards improving the safety compliance and organizational culture at Austin Water.

To address the three findings, Austin water will:

1. Identify clear expectations for PPE use through the development of SOPs, communication, training and outreach, enhance site visits by supervisors, ensure accountability among

2. Develop a new AWU Injury Review Committee that will review and investigate all injury accidents, simplify reporting mechanisms, recommend training, provide accountability for processes, and have AWU Internal Audit division include injury accident documentation audits in their work plan.

3. Identify clear expectations on required safety training through development of SOPs, consistently enforce these requirements, ensure sufficient tracking and notification of training deadlines and expirations to all employees, and develop processes for following up with those employees out of compliance with training requirements.

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2. The Director of the Parks and Recreation Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.

MANAGEMENT RESPONSE: Concur
The Parks and Recreation Department will place a renewed and focused emphasis on communicating the key components of its comprehensive Accident Prevention Plan. The Accident Prevention Plan is a policy document outlining specific occupational health goals and safety strategies. The Plan is updated regularly and the PARD will initiate staff and management refresher orientations on all relevant safety program components. The Accident Prevention Plan is part of the PARD occupational health and safety system that will help address gaps identified din the audit findings.

As part of this initiative, roles and responsibilities will be clarified with regard to the administration and implementation of safety strategies and accountabilities. In addition, the department will conduct a comprehensive review of standard operating procedures to ensure all safety-related procedures reference the use of personal protective equipment (PPE), as well as the placement of proper signage/barricade requirements for worksites. We will also place and contain appropriate accountability statements respectively.

The PARD Safety Committee will also be formalized and charged with investigating 100% of all reported injuries. The committee will be tasked with submitting findings and recommendations when occupational injuries result from employees not wearing required PPE, or as a result of other safety violations. Supervisors will be expected to follow appropriate disciplinary/performance counseling protocol. Supervisors will also be provided tracking tools to help ensure staff is attending all required safety training.

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3. The Director of the Public Works Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.

MANAGEMENT RESPONSE: Concur
Public Works has processes and procedures in place addressing safety accountability; however improvement in enforcement is required. The Department's Systems Engineering Group has been assigned the task of developing a detailed corrective action plan that raises the visibility of safety compliance. The Department's plan will address the findings from the Employee Safety Audit and review best industry practices relating to the most effective safety program that can be implemented by the Public Works Department.

Public Works considers some of the key components of the strategy are:

1. Hire a Safety Manager who will take the lead in program development, responsibility for quality assurance, and compliance of the program.
2. Assign a full time administrative assistant, for record keeping, incident reporting management, training reporting management, and database management.
3. Revise SSPR standards for supervisors and field crews.
4. Revise Department Safety Incentive Program.
5. Decrease supervisor to field crew member ratio.

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4. The Director of the Parks and Recreation Department should ensure that:
   1. the chemicals observed during this audit at the PARD facility are stored in accordance to the applicable Material Safety Data Sheet specifications; and
   2. future such observations by the Safety Officer are immediately reported to the Director.

MANAGEMENT RESPONSE: Concur

PARD Safety and appropriate operation staff have taken steps to remedy the finding of improper storage of the dry chemical, Cyanuric Acid, used in the cleaning of PARD public pools

The chemicals observed at the Central Maintenance Complex facility have been properly removed and the area has been cleaned up. The chemicals are now stored at the Decker Lake Facility which includes an indoor structure for storing supplies. The storage area used for these chemicals is designed to separate the oxidizers from the other chemicals.

The chemicals in the broken bags have been transferred to plastic containers and have been labeled with the chemical name. A Material Safety Data Notebook will be available to all employees who access this site in order to identify the various chemical names, the associated health hazards, and the precautions for safe use and handling. National Fire Protection Agency (NFPA) standard signage has been installed at the front door to prohibit smoking, flames, and to warn of the presence of hazardous materials within the facility.

In the future the PARD will modify and use a Facility Audit Checklist to record and track observations related to improper chemical storage. Facility audit findings will be shared with the respective facility managers to ensure that corrective measures are taken and all chemicals are properly stored. The Department Director will receive notice of any related non-compliance observations.

APPENDIX A

MANAGEMENT RESPONSE

MEMORANDUM

To: Office of the City Auditor

From: Greg Meszaros, Director, Austin Water Utility

Date: July 22, 2011

Subject: Austin Water Response to Safety Audit

I have reviewed the Office of the City Auditor's Performance Audit of Employee Safety and concur with all of the recommendations related to Austin Water.

Austin Water recognizes our need to further enhance our safety culture and compliance. This audit has provided valuable recommendations for Austin Water to focus its attention to make improvements.

Austin Water has already created a Safety Enhancement team that consists of employees in all levels of the organization from the front line workers to executives. This team has been tasked with developing a specific work plan to enhance safety at Austin Water. Employee safety is important to Austin Water, therefore work on these improvements has begun immediately, and we will continue to stay focused on to ensure that these improvements result in a positive safety culture.

I have included the attached Action Plan that provides more detail on our strategies for improving employee safety.

Greg Meszaros, Director
Austin Water Utility

Austin WATER

ACTION PLAN
Employee Safety Audit – Austin Water Utility

Rec #	Recommendation Text	Concurrence	Proposed Strategies for Implementation	Status of Strategies	Responsible Person/ Phone Number	Proposed Implementation Date
01	The Director of the Austin Water Utility should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.	Concur.	1) The Austin Water Utility has created a Safety Enhancement Team that will consist of staff at all levels of the organization working towards improving the safety compliance and organizational culture at Austin Water. To address the three recommendations, Austin Water will:	Underway. AWU has created its Safety Enhancement Team and is currently working on preparation for its first kick-off meeting.	David Anders, Assistant Director of Finance and Business Services	August 2011
			2) Identify clear expectations for PPE use through the development of SOPs, communication, training and outreach, enhance site visits by supervisors, ensure accountability among	Planned. The Safety Enhancement Team will begin brainstorming enhancements and begin work tasks to implement.		December 2011

Rec #	Recommendation Text	Concurrence	Proposed Strategies for Implementation	Status of Strategies	Responsible Person/ Phone Number	Proposed Implementation Date
			3) Develop a new AWU Injury Review Committee that will review and investigate all injury accidents, simplify reporting mechanisms, recommend training, provide accountability for processes, and have AWU Internal Audit division include injury accident documentation audits in their work plan.	Planned. The Safety Enhancement Team will begin brainstorming enhancements and processes for the Injury Review Committee.	David Anders, Assistant Director of Finance and Business Services	December 2011
			4) Identify clear expectations on required safety training through development of SOPs, consistently enforce these requirements, ensure sufficient tracking and notification of training deadlines and expirations to all employees, and develop processes for following up with those employees out of compliance with training requirements.	Planned. The Safety Enhancement Team will develop enhancements and processes for improvements to employee training requirements and tracking.	David Anders, Assistant Director of Finance and Business Services	December 2011

MEMORANDUM

TO: Kenneth J. Mory, CPA, CIA, CISA, City Auditor

FROM: Sara L. Hensley, CPRP, Director
Austin Parks and Recreation

DATE: July 21, 2011

SUBJECT: Response to Performance Audit of Employee Safety

The Austin Parks and Recreation Department is in receipt of the July 2011 Employee Worker Safety and Training Audit Report. A formal response and Action Plan from PARD Management is attached. PARD Management concurs with all findings. To summarize, the areas of safety needing improvement and the Department response are as follows:

- Proper use of protective equipment including protection for the eyes, ears, head, as well as protective shirts/vests:
  - Safety-related performance measures to be incorporated into FY12 Success Strategy Performance Reviews (SSPR's)
  - Training procedures for current and new employees regarding the proper use of protective equipment, as well as proper signage and barricade requirements, to be investigated and re-developed where necessary
  - Random and continual inspection of protective equipment use by PARD employees
- Injury prevention and investigation:
  - Continue established practice of injury reporting, handling, and investigation to strive for a goal higher than the reported 91%
- Safety training for new and current employees:
  - Investigation of all PARD employees to determine who has or has not received PARD New Employee Orientation training
  - Establish tracking system to ensure all new employees attend safety training within a specific time frame
  - Further investigation into the frequency and types of safety training currently being offered to new employees

In addition, we would like to address the identified chemical storage issue discovered at PARD Central Maintenance Complex. We have rectified this situation by removing the spill and relocating the chemicals to a facility equipped to store hazardous materials. We have also taken steps to verify expedient reporting of all safety-related incidents directly to the Director.

We appreciate the work of this safety audit in identifying areas PARD needs to focus on and we look forward to any feedback you might have to our response and action plan.

Cc: Bert Lumbreras, Assistant City Manager

Employee Safety Audit Action Plan – Parks and Recreation Department

07/21/11

Rec #	Recommendation Text	Concurrence	Proposed Strategies for Implementation	Status of Strategies	Responsible Person/ Phone Number	Proposed Implementation Date
02	The Director of the Parks and Recreation Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.	Concur	Further develop PARD Accident Prevention Plan and implement the following safety strategies:			
			1) Incorporate safety-related performance measures and expectations into employee evaluation plans	1) Planned	All Division Managers	10/01/2011
			2) Develop & provide supervisors with adequate safety-related training tracking tools	2) Planned	Rick Ramirez 974-6734	12/01/2011
			3) Implement extensive training on proper use of protective equipment, as well as proper posting of signage/barricades, with emphasis on the findings of this audit	3) Underway	Rex Gressett 974-6764	On-going
			4) Develop strategy for regular and random inspection for employee usage of protective equipment	4) Planned	All Division Managers	08/31/2011
			5) Enhance and schedule department-wide annual safety training and new employee safety orientation	5) Underway	Rex Gressett 974-6764	10/31/11

Rec #	Recommendation Text	Concurrence	Proposed Strategies for Implementation	Status of Strategies	Responsible Person/ Phone Number	Proposed Implementation Date
04	The Director of the Parks and Recreation Department should ensure that: a. the chemicals observed during this audit at the PARD facility are stored in accordance to the applicable Material Safety Data Sheet specifications; and b. future such observations by the Safety Officer are immediately reported to the Director.	Concur	PARD Safety and appropriate staff have investigated and rectified this incident as follows:			
			1) The chemical spill was cleaned and the chemicals were removed from the premises and relocated to a facility offering secure hazardous material storage	1) Implemented	Rex Gressett 974-6764	Complete
			2) Proper signage according to NFPA standards was installed	2) Implemented	Rex Gressett 974-6764	Complete
			3) The Safety Officer has concurred that all future observations of non-compliance will be immediately reported to the Director using the Facility Audit Checklist	3) Implemented	Rex Gressett 974-6764	Complete

MEMORANDUM

TO: KEN MORY, CITY AUDITOR

FROM: HOWARD LAZARUS, DIRECTOR, PUBLIC WORKS DEPARTMENT

SUBJECT: MANAGEMENT RESPONSE TO THE EMPLOYEE SAFETY AUDIT

DATE: JULY 26, 2011

CC: ROBERT GOODE, ASSISTANT CITY MANAGER

I am forwarding this memorandum in response to the Employee Safety Audit of Public Works Department Operations. Public Works concurs with the recommendation by the Auditor and our response is provided below. Please do not hesitate to contact me at 974-7190 if you have any questions or if you need additional information.

Recommendation 03: The Director of the Public Works Department (PWD) should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.

Manage Response: Public Works has processes and procedures in place addressing safety accountability; however improvement in enforcement is required. The Department's Systems Engineering Group has been assigned the task of developing a detailed corrective action plan that raises the visibility of safety compliance. The Department's plan will address the findings from the Employee Safety Audit and review best industry practices relating to the most effective safety program that can be implemented by the Public Works Department.

Public Works considers some of the key components of the strategy are:

- Hire a Safety Manager who will take the lead in program development, responsibility for quality assurance and compliance of the program, and professionally develop the safety staff.
- Assign a full time administrative assistant, for record keeping, incident reporting management, training reporting management, and database management.
- Revise SSPR standards for supervisors and field crews to incorporate measurable and observable safety components.
- Revise Department Safety Incentive Program.
- Improve supervisor to field crew member ratio.

Implementation Date: The Department's proposed implementation date of the components of our correct action plan is no later than October 1, 2012.

ACTION PLAN
Employee Safety Audit – Public Works Department

Rec #	Recommendation Text	Concurrence	Proposed Strategies for Implementation	Status of Strategies	Responsible Person/ Phone Number	Proposed Implementation Date
115	The Director of the Public Works Department should design and implement a system to ensure that employees at all levels are accountable for their safety responsibilities including proper PPE use, injury incidents and injury investigation reporting, and employee safety training.	Concurrence	Public Works has processes and procedures in place addressing safety accountability; however improvement in enforcement is required. The Department's Systems Engineering Group has been assigned the task of developing a detailed corrective action plan that raises the visibility of safety compliance. The Department's plan will address the findings from the Employee Safety Audit and review best industry practices relating to the most effective safety program that can be implemented by the Public Works Department. Public Works considers some of the key components of the strategy are: • Hire a Safety Manager who will take the lead in program development, responsibility for quality assurance and compliance of the program, and professionally develop the safety staff. • Assign a full time administrative assistant, for record keeping, incident reporting management, training reporting management, and database management. • Revise SSPR standards for supervisors and field crews to incorporate measurable and observable safety components. • Revise Department Safety Incentive Program. • Improve supervisor to field crew member ratio.	Public Works has: • Assigned a full time administrative assistant to the safety group. • Re-classified a Safety Coordinator (Lead) position to a Safety Manager position. • Posted the Safety Manager Position for hire.	Jeffrey Travillion Division Manager Systems Engineering 974-9191	Corrective Action plan October 1, 2012