



UNIVERSITY OF
TEXAS
ARLINGTON

DISABILITY SERVICES FIRE & LIFE SAFETY AUDIT

MARCH 13, 2013

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MEMORANDUM

TO: James D. Spaniolo
President

FROM: Ken Schroeder 
Director of Internal Audit

DATE: April 9, 2013

SUBJECT: Disability Services Fire & Life Safety Audit Report
Dated March 13, 2013

Executive Summary

We have completed the Disability Services Fire & Life Safety audit as included in our FY 2013 annual audit plan. The objective of this audit was to determine if there is an adequate system for safe evacuation of disabled people from buildings in case of emergency.

Our audit included a review of policies and procedures within the Housing and Environmental Health and Safety offices in relation to residences, interviews with Residence Directors (RDs), Resident Assistants (RAs) and Department Safety Liaisons (DSLs), general policies in relation to fire safety, examination of fire and hazard inspection reports and a review of evacuation plans and fire drill performance.

The audit resulted in three recommendations:

- Development of a process by the Office of the Provost to ensure that University Procedure 7-6, Emergency/Fire Evacuation Procedures, is communicated to the faculty reminding them that they are required to brief their class, no later than the second class meeting of each new semester, on exit(s) from their class location, and primary and alternate exits from the building.
- Reevaluation of the Department Safety Liaison (DSL) program requirements, giving consideration as to whether all areas of the University have appropriate coverage in the event of an emergency.
- Development and implementation of a tracking system to ensure that the seven trainings listed as “required” in the Department Safety Liaison handbook are completed by the DSLs.

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We deem the first recommendation listed above as “significant to the institution” due to the harm that could result to students if this information is not communicated adequately.

We appreciate the courtesy and cooperation we received from the Environmental Health and Safety and Housing staff throughout this audit. If you have any questions, please contact me at extension 2-2018.

cc: Dr. Ronald L. Elsenbaumer, UT Arlington, Provost and Vice President for Academic Affairs
Ms. Kelly Davis, UT Arlington, Vice President for Business Affairs and Controller
Mr. John Hall, UT Arlington, Vice President for Administration and Campus Operations
Dr. Frank Lamas, UT Arlington, Vice President for Student Affairs
Ms. Mari Duncan, UT Arlington, Director, Residence Life
Ms. Leah Hoy, UT Arlington, Director, Environmental Health and Safety
Mr. Robert Smith, UT Arlington, Associate Director, Fire & Life Safety
Dr. Pedro Reyes, UT System, Executive Vice Chancellor for Academic Affairs
Mr. Alan Marks, UT System, Attorney – General Law Section
Mr. J. Michael Peppers, UT System, Chief Audit Executive
Ms. Moshmee Kalamkar, UT System, Audit Manager
Mr. Ed Osner, Legislative Budget Board
Mr. Jonathan Hurst, Governor’s Office of Budget, Planning and Policy
Internal Audit Coordinator, State Auditor’s Office
Mr. Ken Levine, Sunset Advisory Commission
Report File

Background Information

Apartment and Residence Life (hereinafter referred to as “Housing”) management has a responsibility to ensure that Residence Directors and Resident Assistants are trained in evacuation procedures for persons living in University managed properties. Students who have a disability have the responsibility to self-report their disability to the Office for Students with Disabilities if they choose to be identified as disabled. Once identified, Housing is notified of the student’s disability and Housing personnel go through a protocol with each identified disabled person on the evacuation process.

The Environmental Health and Safety Office is responsible to conduct fire drills on University housing properties, conduct fire and hazard inspections, and manage the Department Safety Liaison program. They also are required to create evacuation plans for all University buildings, with the exception of those buildings that are not used for the congregating of people such as storage buildings.

Objectives

The overall objective of this audit was to determine if there is an adequate system for safe evacuation of disabled people from buildings in case of emergency. To assist in determining this, we focused on the following sub-objectives. Our goal was to determine whether:

1. Housing personnel have gone through the evacuation process with each identified disabled person
2. Identified disabled persons and their associated room number are posted on the fire alarm panels
3. There are evacuation plans in UT Arlington buildings
4. Residence Directors and Resident Assistants are trained on evacuation procedures
5. Department Safety Liaisons are being trained in evacuation procedures
6. Fire inspections are being completed as required
7. Hazard inspections are being completed as required
8. Fire drills are being performed as required

Scope and Methodology

Our examination was conducted in accordance with guidelines set forth in the Institute of Internal Auditors’ *International Standards for the Professional Practice of Internal Auditing* and *Generally Accepted Government Auditing Standards*. The *Standards* set criteria for internal audit departments in the areas of independence, professional proficiency, scope and performance of audit work, and management of the internal auditing department. UTS 129 titled “Internal Audit Activities” require that we adhere to the *Standards*.

Our audit focused on processes and policies in effect for FY 2011 and FY 2012 with respect primarily to academic buildings, apartments and residence halls.

Audit Results

For the above noted objectives, we performed a variety of testing procedures including interviews with pertinent persons noting the following results:

1. Housing personnel have gone through the evacuation process with each identified disabled person – students must register with the Office for Students with Disabilities to be identified as disabled for University classification. Once identified, the Residence Directors meet with the students at the beginning of each semester to review evacuation procedures. Once the information has been discussed, both the Residence Director and the student sign a "Resident Emergency Evacuation Conversations" form. We examined a sample of these forms noting no exceptions.
2. Identified disabled persons and their associated room number are posted on the fire alarm panels - with the assistance of the Housing Safety Inspector from Environmental Health & Safety (EH&S), we examined a sample of fire alarm panels at various buildings noting that the students in our sample were listed, along with their room number, on the inside of the panel door.
3. There are evacuation plans in UT Arlington buildings – the University has a definitive process for developing and updating all of the evacuation plans for the various University buildings. We selected a sample of buildings to examine. With the assistance of the Housing Safety Inspector, we visited each building in our sample noting that there are evacuation plans in each of the buildings observed.
4. Residence Directors (RDs) and Resident Assistants (RAs) are trained on evacuation procedures - there are general evacuation procedures provided in the Residence Director Staff Manual and the Apartment Living Handbook. RDs and RAs are required to review these policies. Each fall, a multi-day general training is offered to all RDs and RAs. This training includes fire safety (using fire extinguishers) and emergency procedures, which review evacuations. A representative from the Office for Students with Disabilities also speaks to the group. Residence Life (the department responsible for the residence halls on campus) has a drill and an educational seminar called the "Great Escape." This is a controlled escape conducted each semester and rotated among the residence halls. Theatrical smoke is used to fill the corridors and create the look of a fire and residents are taught how to react and "escape" by crawling through the smoke to get out safely. Fundamental trainings such as the Evac-U-Chair (a lightweight, compact and easy to use device designed to assist mobility-impaired persons down a stairwell) are offered different times throughout the academic year.

We judgmentally chose a sample of representatives from each housing type and distributed an electronic survey to the sample to gain information about the training they received. Based on the responses received, examination of the training materials provided, and the

drills performed, we conclude that RDs and RAs obtained the training necessary for evacuation procedures.

5. Department Safety Liaisons (DSLs) are being trained in evacuation procedures - the goal and purpose of the DSL program is to maintain a safe and healthful workplace through:
 - a. dissemination of fire/life safety and emergency response information;
 - b. educational meetings and safety training;
 - c. hazard reporting;
 - d. performing DSL responsibilities for hazard communication program, and;
 - e. conducting safety evaluations.

This program is managed through the EH&S department. A Department Safety Liaison Handbook is located on the University's website and provided to all DSLs so that they are aware of the responsibilities of this position. The program is voluntary and the EH&S department will periodically review the DSL roster by department and building location; noting if a department does not have a DSL. They will then request the department head or supervisor to select a staff member to participate as the department DSL. We reviewed the DSL roster noting that there was a high concentration of DSLs in certain buildings (such as Davis Hall, which at the time of our testing had 27 DSLs) and other locations (such as the Office of Research, which is located at the Arlington Technology Incubator) do not have any DSLs. Having a high concentration of DSLs in one building may be redundant and a waste of resources; whereas, not having a DSL may pose a safety concern if the need for evacuation were to arise. Management should consider achieving a better balance of areas covered by DSLs to ensure appropriate safety coverage.

1. **Recommendation:**

We recommend that the Environmental Health and Safety Office (EH&S) reevaluate the DSL program requirements, giving consideration as to whether all areas of the University have appropriate coverage (including someone trained to provide safety instructions) in the event of an emergency. EH&S should also work with senior management of the University to define a procedure as to the areas deemed as "required" to have a DSL. Having such a plan may help to reduce University resources in terms of costs associated with providing training to personnel in buildings where there is excess coverage.

Management Response:

EH&S recently reviewed and cross-checked the number of appointed DSLs by both department and building location to determine the ideal number of DSLs in each. Where necessary, adjustments were made in the number of DSLs positions. With the support of the Vice President for Administration and Campus Operations, requests were sent to department heads requesting appointments if it was determined that additional DSLs were necessary. EH&S has also implemented a quarterly review process to ensure that we maintain the optimum number of DSLs.

Target Implementation Date: February 2013

Responsible Party: Director, EH&S and DSL Coordinator

Review of the DSL Handbook states that there are seven required training items for the DSLs:

- CPR/AED
- Bloodborne Pathogens
- Evac-U-Chair
- Fire Extinguisher
- Great Escape
- Building Evacuation and
- Hazard Reporting

We inquired as to how EH&S ensured that all DSLs have taken all of the trainings since they are noted as “required” per the handbook. We were informed that there has not been a matrix spreadsheet established which would track individual training progress for the DSLs. Without such a matrix or tracking vehicle, the EH&S office is not aware of the DSLs that have or have not taken the training that they state is required. We consider this deficiency an exception.

2. Recommendation:

Since the (DSL) handbook states that there are seven items that are “required” training for DSLs, a tracking system needs to be developed and implemented to ensure that DSLs are receiving the training required. This will also help ensure that training is provided on a timely basis and can assist the EH&S department in better coordinating what training is needed to meet the requirements listed.

Management Response:

This issue was identified during the audit process, at that time EH&S began developing a training matrix to track the training that DSLs have completed. DSL required training is now being tracked on this spreadsheet. EH&S will coordinate and schedule training opportunities for DSLs to acquire the required training. This past quarter, AED/CPR training was scheduled and offered to DSLs as part of this effort.

Target Implementation Date: February 2013

Responsible Party: Director, EH&S and DSL Coordinator

6. Fire inspections are being completed as required – selecting a sample of buildings on campus, we examined the annual fire alarm inspection reports. These inspections are performed by a third party. Each report contained an inspection certificate and sections titled executive summary, notes & recommendations, inspection & testing, sound & visual

testing, battery & power supply testing, inventory & warranty report and zone address report. It was noted that the inspection & testing section was large and listed all items that were tested, such as batteries, expander panels, duct detectors, heat detectors, pull stations and smoke detectors (which for a residence hall is voluminous as each residence room has a smoke detector).

For the same sample of buildings, we also examined the sprinkler systems inspection reports. These inspections are also performed by a third party and items inspected include control valves; water supplies, tanks, pumps and fire department connections; wet & dry systems; alarms; sprinkler piping and improvements and corrections.

For the sample of buildings tested, we noted that no errors or deficiencies were listed in either of the fire alarm or sprinkler systems reports, and all the reports sampled indicated "passed" in the inspection & testing sections.

7. Hazard inspections are being completed as required – our scope for this area was limited to hazard inspections conducted at residence halls and apartments. Working with the Housing Safety Inspector, we learned that the types of items they look for when conducting hazard inspections include use of extension cords; power strips plugged into other power strips; kitchen appliances (microwave, coffee pots, refrigerators, etc.) plugged into a power strip and not directly into the wall receptacle; and use of items such as hotplates, coffee warmers, space heaters, candles, incense, halogen lamps, toasters, rice cookers, etc.

We examined the housing inspection reports for a sample of residence halls and apartments noting that the majority of units had no violations. Of those units with violations, they were properly corrected when the follow up inspection was performed.

8. Fire drills are being performed as required – our scope for this area was limited to fire drills conducted at residence halls and apartments since EH&S is required to conduct two fire drills per year on housing property. In addition, they assist with the “Great Escape” which was defined above. Using the same sample of housing properties that we used for the hazard inspection testing, the properties tested did have fire drills performed twice during the academic year.

Faculty Training

Having conducted interviews with Housing personnel, EH&S, Emergency Management, Office for Students with Disabilities, Human Resources and University Compliance Services, none of these persons were aware of any specific training offered to faculty in the event an emergency evacuation was needed. A resounding concern from those interviewed was what type of training or education (if any) is given to faculty concerning evacuation procedures in general and also in relation to disabled persons. We interviewed the then Provost, Sr. Vice Provost and the Assistant Vice President in the Office of the Provost and none were aware of any training or communication to the faculty concerning this issue.

University Procedure 7-6: Emergency/Fire Evacuation Procedures, Section C, Classrooms states: *Faculty members, graduate teaching assistants, and teaching assistants in charge of a class will brief their class, no later than the second class meeting of each new semester, on exit(s) from their class location, and primary and alternate exits from the building. Classes held above or below the ground floor will also be reminded to not use elevators, but to use stairs only for emergency evacuation. Faculty members are expected to assist students in selecting the safest route for evacuating a building during an actual emergency. Arrangements for help for handicapped students should be made as necessary during the first week of class.* Although this is a University procedure, we could find no evidence that the faculty were made aware of its existence. The procedure also states emergency procedures for Disabled personnel. Without faculty knowing the emergency exits and communicating this to the students, there could be confusion in the event of an emergency that may result in harm to students. We consider this recommendation as significant to the institution.

3. Recommendation:

We recommend that the Office of the Provost develop a process to ensure that Procedure 7-6, Emergency/Fire Evacuation Procedures, Section C, Classrooms is communicated to the faculty and that the faculty are required to communicate this information to their respective students at the beginning of each semester and documenting by sign –off that this was done.

Management Response:

We agree with the recommendation that all faculty, graduate teaching assistants and associated faculty responsible for classroom instruction provide detailed instructions to their students on the location of primary and secondary emergency exits from the building. Students should also be reminded not to take elevators but rather use stairwells for exiting the building in an emergency when the classroom is not on a ground floor. Classroom instructors are also expected to assist their students in selecting the safest route for evacuation, and make arrangements to assist handicapped individuals.

The best way to convey this information to students is by inclusion in each course syllabus, which is provided to every student in every class by the second class day. Additionally, faculty, teaching assistants and associated faculty instructors should be

trained by the department during faculty orientations, graduate teaching assistant orientations and other safety training events.

Target Implementation Date: September 1, 2013

Responsible Party: Vice Provost for Faculty Affairs, Vice provost for Academic Programs and Curriculum, Vice President for Student Affairs

Conclusion

Our audit included a review of policies and procedures within the Housing and Environmental Health and Safety offices in relation to residences, interviews with Residence Directors, Resident Assistants and Department Safety Liaisons, general policies in relation to fire safety, examination of fire and hazard inspection reports and a review of evacuation plans and fire drill performance. The audit resulted in three recommendations, of which one is deemed significant to the University as noted above.

We appreciate the courtesy and cooperation we received from the Environmental Health and Safety and Housing staff throughout this audit.