



THE UNIVERSITY OF TEXAS AT DALLAS

OFFICE OF INTERNAL AUDIT
800 W. CAMPBELL RD. SPN 32, RICHARDSON, TX 75080
PHONE 972-883-4876 FAX 972-883-6846

October 23, 2017

Dr. Richard Benson, President,
Ms. Lisa Choate, Chair of the Institutional Audit Committee:

We have completed an audit of Emergency Management as part of our fiscal year 2017 Audit Plan, and the report is attached for your review. The objective of our audit was to ensure emergency procedures are in compliance with Texas Education Code Section 51.217, *Multihazard Emergency Operations Plan; Safety and Security Audit*.

Based on the audit work performed, we conclude that overall the program complies with Texas Education Code 51.217; however, opportunities exist to enhance emergency management program relating to training and policies and procedures.

Management has reviewed the recommendations and has provided responses and anticipated implementation dates. Though management is responsible for implementing the course of action outlined in the response, we will follow up on the status of implementation subsequent to the anticipated implementation dates. We appreciate the courtesies and considerations extended to us during our engagement. Please let me know if you have any questions or comments regarding this audit.

Toni Stephens, CPA, CIA, CRMA
Chief Audit Executive



Executive Summary

Audit Objective and Scope

To ensure the emergency management procedures are in compliance with Texas Education Code Section 51.217, *Multihazard Emergency Operations Plan; Safety and Security Audit*. The audit scope covered all operations during FY 2017.

Conclusion

Based on the audit work performed, we conclude that overall the program complies with Texas Education Code 51.217; however, opportunities exist to enhance emergency management program relating to training and policies and procedures.

Audit Recommendations by Risk Level

Recommendation	Risk Level	Estimated Implementation Date
(1) Update the Emergency Operations Plan	Medium	October 10, 2019
(2) Ensure Training and Drills Related to Emergency Operations Are Documented and Conducted	Medium	March 31, 2018
(3) Update the University Emergency Management Policy	Low	March 31, 2018

Responsible Vice President

Dr. Calvin Jamison, Vice President for Administration

Responsible Party

Mariah Armitage, Director of Emergency Management and Business Continuity

Staff Assigned to Audit

Project Leader: Ray Khan, CIDA, Staff Auditor

Report Distribution

Members of the UT Dallas Institutional Audit Committee

External Members

- Mr. Gurshaman Bajewa
- Mr. Bill Keffler
- Mr. Ed Montgomery
- Ms. Julie Knecht

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- Dr. Hobson Wildenthal, Executive Vice President
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- Dr. George Fair, Vice President for Diversity and Community Engagement; Compliance Officer
- Mr. Frank Feagans, Vice President and Chief Information Officer
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- Dr. Calvin Jamison, Vice President for Administration
- Mr. Rafael Martin, Interim Vice President for Research
- Dr. Inga Musselman, Interim Provost
- Mr. Terry Pankratz, Vice President for Budget and Finance
- Mr. Timothy Shaw, University Attorney, ex-officio

Responsible Parties

- Mariah Armitage, Director of Emergency Management and Business Continuity
- Office of Institutional Compliance (for high risk area audits)
- James Dockery, Assistant Vice President, Institutional Equity and Compliance
- External Agencies
- The University of Texas System*
- System Audit Office
- State of Texas Agencies*
- Legislative Budget Board
- Governor's Office
- State Auditor's Office
- Sunset Advisory Commission



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Background

[Texas Education Code Section 51.217](#), *Multihazard Emergency Operations Plan; Safety and Security Audit*, requires institutions to implement an emergency management plan that addresses the mitigation, preparedness, response, and recovery procedures the institution will follow during an emergency event. The plan must include training for emergency response, emergency drills for employees and students, coordination with outside entities during emergency events, and the implementation of a safety and security audit.

The University of Texas at Dallas emergency management plan was created in 2006 and approved by former President Daniel. The division of Emergency Management, within the Office of Environmental Health and Safety (EH&S), is responsible for the administration of the emergency management plan. As emergency responses involve multiple areas of the University, the plan is split into different segments, including a basic plan, annexes to the basic plan, and a pandemic plan. The basic plan provides a high level overview of how the university will respond to an emergency while the annexes provide additional details on the response from each identified area. These annexes also allow for collaboration between EH&S and other areas of the university during the development of the emergency response plan.

Audit Objective

The objective of this audit was to ensure the emergency management procedures are in compliance with Texas Education Code Section 51.217.

Scope and Methodology

The scope of this audit was FY17, and our fieldwork concluded on September 19, 2017. To satisfy our objectives, we performed the following:

- Gained an understanding the policies, procedures, and regulations related to emergency management, including Texas Education Code Section 51.217, UTS 172, [Emergency Management](#), and UTDBP3086, [UT Dallas Emergency Preparedness Policy](#).
- Tested the University's Emergency Operations Plan to ensure compliance with Texas Education Code Section 51.217, including determining if:
 - training and drills are documented within the plan
 - coordination with outside entities is documented within the plan
 - the University has implemented the required safety and security audit
- Identified all training and drills conducted by the university and conducted a comparison to the Emergency Operations Plan.
- Ensured the safety and security audit is being conducted and results are properly reported.



We conducted our examination in conformance with the guidelines set forth in The Institute of Internal Auditor’s *International Standards for the Professional Practice of Internal Auditing*. The *Standards* are statements of core requirements for the professional practice of internal auditing.

Additionally, we conducted the audit in accordance with generally accepted government auditing standards. 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 and Management’s Responses

Strengths and Controls Noted During the Audit
A peer review was conducted and submitted to UT System in July 2015 that satisfies the requirement for audits.
UT Dallas has an emergency operations center on campus to activate during an emergency and/or event.
An emergency notification system is in place to notify the campus community during an emergency.
UT Dallas partners with local, regional and state emergency management entities and participates in various activities regarding emergency preparedness, mitigation, response, and recovery.

Although the above strengths and controls were noted, opportunities exist to enhance emergency management operations as outlined below. The Risk Levels are defined in the [appendix](#).

Observation and Risk Level	Risk/Effect	Recommendation	Management’s Response and Action Plan
<p>1. Update the Emergency Operations Plan (Medium)</p> <p>The UT Dallas Emergency Operations Plan was created in 2006. Since then, there have been occasional updates; however, the current plan does not reflect all changes in staff or operations that have occurred on campus.</p> <p>It was also noted that all segments of the plan do not include the mitigation, preparedness, response,</p>	<p>As the plan has not been updated and does not include all procedures to be carried out. The risk is increased that individuals may not be aware of their responsibilities during emergency events.</p>	<p>The Emergency Operations Plan should be updated to reflect the University’s current structure and operations. All segments specific to university operations related to emergency events and all operations (both internal and external) related to university emergency operations should also be documented and included within all segments of the plan.</p>	<p>Management’s Response and Action Plan:</p> <p>The EOP update will be accomplished in four phases: The State of Texas Department of Emergency Management (TDEM) recently announced the development of new emergency operations plan templates. These templates are drastically different from the original state planning documents currently used by the University of Texas at Dallas. These documents were expected to be</p>



Observation and Risk Level	Risk/Effect	Recommendation	Management's Response and Action Plan
<p>and recovery activities specific to university operations during emergency events. Additionally, the plan includes segments that document emergency operations that are not specific to those that need to be conducted by the university during emergency events.</p>			<p>released last year however, the release has been put on hold indefinitely. Emergency Management will move forward with a complete update of the entire Emergency Operations Plan using current state planning standards.</p> <p>State planning standards require certain information to be included in the University Emergency Operations Plan. State planning standards are written for county and local jurisdiction use. As a result, The University Emergency Operations Plan will be updated to reflect current university specific operations. Procedures will also be listed in attachments and/or standard operating procedures as needed.</p> <p>Estimated Date of Implementation: Emergency Management will begin the update 10/10/17. The Emergency Operations Plan update is expected to be completed by 10/10/19.</p> <p>Person Responsible for Implementation: Mariah Armitage, Director of Emergency Management and Continuity Planning</p> <p>Internal Audit Follow-up Response: <i>Emergency Management stated that each of the 23 annexes takes about three</i></p>



Observation and Risk Level	Risk/Effect	Recommendation	Management's Response and Action Plan
			<p><i>to four months to update. They will try to have 12 annexes completed by 2018 and the remaining 11 completed by 2019. Internal Audit will assess implementation status at 8/31/18.</i></p>
<p>2. Ensure Training and Drills Related to Emergency Operations Are Documented and Conducted (Medium)</p> <p>Segments of the plan are being created by outside parties, because the Emergency Operations Plan relies on the City of Richardson for emergency operations that are beyond the University's resources and means. These external segments of the plan do not address all training and drills that are being conducted by the university for emergency operations. In addition, drills and training are not consistently being conducted in line with the segments of the plan.</p>	<p>The risk is increased that members of the campus may not be aware of how to respond during emergencies.</p>	<p>The Emergency Operations Plan should be updated to include specific training and drills conducted by the university for all segments. Additionally, documented drills and training should occur with greater consistency to ensure campus preparedness for emergency events.</p>	<p>Management's Response and Action Plan:</p> <p>While segments of the Emergency Operations Plan (Annexes) written by the City of Richardson do not contain training or exercise information specific to the University of Texas at Dallas, joint training and exercises are regularly conducted to test the shared unified command and emergency response functions.</p> <p>Specific training and exercise requirements will no longer be listed in the Emergency Operations Plan. Instead, this information will be captured in an Annual Training and Exercise Plan. This will allow any changes to training and exercise requirements to be updated regularly.</p> <p>The Office of Emergency Management currently logs all training and exercises attended by Emergency Management staff members. University-wide training and exercise coordination, reporting, and documentation requirements will also be included in the Annual Training and Exercise Plan.</p>



Observation and Risk Level	Risk/Effect	Recommendation	Management's Response and Action Plan
			<p>In addition, the emergency management policy is currently being revised to include university-wide training and exercise coordination, reporting, and documentation requirements. Specifically this will require all departments, schools, and campus units to coordinate with the Office of Emergency Management when conducting emergency management or continuity planning training and/or exercises. This will help ensure training and exercises meet requirements and are documented university-wide.</p> <p>Estimated Date of Implementation: 3/31/18 – Dependent on HOP approval of the updated Emergency Management Policy.</p> <p>Person Responsible for Implementation: Mariah Armitage, Director of Emergency Management and Continuity Planning</p>
<p>3. Update the University Emergency Management Policy <i>(Low)</i></p> <p>The Emergency Preparedness Policy (UTD3086) was implemented on March 27, 1997. This policy has not been updated since this date.</p>	<p>Since the policy is not being reviewed and updated, employees, students, and guests may not be aware of the University's emergency procedures.</p>	<p>University policies related to emergency management should be update to reflect current operations.</p>	<p>Management's Response and Action Plan: The emergency management policy is currently being updated and will be submitted to the HOP Committee for approval upon completion.</p> <p>Estimated Date of Implementation: 3/31/18 – Dependent on HOP approval of the</p>



Observation and Risk Level	Risk/Effect	Recommendation	Management's Response and Action Plan
			updated Emergency Management Policy. Person Responsible for Implementation: Mariah Armitage, Director of Emergency Management and Continuity Planning

Conclusion

Based on the audit work performed, we conclude that overall, the program complies with Texas Education Code 51.217; however, opportunities exist to enhance emergency management program relating to training and policies and procedures.

We appreciate the courtesy and cooperation received from the management and staff in the Office of Environmental Health and Safety as part of this audit.



Priority Findings and Risk Matrix

Definition of Risks

Risk Level	Definition
Priority	High probability of occurrence that would significantly impact UT System and/or UT Dallas. Reported to UT System Audit, Compliance, and Management Review Committee (ACMRC). Priority findings reported to the ACMRC are defined as <i>“an issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.”</i>
High	Risks are considered to be substantially undesirable and pose a moderate to significant level of exposure to UT Dallas operations. Without appropriate controls, the risk will happen on a consistent basis.
Medium	The risks are considered to be undesirable and could moderately expose UT Dallas. Without appropriate controls, the risk will occur some of the time.
Low	Low probability of various risk factors occurring. Even with no controls, the exposure to UT Dallas will be minimal.