

Systematic Program Review

Name of Unit: Compliance Support Services, & Environmental Health & Safety
Reporting Official: Richard Costello

Item 1

Is your program (undergraduate, master's or doctoral program, academic support unit, service unit, center, administrative/staff department/unit) currently reviewed on a regular basis (e.g., annually, biennially, every 5 years)? Examples of systematic review include, but are not limited to: academic program review, internal audits, external accreditation, external review by a consultant, peer review, etc.

Yes No

If "YES", go to Item 2. If "NO", check that box and return form to OIRE.

Item 2

Type an "X" next to the type(s) of program review that applies to your unit, the date of your last review and the date of the next expected review:

	Date of last review	Date of next review
<input type="checkbox"/> academic program review	_____	_____
<input type="checkbox"/> internal audit	_____	_____
<input type="checkbox"/> external accrediting agency	_____	_____
<input type="checkbox"/> external consultant	_____	_____
<input checked="" type="checkbox"/> peer review	Feb, 2004	not yet sched
<input type="checkbox"/> other: _____	_____	_____

Item 3

Describe how your unit has used/is using the findings/recommendations from its last review to improve the effectiveness of the unit. Include references to goals or objectives listed in recent planning documents, and examples of the use of assessment to improve your programs/services.

Compliance Support Services

Recommendations from our comprehensive peer review, with special focus on Environmental Health and Safety Program, from February 2004 were integrated into the Compliance Support Services plans of activity followed up in each quarterly meeting of the ICC (ICC). Most recommendations have been implemented; a few are pending for specific reasons as identified below:

Recommendation 1: Provide additional human resources to the Compliance Program.

Status – Reported implemented in 1st Qtr FY 05 meeting to ICC

Recommendations 2 & 3: Enhance program independence, specifically the perception on campus that the compliance program is seen as a Business Affairs program, and not one owned to the same degree by other Divisions. Evaluate the need for a full-time Director reporting to the President.

Status – The President requested and sponsored compliance training for all supervisors starting in the Summer of 2005. The 4th Qtr FY 05 meeting of ICC reviewed the progress of this training and concluded that it was effective in creating the perception that, while administered by Business Affairs, the compliance program is actually the President's program. At the meeting it was also decided that having the program report to the President was not necessary.

Recommendation 4: Adopt a more comprehensive risk assessment mechanism.

Status – Reported implemented in 1st Qtr FY 05 meeting to ICC

Recommendation 5: Start high-risk area inspections.

Status – Reported implemented in 1st Qtr FY06 meeting to ICC.

Recommendation 6: Implement Quarterly Compliance Reports for risk areas with highest exposure.

Status – As of the 3rd Qtr FY 06 meeting of the ICC, most items have been implemented, with the exception of those detained by Oracle ERP project, as shown below:

Compliance Risk Area	Status	Comments and plans
Cash Receipts	Pending	Most of the risk is associated with variable costs and revenue streams not controlled by budget processes as well as cost accounts with fixed costs only. NOTE- this will be after Budget Office is freed from the budget and Oracle implementation tasks.
Internal Revenue Reporting	Pending	Listed with low significance of exposure (2) on FY 2004 Audit Universe and Risk Analysis; to be undertaken after Oracle Implementation of systems underlying this reporting. NOTE- this will be after June 2005 due to change in Oracle go-live date.
Student Health Services	Complete	
Purchasing	Pending	To be undertaken after Oracle Implementation; this implementation is re-creating our purchasing processes following best practices deployed in current computer technology. . NOTE- this will be after June 2005 due to change in Oracle go-live date.
Harassment Training	Complete	
Sponsored Project Compliance	Complete	
Environmental Health & Safety	Complete	Complete including Indoor Air Quality
Computer Information Security	Pending	To be undertaken after Oracle implementation; this implementation is re-creating our computer information security processes following best practices deployed in current computer technology. . NOTE- this will be after September 2006 due to change in Oracle go-live date.
Personal Information Security, including HIPAA, Gramm-Leach-Bliley, BPM 66	In process	See Agenda section D-7
Athletics	Complete	
Executive Commitment	Complete	This is a control, not a compliance risk per se. It is not addressable through the QCR process. However, the training for supervisor program addresses this item.
Management Inattention to Compliance	Complete	This is a control, not a compliance risk per se. It is not addressable through the QCR process. However, the training for supervisor program addresses this item.

Recommendation 7: Redesign and re-deploy general and specific compliance training to take advantage of the delivery, management and reporting functionality of Oracle iLearning.

Status – Implementation of Oracle iLearning functionality has been postponed to Phase 2 of the implementation.

Recommendation 8: Make specific improvements to Compliance Program website.

Status – Reported implemented in 4th Qtr FY 04 meeting to ICC.

Recommendation 9: Implement stable hyperlinks from website materials to HOP and other policies.

NOTE – As of the 3rd Qtr FY 06 meeting of the ICC, this objective requires deployment of the HOP on Oracle Portal or Collaboration Suite, which is pending at this point.

Recommendation 10: Add a member outside Business Affairs to the hotline triage team.

Status – Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 11: Clarify the confirmation statement in the Standard of Conduct Guide.

Status – Reported implemented in 4th Qtr FY 04 meeting to ICC.

Additional Items from Environmental Health Exhibit to Peer Review Report

Recommendation 12: Train EHS staff on operation of the building fire panels.

Status – Reported implemented in 2nd Qtr FY 05 meeting to ICC.

Recommendation 13: Install secondary containment for Print Shop waste drum(s).

Status – Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 14: Install secondary containment for chemical distribution area in the science building and segregate incompatible waste.

Status - Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 15: Provide regularly scheduled pickups of pre-labeled containers for characterized re-occurring waste.

Status - Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 16: Add the Fine Arts Department to lab safety compliance plan and survey the department regularly.

Status – Reported implemented in 2nd Qtr FY 05 meeting to ICC.

Recommendation 17: Upgrade Indoor Air Quality to High Potential Impact/High Probability and include it in Quarterly Compliance Report reporting.

Status - Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 18: Develop and indoor air quality program in conjunction with the Physical Plant.

Status – Ongoing efforts were formalized into Quarterly Compliance Report process as of 3rd Qtr FY 04 ICC meeting.

Recommendation 19: For Workplace Safety, obtain first reports of injury from Human Resources.

Status - Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 20: Appoint a state approved Radiation Safety Officer.

Status - Reported implemented in 4th Qtr FY 04 meeting to ICC.

Recommendation 21: Follow up on inspection exceptions regarding safety deluge showers and eye wash stations by reporting them via non-routine Physical Plant work-order requests; follow up on these requests to ensure that they are completed.

Status - Reported implemented in 3rd Qtr FY 04 meeting to ICC.

Recommendation 22: Clarify Safety Committee Structure and resume regular meetings by the end of the spring semester.

Status - Reported implemented in 4th Qtr FY 04 meeting to ICC.