Florida Gulf Coast University Board of Trustees  
April 15, 2014

SUBJECT: Environmental Health and Safety Laboratory Safety Procedures Audit

PROPOSED BOARD ACTION

Accept the Environmental Health and Safety: Laboratory Safety Procedures Audit Report provided on January 30, 2014 to President Wilson Bradshaw, Vice President for Administrative Services and Finance Steve Magiera, Assistant Vice President of Business Services Joseph McDonald, and Director of Environmental Health and Safety Rhonda Holtzclaw.

BACKGROUND INFORMATION

This report presents the results of a limited scope audit of the University’s department of Environmental Health and Safety (EH&S) function related to laboratory safety procedures. The audit objective was to review Environmental Health and Safety’s departmental oversight of laboratory safety procedures.

The audit was part of the 2013-2014 internal audit work plan approved by the FGCU Board of Trustees at its June 18, 2013 meeting.

Upon acceptance of the report by the FGCU Board of Trustees, a copy of the report will be sent to the Board of Governors as required.

Supporting Documentation Included: Environmental Health and Safety Laboratory Safety Procedures Audit Report Issued January 30, 2014

Prepared by: Director of Internal Audit Carol Slade

Legal Review by: Vice President and General Counsel Vee Leonard (January 29, 2014)

Submitted by: President Wilson G. Bradshaw
INTEROFFICE MEMORANDUM

To:       Steve Magiera, Vice President for Administrative Services and Finance
          Joseph McDonald, Assistant Vice President of Business Services
          Rhonda Holtzclaw, Director, Environmental Health and Safety

Cc:       Dr. Wilson Bradshaw, President
          Susan Evans, Vice President and Chief of Staff

From:     Deborah McEwan, CIA, Senior Auditor
          Carol Slade, CPA, CIA, Director, Internal Audit

Date:     January 30, 2014

Re:       Environmental Health and Safety: Laboratory Safety Procedures (FINAL REPORT)

Please see the attached final report of the Environmental Health and Safety: Laboratory Safety Procedures, which includes the management response. The report is dated January 13, 2014, which is the date Internal Audit received the management response from the Assistant Vice President, Business Services.

On January 29, 2014, Vee Leonard, Vice President and General Counsel, completed a legal review of the audit report.

The audit was performed by Deborah McEwan, Senior Auditor and reviewed by Carol Slade, Director, Internal Audit.
EXECUTIVE SUMMARY

This Report represents a limited-scope audit of the University’s department of Environmental Health and Safety (EH&S) function related to laboratory safety procedures. According to its mission statement, Environmental Health and Safety “supports the University’s teaching, research and public service mission by assisting members of the campus community in meeting their responsibility to ensure a safe, healthy, and sustainable environment for students, employees and visitors.” Laboratory safety procedures represent one facet of the responsibilities within the Environmental Health and Safety department. However, due to the large number of laboratories on campus, an audit pertaining to laboratory safety procedures was selected as an important subject to review.

In our opinion, EH&S’s oversight of laboratory safety procedures is considered adequate. Notwithstanding, as of the date of this Report, Management needs to ensure that comprehensive laboratory safety inspections are consistently conducted to increase early recognition of any practices needing improvement and to provide for timely modification by the respective academic units or departments. One Observation/Recommendation beginning on Page 5 of this Report provides further details.

OBJECTIVES

The objective of this audit was to review Environmental Health and Safety’s departmental oversight of laboratory safety procedures.

This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing, issued by the Institute of Internal Auditors. The audit procedures provided a reasonable basis for our opinion and the following reportable observation and recommendation.

SCOPE – End of field work was November 8, 2013

- Reviewed FGCU policies and procedures pertaining to the use of laboratories
- Reviewed FGCU policies and procedures governing the use of hazardous substances and equipment
- Reviewed FGCU internal and external audits of laboratories and hazardous materials and equipment
- Discussions held with the Director of EH&S pertaining to activities and services
GENERAL INFORMATION

The University’s Environmental Health and Safety (EH&S) department’s daily operations relate to laboratory safety as well as the following University programs:

- Environmental Stewardship
- Workplace Safety
- Waste Disposal
- Risk Management (Insurance)
- Training

In July 2012, the former director of EH&S resigned and a new director assumed the position in March 2013. As of December 2013, EH&S consisted of 3 full time staff members, including the director.

Chemical Barcoding and Inventory

In January 2013, EH&S began using ChemTracker, a chemical inventory and tracking system for academic institutions. ChemTracker is also known as the Stanford Chemical Inventory System. ChemTracker is a chemical database hosted by Stanford University, which contracts with participating universities. Implementation of the ChemTracker system assists EH&S personnel in barcoding and monitoring the University’s chemical inventory, so that the University continues to comply with the Department of Homeland Security requirement to maintain inventory records of certain hazardous materials. Previously, EH&S maintained an inventory of chemicals through a local database.

Laboratory Safety Training

General Laboratory Safety Procedures Manual

The EH&S website contains comprehensive information related to safety issues, including general laboratory safety procedures. The information includes:

- Responsibilities of key personnel
- Identification and control of hazardous areas
- Hazardous material storage
- Handling of biohazardous waste
- Handling of chemical hazardous waste
- Radioactive wastes
- Hazard and exposure control
- Removal or servicing of laboratory equipment
- Safe work practices
- Maintenance of laboratory facilities
- Use of laboratory equipment
- Emergency response
Computer-based Laboratory Safety Training

EH&S has historically issued offered laboratory safety training for any faculty or staff members requesting such training. However, EH&S has also recently established computer-based training using the Canvas learning management system. The training modules include topics such as general laboratory safety, biowaste, bloodborne pathogens, and chemical hazardous waste training.
OBSERVATION AND RECOMMENDATION

Comprehensive Laboratory Safety Inspections were not completed on schedule as specified in the Laboratory Health and Safety Manual

Criteria: According to the Laboratory Health and Safety Manual located on the EH&S website, the EH&S department is responsible for “performing semiannual inspections of all laboratory spaces to verify compliance with this manual, and provide the results to the appropriate College Dean(s).”

Condition: As of the time of this audit, only two laboratory safety inspections have been documented by EH&S personnel. However, on an annual basis (documented evidence for 2012 and 2013), EH&S has inspected eye washes, showers, and fumes hoods located within various laboratory spaces. These specific inspections are typically part of more comprehensive laboratory safety inspections which address additional key safety requirements within the manual. Additional key requirements include, but are not limited to, personal protective equipment, chemical and biological safety, and handling of hazardous waste.

The University currently has more than 100 rooms that are defined as laboratory spaces. These laboratory spaces are located in various colleges such as the College of Arts and Sciences, the Whitaker College of Engineering and the College of Health Professions and Social Work. The identified rooms include academic classrooms and their related preparatory rooms, research rooms, and mixed-use areas.

Cause: Limited resources and recent employee turnover appear to be the predominant causes for the lack of completed laboratory safety inspections.

Effect: Adherence to established procedures will help ensure that best laboratory safety practices occur in the many FGCU laboratory spaces. As the University continues to grow, the number of laboratory spaces will also increase. The absence of documented and completed laboratory inspections does not provide assurance that University members including Faculty members, Principal Investigators and Laboratory Managers and students are adhering to FGCU’s laboratory safety procedures.

Recommendation

In consultation with Academic Affairs, EH&S management should consider developing a risk-based internal classification of all laboratory spaces throughout the University. The designation of each room or similarly classified rooms may provide an alternative method of specifying the frequency of inspections as agreed upon by Management. Furthermore, this classification system may also assist in timely completions of laboratory safety inspections for spaces which have been identified in the higher risk category, even if resources are limited.
Management Response

Provided by: Joseph McDonald, Assistant Vice President of Business Services

Environmental Health and Safety (EH&S) will perform semiannual inspections to ensure laboratory safety issues are identified and corrected in a timely manner. The department is currently implementing the ChemTracker identification program for all hazardous materials located on campus. An on-line safety training program was rolled out during the Fall semester 2013 addressing required safety training programs for all university laboratories.

An additional employee will be added in July 2014 to assist EH&S in maintaining the increased scope of inspections, documentation and follow up needed to meet the safety standards of the University laboratories. EH&S continues to work with the Academic community in improving the safety of the University laboratories.

Responsible person: Rhonda Holtzclaw, Director, Environmental Health and Safety

Implementation date: July 2014

Performed by: Deborah McEwan, Senior Auditor

Reviewed by: Carol Slade, Director of Internal Audit