Program Review
Environmental Health and Safety Office
University of West Florida
Pensacola, Florida
December, 2004

Review Team:

- William Properzio, PhD
  Director EHS, University of Florida, Gainesville, FL
- James Uhlir
  Director EHS, University of Central Florida, Orlando, FL
- Wayne Landowski
  Director EHS, Florida Atlantic University, Boca Raton, FL
- Glendon Miller, PhD
  Director EHS, Wichita State University, Wichita, KS
- Don Powers
  Division Director EHS, University of Central Oklahoma, Edmond, OK
Executive Summary -

A peer review was conducted of the Environmental Health and Safety Office (EHS) at the University of West Florida by a five person team. This review was focused on assessing the presence of a safety management system and relationships between EHS and their many customers. It was not intended to be a compliance review.

The review gathered information through individual and group meeting with a wide cross section of university faculty and staff. No student interchange was included in the two day review process. The team felt that it received an open and frank assessment of strengths and weakness of the EHS operation through the interview process.

EHS leadership is staffed by personnel who have been on UWF for a number of years. Over this period the campus has experienced growth and change. The demands of the safety program have also seen significant change in required program coverage to meet the expanding regulatory environment. Current EHS leadership appears challenged in its effort to address the broadened scope of activity with the resources available and has elected to concentrate on what they consider areas of priority risk. This was said in conjunction with the admittance that they devote limited time to occupational safety and hazard analysis.

Management views EHS as an essential unit that needs to work with the entire UWF structure in a planned manner. It is management's responsibility and prerogative to assess the performance of personnel and their organizational competence for mission accomplishment, and this item is outside the scope of this peer review. It is obvious that management is prepared to introduce changes relative to the EHS operations to allow it to meet its program objectives. The current organizational reporting line for EHS was noted as being an interim shift. The review team agrees that this reporting line is atypical and that the UWF administration should give this further review.
As is typical with an EHS operation at a university the size of UWF the program is under staffed, under funded and over tasked with missions. This situation requires that all levels of the organization work cooperatively together to fully understanding the reality of the situation and identify changes that need to be made.

Available resources are allocated to what may be the crisis of the moment, there is little time spent in planning or strategic thinking. Management appeared to be aware of what is going on but has not aggressively acted in a timely fashion when needs first develop and are brought to their attention. The fact that safety issues required by faculty, staff and students are often quite different is recognized by the administration. In turn, the administration must provide balanced support to EHS in its support in meeting these wide ranging needs. Both management and EHS can do things better and should.

Details regarding the review groups observations and issues that need to be addressed to strengthen the program are outlined in this report.
Peer Review
University of West Florida
Pensacola, Florida
December 1-2, 2004

A peer review was conducted of the Environmental Health and Safety Office (EH&S) at the University of West Florida (UWF), by a five person team. The review team consisted of the following individuals:

- William Properzio, PhD, Director EHS, University of Florida, Gainesville, FL
- James Uhlir, Director EHS, University of Central Florida, Orlando, FL
- Wayne Landowski, Director EHS, Florida Atlantic University, Boca Raton, FL
- Glendon Miller, PhD, Director EHS, Wichita State University, Wichita, KS
- Don Powers, Division Director EHS, University of Central Oklahoma, Edmond, OK

All of these individuals serve in the capacity of EHS Director at their respective institutions.

This review focused on assessing the presence of a safety management system and the relationships between EHS and their many customers. It was not intended to be a regulatory compliance review.

The review team met with EH&S staff members, as well as a variety of administrators and customers from across the UWF campus over a period of two days. There was no structured agenda for the various meetings, instead an effort were made to elicit honest, objective, and constructive comments with respect to the strengths and weaknesses of the EHS office. This review is occurring following a recent shift in the program reporting line. The program had reported to the Vice President for Administrative Affairs but recently was moved under the Vice President for Student Affairs. It is hoped this review will provide some helpful insight regarding strengths and weaknesses of the program and assist in moving the environmental, health and safety program effort forward. A list of individuals and/or groups interviewed is outlined in Appendix A.
The program operates in two distinct areas of responsibility. The classical responsibilities for a general safety program have been administrated by the same director for approximately 19 years. A building codes program to meet state regulatory requirements was initiated approximately three years ago. This report will discuss these two programs areas separately.

Building Codes Administration

When established, the program was run by a single individual qualified as a Florida Building Codes Administrator. Construction inspections were principally conducted by contract codes inspectors who were not university employees. Due to limited availability of this class of consultants in the Pensacola area obtaining these services was expensive and inspections were often done in a non time-responsive manor. In the last year two additional staff positions have been added to the codes program. There was general agreement that the current codes program staff was well qualified and should be able to provide timely and cost effective support.

The location of the building codes responsibility in an EHS program is consistent with the administrative assignment in the majority of the Florida SUS system. There was general agreement by members of the review team that this is an appropriate administrative location for this function. By providing an administrative separation between the facility management staff responsible for construction and renovation from the code authority a potential conflict of interest is eliminated.

During the interview process we heard concerns regarding the level of interchange between the project management side and those individuals with code responsibility. Both sides expressed a desire to get more cross involvement from the conceptual design stages through completion of a project. It is likely that this involvement did not occur in the past due to the understaffing of the building code program. The review team felt that this continued involvement through out all stages of a project would be beneficial. The addition of staff to the codes program should remove any barrier that may have previously existed. While it needs to be recognized that the codes authority has certain regulatory responsibilities we encourage management to support an effort to integrate the codes staff actively into the projects from the inception stage.
A desire to foster more open communication was noted. One interviewee mentioned that communication between the codes and project management sides had been improved but had recently deteriorated. The suggestion was made that this decline may have been precipitated by the recent change in administrative reporting lines for EHS. The review team feels that adequate and open communication should not be a function of a program's reporting line. Recognition for the need to make improvements and the full support of the administration can solve this problem if indeed it does exist.

Traditional Safety Activities

The assignment of responsibility for safety related issues to the EHS program by the university administration is comprehensive. There appears to be few if any of the traditional safety program activities assigned to other university units. This centralization of responsibility for safety eliminates the potential of conflicts regarding coverage and is more cost effective because it reduces duplication of effort and necessary testing equipment. On the other hand the extensive program coverage to the unit has been difficult to adequately cover with existing resources.

Service to academic users

Feedback from the academic customers was extremely positive. Specific note was made regarding the assistance from EHS in the management of hazardous waste. Training for faculty and staff principally in the areas of hazardous material awareness was noted as being outstanding.

An area of concern was the absence of a routine laboratory survey program. Although management of hazardous waste seems to be operating effectively, other laboratory safety issues may be missed without the conduct of periodic general laboratory safety reviews. At a minimum an effective laboratory safety program would conduct comprehensive inspections annually.

Disaster Planning

Experience in dealing with Hurricane Ivan's impact on UWF validated the university Continuity of Operation Plans (COOP) that had been developed under the leadership of EHS. The Department of Homeland Security has
identified universities as potential targets for terrorism. These planning efforts should continue to validate and update strategies for natural disasters as well as addressing the potential threats from terrorism.

Training

EHS has outlined a training matrix referencing approximately 25 subject coverage areas required to meet the safety and regulatory needs of university staff. There is recognition that the small EHS staff does not have the time or technical background in all areas to internally address all of the coverage areas. Success has been achieved through partnering with outside groups such as the Florida Department of Education and an electrical utility company to obtain assistance in meeting some of the training objectives. This outside assistance has been obtained on a limited training budget. The availability of these resources are limited and if the university intends to provide adequate training as outlined in their plan additional support will be required.

We were informed that a new employee tracking program was to be implemented through Human Resources utilizing the Banner enterprise management system. It is envisioned that this system will track the training needs of the faculty and staff and log the attainment of these requirements on an individual basis. We encourage the university to move forward with this goal but caution that this tracking program may further highlight the voids that exist in meeting the training objectives if an expansion of training resources is not achieved.

A variety of approaches need to be considered if expectations to provide faculty and staff with appropriate and adequate training are to be met. The creation of a training officer in EHS would allow the unit to focus on this critical need. Because of the limited size of the unit a training officer should have technical qualification to present some of the training as well as having responsibility for the organization and management of the program. Additional funding should be made available to retain outside experts to covers subject areas that the existing staff may not be fully qualified to handle or can not be obtained through one of the partnering arrangements. The delegation of responsibility for the conduct of training to individual departments should be considered. This may be most effective in the academic areas where EHS can provide train-the-trainer assistance to faculty or laboratory managers who in turn can provide face to face training for new faculty, staff and students.
Staff Resources

As previously noted, the current staff handling traditional safety issues other than the building codes program is limited in light of the wide spectrum of issues the university needs to address. Some of the areas of responsibility including hazardous waste management and disaster planning to mention two appear to be handled in an effective manner but for the majority of the program areas the staff is working in a “response-to-crisis” mode rather than being able to address issues in a proactive manner.

Due to limitation of time and training dollars EHS staff training has not been keeping pace with program needs. Certifications previously held by staff members have lapsed in the areas of asbestos management, fire safety, environmental trainer and trainer-the-trainer/competent person. The EHS director recently assumed responsibility for the radiation safety program and has been designated as the radiation safety officer. Although the program has received licensure approval from the state the director has yet to receive appropriate training for his role as the radiation safety officer. The inability of the program staff to maintain professional certifications and other requisite training necessary to administer assigned program activities reduces their effectiveness and increases the potential of regulatory violations.

Another answer to a staffing short fall would be to reassign or delegate some of the functions presently handled by EHS to other units. Presently all of the hazardous material management training is conducted by EHS. Some of the faculty and/or laboratory managers in the academic program are capable of handling the training of new faculty, staff and students. EHS might facilitate the preparation of Power Point presentations to assure that all relevant information is covered and make it available to the departmental staff conducting the training.

Other areas where a re-distribution of duties might be considered include responsibility for the potable water system to facilities management, risk management to HR or legal and emergency response/COOP to the police. It should be noted that at most Florida SUS institutions these functions are handled by EHS but if resources are not provided to manage them effectively a transfer of duties may be an option.
The Campus Safety, Health and Environmental Management Association (CSHEMA), a member of the National Safety Council, conducts benchmarking studies for college and university health and safety programs. Results from the study conducted in the year 2000 provide an index of typical staffing based on head count and assignable space. Adequate staffing must be based on individual institutional needs and should not be determined by a formula but an index developed from a multi-institutional survey such as the CSHEMA study provides a basis for comparison. Application of the CSHEMA survey results based on head count, 1 FTE per 1500 faculty, staff, and students, would project \((9508 + 1530)/1500 = 7.4\) FTE not including the building codes, risk management or radiation safety activities. The staffing projection for assignable gross square feet of building space, 1 FTE per 300,000 sq ft, equates to 5.8 FTE.

Reference from UWF web page:

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http://uwf.edu/ir/factbk/total_enroll_fte_deg_conferred.htm

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http://uwf.edu/ir/factbk/empheadcount.htm

Facility and Space Information - June 30, 2003

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<td>Total</td>
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http://uwf.edu/ir/pocketfactbook/factbook.htm
Safety Vision

The review team could not identify a vision statement outlining the university expectations for safety. A short generic mission statement is posted on the EHS web page but we recommend that the Campus Security and Safety Committee develop a comprehensive mission statement that could be endorsed at the Presidents level.

The full effectiveness of the EHS program will be achieved when the entire university community has awareness for safety and knows that EHS is the contact point for assistance in this area. Our interview process indicated that those presently receive services through EHS were aware of the program but recognition by the general campus community may need to be improved.

Risk Management

Responsibility for risk management is currently distributed among various units. The review team was told the UWF intended to assign risk management responsibilities to EHS and that the director had been designated the University Risk Manager. The transfer of duties and resources to manage this function is incomplete with some functions remaining outside of direct EHS oversight. The fact that two new buildings had not been added to the inventory of buildings covered by the state insurance during Hurricane Ivan can likely be traced to the separation of risk management responsibilities. An administrative review of the assignment of responsibility and consolidation of risk management responsibilities under appropriate leadership is recommended. As previously noted in the staff resources section of this report responsibility for risk management has typically been assigned to EHS at other SUS institutions.

The administration needs to define the scope of coverage for risk management and consolidate the staff resources needed to meet these objectives in a single unit.
Safety Committees

The structure and utilization of safety committees needs to be reviewed. Two committees were identified during our interview process. The Campus Security and Safety Committee with upper administration membership is active and would be the appropriate body to deal with major policy issues. A second informal committee is presently chaired by Facilities Services and deals with facility operations safety issues. Chairmanship for this group was recently shifted from EHS to Facilities Services. The review group found no fault with this shift but was told that following the shift in committee leadership that active input by EHS into committee deliberations no longer existed. We recommend that the charge to this committee and its membership be reviewed to assure that appropriate coverage is represented. Active committees to address routine safety issue in the academic and student areas do not appear to exist. An overall look at the committee structure should be reviewed to assure that active bodies exist to appropriately deal with the concerns of faculty, staff and students at the day-to-day operational level. One approach to get input from this unrepresented sector to the broader based university committee might be to establish a subcommittee reporting to the Campus Security Committee.

Attention to new program activity

Attention to new areas of regulatory oversight needs to be given appropriate attention. UWF has responsibility for select agent oversight and compliance with shipping regulations by individuals that ship and receive hazardous materials. Since the 9-11 terrorist incident any institution dealing with these issues have come under increased inspection and review by federal agencies. The EHS program needs to review its coverage in these areas to assure that all impacted individuals and activities are identified and adequately trained to meet regulatory criteria is provided.

Regulatory oversight of university programs by the Environmental Protection Agency has increased in the last few years. A focused enforcement program against colleges and universities in EPA Region 1 has resulted in numerous consent orders and fines. Region 4 which covers Florida has indicated that they will likely initiate a college and university emphasis program. It would be prudent for the UWF to review all of its compliance issues enforced by EPA and or delegated to the Florida Department of Environmental Protection.
Benchmarking

UWF might consider the conduct of a focused benchmarking study. A group of five or six institutions that are considered peers would constitute an appropriate comparison group. Some items that might be included in a benchmarking review include the following:

- Student faculty and staff headcount
- Number of laboratories
- Number of campus residency units
- Number of EH&S staff (FTE)
- EHS budget (not including salaries)
- List of EHS functions (check all from following list):
  - Fire Safety
  - Occupational Safety
  - Occupational Health and Workers Compensation
  - Chemical Safety & Hazardous Waste
  - Biological Safety & Biomedical Waste
  - Radiation Safety & Radiological Waste
  - Industrial Hygiene
  - Laboratory Safety
  - Environmental Compliance
  - Emergency Management / Business Continuity
  - Risk Management
Appendix A

Program Review
Environmental Health and Safety Office
University of West Florida

List of Persons Interviewed

Wednesday, December 1, 2004

Session #1   Meet with EHS Director and Building Code Admin. Staff
             Mr. Ron Hambrick,
             Ms. Tam Landis,
             Mr. Le Wilmot,
             Mr. Marv Brossett

Session #2   Meet with EH&S Staff and Current Program Reporting Authority
             Mr. Ron Hambrick
             Mr. Peter Robinson
             Mr. Floyd Replogle
             Ms. Shirley Vance
             Dr. Patricia Ford

Session #3   University Police
             Mr. John Warren, Assoc. Director

Session #4   Academic Departments
             Dr. Suzette Doyon, Art Dept.
             Dr. Klaus Meyer-Arendt, Chair Environmental Studies
             Dr. Chandra Prayga, Chair Physics,
             Ms. Jan MacCauley, Lab Manager, (CEDB)

Session #5   Academic Departments
             Dr. George Stewart, Chair Biology,
             Dr. Ranga Rao, Director CEDB,
             Dr. Peter Tanner, Chair Chemistry,
             Mr. Phil Conklin, Lab Manager Chemistry/Biology,
             Ms. Penny Sparks, Stores Manager, Chemistry/Biology
Wednesday, December 1, 2004 (continued)

Session #6  Student Affairs
Mr. Jim Hurd, Associate VP, Student Affairs,
Mrs. Tulsa Morein, Director, Child Care Center,
Ms. Bernice Robbins, Director, Health Center,
Ms. Shelly Trimm, Director of Aquatics-Student Affairs

Session #7  Facilities Services
Dr. Jim Barnett, Assoc.V.P

Session #8  Univ. Relations/WUWF
Mr. Pat Crawford, Assoc. V.P.
Ms. Joyce Cooper-Homes

Thursday, December 2, 2004

Session #9  Facility Maint.
Mr. Johnnie Cordeiro, Assistant Director

Session #10  Human Resources
Ms. Aurora Auter, Coord.

Session #11  Architectural & Engineering
Mr. Dave Luttrell, Director
Ms. Glenda Mayo
Ms. Amanda Albertson

Session #12  VP Administrative Affairs
Dr. Cornelius Wooten

Session #13  Exit Interview
Dr. Debbie Ford, V.P. for Student Affairs,
Dr. Cornelius Wooten, V.P. Administrative Affairs,
Ms. Betsy Bowers, Internal Auditing
Ms. Regina Deiulio, General Counsel (TBD)