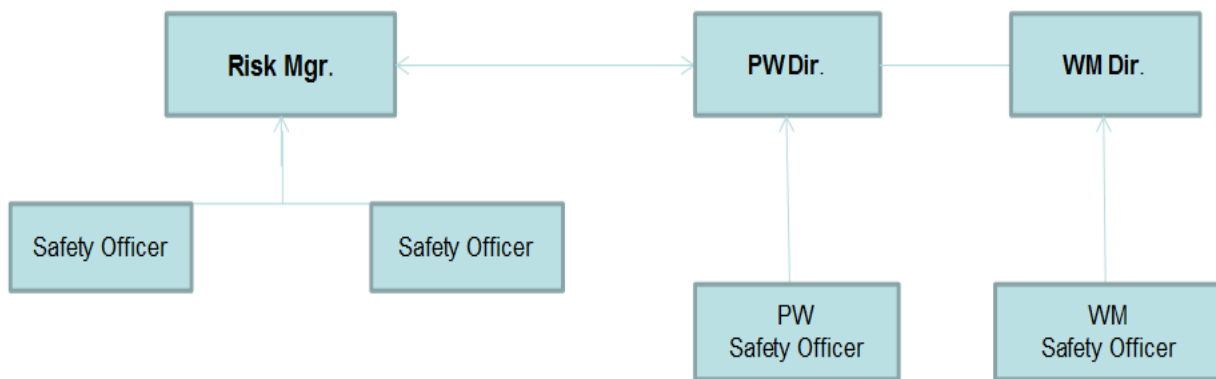


June 2017

# City-Wide Safety Performance Audit



City of Durham  
Audit Services Department  
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Durham, NC 27701  
919-560-4213

## Staff

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*The current organizational structure of the Risk Management Division in the Department of Finance is illustrated on the front cover. This chart was provided by the Risk Management staff.*



CITY OF DURHAM  
*Audit Services Department*  
101 City Hall Plaza  
Durham, NC 2770  
919-560-4213



To: Audit Services Oversight Committee  
From: Germaine F. Brewington, Director  
Audit Services Department  
Date: June 19, 2017  
Subject: City-Wide Safety Performance Audit June 2017

The Audit Services Department staff completed the report for the City-Wide Safety Performance Audit. The purposes of this audit were to:

- Determine the effectiveness of the safety framework at the organizational and departmental levels;
- Verify processes in place to ensure employees obtain the necessary safety training; and
- Ensure root cause analyses or investigations were performed by departments when injuries/accidents occurred to prevent future occurrences.

This report presents the observations, results, and recommendations of the City-Wide Safety Performance Audit. In response to this audit's recommendations, City Management concurs with the recommendations made. The detailed Management Response to the recommendations is included with the attached report.

The Department of Audit Services staff would like to acknowledge the contributions of the staff from the: Departments of Solid Waste, Public Works, Water Management, Parks and Recreation, Transportation, General Services, Fleet Management, and Finance in the completion of this audit.

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# Audit Report Highlights

## Background

An effective safety program engages workers, increases productivity, reduces costs, and boosts operations. Annually, the City of Durham spends greater than a \$1 million dollars on workers' compensation claims. The majority of these claims result from high risk jobs, as found in Fire, Police, and the operations departments. The Departments of Fire and Police have industry specific safety policies, so the focus of this audit was mainly on operational departments other than Fire and Police.

In the City, the Risk Management Division of the Finance Department is charged with oversight of the City's safety program. Departments with safety officers are expected to take responsibility for core safety practices in their departments and have a reporting structure to Risk Management. Departments without safety officers rely directly on Risk Management for guidance.

## Purpose

The objectives of the audit were to:

- Determine the effectiveness of the safety framework at the organizational and departmental levels;
- Verify processes in place to ensure employees obtained the necessary safety training; and
- Ensure root cause analyses or investigations were performed by departments when injuries/accidents happened to prevent future occurrences.

## City-Wide Safety Performance Audit June 2017

The City's safety program was intended to help prevent workplace injuries, improve compliance, reduce costs, engage workers, and enhance overall business operations. Audit Services staff reviewed the safety program and recommended that the entire safety program, along with the roles and responsibilities of the Risk Management staff, be revised.

## Highlights

The Risk Management Division staff supported departments in occupational safety and OSHA compliance. They performed safety inspections, provided guidance, and implemented core safety trainings. The City's safety program was functioning as if it was decentralized. Overarching safety policies were outdated; roles and responsibilities were not defined; and standardized practices were not established organizationally. At the department level, safety practices existed, though they varied by department.

A system existed to capture required OSHA safety training. There was no City-wide standard on training requirements, documentation and monitoring of employee safety training. Determination of required training for a given position was not always based on a Job Hazard Analysis. At most, supervisors were responsible to ensure an employee received the required safety training. Documentation maintained to track training received by employees also varied by department.

Significant improvements in the overall program can be made if:

- 1) the Risk Management staff establish a safety program and update the overarching City-wide safety policies with more formal communications (updated policies, implementation of standardized practices, sharing of problems and solutions); and
- 2) the safety construct of Risk Management is revised to ensure Risk Management can carry out its responsibilities.

# Audit Services Department

## Internal Audit

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The Audit Services Department serves a three-fold role at the City of Durham. Our number one goal is to provide independent, objective assurance that City processes are working effectively. Secondly, we serve as internal fraud examiners when fraud, waste, or abuse is alleged against a City employee or department. Finally, in order to constantly foster high ethical standards, we provide in-depth ethical training to all City employees on a rolling basis. To learn more, visit our CODI site or our page on the [City of Durham's website](#).

## Audit Services Oversight Committee

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In order to maintain its organizational independence, the Audit Services Department reports to the Audit Services Oversight Committee (ASOC) at a minimum of four times a year. The ASOC approves all proposed audit plans and completed audits prepared by Audit Services staff.

The Audit Services Oversight Committee is made up of six members: two City Council Members, three resident members, and one alternate City Council Member. The current members include two certified public accountants, academicians, and persons with business experience. The City Manager is an ex-officio, non-voting member of the ASOC.

## Audit Services Oversight Committee Members

### Chair:

Cora Cole-McFadden  
*Mayor Pro-Tempore*

### Vice-Chair:

Kim Anglin, CPA  
*Resident Member*

### Committee Members:

Steve Schewel  
*City Council Member*

Jenna Meints, PhD  
*Resident Member*

Maticia Sims, CPA, CIA, CRMA  
*Resident Member*

Eddie Davis  
*Alternate City Council Member*

### Non-Voting Member:

Thomas J. Bonfield  
*City Manager*



## Organizational Safety

In the City of Durham (City), safety is handled by the individual departments, as well as the Risk Management and Safety Division (Risk Management) of the Department of Finance. The Risk Management and Safety Division is charged by City management as the oversight body for safety at the City.

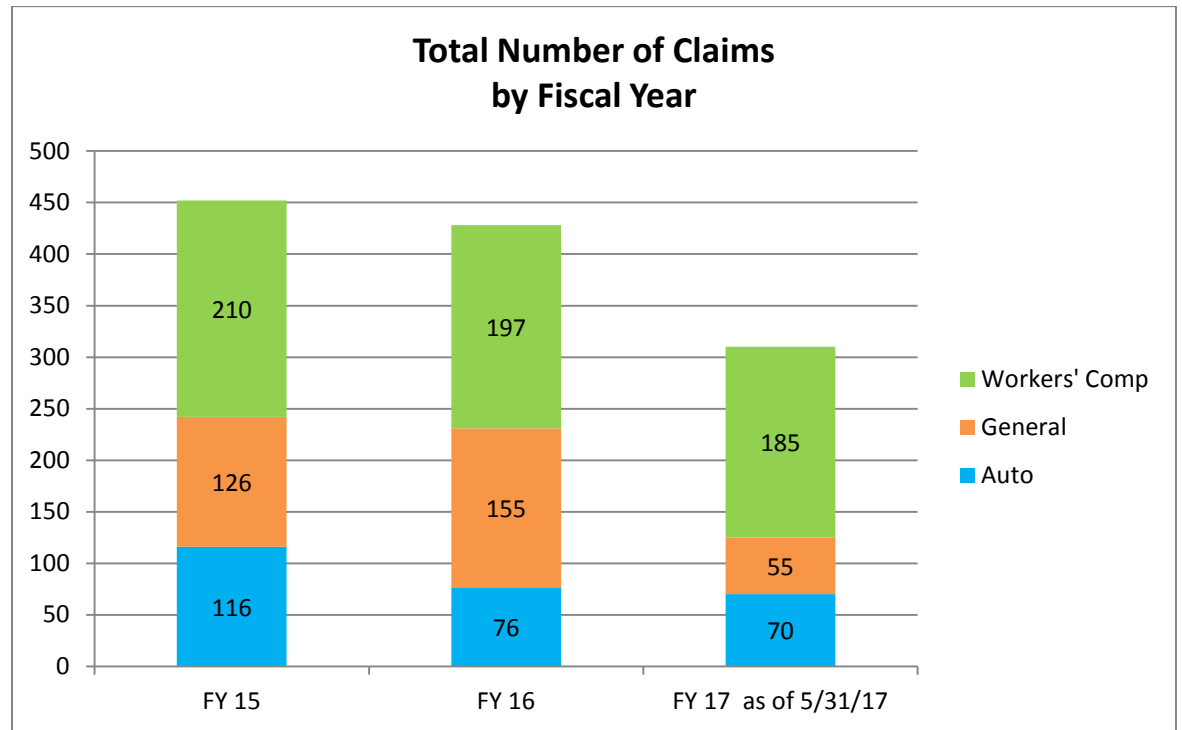
Not only is the City required to comply with safety laws and regulations, an effective safety program reduces costs, engages workers, enhances social responsibility goals, increases productivity, and boosts overall business operations. The City encourages departments to invest in creating a safe and healthy work environment through Safety Liaisons, LMS Safety Training, and OSHA Training. In addition, two City departments, Department of Water Management and the Department of Public Works, have dedicated safety officers that oversee daily safety activities. Other City departments do not have full-time safety officer positions.

**Chart 1. Total Dollars Paid for Claims by Fiscal Year (FY)**

	Automobile	General	Workers' Compensation
<b>FY 15</b>	\$230,730	\$182,672	\$1,967,772
<b>FY 16</b>	\$154,334	\$504,868	\$2,207,636
<b>FY 17 (June 8, 2017)</b>	\$101,335	\$524,794	\$2,075,227

*Note: The data contained in the table was provided by the Risk Management staff of the Finance Department. The information has not been verified by the Audit Services staff.*

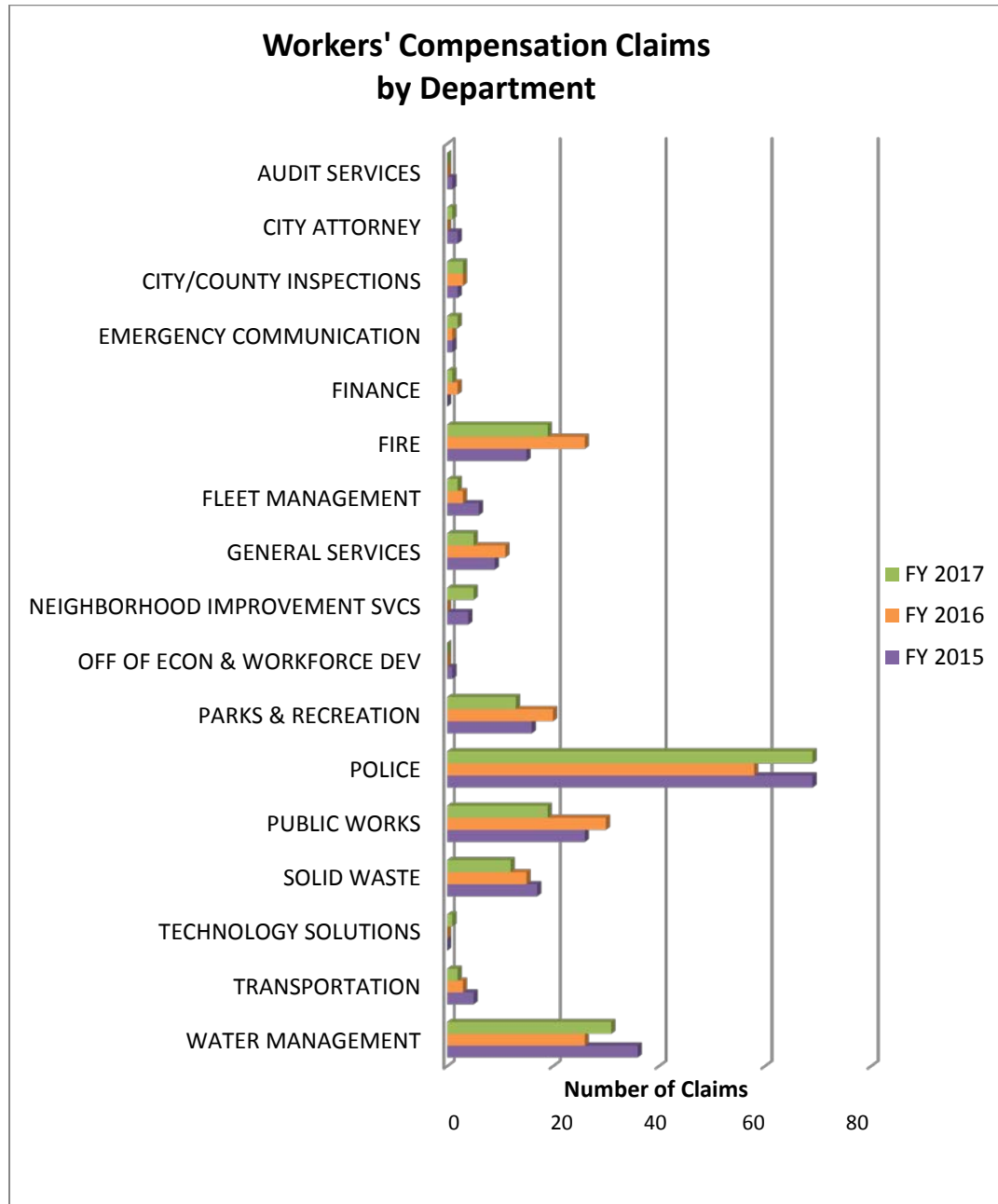
**Graph 1. Total Number of Claims by Fiscal Year (FY)**



*Note: The data contained in the table was provided by the Risk Management staff of the Finance Department. The information has not been verified by the Audit Services staff.*

The location of the workers' compensation claims for fiscal years 2015 through 2017 by department is shown in Chart 2 below.

**Chart 2. Number of workers' compensation claims by department.**



*Note: The data contained in the table was provided by the Risk Management staff of the Finance Department. The information has not been verified by the Audit Services staff.*

### ***Risk Management and Safety Division***

The Risk Management and Safety Division of the Finance Department (Risk Management) manage claims and support departmental safety efforts. The Division has five full time employees. Two (2) full-time employees (FTE) are devoted to supporting departmental safety training, assisting departments in OSHA compliance, and providing guidance pertaining to safety issues. Two (2) FTE are dedicated to claims management: one to general liability and one to workers' compensation. The final FTE is devoted to insurance management and Division oversight. The Risk Management's initiatives as stated in the budget book are to:

- Ensure the safety of City facility's and work sites by increasing the number of safety inspections and by evaluating facility and site inspection reports to identify and correct hazards and potential hazards;
- Reduce the number of lost time claims;
- Develop new employee safety programs that will include training more closely targeted at work hazards and exposures and other risks identified through claims analysis; and
- Maintain a continuous process improvement in the City's risk management and safety process.

### ***Safety Policies***

The Finance Department has several policies that govern safety processes at the City. These policies are:

- *S-201-1 Safety Program*
- *S-202-1 Monthly safety inspections*
- *S-203-1 Response to OSHA Complaints*
- *S-204-1 Employee Driver's License*
- *S-205-1 I.D. Badge Policy*
- *S-206-1 On the Job Accident Reporting and Procedures*

### ***Decentralized Safety Structure***

A decentralized safety structure requires staff to make safety decisions at the departmental level. A decentralized safety structure results in a wide variety of safety opinions and implementation techniques across departments. Safety practices can be inconsistent under such a structure.

### ***Centralized Safety Structure***

A centralized safety structure relies on one person or group to guide the organization through various safety decisions. The centralization of safety efforts allows the organization to collaborate and share problems and solutions. An overarching safety program governs each department's implementation of the policies that document best practices and standard operating procedures. Often, centralized structures are accompanied by City-wide staff committees that foster a collaborative environment between departments.

## **Objectives**

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The objectives of the audit were to:

- 1) Determine the effectiveness of the safety framework at the organizational and departmental levels;
- 2) Verify processes in place to ensure employees obtain the necessary safety training; and
- 3) Ensure root cause analyses or investigations were performed by departments when injuries/accidents happened to prevent future occurrences.

# Scope, Methodology, and Compliance

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## Scope

The scope of the audit included all current practices as they related to safety processes at seven City departments and the Risk Management and Safety Division of the Finance Department. The seven departments were judgmentally selected. They included the following:

- Department of Solid Waste
- Department of Public Works
- Department of Water Management
- Department of Parks and Recreation
- Department of Transportation
- Department of General Services
- Department of Fleet Management

Public safety departments were excluded from this audit due to the industry specific safety regulations required of their roles.

## Methodology

Audit Services staff performed the following procedures to accomplish the objectives of the audit. Staff:

- 1) Reviewed and analyzed safety practices at seven operational departments;
- 2) Reviewed and analyzed safety practices as proposed by Risk Management Division of the Finance Department;
- 3) Analyzed organizational structures pertaining to the safety function at the City;
- 4) Analyzed the level of communication and coordination between Risk Management and seven operational departments;
- 5) Benchmarked the safety function with the City of Greensboro and City of Raleigh;
- 6) Reviewed methodology to ensure employees received the

- necessary/required training at the seven selected departments;
- 7) Selected a judgmental sample of employees from the Department of Public Works, Solid Waste, and Water Management and reviewed the safety training documentation to determine if all required training was provided;
  - 8) Assessed the adequacy of safety training records maintained;
  - 9) Inquired about processes in place at the department level to ensure employees were following safety procedures;
  - 10) Selected a sample of accident injury reports at the Departments of Public Works, Solid Waste, and Water Management and verified actions taken by staff to perform root cause analysis and/or any corrective actions;
  - 11) Assessed if departments and Risk Management staff used the injury/accident data to change the way they approached safety in the workplace; and
  - 12) Analyzed Workers' Compensation claims data to identify trends.

During the audit, Audit Services staff also maintained awareness to the potential existence of fraud.

## Compliance

Audit Services staff conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that Audit Services staff plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. Audit Services staff believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

### Objective 1 Results Summary

*Determine the effectiveness of the safety framework at the organizational and departmental level*

The City's safety program construct charges the Risk Management Division with oversight. However, the safety program at the City of Durham is functioning as if it is decentralized and this construct is not working. At the organizational level, overarching safety policies are outdated; roles and responsibilities are not defined; and standardized practices are not established for safety processes. Because of the decentralization of the program each department has individual safety processes, which can lead to inconsistencies and inefficiencies. Risk Management's role of overseeing the City-Wide Safety Program is not clearly communicated to departments. Departments with safety officers have processes in place to address safety, with opportunities for improvement. For departments without dedicated safety officers, Risk Management staff are relied on for guidance in managing safety concerns and training; however, Risk Management staff's guidance is limited as a result of staffing resources. The formal communication/collaboration outreach by Risk Management staff should be enhanced. Significant improvements in the overall program can be made if best practices, problems, and solutions are shared between the departments in a consistent manner. These improvements should be managed by the Risk Management staff because they are charged with oversight of the current safety processes of the City.



## Finding 1

### **Audit Services staff found:**

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*The safety program structure at the City was not working as intended.*

The construct was designed to have Risk Management provide oversight for all departments that do not have dedicated safety officers. For the two departments with safety officers, those positions were expected to take responsibility for implementation of core safety practices within their respective departments. The suggested reporting structure according to Risk Management staff was that these officers would report on some level to the Risk Manager; however this reporting structure was not clearly defined. At the time of this audit, the two departments that have dedicated safety officers (Department of Water Management and the Department of Public Works) do oversee daily safety activities. However, the departmental safety officers report to their respective department heads with no reporting requirement to the Risk Management. This lack of reporting requirement hinders any authority of the Risk Management staff over the safety officers employed by departments outside of their area, minimizing influence over what they do. Departments that do not have safety officers rely on Risk Management for guidance. Effects of this construct not working are evident from a lack of standardized processes at the City and a lack of an established safety program with all departments working towards a common safety goal. The City has gone through many transitions within the Risk Management Division in recent years. According to the Risk Management staff, the Division is in the initial phase of establishing an effective and robust safety program for the City. Audit Services staff did not review this plan as it was not documented.

## Finding 2

### **Audit Services staff found:**

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*The safety policies were outdated at the organizational level; however, policies existed at the departmental level for the seven selected departments.*

The development and use of policies are an integral part of a successful quality control system as it provides employees with the information to perform a job

properly and facilitates consistency in the quality and integrity of the end-result. As referenced in the background, the Department of Finance holds the policies related to safety; however, according to Risk Management staff, the policies are not current and are not used in practice. As a result of these policies still being published on the City's policy database, a few departments still refer to them. A clear, written policy would communicate that safety is a primary organizational value –not just a departmental responsibility.

## Finding 3

### **Audit Services staff found:**

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*Roles and responsibilities were not clearly defined.*

The roles surrounding the safety program are not clearly defined. Clearly defining roles and responsibilities would help ensure that staff can be held accountable to what is expected of them. The Risk Management Division has experienced significant staff turnover and therefore its role and responsibilities are evolving with the new staff. Department staff are not clear on what is expected of them. Department staff who were interviewed did not have a clear understanding of the role of the Risk Management as it related to their safety program. A City-wide policy would further define the roles and responsibilities of the various parties involved.

## Finding 4

### **Audit Services staff found:**

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*Minimum standard practices were not established for all aspects of safety.*

Setting minimum safety standards is essential to building a safe work environment. Standards help to build a positive culture, control the risks, and create and document expectations. Audit Services staff interviewed employees responsible for safety at various operational departments, as well as staff in the Risk Management Division. From these discussions, Audit Services staff gleaned that departments have varying practices relating to incident investigation, specialized training, performance reporting, and addressing safety concerns. Standard practices existed as it related to the reporting of an incident or injury.

However, standard practices did not exist in areas such as:

- Incident investigation
- Addressing/reporting of safety concerns
- Job hazard analysis and safe work procedures
- Required training
- Performance reporting

## Finding 5

### **Audit Services staff found:**

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*The level of organizational guidance provided by the Risk Management staff was limited.*

The current duties of the Risk Management staff allow for two FTE positions to be designated as safety officers for the entire City. These two positions' responsibilities are focused on performing safety inspections at facilities owned and occupied by the City and implementing safety training programs. The activities consume most of the staff time and leave little time for post-accident analysis, site visits and inspections, or relationship building with departments.

The safety officers at Risk Management will engage in post-accident investigations if available at departments that do not have designated safety officers. The Risk Management staff provide safety talking points (tailgate talking points) to other departments. The departments appreciate the tailgate points and think they are a valuable tool to help initiate safety conversations. Risk Management staff also provide claims data to departments on a regular basis.

## Finding 6

### **Audit Services staff found:**

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*The communications/collaboration efforts needed enhancement.*

There is no formalized collaboration plan to share safety practices, discuss loss prevention data, or promote cross sectional working relationships because of the decentralized safety structure at the City. A safety committee existed for departments housed in City Hall. Creating a committee with representation from each department would allow a forum for employees to share safety practices or

discuss safety concerns. Currently at the departmental level, the department of Solid Waste, Public Works, and Water Management have departmental safety committees. The Risk Management staff are part of the safety committees at the Departments of Solid Waste and Water Management. The Risk Management staff are in the process of formalizing several other committees to help open communication channels with departments.

## Objective 2 Results Summary

### *Verify processes in place to ensure employees obtain the necessary safety training*

In 2017, to facilitate basic training, the Risk Management staff helped to institute a learning management system (LMS). By deploying the LMS, the Risk Management staff attempted to ensure that minimum OSHA required safety training was categorized by position and that training records for all employees were maintained in a centralized location. The Risk Management staff created a list of all required OSHA safety training for each position in conjunction with departmental staff. The LMS and its distributed content are relatively new and with any new system, its value should be evaluated based on user feedback. Some concerns were voiced to Audit staff by employees interviewed at the departmental level regarding the generality of the content of the selected training. According to the personnel interviewed, the trainings offered through the LMS appear to be a one size fits all approach.

Specialized staff safety training provided at the three departments tested for this objective is approached differently in each department. Some departments used on the job training, while other departments focused on safety at new employee orientation. Determination of required training for a given position is not always based on a Job Hazard Analysis. There was no City-wide standard on training requirements, documentation, and monitoring of employee safety training. At most, supervisors were responsible to ensure an employee received the required safety training. Documentation maintained to track training received by employees also varied by department.

## Finding 7

### **Audit Services staff found:**

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*Minimum OSHA safety training was defined and tracked through the Learning Management System (LMS).*

In 2017, the City adopted a LMS to disseminate mandatory training to all employees. Employees are required to take mandatory training through the LMS. The system tracks the training taken by employees. The Risk Management staff created a list of all required OSHA training for each position in conjunction with departmental staff. Establishing a system to track required OSHA training is a good step to ensure that the City meets OSHA regulatory guidelines. As the system is fairly new, some concerns were voiced by employees interviewed at the departmental level regarding the generality of the content of the selected training. However, Risk Management staff stated that the mandatory OSHA safety training videos, while basic, were rolled out initially for compliance reasons. The Risk Management staff aim for more specialized training to be available in the future.

## Finding 8

### **Audit Services staff found:**

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*Determination of required training for a given position was not always based on a Job Hazard Analysis.*

A job hazard analysis is a technique that focuses on job tasks as a way to identify hazards before they occur. The results of a job hazard analysis could help determine and establish proper work procedures, as well as ensure that all employees are trained properly. The Department of Water Management has performed job hazard analysis by position and based on the results, identified required training for the given position. The Department of Public Works has also performed job hazard analysis by job task; however, they have not identified the training that would be required by position. Job hazard analysis has not been completed at the Solid Waste Department and training required for a position is not documented. Performing a job hazard analysis by position and identifying training needs based on the hazard identified is a way to ensure employees are trained on how to deal with hazards that are specific to their positions.

Audit Services staff did not test the quality of the job hazard analysis performed by the departments.

## Finding 9

### **Audit Services staff found:**

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*Documentation to track fulfillment of training requirements varied by department.*

Some departments used Excel spreadsheets to track data, while some departments retained the signed attendance sheets to document required training received by staff. The LMS used for required OSHA training provided the capability to track all training received by employees. This system should be used as a central repository to document all safety training received by employees. Centrally tracking training received by employee will help the City if any OSHA inquiries are made.

## Finding 10

### **Audit Services staff found:**

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*Some employees did not receive the required safety training at the departments of Public Works, Water Management, and Solid Waste.*

The Departments documented the safety trainings received in different methods. In most cases, the documented records did not show that employees received all the required training. To meet the best practice standard, the process of recording and tracking training should be consistent across the City. Training requirements should be identified, documented, and monitored uniformly. There is no standard on training requirements, course documentation, and monitoring of all employee safety training.

***The City cannot substantiate that all employees have received the proper safety training to keep them safe due to incomplete records.***

## Objective 3 Results Summary

*Ensure root cause analyses or investigations were performed by departments when injuries/accidents occurred to prevent future injuries.*

Thoroughly investigating incidents and injuries can help identify hazards that are likely to cause future harm. The decentralized safety structure at the City has provided the opportunity for future harm to occur to City employees because departments have handled accident investigations differently. The risk existed that each respective department's injury/accident report was not fully detailed or shared, leading to inefficiencies and possible future injuries.

### Finding 11

#### **Audit Services staff found:**

*Root cause analyses /accident investigations were being performed at the department levels; however, varying practices existed across the City.*

The decentralized safety structure at the City led the departments to handle accident investigations differently. The departments of Solid Waste, Public Works, and Water Management had different approaches to how they investigated injuries, performed root cause analysis, and determined if the accident was preventable - leading to more fragmentation and less uniformity across the City's larger operational departments. There was also no cross-sectional working relationship among departments. The risk existed that each respective department's injury/accident report was not detailed or shared, leading to inefficiencies. By thoroughly investigating incidents and reports, the City can identify hazards that are likely to cause future harm.

***Because root cause analyses and investigations are not standardized, the opportunity exist that future injuries could occur because incident investigations lack details to ensure actions taken are sufficient to mitigate the hazards.***

## Conclusion

The City has a construct in place for its safety program wherein the Risk Management Division is charged with oversight of the City's safety practices. However, the safety program at the City of Durham is functioning as if it is decentralized and this actual construct is not working. Significant improvements in the overall program can be made if the best practices, problems, and solutions are shared between the departments in a consistent manner. These improvements should be managed by the Risk Management staff because they are charged with oversight of the current safety processes of the City.

A system currently exists to capture required OSHA safety training. Determination of required training for a given position is not always based on a Job Hazard Analysis. There was no City-wide standard on training requirements, documentation and monitoring of employee safety training. At most, supervisors were responsible to ensure an employee receives the required safety training. Documentation maintained to track training received by employees also varied by department.

Significant improvements in the overall program can be made if: 1) the Risk Management staff establish a safety program and update the overarching City-wide safety policies with more formal communications (updated policies, implementation of standardized practices, sharing of problems and solutions); and 2) the safety construct of Risk Management is revised to ensure the staff can carry out its responsibilities.



### Recommendation 1

The City Manager's Office should enforce the organizational safety structure at the City and ensure that there is buy in from all levels. Management should empower the Risk Division staff to oversee the safety processes at the City. The following issues should be assessed:

- Analyze Resources of the Risk Division – Determine if the Risk Division has the resources necessary to carry out the responsibility assigned. If providing additional resources is not feasible, determine how Risk Division staff will be able to fulfill taking on the responsibility for overseeing safety at the City.
- Review the reporting structure for safety officers that are housed in other departments and establish reporting responsibilities either from a direct or dotted line relationship.
- Identify the needs of the departments that do not have safety officers and determine how the Risk Division will be able to meet the safety needs of those departments.
- Finally, communicate the overall safety structure to all employees.

**Value Added:** *Efficiency, Risk Reduction*

### Recommendation 2

The Finance Department should rewrite the existing policy and create a guiding principle to be used to set safety expectations in the City. The policy should clearly outline roles and responsibilities of the Risk Division, departments with safety officers, and departments without safety officers.

**Value Added:** *Efficiency, Risk Reduction*

### Recommendation 3

The Risk Division should establish a written safety program for the City. A safety program should include recommended practices for a safety program approved by OSHA. These elements include:

- Management Leadership;
- Worker Participation;
- Hazard Identification and Assessment;
- Hazard Prevention and Control;
- Education and Training;
- Program Evaluation and Improvement; and
- Communication and Coordination for Host Employers, Contractors, and Staffing Agencies.

**Value Added:** Efficiency, Risk Reduction

## Recommendation 4

The Risk Division should establish a formalized communication plan to share, or discuss safety practices, loss prevention data and promote cross sectional working relationships.

**Value Added:** Efficiency, Risk Reduction

## Recommendation 5

The Risk Division should standardize safety processes at the City in the following areas:

- Incident investigation
- Addressing/reporting of safety concerns
- Job hazard analysis and safe work procedures
- Required training
- Performance reporting

**Value Added:** Efficiency, Risk Reduction

## Recommendation 6

The Risk Division should: 1) require departments use the LMS to track all safety training received; and evaluate, based on user feedback, the benefit of the safety training content currently required via the LMS and revise it if warranted. The Risk Division should clearly communicate the purpose of the basic OSHA training classes to all departmental staff.

**Value Added:** Efficiency, Risk Reduction, Compliance

### Value Added Legend



Compliance: Functioning in accordance with governing laws and regulations.



Cost Reduction: Minimizing costs related to City activities, internally or externally.



Efficiency : Performing effectively without duplication of efforts.



Risk Reduction: Minimizing risks related to reputation, financials, or personnel.

# Management Response

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**City of Durham**  
NORTH CAROLINA

**To:** Germaine Brewington, Audit Services Director  
**From:** Wanda Page, Deputy City Manager  
**From:** David Boyd, Finance Services Director  
**Date:** June 14, 2017  
**Re:** Management's Response to Recommendation  
City-Wide Safety Performance Audit June 2017

## **Recommendation 1:**

The City Manager's Office should enforce the organizational safety structure at the City and ensure that there is buy in from all levels. Management should empower the Risk Division staff to oversee the safety processes at the City. The following issues should be assessed:

- Analyze Resources of the Risk Division – Determine if the Risk Division has the resources necessary to carry out the responsibility assigned. If providing additional resources is not feasible, determine how Risk Division staff will be able to fulfill taking on the responsibility for overseeing safety at the City.
- Review the reporting structure for safety officers that are housed in other departments and establish reporting responsibilities either from a direct or dotted line relationship.
- Identify the needs of the departments that do not have safety officers and determine how the Risk Division will be able to meet the safety needs of those departments.
- Finally, communicate the overall safety structure to all employees.

We concur: The Manager's Office will review the organizational safety structure at the City and determine the need for additional resources, reassignment of resources, and/or other administrative or policy changes indicated by the review. Any program modifications, policy changes or clarification will be communicated to all employees. The review will be completed and communicated by December 31, 2017.

## **Recommendation 2:**



The Finance Department should rewrite the existing policy and create a guiding principle to be used to set safety expectations in the City. The policy should clearly outline roles and responsibilities of the Risk Division, departments with safety officers, and departments without safety officers.

We concur: Management recognizes the need for revising our policies along with providing more clarity as to the division's role relative to all aspects of safety. A newly formed City-Wide Safety Leadership Team will begin reviewing current policies and recommending changes along with developing new policies. We anticipate a completion date of December 31, 2017.

**Recommendation 3:**

The Risk Division should establish a written safety program for the City. A safety program should include recommended practices for a safety program approved by OSHA. These elements include:

- Management Leadership;
- Worker Participation;
- Hazard Identification and Assessment;
- Hazard Prevention and Control;
- Education and Training;
- Program Evaluation and Improvement; and
- Communication and Coordination for Host Employers, Contractors, and Staffing Agencies.

We concur: Policy S-201 serves as the current Safety Program directive. Management recognizes the need for an assessment of this policy to reevaluate practices and program structure. December 31, 2017 is an anticipated completion date.

**Recommendation 4:**

The Risk Division should establish a formalized communication plan to share, or discuss safety practices, loss prevention data and promote cross sectional working relationships.

We concur: Management has recently established a Safety Leadership Team that includes a cross section of employees from multiple departments throughout the City. The Safety Leadership Team will work on various Risk/Safety related projects which will encompass many of the items outlined in the recommendation. Anticipated completion date is September 30, 2018.

**Recommendation 5:**

The Risk Division should standardize safety processes at the City in the following areas:

- Incident investigation
- Addressing/reporting of safety concerns
- Job hazard analysis and safe work procedures

- Required training
- Performance reporting

We concur: Establishing the Safety Leadership Team will address various areas outlined in this recommendation. Sub-committees will be formed from the City Wide Safety Leadership Team to focus specifically on recommended standardize safety processes. Anticipated completion date is September 30, 2018.

**Recommendation 6:**

The Risk Division should: 1) require departments use the LMS to track all safety training received; and evaluate, based on user feedback, the benefit of the safety training content currently required via the LMS and revise it if warranted. The Risk Division should clearly communicate the purpose of the basic OSHA training classes to all departmental staff.

We concur: Management agrees all departments will use the LMS for safety tracking purposes. During FY'18 management plans to continually evaluate safety training content soliciting employee feedback to determine the best delivery process for specific topic. Anticipated completion date is June 30, 2018.

## Distribution of Report

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