

# **Employee Safety: Parks and Recreation Department Follow-Up Report**

**June 2003**

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**DEDICATED TO IMPROVING THE CITY AND BUILDING PUBLIC TRUST**



**OFFICE OF THE CITY AUDITOR**

**AUSTIN, TEXAS**

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On June 10, 2003, the Office of the City Auditor presented this audit report to the City Council Audit and Finance Committee. The Committee accepted the audit report.

A hard copy of this report may be requested, or you may download a copy in PDF format, from our website at <http://www.ci.austin.tx.us/auditor>. You may also request a copy from our office or email us at [oca\\_auditor@ci.austin.tx.us](mailto:oca_auditor@ci.austin.tx.us). Please request Audit No. AU03201.

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June 10, 2003

To: Mayor and Council Members  
From: Stephen L. Morgan, City Auditor  
Subject: Parks and Recreation Department employee safety follow-up audit

I am pleased to present this report on the status of PARD's implementation of audit recommendations made in our April 2001 audit report *Employee Safety: Parks and Recreation Department*.

Two areas show improvement since the original audit. Department management is now developing clearer measures of safety performance. And a review of injury incident management practices shows improved thoroughness of documentation and scope of management review.

Certain management practices still need to be strengthened. Specifically, in the area of preventing and controlling on-the-job hazards, PARD employees need documented standards and departmental procedures, and to be consistently trained and held accountable for following those standards. Staff responsible for safety need to work with site managers to ensure approved practices are implemented throughout a department notable for its large number of geographically dispersed facilities.

Additionally, since the original audit, PARD has lost its budgeted Safety Officer position. Lack of a full time Officer hinders efforts to further strengthen the safety program according to best practices.

We appreciate the cooperation and assistance from Parks and Recreation Department staff during this audit.

A handwritten signature in black ink that reads "Stephen L. Morgan".

Stephen L. Morgan, CIA, CGAP, CFE, CGFM  
City Auditor



## COUNCIL SUMMARY

**Of four original recommendations reviewed, we found two implemented, and two partially implemented.** At the time the original Employee Safety audit was issued, in April 2001, there was considerable work to do to strengthen the Parks and Recreation Department (PARD) safety program. Since then, incident management procedures and practices and safety data quality, analysis and distribution are greatly improved. Furthermore, for FY 02, the Director increased department emphasis on safety training for all regular employees. However, we have found that standard operating procedures (SOPs) and training are two areas still in need of significant attention. Both a communicated set of SOPs for all job locations and a systematic training program should serve as the foundation for preventing injury incidents on the job and holding department employees accountable in the event of an injury. It should be noted that the originally projected implementation date of the SOP recommendation, October 2003, has not passed, although it will likely take significantly longer to fully implement the recommendation.

**Evidence collected in the current and original audits suggests that many employees do not recognize imposed, standard procedures for performing their job.** This is due in part to PARD's policy that leaves development of SOPs at the discretion of the individual site managers. Strengths in safety performance also appear to be due to individual site managers. Familiarity with the concept of standards varies throughout the department. We speculate that supervisors tend to emphasize an employee's experience on the job rather than imposed expectations.

**While we found several improvements in the area of training, many PARD positions still lack training requirements, and controlled, consistent training records.** Since the original employee safety audit, the Aquatics division has been designated the safety trainer for the department and offers classes including back injury prevention and slips, trips, and falls prevention — addressing leading causes of injury on the job at PARD. Also, hazard communication and disease prevention training classes have been added to the menu of classes since the audit, following a safety consultant's evaluation of PARD safety. On the other hand, tests of personnel records show decentralized oversight of many supplementary courses, and incomplete use of the TRAIN system to track training impedes assessment of training coverage. Compliance with training requirements for employees injured on the job is also weak.

**In the course of follow-up work, we found that PARD lost its budgeted Safety Officer position effective February 2003, with the transfer of that staff person to another City department.** In addition to this setback, PARD's Fleet Manager has retired leaving no replacement to respond to and oversee follow-up on all department vehicle accidents. In order to overcome these issues, the Division Manager of Aquatics is currently charged in his SSPR to "manage the department's safety program," and a request has been placed with Parks Police to fill the Fleet Manager's safety responsibility. In addition, Safety Committee members have also been mobilized to contribute to program improvement efforts, beyond their committee responsibilities. In order to dedicate safety resources for FY 04, however, PARD will need to find a vacancy and re-classify it as Safety Officer or request a new position in the proposed budget.

The current staffing structure raises three concerns:

- In the event the Aquatics Division Manager leaves the job, will safety responsibilities continue to be a duty of that position?
- In summer months Aquatics is occupied with its core activity, which can cause setbacks in departmentwide safety administration.
- PARD is a high-risk department, without a staffed, budgeted safety officer.

We found that a lack of staff in this area may compromise incident management follow-through: appropriate corrective actions, indicated by injury incidents, have not been consistently implemented in PARD.

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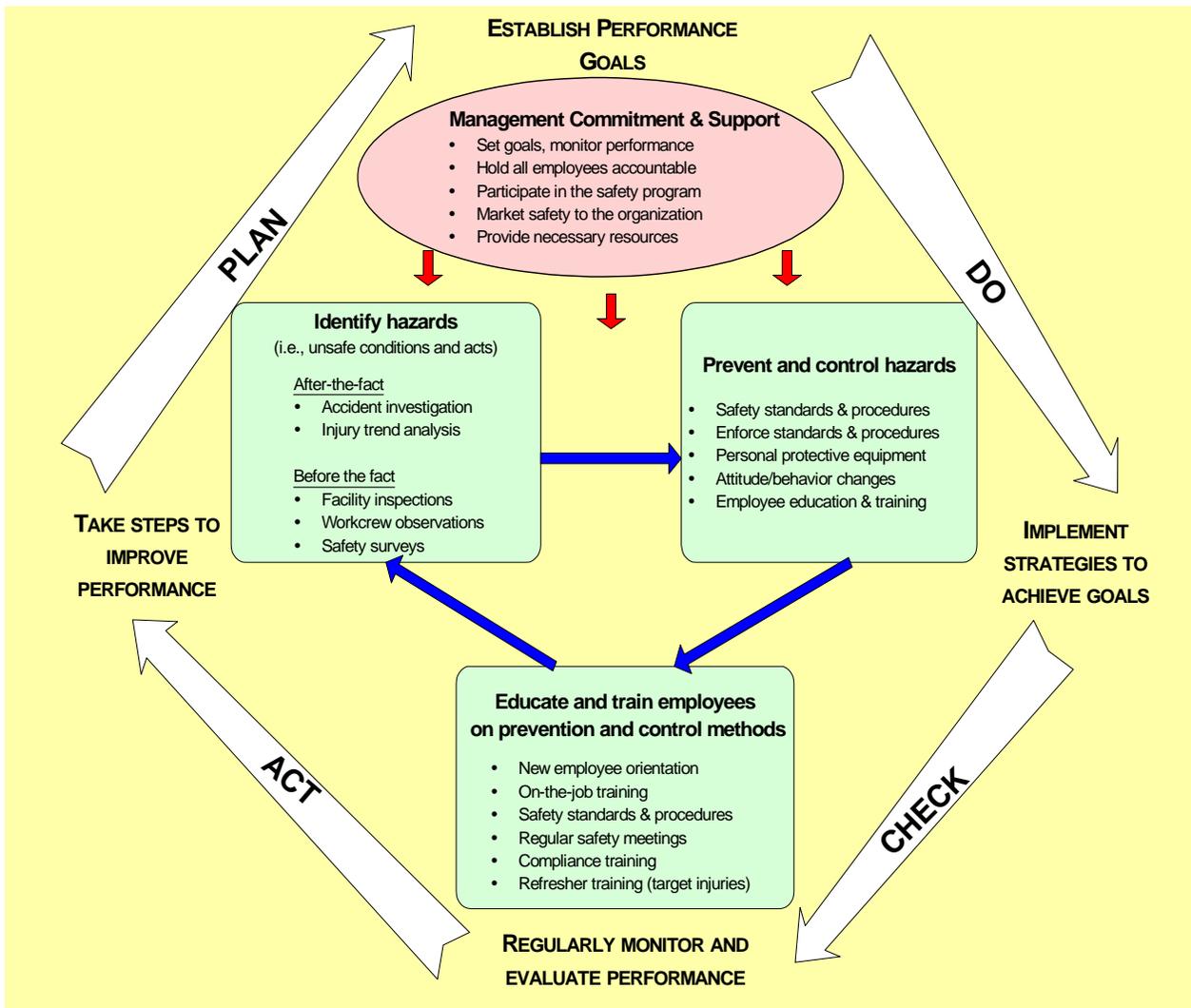
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## BACKGROUND

The basic components of an effective employee safety program include: the consistent involvement and support of senior management; and methods to identify hazards and potential causes of injury, to control the hazards once identified, and to educate and train employees on hazard control and injury prevention. Specific practices, procedures, and processes underpinning these components contribute to program success and effectiveness. Exhibit 1.1 illustrates the basic safety program framework originally used in 2001 to evaluate the Parks and Recreation Department’s (PARC’s) program performance and then used to assess improvements made since the original audit report.

**EXHIBIT 1.1**  
**Safety Program Management**



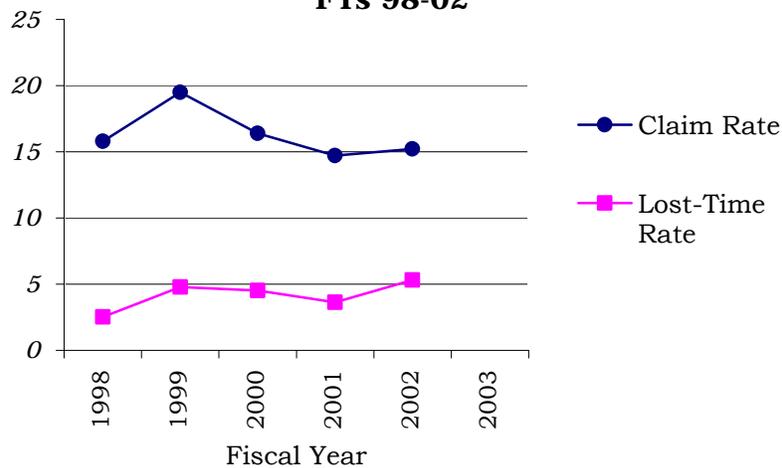
SOURCE: Office of the City Auditor (OCA) analysis of safety industry literature.

OCA issued the PARD Employee Safety audit report in April 2001. It contained seven recommendations designed to improve the department's existing safety program. Management concurred with all the recommendations and presented an implementation plan to the City Council's Audit and Finance Committee.

Original recommendations addressed the need to strengthen key areas of program operation: management roles, standard operating procedures governing job performance, human resource allocation, the Safety Committee role, incident management and accountability processes, and performance measures.

New data presented in Exhibit 1.2 indicates that injury claim rates increased in the year following issuance of the audit report. By presenting this data, we do not suggest that action or inaction caused the increase. However, this gives added emphasis to the need for improving systems. On a positive note, in the follow-up scope period, almost no lost time injuries occurred in two of the three highest injury frequency areas identified in the original audit: Forestry and Corridor Daily in the Operations Division.

**EXHIBIT 1.2**  
**PARD Employee Injury Claim Rates,**  
**FYs 98-02**



SOURCE: Human Resources Department. FY 02 data not audited.

NOTE: Claim rate expresses claims per 100 FTEs, and is based on the number of reported injuries divided by actual employee hours worked, times 200,000. The lost time rate is based on number of injuries with more than seven days of lost time, divided by hours worked, times 200,000.

## **OBJECTIVE, SCOPE AND METHODOLOGY**

The objective of this follow-up work was to assess the progress that the department has made toward addressing the original audit findings and implementing recommendations set forth in the PARD Employee Safety audit report.

We limited our scope to verifying implementation status of four of seven original recommendations. Specific injury cases reviewed occurred between September 2001 and February 2003.

To accomplish our objective we interviewed staff, including some who had been injured on the job, and reviewed and analyzed a variety of internal documents and management reports.

This work was conducted in accordance with generally accepted government auditing standards.

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## FOLLOW UP AUDIT RESULTS

Our follow-up audit addressed four recommendations: numbers 2, 3, 6 and 7 from the original Employee Safety audit, issued April 2001.

**Recommendation #2** To communicate and reinforce expectations for safe work practices, the Director should require program managers to develop, document, and implement [train employees on] Standard Operating Procedures (SOPs) for tasks associated with locations where one or more lost time injuries has occurred in the past two years.

Issue Area	Original Management Strategy (& proposed implementation date)	OCA-verified status
Standard Operating Procedures	Collect and inventory all existing SOPs (10/01)	<b>Partially implemented</b> * <i>SOPs have been collected from all divisions but not inventoried.</i> * <i>Some SOPs have been updated but there is no evidence that written SOPs are systematically reviewed for sufficiency as needed, e.g. by the Safety Committee following accidents.</i> * <i>Anecdotal evidence suggests changes in work practices have occurred as a result of injuries.</i>
	Train employees on SOPs for their respective areas (10/03)	
	Evaluate and revise existing SOPs as needed and draft new SOPs as needed (10/03)	

**In the area of standard operating procedures (SOPs), PARD’s efforts have been confined to collecting existing, documented SOPs for the ten PARD divisions.** These are reportedly due to be inventoried by October 2003.

**As in the original audit, we detected a low level of awareness of the existence of standards.** Of seven injured employees interviewed, three stated that they had been instructed in SOPs. Another knew of his group’s SOPs but had received no instruction in them. (Training is more comprehensively treated in a following section.) In addition, a Parks Police officer knew of SOPs, but received no specific training in these. Identifying and enforcing SOPs remains at the discretion of individual site managers.

**SOPs have not been used to hold employees accountable, in the event they are hurt on the job.** Three of seven injured employees interviewed reported receiving some type of counseling following their injury incident. None had been shown recommendations from the Safety Committee, where SOPs should be – but are not - referenced in incident analysis and used to educate employees on expectations for performing their jobs safely.

**Of the seven cases researched, no SOPs were updated in the event of an injury.** In one case at Forestry, a specific practice was modified after a worker's foot was crushed under a truck; in a separate case at Golf, overall procedures were modified, but not documented in writing. Aquatics, not included in the sample due to proven best practice in the last audit, report that material safety SOPs were updated following a chemical incident.

**Employee interviews reveal a range of on-the-job training and supervisor emphasis on safety.** Some employees interviewed reported that their supervisor presented frequent 15- to 30-minute reviews of safe practices, while others had never received reinforcement of safe procedures following initial on-the-job training. Supervisors to one injured employee emphasized the experience of the employee, while acknowledging that insufficient procedures were in place at the time of the injury.

**A key measure indicates the importance of accountability controls, namely imposing and enforcing standard operating procedures for permanent employees and their work groups.** A marked difference in claim frequency is notable when rates-of-claim are calculated for temporary and regular employees. FY 00 data shows that hour-for-hour of work, an individual who is a permanent PARD employee is actually three times more likely to file a claim resulting in medical costs than is a temporary. PARD has about 400 permanent staff and as many as 1,400 temporaries at peak times of the year. Due to time limits, analysis was not performed on more recent data, although a review of the department's workers' compensation log indicates that, of 48 cases open in February 2003, seven, or fifteen percent, were temporaries.

**Suggested steps for further implementation:**

1. Inventory existing PARD SOPs, create an indexing system, and date the SOPs.
2. Hold direct supervisors accountable for educating and training employees on all pertinent SOPs.
3. Include reference to an indexed, specific SOP and relevant training in the Safety Committee's incident review process requirements.
4. Ensure that employees receive the information produced by the Safety Committee and that managers receive specific guidance on SOPs requiring revision and dissemination.
5. Create checklists specifying SOP reviews as well as specific types of relevant safety training.

**Recommendation #3** To further communicate and reinforce expectations for safe work practices, the Director of the Parks and Recreation Department should establish a safety training function that provides: 1) New employee orientation on workplace safety for both permanent and temporary employees, 2) Refresher safety courses annually to all employees in hazardous positions, and 3) Safety training on proper work procedures for injured employees prior to return to work

Issue Area	Original Management Strategy (& proposed implementation date)	OCA-verified status
Training	NEO trains on safety goals and objectives (10/01) <ul style="list-style-type: none"> <li>• Employee commitment and responsibility</li> <li>• Employee involvement in safety issues</li> <li>• Incident accountability</li> </ul> Require refresher course in hazardous positions: Defensive Driving, Back injury prevention, First Aid/CPR (10/00) Require injured employees to review SOPs or training video from return-to-work video library (10/01)	<b>Partially implemented</b> <ul style="list-style-type: none"> <li>* <i>NEO training addresses these three areas. Fifty-five percent of new regular employees (or 11 out of 20) attended the one NEO class offered to date. One temporary employee has attended.</i></li> <li>* <i>Some employees have received training and some have not. Criteria has not been clearly established for what they should receive.</i></li> <li>* <i>This was not done consistently. Records showed that only 6 of 20 injured employees received applicable post-injury training.</i></li> </ul>

**Aquatics, identified as a best practice division within the department in the previous audit, has been appointed the safety trainer for the department.** The division communicates course availability to employees through the employee newsletter. The menu of safety training classes includes back injury prevention, and slips, trips and falls prevention – two of the leading causes of injury on the job at PARD. Other training is administered external to Aquatics - for example Defensive Driving, offered both by a qualified trainer on PARD’s Human Resources staff and a second City department.

Following an evaluation by Rogers Environmental & Safety Services, a safety consultant, issued July 2002, hazard communication and disease prevention training classes have also been added to PARD’s menu of classes. Also, a new employee orientation with a safety module was designed since the original audit and offered through PARD’s management services function.

**The New Employee Orientation (NEO) training manual became effective March 2002, and one class was administered in December 2002 to 15 employees.** One and a half hours of the content of PARD's New Employee Orientation is dedicated to training employees on their key responsibilities and department commitment and expectations, per PARD's Accident Prevention Plan.

Of all regular employees hired within the 15 months prior to this training, just eleven (or fifty percent) attended the one NEO class; one attendee was a new temporary employee. It is not clear why nine other new employees did not attend. Also, the original recommendation is specific on inclusion of temporaries in such training, yet management excludes them from the class. PARD management reports that it does not anticipate continuing this training during the Citywide hiring freeze.

**In FY 02, of ten regular, injured employees tested, records show that just five achieved the 16 suggested hours of safety training.** For FY 02, the department director mandated that performance appraisals specify 16 hours of safety-related training. This was revised to 8 hours for FY 03. Safety staff report that many employees scrambled to acquire safety training in the closing weeks of the performance evaluation year. Thus, for the five regular employees who didn't achieve the 16 hours, injury-related lost time likely impacted their ability to acquire the hours of training, as a number of these injuries occurred at the end of the fiscal year.

**Records indicate that 6 of 20 cases (30 percent) were compliant with the post-injury training requirement.** PARD staff has tied training to incident management procedures, introducing a policy that requires the injured employee to take relevant training after injury accidents. From a sample of 20 injured employees, records indicate that training was recommended for just 15 of these employees and that just under half of those employees completed such training.

**Decentralized oversight of training classes that supplement Aquatics' course menu, in combination with the incomplete use of the Citywide training tracking system (TRAIN), impedes assessment of the training coverage.** Verifying the level of training an employee has actually acquired was difficult for auditors, and thus too for department administrators. Detailed research revealed that one employee had received training not recorded on TRAIN. We could not establish whether two other employees with no training listed was due to incomplete records, or to no hours of training. Patterns in data, reflecting what the department terms *ad hoc* training, also indicate possible inconsistencies across work sites in the use of TRAIN for tracking.

Aquatics has its own database, and does not use TRAIN to record its staffs' training. Instead, the division has long kept records to meet stringent requirements that are imposed by a state agency.

**The reliability of the department's employee training records suffers due to weak data entry controls.** The student or a division's system administrator, not the instructor, enters "*Ad Hoc* Training" into the TRAIN tracking system. Staff reports that administrators do not verify this training, and a review of on-site records turned up only one on-file certification for an *ad hoc* class. This suggests a need to strengthen verification processes for training taken, be it in-house or vendor-supplied. *Ad hoc* training in fraction-of-an-hour increments appears for three out of 20 employees reviewed, suggesting that only some supervisors or employees are either using and/or documenting such *ad hoc* training. Once data entry is controlled and reliably complete, TRAIN records can be used for accountability purposes in the event of injury.

**A significant disparity is observable between PARD's safety training policies and accountability procedures for temporary employees versus those for regular employees.** In our work, we found that department expectations for safety training and record keeping tie to an employee's status and their position, not their length of service. For example, interviews with two injured employees at the Senior Program revealed that the regular employee had received safety training and the temporary had not, despite her having worked for PARD for 12 years. While procedures for follow-up training are the same for injured regular employees as for temporary employees, compliance frequency with the procedure was significantly worse regarding injured temporaries. In addition, documentation is less consistent with temps, whether injured or not, of any *ad hoc* safety training. In the period September 2001 to February 2003, PARD hired 20 permanent employees and 1,420 temporaries.

**Suggested steps for further implementation:**

1. Ensure that the TRAIN system provides accurate and complete information about safety training received, by issuing a blanket policy for data entry and verification that does not distinguish between temp and regular employees.
  - a. Use these records at Safety Committee incident review.
2. Develop an NEO video, covering the Accident Prevention Plan, and calling for employees to become familiar with their work group SOPs.
  - a. Require supervisors to train all their employees on the APP and SOPs.
3. Routinely monitor information on safety training received against required or recommended training.

**Recommendation #6** To improve assurance that unsafe conditions are corrected and accountability is brought to bear for injury incidents, the Director should require the Safety Officer to evaluate, revise, and document incident management policies and procedures, and revise the investigation tool (supervisor’s report of injury) to reflect process improvements.

Issue Area	Original Management Strategy (& proposed implementation date)	OCA verified status
<b>Injury Incident Management</b>	Review other departments’ incident management procedures (10/01)	<b>Implemented</b> * <i>Procedures are much improved. Reports are more comprehensive and reviewed by more levels of management, but analysis of causal factors and recommended corrective actions are sometimes weak. Process for closure is weak.</i> * <i>Division managers’ performance appraisals are uneven when it comes to requiring measures of safety performance in their respective areas, although improvements have been made.</i>
	Enforce division manager accountability using SSPRs [performance appraisals] (10/01)	
	Improve/modify employee injury forms to include more information and process of accountability and case-closure (7/01)	

**Injury incident management forms are much improved, requiring more sufficient management review.** Furthermore, analysis of a sample of reports indicates that reports are generally completed and reviewed by appropriate personnel. The form has been enhanced with inclusion of a flow chart of the management process and was reviewed and revised a second time based on assessment within the period reviewed.

**Incident reviews still show weak analysis of the causes for injuries and some weak companion recommendations.** For example, Safety Committee recommendations can include such items as “be more aware of surroundings.” Furthermore, as noted in a previous section, injured employees report that they are not receiving copies of the Safety Committee’s evaluation.

**We found weak accountability for corrective actions after a serious accident occurred.** While incident management in general is much improved, the process for closure is weak. In one very serious accident, a special investigation was performed by an *ad hoc* team, and a report with findings and recommendations submitted to and endorsed by the Safety Committee. However, 11 months later, the report had not been disseminated to the appropriate supervisor or employee, and some but not all of the recommendations had been addressed. For example, recommendations that handrails and overhead lighting be installed and improved were implemented,

while a policy stipulating that equipment from home not be used (as was the case in this injury incident) was never implemented.

**Evidence suggests that division manager performance appraisals are stronger in their inclusion of accountability measures and responsibilities.** However, PARD needs to strengthen appraisals to include measurable performance indicators, and be consistent across divisions with regard to responsibilities for employee safety and training. None yet reference a number of incidents as a target, which would now be possible due to division-level data analysis. Enforcing individual accountability for a safe workplace is thus still difficult.

Of the six division manager appraisals we reviewed post-dating the original audit report, there are variations in stated requirements and responsibilities for safety, and in the quality of measures.

- Four of these six have measures associated with responsibilities, but two of these have no numerical target, while for one there is no evidence that actual performance is being calculated at the division level.
- Two that specify measures make no mention of the manager's responsibilities, or actions required, for protecting worker safety and achieving good performance.
- Only two of the six specify responsibility for ensuring on-line tracking of training for temps and regulars, or "providing proof of training" for employees.

**Suggestions for further implementation:**

1. Establish a standard that an injury investigation results in at least one mandatory training, or require documented rationale for not recommending training.
2. Require documentation of changes to applicable SOPs and documentation of how that new information has been disseminated.
3. When a serious accident occurs, document the investigation along with the process for feedback and corrective action to all responsible parties. All documents should be dated and signed.
4. Make consistent the explicit safety responsibilities of division managers and related measures.

**Recommendation #7** To accurately and comprehensively assess the effectiveness of safety programming at PARD, the Director should direct the Safety Officer to revise the safety program performance measures to ensure that meaningful measures are tracked and to work with departmental human resources and workers' compensation personnel to improve reliability of data relevant to these measures.

Issue Area	Original Management Strategy (& proposed implementation date)	OCA verified status
<b>Performance Measures</b>	New performance measures (10/01)	<b>Implemented</b> <i>Internal information management and analysis is improved, and used to support performance reporting internally, and to a lesser degree externally.</i>

**Internal tracking and analysis, and distribution of performance information have greatly improved.** Reports distributed to managers at close of FY 02 include:

- Incident frequency by each of the ten PARD divisions.
- Incurred cost of claims, by division, reflecting costs associated with the incidents counted. This cost reporting requires PARD to enter information into its database from workers' compensation information, because corporate Human Resources reports costs paid on all open claims irrespective of when the injury was incurred.
- Categories/types of incident (not location specific) for FY 02.
- Summary packet of all incidents (no analysis) by division for FY 02.

Staff is making efforts to ensure data discrepancies are reconciled between the City's Human Resources Department (HRD) and PARD. In addition, staff tallied near-miss occurrences and developed a report of employees incurring multiple reported injuries in the fiscal year. However, these reports were not distributed to divisions or their managers.

Since the close of FY 02, PARD safety has issued no reports for the first or second quarter of FY 03. This may reflect constraints on human resources for safety; for example, database maintenance becomes a challenge in summer when Aquatics programs are mobilized.

The staff person appointed as responsible for safety reportedly submits two measures to upper management, per his performance review plan.

1. Number of annual site inspections (a leading indicator)
2. Number of employees receiving training (a leading indicator)

Improved measures would express these numbers as a proportion of what is needed to comply with policies or targets regarding training and inspections. This manager also states that he reports the ratio of injuries to the peak number of PARD employees, a trailing indicator. Our office and a safety consultant have recommended leading indicators such as the two above.

**Budget documents report two measures of performance.** At the budget level, two safety-related measures have been selected for reporting in FY 03 budget: the Occupational Safety and Health Administration's (OSHA's) lost-time injury rate, calculated by HRD, and the Texas Workers Compensation Commission injury rate, a ratio of injuries to number of employees at the peak period. This contrasts with the FY 02 budget which presented 13 measures that had essentially been carried over from the pre-audit year and had numerous problems related to reliability and relevance. Unfortunately, FY 02's stated department performance goal (problematic as it referred to 85 "preventable" accidents) was replaced for FY 03 with a goal that had no numeric specificity.

**Measures are only useful if tied to plans to improve performance.** As noted in a previous section, regarding incident management, measures do not consistently link to division manager's appraisals, and strategies for achieving performance are not consistently documented in the SSPRs.

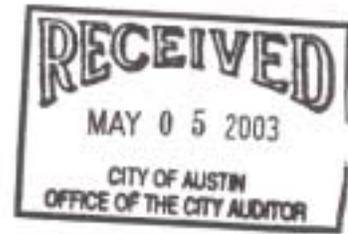
#### **Suggestions for further improvements:**

1. Generate frequency reports quarterly, including training as a leading indicator, enhancing the measure to reflect the level of coverage achieved. Continue to report site inspections, enhancing the measure to reflect level of coverage.
2. Include reported near misses as an element in quarterly safety reports.
3. Provide information quarterly.
4. Post and distribute quarterly data more widely.
5. Link measures more comprehensively to division manager and supervisor SSPRs.

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## **APPENDIX A**

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## MEMORANDUM

**To:** Steve Morgan, City Auditor, Office of the City Auditor

**From:** Jesus M. Olivares, Director, Parks and Recreation Department

**Date:** April 30, 2003

**Subject:** Safety Audit Follow up

We have reviewed the draft report on the PARD Employee Safety Follow Up Results recently provided by your office. The focus areas of this follow up review include Standard Operating Procedures, Training, Incident Management, and Performance Measures.

### Standard Operating Procedures

The department continues to standardize and review current SOPs. The initial projection was that a complete inventory would be accomplished by October 2003. While this is a large undertaking given the diversity of the jobs performed by PARD staff, we remain committed to accomplishing the inventory, and begin indexing, updating and training staff on SOPs. The primary focus will be on the high hazard areas as defined by frequency, severity and other appropriate injury rates.

### Training

The department implemented a New Employee Orientation and a process whereby injured employees receive an in-service prior to or shortly after returning to duty. The inconsistencies identified in this review are being addressed and the department will continue making systematic improvements in this area.

With regard to tracking training for temporary employees, we submit that the challenges associated with this are such that the current system is meeting our needs. We will continue using the current method until a more suitable process is identified for tracking this activity consistently for temporaries.

### Incident Management

Though this recommendation is considered implemented, PARD continues to develop incident management procedures to assist with closing out injury incident cases. This

activity will include benchmarking best practices with other departments, increase accountability through the SSPR process, and improve injury case closure through better tracking, record keeping and consistent follow ups.

**Performance Measures**

Performance reporting will continue to be a priority for the department and efforts will continue to communicate trend data to our managers and supervisors on a regular basis. We will also work to insure the data is accurate and complete.

In light of the budget and staffing challenges we are experiencing, we commit to continue making progress with our Safety Program that is consistent with available resources. We look forward to receiving your final report and are available to answer any questions you might have about the information contained in this letter of commitment.



Jesus M. Olivares, Director  
Parks and Recreation Department

xc: Michael McDonald, Acting Chief of Staff  
Brian K. Williams, Assistant City Auditor  
Farhad Madani, Aquatics and Safety Manager

## **APPENDIX B**

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## STATUS OF RECOMMENDATIONS TESTED

**Recommendation #2** To communicate and reinforce expectations for safe work practices, the Director should require program managers to develop, document, and implement [train employees on] Standard Operating Procedures (SOPs) for tasks associated with locations where one or more lost time injuries has occurred in the past two years.

Implementation status per OCA Review: PARTIALLY IMPLEMENTED

**Recommendation #3** To further communicate and reinforce expectations for safe work practices, the Director of the Parks and Recreation Department should establish a safety training function that provides: 1) New employee orientation on workplace safety for both permanent and temporary employees 2) Refresher safety courses annually to all employees in hazardous positions, and 3) Safety training on proper work procedures for injured employees prior to return to work.

Implementation status per OCA Review: PARTIALLY IMPLEMENTED

**Recommendation #6** To improve assurance that unsafe conditions are corrected and accountability is brought to bear for injury incidents, the Director should require the Safety Officer to evaluate, revise, and document incident management policies and procedures, and revise the investigation tool (supervisor's report of injury) to reflect process improvements.

Implementation status per OCA Review: IMPLEMENTED

**Recommendation #7** To accurately and comprehensively assess the effectiveness of safety programming at PARD, the Director should direct the Safety Officer to revise the safety program performance measures to ensure that meaningful measures are tracked and to work with departmental HR and workers' comp personnel to improve data reliability of information relevant to these measures.

Implementation status per OCA Review: IMPLEMENTED

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