



CITY OF SAN ANTONIO

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June 10, 2019

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SUBJECT: Audit Report of SWMD Employee Training and Safety Programs

Mayor and Council Members:

We are pleased to send you the final report of the Solid Waste Management Department Employee Training and Safety Program audit. This audit began in November 2018 and concluded with an exit meeting with department management in May 2019. Management's verbatim response is included in Appendix B of the report. The Solid Waste Management Department management and staff should be commended for their cooperation and assistance during this audit.

The Office of the City Auditor is available to discuss this report with you individually at your convenience.

Respectfully Submitted,

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
City of San Antonio

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CITY OF SAN ANTONIO

OFFICE OF THE CITY AUDITOR



Audit of Solid Waste Management Department

Employee Training and Safety Programs

Project No. AU19-027

June 10, 2019

Kevin W. Barthold, CPA, CIA, CISA
City Auditor

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the Solid Waste Management Department (SWMD), specifically employee training and safety programs. The audit objective, conclusions, and recommendations follow:

Determine if training and safety programs for SWMD staff are comprehensive and in compliance with recommended standards and/or best practices.

The employee training and safety programs are comprehensive and in compliance with best practices. We determined that SWMD has established comprehensive policies and procedures related to training for equipment operations and safety standards. Additionally, we determined that SWMD has clear expectations of safety practices and the disciplinary procedures for any non-compliance.

However, there are opportunities to improve the administration of the program, including the tracking and documentation of employee training and safety records.

We recommend that SWMD Management implement a standard process to track and ensure that employees are attending their required trainings. In addition, establish a process to better monitor and document completed training.

SWMD Management agreed with the audit findings and has developed positive action plans to address them. Management's verbatim response is in Appendix B on page 6.

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Background

The Solid Waste Management Department (SWMD) is responsible for the collection of municipal solid waste generated by its customers (approximately 355,000 single-family San Antonio households). Primary collection services include: weekly curbside collection of residential garbage, recyclables, and organics; semi-annual residential collection of brush and bulky items, non-residential garbage collection overnight in the downtown area, and, by request, dead animal disposal. Furthermore, SWMD administers the City's Household Hazardous Waste (HHW) programs, monitors and maintains closed City landfills, and operates two brush recycling centers and four bulky waste drop off centers.

SWMD is comprised of 686 employees with various positions ranging from administration to equipment operators, solid waste collection workers and drivers, heavy equipment operators and mechanics.

From a safety standpoint, the use of automated side-loader trucks has decreased the exposure of employees to lifting hazards, coming in contact with the waste, and coming in contact with vehicles in the roadway. However, the use of large industrial trucks still exposes workers to driving accidents and property damage.

The following table illustrates the number of incidents by type during fiscal years 2017 through 2018.

Incident Type	FY 2017	FY 2018
Non-Preventable Collision	101	96
Non-Preventable Injury	34	33
Preventable Collision	106	63
Preventable Injury	5	3
Vehicle Incident	N/A*	23
Total Incidents	246	218

Source: Office of Risk Management

* Revisions to the City Safety Manual for 2018 included addition of Vehicle Incident category

SWMD's goal for fiscal year 2019 is to increase driver safety and collection performance through improved routing, vehicle technology, and the continued implementation of a comprehensive safety plan. In collaboration with the Office of Risk Management, SWMD will fully implement a Safety Management System that will follow international safety standards to ensure the safety of COSA employees and provide for a safe community during service delivery to customers.

Audit Scope and Methodology

The audit scope was fiscal year 2017 through fiscal year 2018.

To establish our test criteria, we reviewed SWMD policies and procedures, Accident Review Board (ARB) database, and employee training requirements. We interviewed SWMD management and staff to gain an understanding of the training and safety requirements and practices. Additionally, we observed route collections and employee's usage of PPE (personal protective equipment).

As part of our testing procedures, we reviewed personnel files for a random sample of 25 employees to ensure training requirements were met and adequate documentation was on file. Additionally, we reviewed management's records to verify employees attended safety meetings, Professional Truck Driver (PTD) course, and post-accident refresher classes and evaluations.

We reviewed a sample of 15 employees who were listed in the ARB database with multiple accidents to confirm the progressive and corrective disciplinary policy is enforced. Additionally, we reviewed all employees whose job position requires a Commercial Driver License (CDL) to ensure their license was not expired.

We relied on computer-processed data in SAP, the City's accounting system, to verify employees receive Safety Incentive Plan (SIP) payments based on requirements established in the SIP policy. Our reliance was based on performing direct tests on the data rather than evaluating the system's general and application controls. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

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

Audit Results and Recommendations

A. Employee Training and Safety

SWMD lacks adequate controls to ensure employees are completing required training courses and safety meetings. Additionally, completion of training is not consistently documented and retained on file.

A1. New Employee Training

New employees receive 80 hours of initial training which takes place in the classroom and on the road with a trainer. Once the trainer observes the new employee has demonstrated a level of safety and competency, the trainer and employee sign the *Safety Orientation* form and the *Release from Training* form. The signed forms are acknowledgements that the employee is ready to be released for a solo route assignment and should be retained in the employee's personnel file.

We reviewed a random sample of 25 new employee training files and identified six files that did not contain the *Safety Orientation* form and five that did not contain the *Release from Training* form.

A2. Post-Accident Refresher Course and In-Cab Observations/Evaluations

If an employee has a vehicle accident, the driver must attend a post-accident driver safety refresher course consisting of four hours of classroom training at the next scheduled class. Additionally, SWMD requires four weeks totaling 24 hours of in-cab observations and evaluations to assess the employee's skill level and to correct unsafe driving habits.

We selected a random sample of 13 employees who had a vehicle accident and identified deficiencies amongst four of them. Two employees did not attend the refresher course. Additionally, these two employees along with another employee did not have in-cab evaluations completed. Finally, another employee completed only a portion of the required 24 hours of in-cab evaluations.

A3. Professional Truck Driver (PTD) Course

SWMD employees who hold a commercial driver's license are required to attend a PTD course within the last three years. The PTD course was specifically created to address the unique challenges of truck drivers and provides truck drivers defensive driving strategies and techniques that will help them avoid collisions and traffic violations.

Through review of all SWMD employees who hold a commercial driver's license, we identified 67 out of 483 (14%) employees who do not have a past record of taking a PTD course and are not scheduled to attend the course. Additionally, there are 203 (42%) employees that have not taken the course within the past three years.

A4. Safety Meetings

SWMD Safety Coordinators and Trainers conduct periodic meetings to revisit and discuss various safety topics. Per the SWMD new employee orientation materials, "Safety meetings are mandatory and all employees are required to attend."

We selected two quarters from fiscal year 2018, Q3 and Q4, to verify if all 538 SWMD operations (non-administration) employees attended the mandatory safety meetings. We identified 25 (5%) employees who did not attend a safety meeting during both selected quarters. Additionally, there were 155 (29%) employees who attended only one of the two quarterly safety meetings.

Without verifying that employees have attended required safety training, there is a risk that the department is not effectively managing the City's exposure to losses resulting from occupational injuries and accidents. Additionally, without sufficient and complete documentation of training hours obtained by SWMD employees, it is possible that heavy equipment operators are not receiving training designed to ensure both their safety and the public's safety.

Recommendation

SWMD Management should implement a standard process to ensure that employees are attending their required trainings and follow-up on instances where training requirements have not been met. In addition, establish documentation storage and retention standards of completed training.

Appendix A – Staff Acknowledgement

Gabe Trevino, CISA, Audit Manager
Holly Williams, CISA, CRISC, Auditor in Charge
Denise Trejo, Auditor

Appendix B – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

June 3, 2019

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management's Corrective Action Plan for SWMD Employee Training and Safety Programs Audit

The Solid Waste Management Department has reviewed the audit report and has developed the Corrective Action Plans below corresponding to report recommendations.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
1	Employee Training and Safety SWMD Management should implement a standard process to ensure that employees are attending their required trainings and follow-up on instances where training requirements have not been met. In addition, establish documentation storage and retention standards of completed training.	4	Accept	Clifford Hughes, Organizational Manager	9/30/2019

Audit of Solid Waste Management Department
Employee Training and Safety Programs

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	Action plan: The department implemented a Safety Management System (SMS) during the first quarter of FY19. SWMD will utilize the SMS Training Calendar to establish required training. The Risk Management Safety Coordinators and SWMD SMS Safety Liaisons will track and retain documentation for all training using Intalex, which is a training tracking system. Intalex will provide reminders of when training is due. Supervisors will ensure employees that miss identified training will attend a makeup session with one of the coordinators. Employees working in positions requiring a Commercial Driver License (CDL) will attend the Professional Truck Driver (PTD) course provided by the department. The department will maintain documentation for PTD training in Intalex. SWMD will complete PTD training for all the identified individuals by September 30, 2019. Supervisors of employees identified as Primary Drivers will be responsible to ensure identified employees attend the Citywide Defensive Driving Course (DDC). Safety coordinators will maintain documentation of all DDC training. In-cab observations have been scheduled for those individuals that have not started or have not fully completed the commitment. SWMD will continue to ensure that employees with a preventable ruling receive the in-cab observations.				

We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,



David W. McCary
Director
Solid Waste Management Department

6/3/19
Date



Roderick Sanchez
Assistant City Manager
City Manager's Office

6-3-19
Date