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Audit Report

**AUDIT OF THE DEPARTMENT OF PARK AND
RECREATION INTERNAL CONTROLS OVER
REGULATORY, SAFETY, AND MAINTENANCE –
AQUATIC FACILITIES**

(Report No. A16-012)

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City Auditor

Craig D. Kinton

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Executive Summary

The Department of Park and Recreation (PKR) has designed internal controls in the form of various handbooks to help ensure PKR complies with Federal, State of Texas (State), and City of Dallas (City) regulatory standards for pools, spas, and spraygrounds (aquatic facilities). In addition, PKR implemented various approaches, such as daily checklists and/or on-site observations, to monitor compliance with these standards.

Although there were no aquatic facilities' health and safety claims reported during Fiscal Year (FY) 2015, the PKR can improve internal controls by consistently ensuring:

- Compliance with Federal, State, and City regulatory standards for aquatic facilities, including meeting water quality standards; lifeguard training and performance evaluation standards; and, City Code health and safety standards
- Effective maintenance procedures, such as identifying, documenting and monitoring the life expectancy of pool drain covers and grates and consistently inspecting aquatic facilities on a daily basis during the operating season
- Documentation is proper, complete, and retained for: (1) daily health, safety, environmental, and maintenance inspections during the operating season; (2) annual maintenance inspections; (3) lifeguard orientation forms; and, (4) water safety instructors' certification

Background Summary

The Aquatic Services Division of the Department of Park and Recreation (PKR) is responsible for operating 17 community pools, Bachman Indoor Pool (Bachman), and the Bahama Beach Waterpark. The Aquatic Services Division is responsible for the health and safety of aquatic facilities users through the application of Federal, State of Texas (State), and City of Dallas (City) regulatory standards for pools and spas. The Aquatic Services Division also provides year round water safety education programs, lifeguard, and cardiopulmonary resuscitation (CPR) training programs, and administers the Teach a Child to Swim scholarship fund.

The Facility Services Division of PKR is responsible for maintenance at the community pools, Bachman, and 11 spraygrounds. Bahama Beach Waterpark maintenance is performed by on-site maintenance personnel.

The Fiscal Year (FY) 2015 Adopted Budget for Aquatic Services Division included total expenditures of \$3,090,380 and total revenue of \$829,650.

Source: PKR

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In addition, the PKR does not require water quality tests¹ to measure the amount of combined chlorine (free chlorine and chloramines²) at Bachman Indoor Pool (Bachman).

Without proper internal controls, there is an increased risk of health and safety concerns for aquatic facilities users. In addition, PKR cannot readily demonstrate compliance with Federal, State, and City regulatory standards if procedures are not consistently performed, documented, and retained.

We recommend the Director of PKR improves the internal controls over regulatory, safety, and maintenance of aquatic facilities by implementing the recommendations made throughout this report.

The audit objective was to determine whether PKR had effective internal controls to identify and ensure compliance with regulatory, safety, and maintenance requirements. The audit scope included the Aquatic Services Division's and the Facility Services Division's operations during FY 2015; however, certain other matters, procedures, and transactions outside that period were reviewed to understand and verify information during the audit period.

Management's response to this report is included as Appendix III.

¹ This test provides key information as to when a pool or spa must be super-chlorinated or shocked. Super-chlorination rids the pool or spa of the buildup of the chloramines.

² Chloramines smell like ammonia or chlorine and are disinfection byproducts that are formed from the reaction of chlorine combined with aquatic facilities users' nitrogen compounds, such as perspiration, personal care products, etc.

Audit Results

Overall Conclusions

The Department of Park and Recreation (PKR) has designed internal controls in the form of various handbooks to help ensure PKR complies with Federal, State of Texas (State), and City of Dallas (City) regulatory standards for pools, spas, and spraygrounds (aquatic facilities). In addition, PKR implemented various approaches, such as daily checklists and/or on-site observations, to monitor compliance with these standards. The PKR, however, can improve internal controls by consistently ensuring: (1) compliance with Federal, State, and City regulatory standards for aquatic facilities, including meeting water quality standards; lifeguard training and performance evaluation standards; and, City Code health and safety standards; (2) effective maintenance procedures, such as identifying, documenting, and monitoring the life expectancy of pool drain covers and grates and consistently inspecting aquatic facilities on a daily basis during the operating season; (3) documentation is proper, complete, and retained for daily health, safety, environmental, and maintenance inspections during the operating season; annual maintenance inspections; lifeguard orientation forms; and, water safety instructors' certification. In addition, the PKR does not require water quality tests to measure the amount of combined chlorine (free chlorine and chloramines) at Bachman Indoor Pool (Bachman).

Section I – Aquatic Services Division Internal Controls

Water Quality Tests Are Not Consistently Performed and Documented in Accordance with the Department of Park and Recreation's 2015 Pool Manager Handbook and the Timeliness of Corrective Actions Are Not Consistently Documented

The Aquatic Services Division meets the State standard of testing water quality once daily for a system that automatically controls disinfectant and pH levels. The Aquatic Services Division; however, does not consistently perform and document water quality tests according to the PKR 2015 Pool Manager Handbook³ and the timeliness of corrective actions are not consistently documented. The aquatic facilities users' health may be at risk if water quality is not tested and documented to ensure compliance with the PKR 2015 Pool Manager Handbook and State standards and issues noted, if any, are resolved timely (see textbox on page 5).

³ According to the handbook: "Pool chemicals should be checked first thing in the morning and then every 2 hours throughout the operating day. Readings should be documented in the Pool Chemical Log. Checking pool chemicals is essential to maintaining safe and clean water for our guests and complying with city and state health regulations."

A judgmental sample of 54 PKR pool sterilization reports (1,290 water quality test results) for the 17 community pools and Bachman showed (18 total):

- Sixteen of the 18 aquatic facilities had water quality tests that were not consistently performed and documented every two hours; 201 of 1,290, or 16 percent, were not completed.
- Five of 18 aquatic facilities had water quality test results for chlorine and pH levels that were not in compliance with State or Aquatic Services Division's standards and were not resolved timely; 59 of 1,290, or five percent, were not in compliance and were not resolved timely.

The PKR 2015 Pool Manager Handbook and State Standards do not require documentation of daily water clarity inspection results; however, both require daily water clarity inspections. Eighteen aquatic facilities had water clarity inspection results that were not documented for 299 of 318 days, or 94 percent.

State Standards

The State requires:

- A test for disinfectant (e.g., chlorine) level and pH shall be conducted at least every two hours. If a system is used to automatically control disinfectant and pH, testing for disinfectant level and pH shall be made at least once per day. If necessary, tests shall be conducted more frequently to assure proper disinfectant level and pH.
- Operational records of the tests shall be kept for two years and be made available during a governmental inspection.
- Free chlorine levels of 1.0 ppm – 8.0 ppm and pH of 7.0 – 7.8 at pools and free chlorine levels of 2.0 ppm – 8.0 ppm for spas. The pH level requirements for spas is the same as pools.
- That a pool or spa be opened for use only if the pool or spa bottom and/or main drains are clearly visible.

Source: Texas Administrative Code, Title 25, Subchapter L (TAC 25L) - Standards for Public Pools and Spas, sections 265.203(b) and 265.204(a), (c), & (e).

Water quality tests are not consistently performed and documented and the Aquatic Services Division does not have procedures to evaluate the pool sterilization reports on a daily basis during the operating season.

Recommendation I

We recommend the Director of PKR ensures:

- Water quality tests are performed and documented in accordance with the PKR 2015 Pool Manager Handbook
- The timeliness of corrective actions for identified water quality issues are consistently documented

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- Applicable daily checklist forms are revised to require the documentation of water clarity inspection results

Please see Appendix III for management's response to the recommendation.

Water Quality Tests to Measure Combined Chlorine Are Not Required

The Aquatic Services Division does not require water quality tests to measure the amount of combined chlorine (free chlorine and chloramines) at Bachman. While PKR considers combined chlorine levels at Bachman a low health risk and reports receiving no complaints, aquatic facilities users at the indoor pool may experience respiratory problems and the heating, ventilating, and air conditioning system (HVAC) is susceptible to deterioration if there is a buildup of chloramines in the air.

Although monitoring chloramine levels is not required by Federal, State, and City standards, Texas Administrative Code, Title 25 Subchapter M (TAC 25M) §265.306(c), *Public Interactive Water Features and Fountains*⁴, which regulates indoor public interactive water features (e.g., water sprays, waterfalls, etc.) could be used as a water quality test benchmark to ascertain if chloramine levels are acceptable and safe.

Recommendation II

We recommend the Director of PKR implements a monitoring process to measure the amount of combined chlorine (free chlorine and chloramines) at Bachman to ascertain if chloramine levels are acceptable and safe.

Please see Appendix III for management's response to the recommendation.

⁴ TAC 25M §265.306(c) requires combined chlorine at indoor public interactive water features and fountains not to exceed 0.5 ppm.

Unannounced Lifeguard Performance Audits Are Not Consistently Performed and Documented Properly

The Aquatic Services Division does not consistently perform and properly document the unannounced lifeguard performance audits (lifeguard audits) for the community pools and Bachman. The lifeguard audits are performed to assess a lifeguard's training to properly respond to a pool emergency. As a result, the health and safety of aquatic facilities users may be at risk if lifeguard audits: (1) are not conducted more than once per season if the audit results are unsatisfactory; (2) do not reflect a lifeguard's overall performance rating (e.g., pass, fail, etc.); (3) do not result in additional training for identified lifeguard performance weaknesses; and, (4) are not complete.

An analysis of the lifeguard audits completed for all 17 community pools showed:

- Three of 17, or 18 percent, of community pools had more than one lifeguard audit performed during the 2015 summer season (ten weeks)
- Lifeguard audit report forms were not always in compliance with American Red Cross (ARC) lifeguard evaluation rating standards⁵
- Ten of 14, or 71 percent, of judgmentally sampled lifeguard audits did not have documented corrective actions for items noted as unsatisfactory
- One of 14, or seven percent, of judgmentally sampled lifeguard audits reviewed was partially completed

State Standards

Pool facilities are required to provide alertness/response drills and other training, including documentation of performance audits as recommended by the American Red Cross (ARC) or Young Men's Christian Association (YMCA), or equivalent aquatic safety organization.

Source: TAC 25L §265.199(g)(6)(C)

Department Policies

Unannounced facility audits will be conducted throughout the season.

Source: Aquatic Services Division's 2015 Pool Manager Handbook

In addition, lifeguard audits at Bachman were not performed during the testing period (October 1, 2014 through September 30, 2015).

The PKR's: (1) policies and procedures do not specify the frequency of lifeguard audits or that the audit checklists meet ARC standards; and, (2) internal controls

⁵ Aquatic Services Division uses the ARC's Aquatic Examiner Service Client Get Started Guide (AES) to comply with TAC 25L §265.199(g)(6)(C). The AES requires that each activity being evaluated receive a rating (e.g., satisfactory, unsatisfactory). In addition, a skills evaluation summary rating is required for each lifeguard evaluated (e.g., pass, pass with remediation, fail).

are not present to monitor that lifeguard audits are completed and properly documented.

Recommendation III

We recommend the Director of PKR ensures:

- Lifeguard audits at each community pool are completed more than once per season if audit results are unsatisfactory
- Lifeguard audits at Bachman are completed on a quarterly basis, at a minimum, or more frequently if results are unsatisfactory
- Lifeguard audits documentation is fully completed
- The lifeguard audit form includes a final summary evaluation rating (e.g., pass, fail, pass with remediation)
- Actions taken for audit activities that were not rated as satisfactory are documented on the lifeguard audit report

Please see Appendix III for management's response to the recommendation.

Daily Health and Safety Inspection Procedures Do Not Ensure Compliance with City Code or that Identified Repairs and Maintenance Issues Are Addressed

The Aquatic Services Division's daily health and safety inspection procedures do not ensure compliance with City Code and that identified repairs and maintenance issues are addressed. The aquatic facilities users' health and safety may be at risk if aquatic facilities do not comply with City Code health and safety standards and inspection procedures.

Auditors performed on-site observations at eight community pools and Bahama Beach Waterpark on August 14, 2015 and at Bachman on December 3, 2015. The auditors compared the on-site observation results to City Code Compliance inspections for the same aquatic facilities. The following issues were noted at two of ten, or 20 percent, of aquatic facilities inspected:

- An emergency shut off switch for the spa was not present at Bachman; this issue was also noted on a City Code Compliance inspection report completed on January 12, 2015
- The shepherd's crook pole used for water rescue was missing at Bachman and was damaged at the Tommie Allen community pool; these issues were also noted on City Code Compliance inspection reports completed on January 12, 2015 and August 10, 2015, respectively

According to the Aquatic Services Division, these issues were not remediated because the Aquatic Services Division personnel thought having lifeguards on duty mitigated the risks.

Auditors also noted:

- 1) Damage to the pool deck, such as chips and cracks, were present at Bachman
- 2) The water fountain and the pool pump/chemical storage area were not clean
- 3) The pool depth markings were not visible at Bahama Beach Waterpark

Issues one and two above were also noted on City Code Compliance inspection reports completed on January 12, 2015 and July 1, 2015, respectively.

The PKR's internal controls did not ensure compliance with City Code health and safety standards and identified repairs and maintenance issues were addressed.

Recommendation IV

We recommend the Director of PKR:

- Verifies issues noted above have been remediated
- Develops and implements internal controls to ensure compliance with City Code Compliance inspections

Please see Appendix III for management's response to the recommendation.

Lifeguard In-Service Training Is Not Consistently Performed on a Weekly Basis and Training Is Not Properly Documented and Retained

The Aquatic Services Division does not consistently perform lifeguard in-service training on a weekly basis, and training is not properly documented and retained. As a result, the Aquatic Services Division does not comply with State Standards.

An analysis of the weekly in-service training logs showed:

- Ninety-seven of 170, or 57 percent, of weekly in-service training logs were not on file for community pools in operation during the 2015 summer season⁶. In addition, all of the in-service training logs did not include the time spent for training, and two of 73, or three percent, were not dated

State Standards

Pool facilities are required to provide alertness/response drills and other training, including documentation of a continual "in-service" training program for all lifeguards and other aquatic personnel totaling a minimum 60 minutes per week.

Source: TAC 25L §265.199(g)(6)(B)

- Bachman (open year round) – Monthly in-service trainings were performed instead of weekly in-service trainings. In addition, 17 of 20, or 85 percent, of the lifeguards had at least one month where in-service training attendance was not documented and kept on file
- Bahama Beach Waterpark (open 68 days during the 13 week season) – Weekly in-service training documentation for all 38 lifeguards was not consistently documented and/or kept on file. Exceptions noted for missing in-service training documentation ranged from four to 13 weeks.

The Aquatic Services Division assumed that conducting a four-hour monthly in-service training would comply with TAC 25L §265.199(g)(6)(B). The Aquatic Services Division also stated that monthly in-service training is an industry practice and other large Texas cities also conduct four-hour monthly in-service training as it is difficult to coordinate staff schedules for weekly in-service trainings.

The PKR procedures did not ensure all the lifeguards attended required in-service training or that attendance was properly documented and kept on file. According to Aquatic Services Division, some files were lost due to flooding in June 2015 at Bahama Beach Waterpark.

⁶ Seventeen community pools were in operation for 10 weeks (17 x 10 = 170).

Recommendation V

We recommend the Director of PKR ensures weekly lifeguard in-service training of at least 60 minutes in duration is completed, training attendance is properly documented (e.g., date, signatures, training description, duration, etc.), and retained.

Please see Appendix III for management's response to the recommendation.

Certifications for Water Safety Instructors Are Not Consistently Retained

The Aquatic Services Division does not consistently retain the ARC certifications of Water Safety Instructors. There is a potential liability risk to the City if Water Safety Instructors are not properly certified and a copy of the certifications are not kept on file. Eight of 22, or 36 percent, of Water Safety Instructor certifications reviewed at six community pools and at Bachman were not retained.

Department Policies

All Water Safety Instructors are required to be certified by the ARC.

Source: Aquatic Services Division
Summer 2015 Hiring Procedures

The PKR procedures were not adequate to ensure the Water Safety Instructors' certifications are retained.

Recommendation VI

We recommend the Director of PKR ensures procedures are developed to retain Water Safety Instructors' certifications.

Please see Appendix III for management's response to the recommendation.

Orientation Documentation for New Lifeguards and Pool Managers Are Not Consistently Completed Properly and Retained

The Aquatic Services Division does not consistently complete and retain the orientation documentation for new lifeguards and pool managers. Consequently, the City may not be compliant with TAC 25L §265.199(g) (5) *Lifeguard personnel standards at post-10/01/99 and pre-10/01/99 pools*. If documentation to support all applicable employees attended orientation is not kept on file, the City's liability risk may increase. In addition, aquatic facilities users' health and safety may be at risk if lifeguards do not attend orientation.

State Standards

All lifeguards and second responders are required to receive training in the application of effective pool emergency procedures for events, such as submersions, suspected spinal injury, medical emergencies, missing persons, bad weather, etc. Such training will be reviewed as necessary and kept current.

Source: TAC 25L §265.199(g)(5)

Department Policies

All staff are required to attend a mandatory orientation.

Source: Aquatic Services Division 2015 Staff Manual

Auditors reviewed various orientation documentation for lifeguards and pool managers by type of aquatic facility to determine: (1) the lifeguards and managers attended orientation, as evidenced by appropriate documentation; and, (2) the documentation was retained. The following exceptions were noted:

- Eight of 90, or nine percent, of the new lifeguards and pool managers attending orientation did not sign the attendance sign-in sheets (at 17 community pools)
- Seven of 38, or 18 percent, of orientation attendance documents for new lifeguards at Bahama Beach Water Park were not retained
- The Aquatic Services Division did not retain the orientation checklist for one of 14, or seven percent, of the new lifeguards attending orientation at Bachman

The PKR procedures do not ensure that orientation attendance documentation for all lifeguards and pool managers are properly completed and retained.

Recommendation VII

We recommend the Director of PKR ensures procedures are implemented to properly complete and retain orientation documentation for all new lifeguards and pool managers.

Please see Attachment III for management's response to the recommendation.

Daily Inspections of the Automated External Defibrillators Are Not Consistently Documented and Pool Lift Inspections Are Not Documented

The Aquatic Services Division does not consistently document the daily inspection results of the automated external defibrillators (AED). In addition, the daily inspection results for the pool lifts⁷ are not documented. There is a health risk if the AEDs are not inspected on a daily basis to ensure proper working order. Disabled aquatic facilities users might not be able to safely access the pool if inspections of the pool lifts are not completed and documented on a daily basis. The Aquatic Services Division cannot determine if daily AEDs and pool lift daily inspections are performed if the inspections are not documented.

Five of 17, or 29 percent, of community pools reviewed did not document the daily inspection results of the AEDs during the FY 2015 operating season. In addition, the daily pool lift inspection results were not documented at all 17 community pools and Bachman.

The PKR procedures did not ensure that the AED inspections were completed and documented on a daily basis. In addition, the pool lift daily inspection results were not required to be documented.

Recommendation VIII

We recommend the Director of PKR ensures procedures are implemented to:

- Complete and document AED daily inspections
- Revise checklists to include daily pool lift inspection results

Please see Appendix III for management’s response to the recommendation.

⁷ A pool lift is used to assist disabled aquatic facilities users to safely enter and exit the pool as required by the Americans with Disabilities Act (ADA).

<p style="text-align: center;">Department Policies</p> <p>The automated external defibrillators (AED) and lift check inspections should be performed on a daily basis.</p> <p>Source: Aquatic 2015 Pool Manager Handbook</p> <p style="text-align: center;">City Policies</p> <p>Department Directors are required to:</p> <ul style="list-style-type: none">• Implement control activities through written policies and procedures that include documenting the internal controls• Create a process to regularly assess the effectiveness of internal control by comparing actual results to expectations. Document the decision making process used to determine the scope, materiality, and testing results. <p>Source: Administrative Directive 4-09 (AD 4-09) <i>Internal Controls</i> section 5.1.3.3 and 5.1.5.</p>

Daily Inspection Results for Pool Drain Covers and Grates Are Not Documented and Retained

The Aquatic Services Division does not document and retain the daily inspection results of the pool drain covers and grates for the community pools and at Bachman. Aquatic facilities users' safety may be at risk if daily inspections of pool drain covers and grates are not performed and timely corrective actions are not taken. The Aquatic Services Division cannot determine if daily inspections are performed if inspections are not documented.

State Standards

If the owner or operator of a pool or spa knows or should have known in the exercise of ordinary care that a cover or grate of a suction outlet (including a vacuum outlet) is missing, broken, or loose, the pool or spa must be closed immediately and the pump(s) must be shut off. The pool or spa must remain closed until a proper repair or replacement has been accomplished. The pool or spa shall not be opened unless all covers or grates are securely installed.

Source: TAC 25L §265.190(b)

The PKR procedures for community pools and Bachman do not require documentation and retention of daily inspection results of pool drain covers and grates.

Recommendation IX

We recommend the Director of PKR ensures procedures are implemented to document and retain daily inspection results of pool drain covers and grates.

Please see Appendix III for management's response to the recommendation.

Pollution Prevention Daily Checklists Are Not Consistently Completed Properly

The Aquatic Services Division does not consistently complete the Pollution Prevention Daily Checklist (PPDC)⁸ properly. Specifically, actions taken in response to various environmental issues noted were not documented on the PPDC. As a result, Aquatic Services Division's management cannot determine if the appropriate actions were taken for environmental issues noted.

Department Policies

The Pollution Prevention Daily Checklist (PPDC) is required to be completed daily and kept on file. The PPDC form states that the action taken for any issues noted be documented.

Source: Aquatic Services Division's 2015 Pool Manager Handbook

Twenty-two of 27, or 81 percent, of issues noted on the PPDCs did not have documentation of the corrective action taken. The PPDCs were completed during the 2015 summer season at 17 community pools.

The PKR procedures did not include monitoring to determine whether the PPDCs were completed in compliance with PKR procedures. According to the Aquatic Services Division, the PPDC forms were designed by the PKR Environmental Division and certain questions are ambiguous resulting in incorrect responses.

Recommendation X

We recommend the Director of PKR ensures monitoring procedures are implemented to properly document on the PPDC the actions taken in response to environmental issues noted.

Please see Appendix III for management's response to the recommendation.

⁸ The PPDCs verify the following environmental items: storage; vehicles and equipment; and, runoff to reduce risks to public health and environment.

SECTION II – Facility Services Division Internal Controls

Daily Inspection Procedures for Aquatic Facilities Are Not Consistently Performed, Documented, or Retained

The Facility Services Division does not consistently comply with the daily inspection requirements (during the operating season) for aquatic facilities, including performing daily inspections and properly completing the appropriate inspection report form (see textbox). As a result, aquatic facilities users' health and safety risks may increase if aquatic facilities are not properly inspected on a daily basis.

A judgmental sample of ten PKR Sprayground Weekly Inspection Reports (totaling 70 daily inspection results) for ten spraygrounds and Daily Pool Reports (totaling 35 daily inspection results) for five community pools showed:

Department Policies

All aquatic facilities are required to be inspected on a daily basis and inspection results properly documented and filed.

Source: Facility Services Division

City Policies

Department Directors are required to:

- Implement control activities through written policies and procedures that include documenting the internal controls
- Create a process to regularly assess the effectiveness of internal control by comparing actual results to expectations. Document the decision making process used to determine the scope, materiality, and testing results.

Source: Administrative Directive 4-09 (AD 4-09), *Internal Controls*, section 5.1.3.3 and 5.1.5.

- Nine of 70 daily sprayground inspection results, or 13 percent, did not have the results of the daily inspections on file. These issues were noted for two of ten spraygrounds.
- Fourteen of 70 daily sprayground⁹ inspection results, or 20 percent, were documented on the Daily Pool Report form instead of the Sprayground Weekly Inspection Report form. These issues were noted for six of ten spraygrounds. In addition, three inspection reports for two community pools were only partially completed.
- The Sprayground Weekly Inspection Reports were not signed by the Facility Services Division's Pool Supervisor

⁹ Spraygrounds are not staffed by City employees so they require additional health and safety inspection steps which are not applicable to community pools.

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- Five of 35 daily community pool inspection results, or 14 percent, did not have the results of the daily inspections on file. These issues were noted for two of five community pools
- Issues (vacuuming and brushing the pool walls) at a community pool were not resolved timely as the same issues were identified from June 22, 2015 through June 26, 2015
- The Daily Pool Report form does not include a line item to document the inspection results of pool drain covers and grates; condition of the pump flow meters; and, pressure and vacuum gauges

The PKR daily inspection requirements are not documented in PKR procedures and the Facility Services Division's daily inspections were inconsistent.

Recommendation XI

We recommend the Director of PKR:

- Requires the daily inspection processes for aquatic facilities during the operating season are documented in PKR procedures and Facility Services Division receive the associated training
- Ensures inspections of aquatic facilities are performed on a daily basis during the operating season; inspection results are documented on the appropriate form and retained; and, applicable forms (for the spraygrounds) are reviewed and includes the appropriate supervisor signature
- Requires the Daily Pool Report forms are revised to include the inspection results of pool covers and grates; condition of the pump flow meters; and pressure and vacuum gauges

Please see Appendix III for management's response to the recommendation.

Life Expectancy of Pool Drain Covers and Grates Are Not Identified, Documented, and Monitored to Ensure Timely Replacement

The Facility Services Division does not identify and document the life expectancy of pool drain covers and grates in order to monitor and ensure they are replaced timely. The aquatic facilities users' safety may be at risk if pool drain covers and grates are not replaced after the end of the expected useful lives, and the City may not be in compliance with the Virginia Graeme Baker Pool and Spa Safety Act (VGBA)¹⁰.

Federal Standards

Fitting components shall be marked "Life: X Years" where the manufacturer indicates the appropriate installed life in years. Individual components may be marked with unique life spans.

As an alternate to marking field fabricated outlets, the owner of the facility where these fittings will be installed shall be advised in writing by the Registered Design Professional the information called for in paragraphs. 7.1.1(b)(1) through (8).

Source: American Society of Mechanical Engineers (ASME) A112.19.8-2007 §7.1.1(b)(5) and 7.1.2

The PKR procedures did not require the identification and documentation of the life expectancy of pool drain covers and grates. Daily and annual inspections of the pool drain covers and grates performed by PKR only required inspection of pool drain covers and grates for structural deficiencies. In addition, PKR did not require the retention of American Society of Mechanical Engineers (ASME) A112.19.8-2007 certification information (including life expectancy) if the markings were not present (see textbox).

Recommendation XII

We recommend the Director of PKR ensures procedures are developed to:

- Monitors the life expectancy of all pool drain covers and grates
- Replaces pool drain covers and grates timely
- Obtains and/or retain ASME A112.19.8-2007 certification information if the information is not already marked on the pool drain cover or grate

Please see Appendix III for management's response to the recommendation.

¹⁰ The Virginia Graeme Baker Pool and Spa Safety Act (VGBA), Title XIV – Pool and Spa Safety, Sec. 1404. Federal swimming pool and spa drain cover standard (15 U.S.C. 8003) consists of safety requirements to reduce the number of pool drownings and near drownings. The regulation requires that drain covers conform to the entrapment protection standards of ASME/ANSI A112.19.8 performance standards effective 1 year after December 19, 2007.

Completed Pool Maintenance Concerns Forms Are Not Retained and Inspection Results for Pool Drain Covers and Grates Are Not Documented

The Facility Services Division does not retain the completed Pool Maintenance Concerns forms. In addition, the Pool Maintenance Concerns forms did not include a line item that requires the inspection of pool drain covers and grates for compliance with VGBA standards. As a result, the City may not be in compliance with VGBA safety standards.

The Facility Services Division was not able to demonstrate:

- Timely performance of maintenance inspections of aquatic facilities prior to and after the 2015 summer season
- Supervisory review of the forms was performed to ensure that maintenance issues noted were resolved in a timely manner

City Policies

Department Directors are required to:

- Implement control activities through written policies and procedures that include documenting the internal controls
- Create a process to regularly assess the effectiveness of internal control by comparing actual results to expectations. Document the decision making process used to determine the scope, materiality, and testing results.

Source: AD 4-09 *Internal Controls* section 5.1.3.3 and 5.1.5.

The PKR procedures did not require that the completed Pool Maintenance Concerns forms were retained or that VGBA compliance inspection results were documented on the form.

Recommendation XIII

We recommend the Director of PKR:

- Requires that the Pool Maintenance Concerns forms are revised to include a line item for documenting VGBA inspection results of the pool drain covers and grates
- Ensures that the completed forms are retained and evidence of supervisory review are documented in the form of signatures and dates to ensure that maintenance issues are resolved in a timely manner

Please see Appendix III for management's response to the recommendation.

A Closed Community Pool Is Not Adequately Monitored to Ensure Compliance with State Standards

The Facility Services Division does not adequately monitor a community pool that has been closed since FY 2010¹¹ to ensure compliance with State standards (see textbox). As a result, the public's health and safety: (1) may be at risk if the City is not monitoring to ensure compliance with State standards; and, (2) may also create liability for the City due to illegal and/or criminal activity that may occur at the pool site.

Auditors performed a December 9, 2015 on-site inspection and noted the following:

- Standing water was present in the pool; this is conducive to mosquito breeding which poses a health risk to the public in general
- The pool site may be subject to unauthorized access by the public even though it is secured by a fence and locked gates

State Standards

When a pool or spa is not in use after seasonal operation, while under construction or renovation, or for any other reason, the facility shall not be allowed to give off objectionable odors, become a breeding site for insects, or create any other nuisance situation or safety hazard.

Pool enclosures should have:

- A minimum effective perpendicular height of at least six feet as measured from the ground surface on the outside of the fence
- No openings in the enclosure through or under which a 4-inch diameter sphere can pass
- Be designed and constructed so that it cannot be readily climbed
- All doors, gates, and windows in the enclosure directly and continuously supervised by staff at the pool during hours of operation, or locked to prevent unauthorized entry

Source: Texas Administrative Code, Title 25 Subchapter L (TAC 25L) §265.200(a)(3) and §265.203(e)

According to the Facility Services Division, due to limited personnel resources, the pool is only inspected after a storm to detect for standing water.

Recommendation XIV

We recommend the Director of PKR ensures that a closed community pool be adequately monitored to ensure compliance with State standards.

Please see Appendix III for management's response to the recommendation.

¹¹ The PKR management has not determined if the pool should re-open or if it should be permanently taken out of commission.

Appendix I

Background, Objective, Scope and Methodology

Background

The first pool built for the City of Dallas (City) was in 1921 at Lake Cliff Park. By 1980, the City operated over 80 pools which were mostly small neighborhood wading pools. Between 1980 and 1990, pool attendance dropped from 310,000 to 141,000. Pool operational funding was decreased, resulting in pool closings and shorter pool seasons. All wading pools were closed in 2000 due to low attendance and new State of Texas (State) health safety codes.

During Fiscal Year (FY) 2015, the City had 17 community pools, Bachman Indoor Pool (Bachman), Bahama Beach Waterpark, and 11 spraygrounds (aquatic facilities) in operation, and one community pool that was out of service. The Aquatic Services Division of the Department of Park and Recreation (PKR) operated all of the aquatic facilities except for the spraygrounds. The Aquatic Services Division's FY 2015 Adopted Budget included total expenditures of \$3,090,380 and total revenue of \$829,650. The PKR's Facility Services Division operates and maintains the spraygrounds as well as performs the maintenance of all the community pools and Bachman.

Community Pools

The 17 community pools in operation during FY 2015 were built between 1947 and 1975. Some of the aquatic programs offered at these community pools include water exercise, open swim, swim team, swim lessons, swim meets, pool rentals, junior lifeguarding, kayaking courses, and safety courses. Community pools employ approximately 120 teens and young adults across the City. The Aquatic Services Division also provides educational programs for over 11,000 youth throughout the school year as well as scholarship swim lessons. Lifeguards and Water Safety Instructors at community pools are required to complete the American Red Cross (ARC) training and obtain certification. Community pools were open for ten weeks during FY 2015.

Bachman Indoor Pool

Bachman, built in 1980 and renovated in 2008, offers year round aquatic programming, such as water exercise classes, swim lessons, therapeutic and special needs programs, lap swimming, and pool rental packages. Lifeguards and Water Safety Instructors at Bachman are required to complete the ARCs training

and obtain certification. Bachman is also the home of the Dallas Special Olympics Swim Team.

Bahama Beach Waterpark

Bahama Beach Waterpark opened in 2005, and the six-acre waterpark features a 1,000 foot-long lazy river, an interactive water playground, three flume slides, a 45 foot-high tower with two enclosed tube slides, a 300 foot-long mat racing slide, a group pavilion with seating for 500, a full service concession stand, retail shop, lockers, and restrooms. Lifeguards are required to be trained and certified by Jeff Ellis & Associates, Inc., a third party vendor that specializes in addressing aquatic health and safety risks at waterparks. Bahama Beach Waterpark was open for 68 days during FY 2015 and employed 95 seasonal staff.

Spraygrounds

The 11 spraygrounds in operation during FY 2015 were opened between 2001 and 2015. A sprayground is a type of playground where water shoots up out of the ground, streams from pipes and spouts, bubbles up from the ground, or falls from waterfalls. The water is no deeper than a puddle so spraygrounds are not staffed. The spraygrounds were open from Memorial Day weekend through Labor Day, seven days a week, and open on weekends only from Labor Day through September 27. The spraygrounds are free to the public and are generally located next to a City recreation center.

The PKR is responsible for ensuring that all aquatic facilities comply with the following Federal, State, and City regulatory standards:

- The Virginia Graeme Baker Pool and Spa Safety Act (VGBA), Title XIV – *Pool and Safety Act, Sec. 1404* consists of safety standards to reduce the number of childhood pool drownings and near drownings
- Texas Health and Safety Code, Title 5, Subtitle A, Chapter 341 *Minimum Standards of Sanitation and Health Protection Measures*, Subchapter D:
 - Sec. 341.064 *Swimming Pools and Bathhouses* – Provides standards for water quality and facility amenities
 - Sec. 341.0645 *Pool Safety* – Safety standards must meet VGBA standards
 - Sec. 341.0695 *Interactive Water Features & Fountains* – Provides health and safety standards for spraygrounds

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- Texas Administrative Code, Title 25, Chapter 265, Subchapter L *Standards for Public Pools and Spas* – Provides specific health, safety, and maintenance standards
- Texas Administrative Code, Title 25, Chapter 265, Subchapter M *Public Interactive Water Features and Fountains* – Provides specific health, safety, and maintenance standards for spraygrounds
- The Dallas City Code CHAPTER 43A *Swimming Pools* – Provides specific health, safety, and maintenance standards for pools and spas

Objective, Scope and Methodology

This audit was conducted under authority of the City Charter, Chapter IX, Section 3 and in accordance with the Fiscal Year 2015 Audit Plan approved by the City Council. The audit objective was to determine whether PKR had effective internal controls to identify and ensure compliance with regulatory, safety, and maintenance requirements. The audit scope included the Aquatic Services Division's and the Facility Services Division's operations during FY 2015; however, certain other matters, procedures, and transactions outside that period were reviewed to understand and verify information during the audit period. This performance audit was conducted 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

To achieve the audit objective, we performed the following procedures:

- Interviewed PKR personnel
- Reviewed PKR policies and procedures; the Texas Health and Safety Code Title 5, Chapter 341, *Minimum Standards of Sanitation and Health Protection Measures*; the Texas Administrative Code Title 25, Chapter 265 Subchapters L and M; the Virginia Graeme Baker Pool and Spa Safety Act; the City Code Chapter 43A, *Swimming Pools*, and Administrative Directive (AD) 4-09, *Internal Control*
- Tested judgmental samples of checklists and inspection reports
- Performed various analyses

Appendix II

Major Contributors to This Report

Norman Blaiotta, CIA, CFE – Auditor

Richard Siu, CIA – Project Manager

Carol A. Smith, CPA, CIA, CFE, CFF – First Assistant City Auditor

Theresa A. Hampden, CPA – Quality Control Manager

Management's Response

Memorandum

RECEIVED

JUN 16 2016

City Auditor's
Office



CITY OF DALLAS

DATE: June 15, 2016

TO: Craig D. Kinton, City Auditor

SUBJECT: Response to Audit Report:
Audit of the Department of Park and Recreation Internal Controls over Regulatory,
Safety, and Maintenance – Aquatic Facilities

The Park and Recreation Department is committed to safe operation of aquatic facilities in accordance with all state and local standards. To that end, PKR requested this audit to test processes and improve operations. In some instances, internal procedures exceed state standards. PKR has already begun to implement the agreed upon recommendations in this report and will be testing them throughout the remainder of the 2016 season. Due to lack of computer connectivity and full-time staff presence at community pools, PKR is actively investing in and implementing significant technology upgrades that will improve efficiency, oversight and effectiveness of reporting. All agreed-upon recommendations will be tested and fully implemented by 9/30/17.

Our responses to the audit report recommendations are as follows:

Recommendation I

We recommend the Director of PKR ensures:

- Water quality tests are performed and documented in accordance with the PKR 2015 Pool Manager Handbook
- The timeliness of corrective actions for identified water quality issues are consistently documented
- Applicable daily checklist forms are revised to require the documentation of water clarity inspection results

Management Response / Corrective Action Plan

Agree Disagree

PKR will continue to conduct water quality tests in accordance with state standards and PKR will amend written department procedures to reflect the state standard for pools with automated control systems of once per day water quality testing. However, PKR will

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continue to maintain the long-established practice of testing water quality more frequently (up to every 2 hours).

PKR will revise forms to include corrective actions for water quality issues and daily water clarity inspections.

Implementation Date

The recommendations will be fully implemented by 9/30/17

Responsible Manager

Aquatics Manager

Recommendation II

We recommend the Director of PKR implements a monitoring process to measure the amount of combined chlorine (free chlorine and chloramines) at Bachman to ascertain if chloramine levels are acceptable and safe.

Management Response / Corrective Action Plan

Agree Disagree

The requirement to monitor combined chlorine applies only to public interactive water features and fountains and therefor is not a requirement for the operation of Bachman Pool. However, PKR concurs with the recommendation to implement combined chlorine testing and will add this to the other existing periodic water chemistry tests that are currently being conducted but not required by state standards.

Implementation Date

The recommendations will be fully implemented by 1/30/17.

Responsible Manager

Aquatics Manager

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Recommendation III

We recommend the Director of PKR ensures:

- Lifeguard audits at each community pool are completed more than once per season if the audit results are unsatisfactory
- Lifeguard audits at Bachman are completed on a quarterly basis, at a minimum, or more frequently if results are unsatisfactory
- Lifeguard audits documentation is fully completed
- The lifeguard audit form includes a final summary evaluation rating (e.g., pass, fail, pass with remediation)
- Actions taken for audit activities that were not rated as satisfactory are documented on the lifeguard audit report

Management Response / Corrective Action Plan

Agree Disagree

PKR will develop a schedule of audit frequency for all aquatic facilities, including community pools and Bachman pool and will modify lifeguard audit forms to include summary evaluations and documentation of any necessary remediation of each activity being evaluated.

Implementation Date

The recommendations will be fully implemented by 9/30/17.

Responsible Manager

Aquatics Manager

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Recommendation IV

We recommend the Director of PKR:

- Verifies issues noted above have been remediated
- Develops and implements internal controls to ensure compliance with City Code Compliance inspections

Management Response / Corrective Action Plan

Agree Disagree

All issues noted in the report with the exception of the chips and cracks in the Bachman Pool deck have already been fully remediated. To address the Bachman Pool issue, PKR will remove the rubberized flooring in the areas that exhibit chips and cracks. In addition, PKR will implement a process to ensure all code issues are addressed.

Implementation Date

The recommendations will be fully implemented by 1/31/17

Responsible Manager

Facility Services Manager

Recommendation V

We recommend the Director of PKR ensures weekly lifeguard in-service training of at least 60 minutes in duration is completed, training attendance is properly documented (e.g., date, signatures, training description, duration, etc.), and retained.

Management Response / Corrective Action Plan

Agree Disagree

PKR is dedicated to ensuring its aquatic staff are well-trained and prepared to respond in the event of an emergency. Operating 19 locations with varying schedules seven days a week with up to 200 staff at the height of the season, makes achieving 100% attendance at weekly in-service trainings a challenge. Recognizing this challenge, PKR conducts monthly four-hour in-service trainings in addition to the weekly 60 minute in-service trainings, giving staff up to eight hours of in-service training per month (four hours more than the state standard requires). PKR will continue to offer 60 minutes of weekly in-service training and will document and retain records.

PKR will also advocate for the adoption of the Centers for Disease Control's, *Model Aquatic Health Code* by the State of Texas, which offers agencies more flexibility in scheduling in-service trainings to accommodate operational challenges.

Implementation Date

The recommendations will be fully implemented by 9/30/17.

Responsible Manager

Aquatics Manager

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Recommendation VI

We recommend the Director of PKR ensures procedures are developed to retain Water Safety Instructors' certifications.

Management Response / Corrective Action Plan

Agree Disagree

PKR will develop procedures to ensure Water Safety Instructor Certifications are retained in a central file and will assist staff with the renewal process to ensure certifications do not lapse.

Implementation Date

The recommendation will be fully implemented by 9/30/17

Responsible Manager

Aquatics Manager

Recommendation VII

We recommend the Director of PKR ensures procedures are implemented to properly complete and retain orientation documentation for all new lifeguards and pool managers.

Management Response / Corrective Action Plan

Agree Disagree

Procedures will be developed to ensure that documentation of orientation training, including any make-up orientation trainings, for all staff is complete. In addition to traditional sign-in sheets, individual orientation acknowledgement forms will be retained in employee files.

Implementation Date

The recommendation will be fully implemented by 9/30/17.

Responsible Manager

Aquatics Manager

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Recommendation VIII

We recommend the Director of PKR ensures procedures are implemented to:

- Complete and document AED daily inspections
- Revise checklists to include daily pool lift inspection results

Management Response / Corrective Action Plan

Agree Disagree

PKR will continue to inspect AEDs and pool lifts as part of its routine activities and will add both items to the daily opening checklist.

Implementation Date

The recommendation will be fully implemented by 9/30/17.

Responsible Manager

Aquatics Manager

Recommendation IX

We recommend the Director of PKR ensures procedures are implemented to document and retain daily inspection results of pool drain covers and grates.

Management Response / Corrective Action Plan

Agree Disagree

PKR will continue to visually inspect pool drain covers and grates as part of its routine activities and will develop procedures to document the daily inspection of pool drain covers and grates.

Implementation Date

The recommendation will be fully implemented by 9/30/17.

Responsible Manager

Aquatics Manager/Facility Services Manager

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Recommendation X

We recommend the Director of PKR ensures staff are properly trained on the completion of the PPDC and ensures monitoring procedures are implemented to properly document on the PPDC the actions taken in response to any environmental issues noted.

Management Response / Corrective Action Plan

Agree Disagree

PKR will work with environmental management staff to clarify questions on the PPDC and ensure staff are trained to properly complete the forms in the future, including the documentation of response to any noted environmental issues in the event that one occurs.

Out of 14,280 individual potential checklist responses, there were 22 (0.15%) instances of staff incorrectly completing a section of the PPDC. There were no environmental incidents reported or found documented in a search of environmental division records.

Implementation Date

Not Applicable

Responsible Manager

Aquatics Manager/Environmental Division Manager

Recommendation XI

We recommend the Director of PKR:

- Requires the daily inspection processes for aquatic facilities during the operating season are documented in PKR procedures and Facility Services Division receive the associated training
- Ensures inspections of aquatic facilities are performed on a daily basis during the operating season; inspection results are documented on the appropriate form and retained; and, applicable forms (for the spraygrounds) are reviewed and includes the appropriate supervisor signature
- Requires the Daily Pool Report forms are revised to include the inspection results of pool covers and grates; condition of the pump flow meters; and pressure and vacuum gauges

Management Response / Corrective Action Plan

Agree Disagree

PKR will ensure the daily inspection processes for aquatic facilities during the operating season are documented and that forms are revised to include the inspection of pool

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grates and covers and the condition of flow meters, pressure and vacuum gauges. PKR will ensure inspections are performed, results documented on the appropriate form, and that forms are reviewed and retained.

Implementation Date

The recommendations will be fully implemented by 9/30/17.

Responsible Manager

Facility Services Manager

Recommendation XII

We recommend the Director of PKR ensures procedures are developed to:

- Monitor the life expectancy of all pool drain covers and grates
- Replace pool drain covers and grates timely
- Obtain and/or retain ASME A112.19.8-2007 certification information if the information is not already marked on the pool drain cover or grate

Management Response / Corrective Action Plan

Agree Disagree

PKR will ensure procedures are developed to monitor life expectancy of drain covers, will retain all drain cover documentation, and will replace covers as necessary.

Implementation Date

The recommendation will be fully implemented by 9/30/17.

Responsible Manager

Facility Services Manager

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Recommendation XIII

We recommend the Director of PKR:

- Requires that the Pool Maintenance Concerns forms are revised to include a line item for documenting VGBA inspection results of the pool drain covers and grates
- Ensures that the completed forms are retained and evidence of supervisory review are documented in the form of signatures and dates to ensure that maintenance issues are resolved in a timely manner

Management Response / Corrective Action Plan

Agree Disagree

PKR will ensure Pool Maintenance Concerns forms (off-season work plan) will be revised to include drain cover inspection and will be reviewed and retained.

Implementation Date

The recommendation will be fully implemented by 9/30/17.

Responsible Manager

Facility Services Manager

Recommendation XIV

We recommend the Director of PKR ensures that a closed community pool be adequately monitored to ensure compliance with State standards.

Management Response / Corrective Action Plan

Agree Disagree

PKR will ensure that a closed community pool be adequately monitored in accordance with state standards.

Implementation Date

The recommendation will be fully implemented by 9/30/17

Responsible Manager

Facility Services Manager

Sincerely,



Willis Winters, FAIA, FAAPRA, Director
Department of Park and Recreation

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