



Audit of City Park Maintenance and Safety

March 6, 2020

Mark S. Swann, City Auditor

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Executive Summary

Objective and Scope

The objective of the audit was to evaluate the processes the Dallas Park and Recreation Department uses to ensure City parks are maintained and safety risks are managed to defined standards.

The audit scope included management operations from October 1, 2016, through June 30, 2019.

What We Recommend

The Park Maintenance and Operations Division should strengthen the management and monitoring of park maintenance and playground safety by developing and/or revising procedures and increasing the Ranger Program staffing as described in this report.

Background

The Dallas Park and Recreation Department's Park Maintenance and Operations Division:

- Is responsible for maintenance, infrastructure improvements, and public safety for over 5,000 developed acres.
- Employs approximately 210 employees.
- Had a Fiscal Year 2019 budget of approximately \$31 million.

What We Found

The Park Maintenance and Operations Division does not:

- Establish a maintenance service level for each park.
- Monitor maintenance to defined standards.
- Follow its procedures as stated in Core Function, *Section 7: Playground Operations*.
- Have sufficient staffing levels for Park Rangers compared to peer cities.
- Provide a complete history of repairs and maintenance performed from its computerized maintenance management system.

Audit Results

As required by *City Council Resolution 88-3428*, departments will establish internal controls in accordance with the standards established by the Comptroller General of the United States pursuant to the *Federal Managers' Financial Integrity Act of 1982*. Administrative Directive 4-09, *Internal Control* prescribes the policy for the City to establish and maintain an internal control system. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

Observation A: Park Quality Level

The Park Maintenance and Operations Division has not assigned a maintenance service level for each park. As a result, there is an increased risk that each park will not receive the appropriate level of maintenance service.

The Park Maintenance and Operations Division uses a maintenance service schedule of weekly, bi-weekly, semiannual, and annual with general guidance of the type of park that should be scheduled for each category. Though general guidance is provided, there is not a specific service level assigned to each park.

The maintenance service level is the basis for allocating maintenance resources among all parks and evaluation of maintenance performed. A maintenance service level is based on the park's mission and vision including the park type, size, and usage and outlines the maintenance activities required to achieve the maintenance service level.

Criteria

- ❖ Association of Higher Education Facilities Officers, National Recreational and Park Association Professional Grounds Management Society, Operational Guidelines for Grounds Management, *Chapter 3: Grounds Staffing Guidelines*
- ❖ Standards for Internal Control in the Federal Government,(Green Book), *Principle 6.02 - Definitions of Objectives*

Assessed Risk Rating:

Moderate

We recommend the **Director of the Department of Park and Recreation:**

- A.1.** Assign a maintenance service level to each park.

Observation B: Monitoring Maintenance

The Park Maintenance and Operations Division's procedures do not sufficiently address how to monitor and ensure proper maintenance in the areas described below. As a result, there is an increased risk that park maintenance will be inadequate, incomplete, or not performed according to procedures.

Expected Maintenance

Of the 36 parks sampled and inspected, maintenance exceptions were identified at approximately 75 percent, or 27 parks.

Park Quality Control Inspections

Park Quality Control Inspections were not consistently performed in accordance with the Park Maintenance and Operations Division's procedures.

- A review of park quality control inspections performed in three two-month periods during the audit period indicated:
 - Only 46 percent of the required inspections were performed – (1,453 out of the 3,132 required inspections).
 - Unauthorized personnel (not supervisors, crew leaders, or managers) performed 32 percent (466) of the inspections.
 - Park Quality Control Inspection forms with pre-filled standardized wording in the *"Describe Action Needed"* and *"Comments"* sections were used on 15 percent (225) of the inspections and did not clearly indicate the follow-up actions needed. Also, these forms were used in only one of the six districts.
- Park Quality Inspection forms were not always in a central location or filed in a binder titled, *"Park Quality Control Inspections."*

Park Quality Control Inspection Form Rating Guidance/Condition Detail

The Park Quality Control Inspection form lacks rating guidance and condition detail to be inspected for each item. The Park Quality Control Inspection form only states a rating of "one" means the inspection item is in poor condition and a rating of "ten" means that the inspection item is in excellent condition. In addition, the Park Quality Control Inspection form does not state the acceptable condition that should be observed and rated for each item listed.

Monitoring of Litter Contracts

The Park Maintenance and Operations Division has a contract with two contractors for removal of litter. Of the 36 parks sampled and inspected, approximately 42 percent (15), had litter, including parks where the litter contractors reportedly left the park within a 30-minute window preceding the inspection (see [Exhibit 1](#) on page 4).

Exhibit 1:



Source: Office of the City Auditor

Criteria

- ❖ Park and Recreation Policy, *Park Quality Control Inspection*
- ❖ U. S. Consumer Product Safety Commission, Public Playground Safety Handbook, Appendix A, *Suggested General Maintenance Checklists*
- ❖ The National Association of State Auditors, Comptrollers and Treasurers, *Best Practices in Contracting for Services*
- ❖ Standards for Internal Control in the Federal Government,(Green Book), *Principle 10.03–Design of Appropriate Types of Control Activities*

Assessed Risk Rating:

Moderate

We recommend the **Director of the Department of Park and Recreation:**

- B.1.** Ensure that department procedures regarding park quality control inspections, as written, are followed.
- B.2.** Revise the Park Quality Control Inspection form to provide additional rating guidance and condition detail to inspect for each category.
- B.3.** Develop contract monitoring procedures to ensure that litter contractors meet the contract service requirements.

Observation C: Playground Safety

The Park Maintenance and Operations Division is not following its Core Function, Section 7: Playground Operations, subsection *Playground Operations*, 4.1.1 requirement that playground inspections are to follow the U.S. Consumer Product Safety Commission Handbook guidelines. As a result, there is an increased risk for playground injuries.

Subsection Playground Operations, *4. Function - Procedures* includes the following procedures that do not follow the U.S. Consumer Product Safety Commission Handbook guidelines:

- Instead of developing a comprehensive maintenance program for each playground, subsection 4.2 states that playground inspections are to be conducted monthly. The U.S. Consumer Product Safety Commission Handbook guidelines states, "*inspections alone do not constitute a program.*"
- Instead of establishing the frequency of inspection for each piece of equipment based on the type and age of equipment, the amount of use, and the local climate, subsection 4.2 states, "*Playground inspections are to be conducted monthly;*" and, subsection 4.6.2 explains, "*Audits should be conducted after installation of a new playground, new equipment, after major repairs or modifications [are] made, and when industry standards change.*" Subsection 4.6.2 does not define a major repair or modification.

Of the 36 parks sampled and inspected, approximately 44 percent (16), had instances of equipment damage and grounds maintenance issues such as: surface needs, litter, and graffiti.

In addition, service centers do not maintain folders for each playground that include: (1) pictures; (2) a drawing or sketch of the border with dimensions around the playground; (3) manufacturer information; (4) a copy of monthly playground inspections; (5) a copy of any playground audits; (6) a tracking sheet with dates and amount of fibar added to the playground; and, (7) a tracking sheet showing any repairs or replacements of playground parts.

Finally, there is no playground replacement schedule that includes the installation or recommended replacement date; and, there is no documentation of playground audits for each piece of playground equipment. The typical lifespan of playground equipment is around 15 to 20 years. Therefore, having no playground replacement schedule and/or failure to document the date new playground equipment is installed or replaced, reduces the level of dependability and suitability of the equipment.

Criteria

- ❖ U. S. Consumer Product Safety Commission's Public Playground Safety Handbook, section *4. Maintaining a Playground*
- ❖ Core Function Section 7: Playground Operations, subsection Playground Operations, *4. Function-Procedures*
- ❖ Standards for Internal Control in the Federal Government,(Green Book), *Principle 10.03 – Definitions of Appropriate Types of Control Activities*

Assessed Risk Rating:

Moderate

We recommend the **Director of the Department of Park and Recreation:**

- C.1.** Revise the appropriate subsections of Core Function, Section 7: Playground Operations, subsection Playground Operations, *4. Function-Procedures* to comply with the U. S. Consumer Product Safety Commission's Public Playground Safety Handbook, section *4. Maintaining a Playground*.
- C.2.** Ensure service centers maintain folders in compliance with Core Function, Section 7: Playground Operations, subsection Playground Operations, 4. Function-Procedures, *4.8. Inventory and Tracking, 4.8.1*.
- C.3.** Develop a playground replacement schedule that includes the installation date, recommended replacement date, and the results of playground audits for each piece of playground equipment.

Observation D: Park Ranger Staffing

The Park Maintenance and Operations Division’s current Ranger program staff level is lower than other comparable cities. As a result, there is an increased risk that the Park Ranger program is not meeting its objective.

Surveying the three other major State of Texas cities and four major cities outside of the State of Texas the following chart shows the low staff levels:

Exhibit 2:

Attribute Surveyed	City of Dallas	Cities Surveyed Low	Cities Surveyed High
Number of Full Time Employees	8	11	49
Parks Services by Park Rangers	397	36	380
Park and Recreation Acres	23,464	800	39,501
Average Number of Parks Assigned to One Park Ranger	50	2	29
Average Number of Acres Assigned to One Park Ranger	2,933	44	1905
Park Ranger Budget	\$641,268	\$152,944	\$8,300,000

Source: Office of the City Auditor – Survey Responses

The Dallas Park and Recreation Department has budgeted to increase the Park Ranger staff by eleven over the next three fiscal years. This increase will bring the City more in line with the cities surveyed.

Criteria

- ❖ Standards for Internal Control in the Federal Government by the Comptroller General of the United States (Green Book), *Principle 10.10 – Design of Control Activities at Various Levels*

Assessed Risk Rating:

Low

We recommend the **Director of the Department of Park and Recreation:**

- D.1.** Enact the plan to increase Park Ranger staffing levels by eleven over the next three fiscal years.

Observation E: Maintenance Management System

Micro-main, the computerized maintenance management system does not provide a complete history of repairs and maintenance performed. As a result, there is an increased risk that repair and maintenance issues are not properly addressed.

Specifically,

- Playground crews often make repairs to playgrounds without generating an on-demand work order.
- Maintenance Inspection Checklist findings are not entered on the original routine work order and tracked to any resulting on-demand work order.

Criteria

- ❖ Standards for Internal Control in the Federal Government by the Comptroller General of the United States (Green Book), *Principle 11.03 – Design of the Entity's Information System*

Assessed Risk Rating:

Low

We recommend the **Director of the Department of Park and Recreation:**

- E.1.** Develop procedures to ensure all repairs and maintenance work is recorded in the Micro-main system; and, when appropriate, link the original work order.

Appendix A: Background and Methodology

Background

The Dallas Park and Recreation Department's Park Maintenance and Operations Division: (1) is responsible for maintenance, infrastructure improvements, and public safety for over 5,000 developed acres from the Dallas Park and Recreation Department's 23,464 acres; (2) employs approximately 210 employees; and, (3) had a Fiscal Year 2019 budget of approximately \$31 million.

Park Maintenance

The Park Maintenance and Operations Division has six park districts each with a service center that houses various maintenance crews and equipment. Maintenance crews are assigned to one of the following maintenance category responsibilities:

- Amenities – park benches, picnic tables.
- Playgrounds – repair, needles, bottles, glass.
- Athletics – bleachers, fences, field mowing, benches.
- Pesticides – trees, shrubs.
- Irrigation – water related issues.
- Strike team - mowing, weed eating, edging, hedge trimming, and small tree trimming.

Micro-main, a computerized maintenance management system is used for managing work orders and workforce, and preventative maintenance scheduling.

Park Safety

Eight Park Rangers monitor parks, trails, and recreation facilities seven days a week to help decrease unwanted behavior, such as smoking, off-leash pets, unscheduled use of athletic facilities and vandalism. Additionally, Park Rangers provide community and educational services.

Methodology

To accomplish our audit objectives, we performed the following steps:

- Interviewed personnel from the Park Maintenance and Operations Division.
- Reviewed Park Maintenance and Operations Division policies and procedures, and best practice guidance from the National Recreation and Park Association and U. S. Consumer Product Safety Commission.

- Performed park site inspections of 36 parks judgmentally sampled from all six park districts, covering all park categories.
- Performed various analyses and reviewed documentation as needed to support the analyses conclusions.
- Considered risk of fraud, waste, and abuse.
- Considered information technology risks.

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 enough, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Major Contributors to the Report

Yzalida Hiley, MBA – Assistant City Auditor II
Lina Wang, CPA – Assistant City Auditor III
Julia Webb-Carter, MPA, CIA – Project Manager
Rory Galter, CPA – Audit Manager

Appendix B: Management's Response

Memorandum



DATE: March 4, 2020
TO: Mark S. Swann, City Auditor
SUBJECT: Response to Audit of City Park Maintenance and Safety

This letter acknowledges the City Manager's Office received the *Audit of City Park Maintenance and Safety* and submitted responses to the recommendations in consultation with the Department of Park and Recreation.

We agree it is important that the Park and Recreation Department should strengthen the management and monitoring of park maintenance and playground safety by developing and/or revising park maintenance operational procedures and increasing the Ranger Program staffing level.

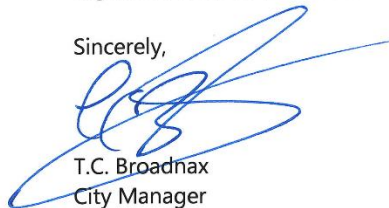
To enhance park maintenance operations, Park and Recreation has already started increasing the Park Ranger staffing level for this fiscal year with a plan to reach a total of twenty-one (21) Park Rangers over the next two fiscal years.

Further, the Park and Recreation Department will:

- Enhance park maintenance schedules by transitioning from our current system, based on park type, to a system that uses multiple criteria to establish maintenance service levels;
- Develop contract monitoring procedures to ensure maintenance contractors consistently meet requirements; and
- Ensure operational procedures include best practices and are consistently performed.

However, the Park and Recreation Department will accept the risk that minor maintenance and repairs that occur in the field are not subsequently entered into Micro-main. Park will maintain organized records of minor maintenance and repairs in the maintenance district offices.

Sincerely,



T.C. Broadnax
City Manager

"Our Product is Service"
Empathy | Ethics | Excellence | Equity

Response to Audit of City Park Maintenance and Safety
March 4, 2020
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John D. Jenkins, Interim Director
Park & Recreation Department

c: Kimberly Bizzor Tolbert, Chief of Staff
M. Elizabeth Reich, Chief Financial Officer
Joey Zapata, Assistant City Manager

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Assessed Risk Rating	Recommendation	Concurrence and Action Plan		Implementation Date	Follow-Up/ Maturity Date
Moderate	We recommend the Director of the Dallas Park and Recreation Department:				
	A.1. Assign a maintenance service level to each park.	Agree:	Park Maintenance and Operations currently uses a maintenance schedule with general guidance based on park type. Park Maintenance and Operations will assign maintenance service levels that consider the individual park's size, usage, and other relevant criteria.	03/31/2021	09/30/2021
Moderate	We recommend the Director of the Dallas Park and Recreation Department:				
	B.1. Ensure that department procedures regarding park quality control inspections, as written, are followed.	Agree:	Park Maintenance and Operations will ensure that the Park Quality Control Inspection procedures are followed.	03/31/2021	09/30/2021
	B.2. Revise the Park Quality Control Inspection form to provide additional rating guidance and condition detail to inspect for each category.	Agree:	Park Maintenance and Operations will revise the inspection form to include additional rating guidance and condition detail to inspect for each category.	03/31/2021	09/30/2021
	B.3. Develop contract monitoring procedures to ensure that litter contractors meet the contract service requirements.	Agree:	Park Maintenance and Operations will develop written procedures for monitoring contract litter services.	03/31/2021	09/30/2021

Assessed Risk Rating	Recommendation	Concurrence and Action Plan	Implementation Date	Follow-Up/ Maturity Date	
Moderate	We recommend the Director of the Dallas Park and Recreation Department:				
	C.1. Revise the appropriate subsections of Core Function, Section 7: Playground Operations, subsection Playground Operations, 4. <i>Function-Procedures</i> to comply with the U. S. Consumer Product Safety Commission's Public Playground Safety Handbook, section 4. <i>Maintaining a Playground.</i>	Agree:	Park Maintenance and Operations will develop a comprehensive playground maintenance program for each playground and that aligns with the US Product Safety Commission handbook guideline, as applicable to park maintenance operation.	12/31/2021	06/30/2022
	C.2. Ensure service centers maintain folders in compliance with Core Function, Section 7: Playground Operations, subsection Playground Operations, 4. <i>Function-Procedures</i> , 4.8. <i>Inventory and Tracking</i> , 4.8.1.	Agree:	Park Maintenance and Operations will create folders to maintain records of purchases, repair parts, maintenance of playground surfacing to be in compliance with the operational procedures.	12/31/2021	06/30/2022
	C.3. Develop a playground replacement schedule that includes the installation date, recommended replacement date, and the results of playground audits for each piece of playground equipment.	Agree:	Park and Recreation Department will develop a playground replacement schedule that includes the installation date, recommended replacement date, and Park Maintenance and Operation will provide the results of playground audits for each piece of playground equipment.	12/31/2021	06/30/2022
Low	We recommend the Director of the Dallas Park and Recreation Department:				
	D.1. Enact the plan to increase Park Ranger staffing levels by eleven over the next three fiscal Years.	Agree:	Park Maintenance and Operations will strive to increase Park Ranger staff by eleven over the next three fiscal years, subject to City Council appropriation.	09/30/2022	03/31/2023

Assessed Risk Rating	Recommendation	Concurrence and Action Plan		Implementation Date	Follow-Up/ Maturity Date
Low	We recommend the Director of the Dallas Park and Recreation Department:				
	<p>E.1. Develop procedures to ensure all repairs and maintenance work is recorded in the Micro-main system; and, when appropriate, link the original work order.</p>	<p>Accept Risk:</p>	<p>Park Maintenance and Operations believes the benefit from implementing the low-risk recommendation is limited and the time required to subsequently enter minor repairs and maintenance into Micro-main is more effectively utilized providing service in the field.</p> <p>Park Maintenance and Operations will maintain organized records of minor maintenance and repairs in the maintenance district offices.</p>	N/A	N/A