

**PARKS AND RECREATION DEPARTMENT
AQUATICS
AUDIT 15-11
DECEMBER 3, 2015**



CITY OF TAMPA

Bob Buckhorn, Mayor

Internal Audit Department

Christine Glover, Internal Audit Director

December 3, 2015

Honorable Bob Buckhorn
Mayor, City of Tampa
1 City Hall Plaza
Tampa, Florida

RE: Aquatics, Audit 15-11

Dear Mayor Buckhorn:

Attached is the Internal Audit Department's report on Aquatics.

We thank management and staff of Parks and Recreation Department, Aquatics Division, for their cooperation and assistance during this audit.

Sincerely,

/s/ Christine Glover

Christine Glover
Internal Audit Director

cc: Dennis Rogero, Chief of Staff
Sonya Little, Chief Financial Officer
Greg Bayor, Parks and Recreation Director
Heather Wolf-Erickson, Aquatics Manager

**PARKS AND RECREATION DEPARTMENT
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/s/ Stephen Mhere

Auditor

/s/ Christine Glover

Audit Director

PARKS AND RECREATION DEPARTMENT
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BACKGROUND

Aquatics, Special Facilities, and Athletics is a division in the City of Tampa (COT) Parks and Recreation Department (P&R). The division was created in 2014 as a result of a departmental reorganization. Prior to that, P&R was organized geographically into service areas namely North, South, East, and West. Diverse functions, facilities, and/or activities, for example swimming pools, community centers, and parks, were grouped and managed together as long as they were located in the same geographic area.

The Aquatics subdivision (excluding Special Facilities and Athletics) has a staff complement of about 121 members, including 77 seasonal lifeguards and 33 aquatic leaders. Aquatic leaders and seasonal lifeguards are organized into four teams, each of which is led by a site supervisor or center coordinator. Above the site supervisor or center coordinator is a team supervisor who coordinates and manages all aquatics operations citywide. The overall administration and management of all aquatics operations is the responsibility of the manager, who is also in charge of Special Facilities and Athletics. Maintenance support for COT's 11 swimming pools and splash pad facilities is provided by a four-member team of certified aquatic facility operators.

COT offers a variety of programs and activities at its swimming pools, including swim lessons, fitness classes, lifeguarding, as well as recreational and competitive team activities. To better deliver some of these services, Aquatics entered into partnerships with various entities, including the American Red Cross and other locally-based professional organizations.

STATEMENT OF OBJECTIVES

This audit was conducted in accordance with the Internal Audit Department's fiscal year (FY) 2015 Audit Agenda. Its objectives were to:

1. Evaluate whether the Aquatics Division applies information security best practice principles relating to employee access into the RecTrac System (a program management application used in P&R).
2. Verify that the City's pools are compliant with the Americans with Disabilities Act (ADA), i.e., they are accessible to people with disabilities, and that those that provide portable pool lifts, the lifts include features allowing for independent operability by users.
3. Verify that appropriate background checks are being conducted for program partner instructors before they begin working at City facilities.

STATEMENT OF SCOPE

The audit looked at FY 2014 and 2015, and focused mainly on COT's public swimming pools and splash pads, which constitute Aquatics' core operations. Internal division policies were evaluated, as were state and federal laws affecting the division's activities. Compliance with contractual agreements with outside vendors and/or partners was also examined. The division's cash handling activities were not included in this audit because they were the subject of a citywide audit on banking and cashing.

STATEMENT OF METHODOLOGY

The audit reviewed Aquatics' operating procedures, including policies governing the hiring of lifeguards. Evaluations of the division's compliance with both COT's municipal code and the ADA were also performed. Specifically, the municipal code requires background checks for individuals working with vulnerable populations, and ADA requires swimming pool facilities to comply with specific accessibility standards.

Information was gathered from all levels of staff through the interview process: one-on-one interviews were held with the P&R Department Director, the Aquatics Manager, the citywide Aquatics Team Supervisor, and a Site Supervisor. A one-on-one interview was also held with the system administrator for RecTrac. Information was also gathered from interviews and dialogue with aquatic leaders and lifeguards during tours of swimming pool facilities. The maintenance team supervisor and his aquatic facility operators provided information regarding maintenance of facilities.

An information security assessment was also performed. It focused on the division's practices regarding the use of RecTrac system by employees.

STATEMENT OF AUDITING STANDARDS

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.

NOTEWORTHY ACCOMPLISHMENTS

1. Aquatics introduced a new management structure through a departmental reorganization initiated in 2014. This streamlined the division and enabled a more focused approach towards the management of aquatic operations.
2. Alongside other divisions within P&R, Aquatics achieved accreditation with the Commission for Accreditation of Park and Recreation Agencies (CAPRA). This is an accomplishment achieved only by 139 parks and recreation agencies in the USA. Accreditation means the department has met or exceeded various mandatory standards, including standards in aquatic activities.
3. Aquatics partnered with Hillsborough County, Tampa YMCA, and Brandon Sports Aquatics to provide swim lessons to 287 Head Start children at City swimming pools.

AUDIT CONCLUSIONS

Our conclusions, based upon a review of documented policies and fieldwork performed are as follows:

1. P&R does not apply information security best practice principles in its operation of the RecTrac application software system.
2. COT's public swimming pools are compliant with ADA. However, there were minor observations communicated to management and implementation action began immediately.
3. Appropriate background checks are conducted for program partner instructors before they begin working at City swimming pool facilities.

While the findings discussed below may not, individually or in the aggregate, significantly impair Aquatics operations, they do present risks that can be more effectively controlled.

COMPLIANCE WITH STATUTORY REQUIREMENTS

STATEMENT OF CONDITION: The Florida Department of Health (DOH) periodically performs health and safety inspections of all public swimming pool facilities, including those operated by COT. After every inspection, inspectors generate reports, copies of which are provided to the operator of the respective swimming pools. COT does not publicly post DOH inspection reports at its swimming pool facilities as statutorily required. However, operating permits were posted at every facility.

Also, COT does not always post swimming pool and splash pad rules and regulations according to statutory requirements. One swimming pool did not post information regarding its maximum bathing load. Two others posted bathing loads that were inconsistent with DOH operating permits – one had a bath load of 124 people and the other 175. Operating permits stipulated bathing loads of 120 in both cases. One splash pad facility did not have rules and regulations posted for public view.

CRITERIA: All Florida public swimming pool facilities are required to comply with certain statutory requirements. Regarding inspection reports, Florida Statute Chapter 514.031(5) states that an owner or operator of a public swimming pool “...*shall post in a prominent location within the facility the most recent pool inspection report issued by the department pertaining to the health and safety conditions of such facility. The report shall be legible and readily accessible to members or potential members...*”

Also, Florida Administrative Code Chapter 64E-9.008 requires public swimming pools and splash pads to post rules and regulations providing guidance on the public’s use of those facilities. The statute stipulates, among other things, that the rules will show the maximum bathing load of the facility, and be viewable from the pool deck or water playing areas.

CAUSE: The Aquatics Division was not publicly posting inspection reports because it was filing them centrally with the Aquatic Facility Operators (AFOs), who are responsible for maintaining swimming pools. Also, DOH did not provide the division, in a timely manner, reports for inspections performed around the second quarter because of its ongoing process to go paperless. Furthermore, it appears DOH inspectors might have indicated to AFOs that publicly posting reports was not a priority for them.

The division is researching to definitively determine why publicized bath loads are inconsistent with operating permits. Where bath load is not altogether provided, the division believes it might be because the sign was misplaced during maintenance projects. The division also believes the sign for rules and regulations might have been removed without authority from the splash pad.

EFFECT OF CONDITION: Not posting health and safety inspection reports, as well as rules and regulations regarding use of facilities, deprives the public of its right to know. This is especially important because the public needs to be warned about safety and health hazards associated with pool or splash pad water. In addition, the state can initiate administrative

finer or other legal action against COT for violating statutes relating to swimming pool operations.

RECOMMENDATION 1: To comply with state statutes the Aquatics Division should consider implementing the following recommendations at all COT-operated public swimming pools and splash pads:

- a) Publicly post DOH's latest health and safety inspection reports at the respective swimming pool facilities as soon as the reports are available.
- b) Post bathing loads that are consistent with operating permits at all swimming pool facilities.
- c) Post appropriate rules and regulations at all splash pads.

MANAGEMENT RESPONSE: The Aquatics Division is in agreement with the recommendations listed and has made the following changes:

- a) DOH latest Health and Safety Inspection reports have been obtained via that department's web site and a copy has been distributed to each pool and is displayed for public viewing.
- b) Bathing load postings have been adjusted at sites in question to mirror those on the current Department of Health reports. Pool in question where bathing load numbers were not present on the sign has been replaced.
- c) Missing rules sign at Springhill Splash Pad has been installed.

TARGET IMPLEMENTATION DATE: Recommendations have been addressed as of 7/24/15.

USE OF APPLICATION SOFTWARE SYSTEM

STATEMENT OF CONDITION: P&R has been using RecTrac software as its main information technology system since 2010. RecTrac is a program management software capable of handling various activities related to parks and recreation. It is used to perform activity registrations and facility reservations, and to process credit card or cash payments. Management relies upon RecTrac for its extensive reporting capabilities – it can produce general ledger reports, facility fees reports, activity rosters, as well as issue receipts.

During the summer swim season of 2015, Aquatics had more than 110 employees on staff, about 77 of whom were lifeguards and the rest aquatic leaders. Lifeguards are hired on a seasonal basis primarily to provide lifeguarding services but also to perform other tasks as assigned by aquatic leaders. Those tasks include using RecTrac to admit patrons into swimming pool facilities.

We conducted a survey of 46 lifeguards at 10 of the City's 11 public swimming pools to evaluate lifeguards' use of the RecTrac system. We found that 28 (about 61%) of them had used the system. None of these lifeguards had been formally granted access rights to RecTrac: aquatic leaders use their accounts to sign on to the system and then lifeguards process patrons under those accounts. All of them indicated that they had been shown how to use the system either by their aquatic leaders or site coordinators/supervisors. Of the lifeguards who said they had never used RecTrac, 16 said they had not done so because, as seasonal employees, they were not allowed to access the system. Two said they had not yet been trained to use it.

CRITERIA: Best practice standards for information security require users to access systems via their own logon credentials. This is needed for accountability, which is better enforced through audit logs that link system activity to uniquely identifiable users. Also, this sharing of user accounts or system access does not comply with COT information security policies, namely Policy 010706 (preservation of information confidentiality through proper logoff practices), Policy 020106 (upholding security by not sharing passwords), and Policy 090303 (sharing information only with authorized staff). Employees who do not have their own logon credentials to a system are not authorized to information in that system.

CAUSE: P&R does not give seasonal employees access rights to RecTrac. However, aquatic leaders often assign patron processing duties to lifeguards, which they can only do by using the RecTrac system.

EFFECT OF CONDITION: System logs play a critical accountability role in effective forensic evaluation when the integrity of data in a system is compromised. However, this is diminished when many users perform tasks in an application under a common user account. There is little or no incentive for seasonal employees to be diligent in their use of RecTrac when their activities on the system are not linked to them. This increases the risk of malicious activity on the system, including application data corruption and breach of information confidentiality.

RECOMMENDATION 2: Aquatics should consider implementing the following recommendations:

- a) Provide RecTrac access rights to all employees required to use the system in the performance of their duties.
- b) Require all employees to abide by existing COT information security policies in accessing RecTrac.

MANAGEMENT RESPONSE: Management agrees with both recommendations:

- a) Aquatics and the department have historically not granted RecTrac access to seasonal employees. Upgrades to the system will allow for temporary access during the summer season once employees are properly trained. The department's administration has agreed that in summer 2016 select seasonal employees will be trained and granted access to RecTrac.
- b) By providing the RecTrac access to select seasonal employees in summer 2016 the COT security policies will be upheld within the Aquatics Division. Staff will be reminded and provided a copy of the COT policies referenced in the audit.

TARGET IMPLEMENTATION DATE: Implementation to take place effective immediately.