

**Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc.
Citizen Support Organization**

Division of Recreation and Parks

Report: A-1920DEP-006

Office of Inspector General

Internal Audit Section

Florida Department of Environmental Protection

November 13, 2019

3900 Commonwealth Boulevard, MS 40
Tallahassee, Florida 32399-3000

<https://floridadep.gov/>





Audit of Jonathan Dickinson State Park
and the Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks



Report: A-1920DEP-006

Table of Contents

Scope and Objectives	1
Methodology	1
Background	2
Results	2
Conclusions	18
Findings and Recommendations.....	18
Division Response.....	32

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

The Department of Environmental Protection (Department) Office of Inspector General (OIG) conducted an audit of Jonathan Dickinson State Park (Park), as well as the Agreement with the Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization (CSO). This audit was initiated as part of the Fiscal Year (FY) 2019-2020 Annual Audit Plan.

Scope and Objectives

The scope of this audit included Park and CSO activities and financial records during the period beginning January 1, 2018, to current activities. The objectives were to determine whether

1. the Park is operating in compliance with applicable requirements and controls are in place with respect to:
 - revenue collection and reporting
 - attendance
 - park expenditures, procurement, and Purchasing Card (P-Card) use
 - property and equipment management
 - volunteer activities
2. the CSO is operating in compliance with the Agreement and applicable requirements, and whether controls are in place regarding reported revenues and expenditures.

Methodology

This audit was conducted under the authority of Section 20.055, Florida Statutes (F.S.), and in conformance with the current *International Standards for the Professional Practice of Internal Auditing*, published by the Institute of Internal Auditors. Our procedures included review of authoritative information, interviews with Park and Division staff and CSO officers and review of Park and CSO records.

Report: A-1920DEP-006

Background

The Park is located in Hobe Sound, Florida and is the largest State Park in Southeast Florida. Park highlights include a variety of landscapes, historical World War II training camp, the story of the shipwreck that led to the Parks namesake, as well as the history of Trapper Nelson, known as the “Wild Man of the Loxahatchee”. The Park offers Ranger-guided tours, as well as paved and off-road biking, equestrian, and hiking trails. The Elsa Kimbell Environmental Education and Research Center provides educational programs. Camping at the Park includes 132 camp and cabin sites. A contracted concession offers the rental of canoes, kayaks, stand-up paddle boards, motor boats, and bicycle rentals. The concession also provides a food and beverage garden for visitors. Park revenues are generated primarily through camping, annual permits, entrance fees, guided tours, and concession commissions. Day use revenues are received at the ranger station and honor stations. For FY 2018-2019 reported Park revenues were \$1,783,828.76 with 321,643 in reported attendance.

The current Agreement with the CSO was executed in March 2015. The CSO raises funds through memberships and special events in support of the Park. According to the CSO’s 2018 Profit and Loss Report, CSO income was \$237,446.25 with \$221,570.69 in expenses.

Results

Revenue Collection and Reporting

Park revenue is collected at the Park’s ranger station and two honor trail entrances. According to discussions with Park staff, the gate and safe combinations have been changed as required in the Division’s Operations Manual (OM). Access to the safe combination is limited to Park management and administrative staff. According to Chapter 1.8(i) of the OM, Park safes

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

must be secured to a wall or structure and have an inner compartment that can be locked to provide additional access restrictions. During our site visit, we observed that the safe used by the Park does not contain the required inner compartment and is not secured on a daily basis.

To determine the accuracy of reported revenue, we compared revenue documented on Daily Deposit Worksheets (DDW) to support documentation for the sampled months of March and April 2019. The Park submits a deposit summary weekly. Of the 61 days in the sample months, documented adjustments on DDWs were not consistent with differences between financial session reports and credit/cash receipts for nine days. According to the Florida State Parks and CAMA Revenue Collection Procedures (Revenue Procedures), an explanation for any differences should be included in the Comments Section of the DDW. There was insufficient documentation to explain a majority of the adjustments made for the months reviewed. This was due, in part, to the Park's decision to submit a weekly deposit summary, rather than documenting shift adjustments on a daily basis.

According to the Revenue Procedures, deposit slips should be initialed by both the individual preparing and the individual verifying deposited amounts. We reviewed 207 deposit slips for the sampled months. Of these, 200 deposits slips were initialed by two staff as required. The remaining seven were signed or initialed by one staff. The OM requires all deposits amounting to \$1,000 or more be deposited the morning after the shift ends. If Park receipts exceed \$2,000, a night deposit is required when staff safety can be assured. During the sample months, daily cash receipts exceeded \$1,000 for 19 days, with three days exceeding \$2,000. Based on our review, deposits were made timely as required with minor exceptions.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

We verified the District completed a Fiscal Compliance Review for the Park in August 2017, and February 2019 as required in the OM. According to the most recent compliance review, the Park met the requirements, with no noted deficiencies.

Tax-Exempt Transactions

In accordance with Revenue Procedures, the Park has an established process to maintain visitor's tax-exempt forms and documented each transaction on a log. During the sample months, the Park documented 20 tax-exempt transactions and had maintained tax-exempt forms for all but one.

Attendance Reporting

Daily attendance is recorded directly in the Division-wide Point of Sale (POS) system. According to the Park's approved Attendance Reporting Plan (ARP), actual visitors will be counted at the ranger station. Estimated visitor counts will be an additional 25 visitors added daily Monday through Friday, and 99 visitors added Saturday and Sunday. Per the ARP, a trail counter is not used. For the sampled months of March and April 2019, we compared the estimated daily visitor counts reported in the POS system to visitation recorded in Honor Envelope Documentation Reports as follows.

Estimated Attendance		
Month	Reported Estimated Attendance	Estimated Attendance per ARP Calculations
March	1,470	1,515
April	1,344	1,342

Based on discussions with Park staff, estimates were calculated based on 24 visitors daily Monday through Thursday and 222 visitors estimated from Friday through Sunday. Differences were minor and Park staff acknowledged the need to align weekly estimates with the ARP.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

Expenditures and P-card Use

To verify compliance with purchasing requirements, we reviewed a sample of five purchase orders processed through MyFloridaMarketPlace¹ (MFMP) and seven P-Card expenditures in the Department's P-Card Works² system. According to Chapter 60A-1.002, Florida Administrative Code (F.A.C.), purchases \$2,500 or greater require two written quotes. If less than two quotes are received, agencies must provide justification as to why additional quotes could not be obtained. If commodities or contractual services are available from a single source, the agency must document the conditions and circumstances.

The five purchase orders reviewed exceeded \$2,500. Of the five, four were issued to one vendor for cabin and resident lift station pump services. These purchase orders were as follows.

Purchase Order	Date Issued	Amount	Description	Exception
B3CA14	August 29, 2018	\$4,965.84	Diagnose and repair two cabin lift stations	Emergency
B2D8AE	April 3, 2018	\$3,605.00	Diagnose and repair one resident lift station	Emergency
B278B7	March 29, 2018	\$11,500.00	Sewer connection of residence to regional wastewater facility	Single Source
B2C30D	March 21, 2018	\$4,550.00	Diagnose and repair two resident lift stations	Emergency

The Park did not obtain two quotes for services under any of the four purchase orders and submitted the Emergency/Single Source/Contract Exception Form (DEP 55-201) with each. One exception was documented as a single source service provider, and three were documented as emergency purchases. Under the purchase order with single source exception, Form DEP 55-201 included documentation that the Park had used the vendor in the past and was satisfied with the work quality and price. However, there was no justification which documented the vendor was the only source available to provide the service. Justification for the emergency purchases

¹ MyFloridaMarketPlace is the State online procurement processing system for Florida.

² Works is a web-based system used to process State P-Card transactions.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

included documented time limitations and health and safety. In each of these three purchases, the requisition had been copied from a prior purchase requisition. The Park had two prior purchases for lift station repair or replacement services which were outside the scope of the audit.

However, in the original lift station replacement purchase, the Park had obtained multiple quotes.

Based on discussions with Park staff, the Park did not have processes in place to ensure these pumps were being maintained. Many of these lift stations have since been maintained by the regional wastewater facility.

The remaining purchase order reviewed was for the Park's annual purchase of rental cabin linen services. The purchase order cost for these services during FY 2018-2019 was \$14,500. The Park has used the same vendor each year for these services since FY 2014-2015. For services during FY 2018-2019, the Park documented solicitation of quotes from three vendors; however, only one submitted a quote. One of the other vendors appeared to be a dry-cleaning business. The Park's Administrative Assistant indicated that the other vendor had previously advised that the work would not be cost effective. Despite these known factors, prior year purchases documented solicitation of quotes from the same three vendors each year, with the sole quote obtained from the same vendor.

For the seven P-Card expenditures reviewed, all were pre-approved by the Park Manager or had a pre-authorized memo attached, were supported by invoices or receipts, and reviewed or reconciled by staff other than the cardholder. Each of the P-Card expenditures reviewed also included required quotes and were documented consistent with purchasing requirements.

Bulk Fuel

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

The Park maintains two 500-gallon tanks for unleaded and diesel bulk fuel. Per Chapter 1.8(j) of the OM, a Bulk Fuel and Oil Issue Log is to be used to track the use of bulk fuel and oil. The Park maintains a Monthly Bulk Gas and Oil Issue Log which documents beginning inventory, purchases, use, and a reconciliation between the ending fuel balance and actual quantity on hand at the end of the month.

Based on a comparison of these logs to purchases during the audit period for unleaded fuel, the Park documented receiving 34 gallons less on the log than purchased during the month of July 2018. Per discussions with Park maintenance staff, this was due to clerical entry errors. However, the amounts entered as the quantity on hand at the end of the month did not reflect the error. During our site visit on June 18, 2019, we measured the quantity of fuel in the tank in comparison with the quantity on hand per record. From this measurement, the actual quantity on hand was an additional 30 gallons less than supported by record.

For diesel fuel, the Park documented receiving 67 gallons more on the log than purchased during the month of November 2018. This was also acknowledged by Park staff as a clerical error, but the error was not reflected in the recorded quantity on hand at the end of the month. From our measurement of the diesel fuel tank, the actual quantity on hand was only 30 gallons more than the amount supported by record.

State Property and Equipment Management

To verify compliance with Department requirements regarding property, we reviewed a sample of 71 property items from the Park's Master Property file. We verified that all property items sampled were located at the Park. The Park has one firearm, which is kept in a locked safe in a secure location. We reviewed the Firearm Activity Logs for March 26, 2019, through June 2,

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

2019. The Park is required to maintain a firearm activity log for each firearm in accordance with the Firearm Use Standard. We reviewed the provided activity logs and found eight instances of recorded Disposition of Feral Hogs forms that were not noted on the log. Further, the nuisance and exotic animal removal standard requires the Disposition of Feral Hogs form to be completed each time. Of the documentation reviewed, 9 activity log entries were noted to not have the required disposal sheet.

According to the Firearm Use Standard, employees and volunteers must complete classroom training, Division in-house training, and range qualification. We received documentation for nine staff members. Of those nine, three were missing documentation. One did not have a firearm approval memo on file, one did not have documentation of completing the Division in-house training, and the classroom training certificate and firearms qualification was not on file for all three. Of the three, one was listed as a volunteer for the Park. The remaining two of the three employees are former Park management and no longer with the Park.

For Park staff located in Park housing during the audit period, we noted inconsistencies with both the Agreements of Occupancy for State-Owned Residences and Employee-Owned Mobile Home Sites. Section 1 of the Agreement of Occupancy for Employee-Owned Mobile Home Sites states, *This site is provided to the employee subject to all provisions and restrictions noted in the Florida Park Service Housing Policy contained in Chapter 2, Operations Manual.* This language in the Agreement is not consistent with the OM as the Housing Policy is in Chapter 1.5(c) of the OM.

Section 11 of the Agreement requires residents of State-Owned or Employee-Owned sites to pay utilities directly through the provider, unless they share a meter with another residence. In

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

this case, payment is to be made directly to the Department. The base rate for the residences that fall under this exception is \$125 per month for one bedroom, and \$25 for each additional bedroom. Of the 16³ residents located at the Park, 12 are to pay utilities directly to the provider, and the remaining four pay the Department monthly. During the sample months, we verified ten of the 12 residents paid utilities directly to the provider, and two had yet to occupy the residence. Of the four residents required to make payments to the Department, one paid the required amount to the Department. The remaining three are staff residing in Park housing at the STOP Camp and were paying \$50 per month, which was inconsistent with the Agreement. Based on conversation with Park Management, the previous Park Manager agreed to allow a flat fee of \$50 per month for utilities for STOP Camp residences.

Per the Agreement, a resident employee is required to notify the Department of all occupants, which must be approved by the Department. Section 1.5(c)(8)(b) of the Agreement requires individuals occupying the residence with the employee who are not considered immediate family pay a rental fee based on the approved Florida Park Service (FPS) housing rental schedule. The rental rate for additional occupants is \$100 per person, per month. We verified that two residents had additional occupants not considered immediate family, and that one had not paid the required rental fee per the OM. Upon inquiry, the resident employee was unaware that the additional occupant was not considered immediate family and indicated the individual resided with the employee from June 2018 to May 2019.

³ One resident is a staff member of Atlantic Ridge Preserve State Park, which is under Park Administration responsibilities.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

Chapter 1.5(c)(11) of the OM states *an annual inspection of all park residences should be performed by the Park Manager utilizing the Residence Inspection Report*. Based on documentation provided, eight of the 16 sites had completed inspection reports for FY 2017-2018, and five had an inspection completed in FY 2018-2019. The remaining three did not have an inspection report on file.

Further, Chapter 1.2(h) of the OM requires an annual Park inspection be performed by District management. The District is required to complete the Park Management Summary (Summary), DRP-033. The District was unable to provide a completed Summary for the scope of our audit, however, the District was able to provide a Summary completed August 1, 2019.

Volunteers

We reviewed volunteer records provided by the Park and in the Volunteer Service Tracking System (V Sys) for 71 regular service volunteers documented during the audit period. Of these, Volunteer Agreements were not completed through V Sys digitally or provided by the Park for 23 as required under Chapter 1.6 of the OM. Of the 23, five volunteers were not returning as of July 2019, and four had paper applications. Further, the Volunteer Coordinator has made an effort to obtain applications for the remaining 14. According to Chapter 1.5 of the OM, all regular service volunteers must have searches conducted through the U.S. Department of Justice National Sexual Offender Public Website and Florida Department of Law Enforcement Sexual Offenders and Predators and these searches must be recorded in V Sys by electronic documentation maintained in the volunteer's V Sys profile. All volunteers had U.S. Department of Justice National Sexual Offender searches or the Florida Department of Law Enforcement's Sexual Offenders and Predators searches as required.

Report: A-1920DEP-006

Short Term Special Event Permits

Division requirements for Short Term Special Event Permits (Permit) are addressed in the OM in Chapter 1.2 as well as Chapter 5.2. We reviewed a sample of five Permits with events occurring between March 2019 and June 2019. All of the Permits were signed by either the Park Manager or Assistant Park Manager; however, two were signed after the Permitted event occurred. One was signed two days after the event ended, but one was signed one month after the event ended. In addition, the Permits documentation included a Department Contract/Grant Review Form (DEP 55-203), which had been used only for Department contracts and grants and is no longer a valid Department form. According to Park and District staff, this form was used for routing purposes. There were noted inconsistencies of District approval on four out of five Permits.

Three of the five Permits required the Permittee to pay per participant for Park entry fees and to make a donation per participant to the CSO. Two of the three required a \$4 per participant per day Park entry fee and \$2 CSO donation, while the remaining one required \$8 per participant Park entry fee and \$4 CSO donation. This fee structure is not consistent with the Division fees for individual entry and the event was not sponsored by the CSO. Per POS records, all required fees were paid by the Permittee.

Attachment A of the Permits includes an application submitted by the Permittee prior to execution of the Permit. The application requires the Permittee to provide liability insurance if alcohol is sold at the event. Further, Part III, Event Information, of the Permit asks the Permittee to designate if alcohol will be sold at the event. None of the Permits designate that alcohol will be sold. However, upon review of the Parks internal reservation documentation, it is designated

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

that alcohol is approved to be served per the Park Manager for two events. From event information available online, alcohol was provided for one event. However, the Permit did not indicate that alcohol would be served, nor was documentation available to demonstrate written approval had been obtained from the Park Manager in advance as required under Chapter 5.5(j) of the OM.

CSO Statutory and Agreement Compliance

Based on our review, the CSO was established and operates in compliance with Section 258.015, F.S. The following was noted during the audit.

- The CSO submitted the 2018 Annual Financial Report and required documents to the Department as required under Section 20.058, F.S. and the CSO Handbook.
- The 2018 Annual Financial Report included the 2017 990 income tax report, Park Manager's Letter, CSO President's Letter, list of Board members, CSO Statement of Accomplishments and Goals, and CSO Statement of Value and Contributed Services.
- The CSO's Code of Ethics was posted on the CSO's website as required under Section 112.3251, F.S.
- The CSO paid sales tax to the Department of Revenue, as required during the sampled months.

The CSO's fiscal year begins on January 1 and ends on December 31. According to the Agreement, the CSO is required to submit an Annual Program Plan on or before the end of the CSO's fiscal year. The Annual Program Plan for 2018 was submitted and approved by the Park Manager on February 12, 2018. The Annual Program Plan submitted for 2019 was signed by the CSO President on January 13, 2019 and approved by the Park Manager on January 10, 2019.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

Paragraph 5(b) of the Agreement also states that the *Annual Program Plan shall include a complete plan as described in the CSO Handbook for all park improvement projects, activities, fundraisers, and events the CSO proposes. For any activities, programs or events anticipated to take place on Park property, the CSO's Annual Program Plan must also include the requested designation of the specific location, facilities, and time for each such use.* Paragraph 7 of the Agreement provides that the *CSO is authorized to sell merchandise in the Park ranger's station subject to the Park Manager's approval.* The CSO collects funds from coin-operated laundry machines located in the campground area and sells merchandise at the Elsa Kimbell Environmental Education and Research Center (Visitor Center). However, the locations, facilities, and times associated with the activities were not designated in the Annual Program Plan approved by the Park Manager.

CSO Income and Expenses

During the audit period, the CSO received revenue through annual Park events, memberships, sponsorships, sale of merchandise, and donations. According to the Profit and Loss Report, CSO income and expenses were as follows.

CSO Income and Expenses	2018	2019 (January -May)
Total Income	\$237,446.25	\$164,266.68
Total Expense	\$221,570.69	\$111,857.40
Net Income	\$15,875.56	\$52,409.28

We compared amounts documented in the Profit and Loss Report to the CSO's general ledger and compared the general ledger to bank statements and source documentation for the sampled month of April 2019. Overall, amounts reported in the Profit and Loss Report were consistent with the general ledger and bank statements and were supported by revenue and expense source documents.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

The CSO has established a Financial Policy in addition to the By-Laws. According to the Financial Policy, *The CSO shall have a safe at Park headquarters designated for the receipt and temporary holding of any monies received at the Park. The safe shall be kept locked except when accessing to deposit or remove money. All movement of monies to and from the safe shall be documented on a "safe log"*. Based on observations during our site visit, the CSO does not have a separate safe designated at the Park for CSO funds. The CSO uses the Park's safe for temporarily holding funds collected by Park staff for operation of the coin-operated laundry machines in the campground area. This safe is not secured as required. Funds collected for merchandise sales at the Visitor Center were also not maintained in the safe as described in the financial policy. According to the OM, the District Bureau Chief must approve Park staff collecting funds on behalf of the CSO. The District was unable to provide documentation of written approval for Park staff to collect CSO funds.

According to the Financial Policy, the treasurer shall approve any expenditures up to \$100 and the President shall approve up to \$250 for direct support of Park system activities. All other expenditures, that are not budgeted must be approved by the Board of Directors. The CSO maintains two checking accounts for revenue collection and operating expenses. Separate accounts are maintained for the CSO's Club Scrub committee. The CSO also has a secondary savings account. The CSO President and Treasurer have access to the CSO bank accounts, credit card and on-line payment accounts. The CSO's Club Scrub committee Board members have access to the Club Scrub bank account, credit cards and on-line payment accounts. Checks written during the sampled months were signed by one Board member. Monthly bank statements

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

are addressed to the CSO and mailed to the Park. Bank statements were available to the CSO President, Treasurer, Bookkeeper, and Club Scrub Board members.

For the sampled month of April 2019, most expenditures were supported by vendor invoices or receipts consistent with the CSO's financial policy. However, with respect to Club Scrub committed expenditures, committee Board members did not have spending limits and individual expenditures were not approved by the Board. Specifically, we noted the following circumstances:

- Both the CSO's 2018 and 2019 Annual Program Plan included budget for maintaining and improving the mountain bike trail system. Club Scrub expenditures during the audit period included \$35,676.87 in payments to a business owned by one Board member for equipment rental. The CSO Board Member provided documentation demonstrating that two additional service quotes had been obtained prior to using the business. However, there was no documentation of Board approval for using the Board member's business, or that the Board voted on using the business, with the Board member abstaining. Several of the expenditures to the business owned by the Board member was through the use of the Board member's CSO credit card.
- Two expenditures of \$570 and \$667.50 were not supported by invoices or receipts. Documentation associated with these expenditures included an e-mail to a Club Scrub committee Board member and a record of hours with no name or description of services.
- A check for \$1,000 was written by a Club Scrub committee Board member to an external trail association as a donation. The CSO could not provide documentation that the donation was pre-approved in writing by the Park Manager.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

In February 2018, the CSO Board approved a provision for Club Scrub Sponsorships with designated levels associated with specific sponsorship amounts. Based on CSO sponsorship activities reviewed for the Club Scrub committee, several sponsors were promoted without sponsorship payments and listed as providing in-kind services. Other sponsorship designations were inconsistent with promotional levels approved by the Board.

During the sampled months, the CSO held a Club Scrub Growler event. A portion of the event took place at the Park. For this event, we noted the following circumstances.

- The CSO had not obtained written approval from the Park Manager/District Bureau Chief to charge a separate fee or donation in lieu of the usual Park entrance fee as required under Paragraph 5.b. of the CSO Agreement.
- A copy of the written Essential Eligibility Criteria (EEC) was not submitted to the Park as required under Chapter 4.5.1 of the CSO Handbook.
- The CSO had not obtained written approval for any publicity released about the event from the Park Manager as required under Chapter 4.5.3 of the CSO Handbook.
- The CSO had not obtained written Park Manager approval for the CSO to serve alcohol at the event as required under Chapter 4.6 of the CSO Handbook.
- The CSO paid the Park \$670.41 in entrance fee payments for 357 event participants calculated at \$1.88 per individual. However, the CSO's Board Meeting minutes document that the event included 750 participants. Upon request, the CSO could not provide a listing of event participants to justify the difference in entrance fees but indicated that not all participants at the event entered the Park.

Several of the expenditures reviewed during the audit period were in preparation for the

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

Club Scrub committee's Endless Summer Paddle Event in June 2019. This event was not included on the CSO's Annual Program Plan for 2019 and had not been approved in writing by the Park Manager.

Park Management Oversight of CSO Activities

CSO Officers include a President, Vice President, Secretary, and Treasurer, as well as Board members over the Club Scrub Committee. Based on information provided by the Park, sexual predator checks were conducted for the 15 CSO Officers and Board Members reviewed. Volunteer agreements were current for all but one member who was no longer serving. Membership documents and volunteer hours for Officers and Board members were maintained either at the park level or in the Department VSys database.

The CSO and Park management work together to plan CSO sponsored events and projects. Many agreed upon CSO activities have historically been the result of verbal agreements with Park management. During the sampled months in the audit, the Assistant Park Manager and Park Services Specialist attended the monthly Board meetings. Meeting minutes were retained by the CSO and provided for the audit period.

According to Chapter 1.4.(c)(3) of the Division OM, *A spouse, relative, or dependent who resides with a park employee must not serve as a CSO officer (president, vice president, secretary, treasurer, etc.) with that park's CSO.* The CSO's 2019 Annual Report filed with the Department of State Division of Corporations listed the spouse of a Park employee as the CSO Treasurer.

Report: A-1920DEP-006

Section 1.4 of the OM requires the District to conduct a CSO Management Review every four years. The last review was conducted on November 28, 2016. The review reflected positive results.

Conclusions

Based on our audit, the Park was generally in compliance with Division requirements regarding tax-exempt transaction and deposits, attendance reporting, and volunteer documentation with minor exceptions. However, we noted control weaknesses regarding revenue collection and reporting, expenditures, management of bulk fuel, Housing Requirements, and Permit oversight. While the CSO was established and operates in compliance with Section 258.015, F.S., we noted control weaknesses regarding Park oversight of CSO operations in the areas of the Annual Program Plan, use of CSO funds, events, and Board membership.

Findings and Recommendations

Finding 1: Park Safe

According to Paragraph 1.8(i) of the OM, *Park safes must be secured to a wall or structure and have an inner compartment that can be locked to provide additional access restrictions.* During our site visit, we observed that the safe used by the Park does not contain the required inner compartment and is not secured on a daily basis.

Recommendation:

We recommend the Division ensure that the Park maintains a safe with an inner compartment that can be locked to provide additional access restrictions. Further, the Park should take added steps to ensure the safe is maintained in a secured manner.

Report: A-1920DEP-006

Finding 2: Revenue Collection and Reporting

For reported revenue reviewed during the sampled months, adjustments reported monthly on the Park's DDWs were not consistent with differences between financial session reports and credit/cash receipts for nine out of 61 days. Per the Revenue Procedures, an explanation for any differences should be included in the Comments Section of the DDW. There was insufficient documentation to explain a majority of the documented adjustments. This was due, in part, to the Park's decision to submit a weekly deposit summary, rather than documenting shift adjustments on a daily basis.

Recommendation:

We recommend the Division work with the Park to ensure all adjustments between reported revenue and daily receipts are documented to provide an explanation for the difference. To promote better accountability for daily adjustments, this should be documented daily for each shift.

Finding 3: Expenditures

According to Chapter 60A-1.002, F.A.C., purchases \$2,500 or greater require two written quotes. If less than two quotes are received, agencies must provide justification as to why additional quotes could not be obtained. If commodities or contractual services are available from a single source, the agency must document the conditions and circumstances.

Of the five reviewed purchase orders exceeding \$2,500, four were issued to one vendor for cabin and resident lift station pump services. The Park did not obtain two quotes for services under any of the four purchase orders and submitted a contract exception form with each. One exception was documented as a single source service provider, and three were documented as

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

emergency purchases. Under the purchase order with single source exception, Form DEP 55-201 included documentation that the Park had used the vendor in the past and was satisfied with the work quality and price. However, there was no justification which documented the vendor was the only source available to provide the service. Justification for the emergency purchases included documented time limitations and health and safety. Based on discussions with Park staff, the Park did not have processes in place to ensure these pumps were being maintained. While it is imperative that the Park maintain the health and safety of all Park visitors and residents, repetitive emergency repair purchases do not demonstrate effective on-going management of equipment nor adherence with Chapter 60A-1.002, F.A.C.

The remaining purchase order was for the Park's annual purchase of rental cabin linen services. The Park has used the same vendor each year for these services since FY 2014-2015. For services during FY 2018-2019, the Park documented solicitation of quotes from three vendors and obtained a quote from one. Of the two other vendors invited to submit a quote, one appeared to be a dry-cleaning business and the Park's Administrative Assistant indicated that the other had previously advised the work would not be cost effective. Despite these known factors, the annual solicitation consistently documented a request for quotes from the same three vendors, with the sole quote obtained from the same vendor. All the purchases reviewed were approved by the District and subsequently through the Procurement Section in the Bureau of General Services.

Recommendation

We recommend the Division ensure that District and Park procurement practices comply with Section 287, F.S., Chapter 60A-1.002, F.A.C, and the Department Procurement Guide. For

Report: A-1920DEP-006

purchases that exceed \$2,500, a minimum of two quotes should be obtained. If the minimum quotes cannot be obtained and due diligent procurement efforts have been demonstrated, the circumstances for the single source purchase should be documented as required. Further, the Division should work with the District and Park to address equipment maintenance practices to minimize circumstances that put the Park at risk of paying inflated costs due to emergency repairs.

Finding 4: Bulk Fuel

The Park maintains two 500-gallon tanks for unleaded and diesel bulk fuel. Per Paragraph 1.8(j) of the OM, a Bulk Fuel and Oil Issue Log is to be used to track the use of bulk fuel and oil. The Park maintains a Monthly Bulk Gas and Oil Issue Log which documents beginning inventory, purchases, use, and a reconciliation between the ending fuel balance and actual quantity on hand at the end of the month.

Based on a comparison of these logs to purchases during the audit period for unleaded fuel, the Park documented receiving 34 gallons less on the log than purchased during the month of July 2018. Based on measurements of fuel taken during our site visit on June 18, 2019, the actual quantity on hand was an additional 30 gallons less than supported by record. For diesel fuel, the Park documented receiving 67 gallons more on the log than purchased during the month of November 2018. From our measurement of the diesel fuel tank, the actual quantity on hand was only 30 gallons more than the amount supported by record. From discussions with Park staff, there is limited access to the fuel tanks; however, Park management has historically not verified information recorded by maintenance staff on the Monthly Bulk Gas and Oil Issue Logs.

Report: A-1920DEP-006

Recommendation:

We recommend that the Division work with the Park to put additional controls in place to reconcile purchases with recorded amounts received. Park management should verify the level of fuel on hand at the end of each month to ensure the accuracy of recorded amounts.

Finding 5: Firearm Activity Log and Training

The Park is required to maintain a firearm activity log for each firearm in accordance with the Firearm Use Standard. Further, the nuisance and exotic animal removal standard requires the Disposition of Feral Hogs form to be completed each time. We reviewed the Firearm Activity Logs for March 26, 2019, through June 2, 2019, and found eight instances of recorded Disposition of Feral Hogs forms that were not noted on the log and nine activity log entries were noted to not have the required disposal sheet.

According to the Firearm Use Standard, employees and volunteers must complete classroom training, Division in-house training, and range qualification. We received documentation for nine staff members. Of those nine, three were missing documentation. One did not have a firearm approval memo on file, one did not have documentation of completing the Division in-house training, and the classroom training certificate and firearms qualification was not on file for all three. Of the three, one was listed as a volunteer for the Park. The remaining two of the three employees are former Park management and no longer with the Park.

Recommendation:

We recommend the Division work with the Park to ensure that proper procedures are in place documenting firearm use activity and staff training in accordance with standards.

Report: A-1920DEP-006

Finding 6: Housing Policy and Requirements

We reviewed the Agreements of Occupancy for employees residing at the Park. Section 1 of the Agreement of Occupancy for Employee-Owned Mobile Home Sites states *This site is provided to the employee subject to all provisions and restrictions noted in the Florida Park Service Housing Policy contained in Chapter 2, Operations Manual.* However, the housing policy is in Section 1.5(c) of the Operations Manual. Section 11 of the Agreements require the resident of State-Owned or Employee-Owned sites to pay utilities directly through the provider, unless they share a meter with another residence, which they would pay the Department directly. The base rate for the residences that fall under this exception is \$125 per month for one bedroom, and \$25 for each additional bedroom. Three employees residing in housing at the STOP Camp are being charged and paying \$50 per month. Based on conversation with Park management, the previous Park Manager and District Manager agreed to a flat fee of \$50 per month for utilities for STOP Camp residences.

Recommendation:

We recommend the Division work with the Park to review and correct any inconsistencies with the Agreement language referencing the OM. Further, the Division should determine an accurate amount to be charged to STOP camp residents and correct Agreements accordingly.

Finding 7: Housing Payments made to the Park/Department

Based on the Agreements of Occupancy, the employee is required to notify the Department of all occupants, which must be approved by the Department. Section 1.5(c)(8)(b) of the OM requires individuals occupying the residence with the employee who are not considered

Report: A-1920DEP-006

immediate family pay a rental fee based on the approved FPS housing rental schedule.

According to Section 1.5(c)(8)(a) of the OM, *immediate family is defined as the spouse of the approved resident, lawful dependent children and parents of the approved resident and spouse and any other persons in custodial care of the approved resident and spouse.* The rental rate for additional occupants is \$100 per person, per month. We verified that two residents had additional occupants, and that one had not paid the required rental fee per the OM. Based on conversation with the Resident, they were unaware that their granddaughter was not considered immediate family. The additional occupant resided with the employee from June 2018 to May 2019.

Recommendation:

We recommend the Division work with the Park and the employee to determine the amount owed to the Park for the additional occupant rent.

Finding 8: Inspection Reports

According to the OM, Section 1.5(c)(11) states *an annual inspection of all park residences should be performed by the Park Manager utilizing the Residence Inspection Report.* Based on documentation provided, eight of the 16 sites had completed inspection reports for FY 2017-2018, and five had an inspection completed in FY 2018-2019. The remaining three did not have an inspection report on file.

Further, Chapter 1.2(h) of the OM requires an annual Park inspection be performed by District Management. The District is required to complete the Park Management Summary. The District was unable to provide a completed Summary for the scope of our audit; however, the District was able to provide a Summary completed August 1, 2019.

Report: A-1920DEP-006

Recommendation:

We recommend the Division work with Park and District management to ensure that all inspection reports are completed accurately and timely.

Finding 9: Short Term Special Event Permits

Division requirements for Permits are addressed in the OM in Chapter 1.2 as well as Chapter 5.2. We reviewed a sample of five Permits with events occurring between March 2019 and June 2019. One Permit was signed two days after the event ended, and one was signed one month after the event ended. In addition, the Permits documentation included a Department Contract/Grant Review Form, which had been used only for Department contracts and grants and is no longer a valid Department form. According to Park and District staff, this form was used for routing purposes. There were noted inconsistencies of District approval on four of out five Permits.

The Permit included a fee structure that is not consistent with the Division fees for individual entry. Three of the five Permits required the Permittee to pay per participant for Park entry fees and include a per participant donation to the CSO. The events were not sponsored by the CSO. From event information available online, alcohol was provided at one event. However, the Permit did not include sufficient documentation of Park Manager approval as required under Chapter 5.5(j) of the OM, and there is no documentation of required liability insurance for the event.

Recommendation:

We recommend the Division work with the District and the Park to ensure proper approval procedures are in place regarding Permits. The Division should review the OM to

Report: A-1920DEP-006

ensure that there are concise guidelines for the Park in regards to fee structure, allowable items, and sufficient documentation.

Finding 10: CSO Annual Program Plan

The CSO's fiscal year begins on January 1 and ends on December 31. According to the Agreement, the CSO is required to submit an Annual Program Plan on or before the end of the CSO's fiscal year. The Annual Program Plans for 2018 and 2019 were not submitted by the end of the CSO's fiscal year. The 2019 Annual Program Plan reflected Park Manager approval prior to the date signed by the CSO President.

According to paragraph 5(b) of the Agreement, the Annual Program Plan must include a complete plan of Park improvement projects, activities, and fundraisers, and events. All activities must include designation of location, facilities, and time of use. Paragraph 7 of the Agreement gives the CSO authorization to sell merchandise in the Park ranger's station. The CSO collects funds from coin-operated laundry machines located in the campground area and sells merchandise at the Visitor Center. However, the locations, facilities, and times associated with the activities were not designated in the Annual Program Plan approved by the Park Manager.

Recommendation:

We recommend the Division work with the Park to provide additional oversight of CSO activities to ensure the Annual Program Plans are submitted on or before the end of the CSO's fiscal year. The Division should work with the Park to ensure that all CSO fundraising activities are designated in the Annual Program Plan, and approved by the Park Manager.

Report: A-1920DEP-006

Finding 11: Controls Regarding the Use of CSO Funds

According to the Financial Policy, *The CSO shall have a safe at Park headquarters designated for the receipt and temporary holding of any monies received at the Park. The safe shall be kept locked except when accessing to deposit or remove money. All movement of monies to and from the safe shall be documented on a "safe log"*. Based on observations during our site visit, the CSO does not have a separate safe designated at the Park for CSO funds. The CSO uses the Park's safe for temporarily holding funds collected by Park staff for operation of the coin-operated laundry machines in the campground area. This safe is not secured as required. Funds collected for merchandise sales were not maintained in the safe as described in the financial policy. Section 1.4(11) of the OM requires that Park employees handling CSO funds on behalf of the CSO must follow guidelines established in the CSO's financial policies. According to the CSO's financial policy, individuals responsible for receipt of CSO revenue must be approved by the Board. The District Bureau Chief must approve Park staff collecting funds on behalf of the CSO. Based on our inquiry, the District Bureau Chief was unable to provide documentation of written approval for Park staff to collect CSO funds.

According to the Financial Policy, the treasurer shall approve any expenditures up to \$100 and the President shall approve up to \$250 for direct support of Park system activities. All other expenditures, that are not budgeted must be approved by the Board of Directors. The CSO's Club Scrub committee Board members have access to a separate CSO Club Scrub bank account, credit cards and on-line payment accounts. During the audit period, Club Scrub committee Board members did not appear to have spending limits and many expenditures were not approved in writing by the Board. Specifically, we noted the following control weaknesses:

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

- Club Scrub committee expenditures during the audit period included payments to a business owned by one Board member for equipment rental. While additional service quotes had been obtained prior to using the business, there was no documentation of Board approval for using the Board member's business, or that the Board voted on using the business with the Board member abstaining as outlined in the CSO's Code of Ethics. Several of the expenditures to the business were through the use of the Board member's CSO credit card.
- Two Club Scrub committee expenditures were not supported by invoices or receipts. Documentation associated with these expenditures included an e-mail to a Club Scrub committee Board member and a record of hours with no name or description of services.
- According to Chapter 4.3 of the CSO Handbook, *Spending must be consistent with the CSO Agreement or in support of the CSO's purposes as stated in the Articles of Incorporation. Any other proposed use of CSO funds must be pre-approved in writing by the Park Manager (e.g., donations to other organizations, memberships in other organizations, etc.).* During the sampled month of April 2019, a check for \$1,000 was written by a Club Scrub committee Board member to an external trail association as a donation. The CSO could not provide documentation that the donation was pre-approved in writing by the Park Manager.

Recommendation:

We recommend the Division work with the Park to strengthen controls over CSO activities consistent with the CSO's Financial Policy, Code of Ethics, and the CSO Handbook. These controls should include documented financial oversight, review, and written approval of

Report: A-1920DEP-006

CSO expenditures and activities. The Division should review whether the current practices of Park staff collecting CSO funds is appropriate use of Park resources. Any use of Park staff should be approved in writing by the District Bureau Chief and consistent with requirements in the OM.

Finding 12: Management Oversight of CSO Activities and Events

During the audit period, the CSO held a Club Scrub Growler event. For this event, the CSO had not obtained written approval from the Park Manager/District Bureau Chief to charge a separate fee or donation in lieu of the usual Park entrance fee as required under Paragraph 5.b. of the CSO Agreement. A copy of the written EEC for the event was not submitted to the Park as required under Chapter 4.5.1 of the CSO Handbook. In addition, the CSO had not obtained written approval for publicity released about the event from the Park Manager as required under Chapter 4.5.3 of the CSO Handbook and had not obtained written Park Manager approval for the CSO to serve alcohol at the event as required under Chapter 4.6 of the CSO Handbook. Based on discussions with CSO and Park staff, most of these activities resulted from verbal discussion with prior Park management.

For the event, the CSO paid the Park \$670.41 in entrance fee payments for 357 participants calculated at \$1.88 per individual. The CSO's Board Meeting minutes documented 750 event participants. The CSO did not provide a listing of event participants to justify the difference in fee payment but indicated that not all participants at the event entered the Park. The CSO also could not provide authority or written approval to pay the Park individual entrance fee amounts less than the Division's statewide fee schedule.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

Several of the expenditures reviewed during the audit period were in preparation for the Club Scrub committee's Endless Summer Paddle Event in June 2019. This event was not included on the CSO's Annual Program Plan for 2019 and had not been approved in writing by the Park Manager.

Recommendation:

Going forward, we recommend the Division work with the Park to strengthen controls and provide additional oversight of CSO events. All events and event publicity should be approved in advance in writing, including written approval from the Park Manager/District Bureau Chief to charge a separate fee or donation in lieu of the usual Park entrance fee. Prior to events, the Park should ensure the event EEC is submitted to the Park Manager and published for event participation. The Park should ensure that written Park Manager approval is provided in advance if alcohol will be served at an event. The Park should also require documentation to support the number of participants included in CSO fees for individual Park entrance and ensure the fee payment is consistent with the Division's standard fee for individual entry.

Finding 13: CSO Board Membership

According to Chapter 1.4.(c)(3) of the Division OM, *A spouse, relative, or dependent who resides with a park employee must not serve as a CSO officer (president, vice president, secretary, treasurer, etc.) with that park's CSO.* The CSO's 2019 Annual Report filed with the Department of State Division of Corporations listed the spouse of a Park employee as the CSO Treasurer.

Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support Organization
Division of Recreation and Parks

Report: A-1920DEP-006

Recommendation:

We recommend the Division work with the Park to ensure that no Park employee, spouse, relative, or dependent who resides with a Park employee serve as an Officer on the CSO Board.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of Section 20.055, F.S., and in conformance with the International Standards for the Professional Practice of Internal Auditing, published by the Institute of Internal Auditors, and Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The audit was conducted by Christine Cullen and supervised by Valerie J. Peacock.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at (850) 245-3151. Copies of final reports may be viewed and downloaded via the internet at <https://floridadep.gov/oig/internal-audit/content/final-audit-reports>. Copies may also be obtained by telephone (850) 245-3151, by fax (850)245-2994, in person or by mail at Department of Environmental Protection, Office of Inspector General, 3900 Commonwealth Boulevard, Mail Station #41, Tallahassee, FL 32399.

*Valerie J. Peacock,
Director of Auditing*

*Candie M. Fuller,
Inspector General*



FLORIDA DEPARTMENT OF Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, FL 32399

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Memorandum

TO: Valerie Peacock, Audit Director
Office of the Inspector General

FROM: Eric Draper, Division Director *ED 11/12/19*
Division of Recreation and Parks

SUBJECT: Division Response to Audit of Jonathan Dickinson State Park and the
Friends of Jonathan Dickinson State Park, Inc. Citizen Support
Organization (Report:A-1920DEP-006)

DATE: November 12, 2019

Finding 1: Park Safe

According to Paragraph 1.8(i) of the OM, Park safes must be secured to a wall or structure and have an inner compartment that can be locked to provide additional access restrictions. During our site visit, we observed that the safe used by the Park does not contain the required inner compartment and is not secured on a daily basis.

Recommendation:

We recommend the Division ensure that the Park maintains a safe with an inner compartment that can be locked to provide additional access restrictions. Further, the Park should take added steps to ensure the safe is maintained in a secured manner.

Division Response:

Concur with finding and recommendation. Corrective action will be taken. Park management will procure, install and maintain a secure safe with an inner compartment.

Finding 2: Revenue Collection and Reporting

For reported revenue reviewed during the sampled months, adjustments reported monthly on the Park's DDWs were not consistent with differences between financial session reports and credit/cash receipts for nine out of 61 days. Per the Revenue Procedures, an explanation for any differences should be included in the Comments Section of the DDW. There was insufficient documentation to explain a majority of the documented adjustments. This was due, in part, to the Park's decision to submit a weekly deposit summary, rather than documenting shift adjustments on a daily basis.

Recommendation:

We recommend the Division work with the Park to ensure all adjustments between reported revenue and daily receipts are documented to provide an explanation for the difference. To promote better accountability for daily adjustments, this should be documented daily for each shift.

Division Response:

Concur with finding and recommendation. Corrective action has been taken. The park now documents and provides justification for variances and adjustments between reported revenue and daily receipts.

Finding 3: Expenditures

According to Chapter 60A-1.002, F.A.C., purchases \$2,500 or greater require two written quotes. If less than two quotes are received, agencies must provide justification as to why additional quotes could not be obtained. If commodities or contractual services are available from a single source, the agency must document the conditions and circumstances.

Of the five reviewed purchase orders exceeding \$2,500, four were issued to one vendor for cabin and resident lift station pump services. The Park did not obtain two quotes for services under any of the four purchase orders and submitted a contract exception form with each. One exception was documented as a single source service provider, and three were documented as emergency purchases. Under the purchase order with single source exception, Form DEP 55-201 included documentation that the Park had used the vendor in the past and was satisfied with the work quality and price. However, there was no justification which documented the vendor was the only source available to provide the service. Justification for the emergency purchases included documented time limitations and health and safety. Based on discussions with Park staff, the Park did not have processes in place to ensure these pumps were being maintained. While it is imperative that the Park maintain the health and safety of all Park visitors and residents, repetitive emergency repair purchases do not demonstrate effective on-going management of equipment nor adherence with Chapter 60A-1.002, F.A.C.

The remaining purchase order was for the Park's annual purchase of rental cabin linen services. The Park has used the same vendor each year for these services since FY 2014-2015. For services during FY 2018-2019, the Park documented solicitation of quotes from three vendors and obtained a quote from one. Of the two other vendors invited to submit a quote, one appeared to be a dry-cleaning business and the Park's Administrative Assistant indicated that the other had previously advised the work would not be cost effective. Despite these known factors, the annual solicitation consistently documented a request for quotes from the same three vendors, with the sole quote obtained from the same vendor. All the purchases reviewed were approved by the

District and subsequently through the Procurement Section in the Bureau of General Services.

Recommendation:

We recommend the Division ensure that District and Park procurement practices comply with Section 287, F.S., Chapter 60A-1.002, F.A.C, and the Department Procurement Guide. For purchases that exceed \$2,500, a minimum of two quotes should be obtained. If the minimum quotes cannot be obtained and due diligent procurement efforts have been demonstrated, the circumstances for the single source purchase should be documented as required. Further, the Division should work with the District and Park to address equipment maintenance practices to minimize circumstances that put the Park at risk of paying inflated costs due to emergency repairs.

Division Response:

Concur with finding and recommendation. Corrective action has been taken. The district and park procurement practices now comply with Section 287, F.S., Chapter 60A-1.002, F.A.C, and the Department Procurement Guide.

Finding 4: Bulk Fuel

The Park maintains two 500-gallon tanks for unleaded and diesel bulk fuel. Per Paragraph 1.8(j) of the OM, a Bulk Fuel and Oil Issue Log is to be used to track the use of bulk fuel and oil. The Park maintains a Monthly Bulk Gas and Oil Issue Log which documents beginning inventory, purchases, use, and a reconciliation between the ending fuel balance and actual quantity on hand at the end of the month.

Based on a comparison of these logs to purchases during the audit period for unleaded fuel, the Park documented receiving 34 gallons less on the log than purchased during the month of July 2018. Based on measurements of fuel taken during our site visit on June 18, 2019, the actual quantity on hand was an additional 30 gallons less than supported by record. For diesel fuel, the Park documented receiving 67 gallons more on the log than purchased during the month

of November 2018. From our measurement of the diesel fuel tank, the actual quantity on hand was only 30 gallons more than the amount supported by record. From discussions with Park staff, there is limited access to the fuel tanks; however, Park management has historically not verified information recorded by maintenance staff on the Monthly Bulk Gas and Oil Issue Logs.

Recommendation:

We recommend that the Division work with the Park to put additional controls in place to reconcile purchases with recorded amounts received. Park management should verify

the level of fuel on hand at the end of each month to ensure the accuracy of recorded amounts.

Division Response:

Concur with finding and recommendation. Corrective action has been taken. Park management now verifies the level of fuel on hand at the end of each month to ensure the accuracy of recorded amounts. Locks have been changed to ensure limited access to fuel transfer pumps.

Finding 5: Firearm Activity Log and Training

The Park is required to maintain a firearm activity log for each firearm in accordance with the Firearm Use Standard. Further, the nuisance and exotic animal removal standard requires the Disposition of Feral Hogs form to be completed each time. We reviewed the Firearm Activity Logs for March 26, 2019, through June 2, 2019, and found eight instances of recorded Disposition of Feral Hogs forms that were not noted on the log and nine activity log entries were noted to not have the required disposal sheet.

According to the Firearm Use Standard, employees and volunteers must complete classroom training, Division in-house training, and range qualification. We received documentation for nine staff members. Of those nine, three were missing documentation. One did not have a firearm approval memo on file, one did not have documentation of completing the Division in-house training, and the classroom training certificate and firearms qualification was not on file for all three. Of the three, one was listed as a volunteer for the Park. The remaining two of the three employees are former Park management and no longer with the Park.

Recommendation:

We recommend the Division work with the Park to ensure that proper procedures are in place documenting firearm use activity and staff training in accordance with standards.

Division Response:

Concur with finding and recommendation. Corrective action will be taken. The Division will work with the Park to ensure that proper procedures are in place and followed to document firearm use activity and staff training in accordance with standards.

Finding 6: Housing Policy and Requirements

We reviewed the Agreements of Occupancy for employees residing at the Park. Section 1 of the Agreement of Occupancy for Employee-Owned Mobile Home Sites states This site is provided to the employee subject to all provisions and restrictions noted in the Florida Park Service Housing Policy contained in Chapter 2, Operations Manual. However, the housing policy is in Section 1.5(c) of the Operations Manual. Section 11 of the Agreements require the resident of State-Owned or Employee-Owned sites to pay

utilities directly through the provider, unless they share a meter with another residence, which they would pay the Department directly. The base rate for the residences that fall under this exception is \$125 per month for one bedroom, and \$25 for each additional bedroom. Three employees residing in housing at the STOP Camp are being charged and paying \$50 per month. Based on conversation with Park management, the previous Park Manager and District Manager agreed to a flat fee of \$50 per month for utilities for STOP Camp residences.

Recommendation:

We recommend the Division work with the Park to review and correct any inconsistencies with the Agreement language referencing the OM. Further, the Division should determine an accurate amount to be charged to STOP camp residents and correct Agreements accordingly.

Division Response:

Concur with finding and recommendation. Corrective actions include: The OM is being revised for statewide consistency. All Occupancy Agreements are being reviewed and the Occupancy Agreements for this park will be updated.

Finding 7: Housing Payments made to the Park/Department

Based on the Agreements of Occupancy, the employee is required to notify the Department of all occupants, which must be approved by the Department. Section 1.5(c)(8)(b) of the OM requires individuals occupying the residence with the employee who are not considered immediate family pay a rental fee based on the approved FPS housing rental schedule. According to Section 1.5(c)(8)(a) of the OM, immediate family is defined as the spouse of the approved resident, lawful dependent children and parents of the approved resident and spouse and any other persons in custodial care of the approved resident and spouse. The rental rate for additional occupants is \$100 per person, per month. We verified that two residents had additional occupants, and that one had not paid the required rental fee per the OM. Based on conversation with the Resident, they were unaware that their granddaughter was not considered immediate family. The additional occupant resided with the employee from June 2018 to May 2019.

Recommendation:

We recommend the Division work with the Park and the employee to determine the amount owed to the Park for the additional occupant rent.

Division Response:

Concur with finding and recommendation. The OM is being modified to limit non-family residents. The bureau chief will either demonstrate the need to provide residency to the non-family occupants and determine, consistent with state rules, a basis for fees or

cause non-staff to be removed. To the extent possible resident and utility payments owed to the state will be collected. In the event collections do not take place, the bureau chief will document reasons.

Finding 8: Inspection Reports

According to the OM, Section 1.5(c)(11) states an annual inspection of all park residences should be performed by the Park Manager utilizing the Residence Inspection Report. Based on documentation provided, eight of the 16 sites had completed inspection reports for FY 2017-2018, and five had an inspection completed in FY 2018-2019. The remaining three did not have an inspection report on file.

Further, Chapter 1.2(h) of the OM requires an annual Park inspection be performed by District Management. The District is required to complete the Park Management Summary. The District was unable to provide a completed Summary for the scope of our audit; however, the District was able to provide a Summary completed August 1, 2019.

Recommendation:

We recommend the Division work with Park and District management to ensure that all inspection reports are completed accurately and timely.

Division Response:

Concur with findings and recommendations. Inspection reports are required to be complete, accurate and timely. The Park Manager is working with the District management to complete all inspection reports and then follow an annual inspection schedule.

Finding 9: Short Term Special Event Permits

Division requirements for Permits are addressed in the OM in Chapter 1.2 as well as Chapter 5.2. We reviewed a sample of five Permits with events occurring between March 2019 and June 2019. One Permit was signed two days after the event ended, and one was signed one month after the event ended. In addition, the Permits documentation included a Department Contract/Grant Review Form, which had been used only for Department contracts and grants and is no longer a valid Department form. According to Park and District staff, this form was used for routing purposes. There were noted inconsistencies of District approval on four of out five Permits.

The Permit included a fee structure that is not consistent with the Division fees for individual entry. Three of the five Permits required the Permittee to pay per participant for Park entry fees and include a per participant donation to the CSO. The events were not sponsored by the CSO. From event information available online, alcohol was

provided at one event. However, the Permit did not include sufficient documentation of Park Manager approval as required under

Chapter 5.5(j) of the OM, and there is no documentation of required liability insurance for the event.

Recommendation:

We recommend the Division work with the District and the Park to ensure proper approval procedures are in place regarding Permits. The Division should review the OM to ensure that there are concise guidelines for the Park in regards to fee structure, allowable items, and sufficient documentation.

Division Response:

Concur with findings and recommendations. The Division is reviewing the OM to ensure that there are clear guidelines for the permit fees and requiring specific documentation. Park management will ensure that event permits are completed prior to the event, approvals are documented, and permit fees collected.

Finding 10: CSO Annual Program Plan

The CSO's fiscal year begins on January 1 and ends on December 31. According to the Agreement, the CSO is required to submit an Annual Program Plan on or before the end of the CSO's fiscal year. The Annual Program Plans for 2018 and 2019 were not submitted by the end of the CSO's fiscal year. The 2019 Annual Program Plan reflected Park Manager approval prior to the date signed by the CSO President.

According to paragraph 5(b) of the Agreement, the Annual Program Plan must include a complete plan of Park improvement projects, activities, and fundraisers, and events. All activities must include designation of location, facilities, and time of use. Paragraph 7 of the Agreement gives the CSO authorization to sell merchandise in the Park ranger's station. The CSO collects funds from coin-operated laundry machines located in the campground area and sells merchandise at the Visitor Center. However, the locations, facilities, and times associated with the activities were not designated in the Annual Program Plan approved by the Park Manager.

Recommendation:

We recommend the Division work with the Park to provide additional oversight of CSO activities to ensure the Annual Program Plans are submitted on or before the end of the CSO's fiscal year. The Division should work with the Park to ensure that all CSO fundraising activities are designated in the Annual Program Plan, and approved by the Park Manager.

Division Response:

Concur with findings and recommendations. It is now the Park Manager's responsibility to ensure that all CSO fundraising activities are designated in the approved Annual Program Plan.

Finding 11: Controls Regarding the Use of CSO Funds

According to the Financial Policy, The CSO shall have a safe at Park headquarters designated for the receipt and temporary holding of any monies received at the Park. The safe shall be kept locked except when accessing to deposit or remove money. All movement of monies to and from the safe shall be documented on a "safe log". Based on observations during our site visit, the CSO does not have a separate safe designated at the Park for CSO funds. The CSO uses the Park's safe for temporarily holding funds collected by Park staff for operation of the coin-operated laundry machines in the campground area. This safe is not secured as required. Funds collected for merchandise sales were not maintained in the safe as described in the financial policy. Section 1.4(11) of the OM requires that Park employees handling CSO funds on behalf of the CSO must follow guidelines established in the CSO's financial policies. According to the CSO's financial policy, individuals responsible for receipt of CSO revenue must be approved by the Board. The District Bureau Chief must approve Park staff collecting funds on behalf of the CSO. Based on our inquiry, the District Bureau Chief was unable to provide documentation of written approval for Park staff to collect CSO funds.

According to the Financial Policy, the treasurer shall approve any expenditures up to \$100 and the President shall approve up to \$250 for direct support of Park system activities. All other expenditures, that are not budgeted must be approved by the Board of Directors. The CSO's Club Scrub committee Board members have access to a separate CSO Club Scrub bank account, credit cards and on-line payment accounts. During the audit period, Club Scrub committee Board members did not appear to have spending limits and many expenditures were not approved in writing by the Board. Specifically, we noted the following control weaknesses:

- Club Scrub committee expenditures during the audit period included payments to a business owned by one Board member for equipment rental. While additional service quotes had been obtained prior to using the business, there was no documentation of Board approval for using the Board member's business, or that the Board voted on using the business with the Board member abstaining as outlined in the CSO's Code of Ethics. Several of the expenditures to the business were through the use of the Board member's CSO credit card.
- Two Club Scrub committee expenditures were not supported by invoices or receipts. Documentation associated with these expenditures included an e-mail to a Club Scrub committee Board member and a record of hours with no name or description of services.

- According to Chapter 4.3 of the CSO Handbook, Spending must be consistent with the CSO Agreement or in support of the CSO's purposes as stated in the Articles of Incorporation. Any other proposed use of CSO funds must be pre-approved in writing by the Park Manager (e.g., donations to other organizations, memberships in other organizations, etc.). During the sampled month of April 2019, a check for \$1,000 was written by a Club Scrub committee Board member to an external trail association as a donation. The CSO could not provide documentation that the donation was pre-approved in writing by the Park Manager.

Recommendation:

We recommend the Division work with the Park to strengthen controls over CSO activities consistent with the CSO's Financial Policy, Code of Ethics, and the CSO Handbook. These controls should include documented financial oversight, review, and written approval of CSO expenditures and activities. The Division should review whether the current practices of Park staff collecting CSO funds is appropriate use of Park resources. Any use of Park staff should be approved in writing by the District Bureau Chief and consistent with requirements in the OM.

Division Response:

Concur with findings and recommendations. The Division will work with the Park to strengthen controls over CSO activities consistent with the CSO's Financial Policy, Code of Ethics, and the CSO Handbook. Current resolutions to the Finding include the following:

- *The Park is working with the CSO to achieve compliance.*
- *The CSO has removed vending machine revenues from the Ranger Station safe and the CSO quarter exchange fund has been dissolved with signs directing visitors to the concession for change.*
- *The CSO has purchased its own safe with an internal compartment and the safe is located at the Kimbell Center.*
- *Park staff involvement has been limited.*
- *The CSO Board members are assisting with vending machine revenue collection and are trying to recruit a volunteer to handle.*
- *The Club Scrub Committee Chair who had undocumented purchases and Board member with business conflicts have resigned from the Board.*
- *Club Scrub no longer maintains a separate PayPal account.*
- *All purchases not pre-approved in the annual budget are being approved by the Friends Board. By-laws are being updated to remove language approving Club Scrub to make large purchases from select businesses.*

Finding 12: Management Oversight of CSO Activities and Events

During the audit period, the CSO held a Club Scrub Growler event. For this event, the CSO had not obtained written approval from the Park Manager/District Bureau Chief to charge a separate fee or donation in lieu of the usual Park entrance fee as required under Paragraph 5.b. of the CSO Agreement. A copy of the written EEC for the event was not submitted to the Park as required under Chapter 4.5.1 of the CSO Handbook. In addition, the CSO had not obtained written approval for publicity released about the event from the Park Manager as required under Chapter 4.5.3 of the CSO Handbook and had not obtained written Park Manager approval for the CSO to serve alcohol at the event as required under Chapter 4.6 of the CSO Handbook. Based on discussions with CSO and Park staff, most of these activities resulted from verbal discussion with prior Park management.

For the event, the CSO paid the Park \$670.41 in entrance fee payments for 357 participants calculated at \$1.88 per individual. The CSO's Board Meeting minutes documented 750 event participants. The CSO did not provide a listing of event participants to justify the

difference in fee payment but indicated that not all participants at the event entered the Park. The CSO also could not provide authority or written approval to pay the Park individual entrance fee amounts less than the Division's statewide fee schedule.

Several of the expenditures reviewed during the audit period were in preparation for the Club Scrub committee's Endless Summer Paddle Event in June 2019. This event was not included on the CSO's Annual Program Plan for 2019 and had not been approved in writing by the Park Manager.

Recommendation:

Going forward, we recommend the Division work with the Park to strengthen controls and provide additional oversight of CSO events. All events and event publicity should be approved in advance in writing, including written approval from the Park Manager/District Bureau Chief to charge a separate fee or donation in lieu of the usual Park entrance fee. Prior to events, the Park should ensure the event EEC is submitted to the Park Manager and published for event participation. The Park should ensure that written Park Manager approval is provided in advance if alcohol will be served at an event. The Park should also require documentation to support the number of participants included in CSO fees for individual Park entrance and ensure the fee payment is consistent with the Division's standard fee for individual entry.

Division Response:

Concur with findings and recommendations. Prior to events, park management will require approval with fees consistent with state fee schedule. The Park will also require

Director's office approval to allow participants for individual park entrance and ensure the fee payment is consistent with the Division's standard fee for individual entry.

Finding 13: CSO Board Membership

According to Chapter 1.4.(c)(3) of the Division OM, A spouse, relative, or dependent who resides with a park employee must not serve as a CSO officer (president, vice president, secretary, treasurer, etc.) with that park's CSO. The CSO's 2019 Annual Report filed with the

Department of State Division of Corporations listed the spouse of a Park employee as the CSO Treasurer.

Recommendation:

We recommend the Division work with the Park to ensure that no Park employee, spouse, relative, or dependent who resides with a Park employee serve as an Officer on the CSO Board.

Division Response:

Concur with findings and recommendations. The issue has been remedied. Now, no park employee, spouse, relative, or dependent who resides with a park employee serves or may serve as an Officer on the CSO Board.