

**Audit of Wakulla Springs State Park and the
Friends of Wakulla Springs State Park, Inc.
Citizen Support Organization**

Division of Recreation and Parks

Report: A-1819DEP-005

Office of Inspector General

Internal Audit Section

Florida Department of Environmental Protection

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3900 Commonwealth Boulevard, MS 40
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The Department of Environmental Protection (Department) Office of Inspector General (OIG) conducted an audit of Wakulla Springs State Park as well as the Agreement with Friends of Wakulla Springs State Park, Inc. Citizen Support Organization (CSO). This audit was initiated as part of the Fiscal Year (FY) 2018-2019 Annual Audit Plan.

Scope and Objectives

The scope of this audit included Park and CSO activities and financial records during the period July 1, 2017, through June 30, 2018. 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.

Background

The Park, located in Wakulla Springs, Florida, has one of the world's largest and deepest freshwater springs. Park amenities include guided riverboat and glass bottom boat tours, and nature trails. A contracted concession operates the Wakulla Springs Lodge with overnight accommodations, food and beverage services, merchandise sales, and event services. Park revenues are derived primarily through annual permits, entrance fees, and guided tours.

The CSO supports the park with funds raised through memberships fees, donations, grants and special events. CSO funds have benefited the Park with a park bridge, upgrades to the Park tour boats, and redesign of the ticket office. During Fiscal Year (FY) 2017-2018, the Park's reported revenues were \$826,571.49 with 203,714 in reported attendance. According to the CSO's 2017-2018 Profit and Loss statement, the CSO reported \$82,844.54 in total revenue and \$35,607.54 in expenses.

Results

Revenue Collection and Reporting

Park revenue is collected at the Park's ranger station, Waterfront Center, and honor trail entrances. To determine the accuracy of reported revenue, we compared revenue reported on the Deposit Worksheet and the Daily Shift Check Out Sheets to support documentation¹ for the sampled months of May and June 2018. Reported amounts were generally consistent with minor errors which were documented by the park.

¹ Park credit card settlement reports, deposit tickets, and deposit summary reports.

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According to the Florida State Parks and CAMA Revenue Collection Procedures (Revenue Procedures), deposit slips should be initialed by both the individual preparing and the individual verifying the deposit amounts. We reviewed 158 deposit slips for the sampled months. Of these, 148 deposits slips were initialed by two staff as required. Deposit slips for seven were signed or initialed by only one staff, and three had no initials or signatures. Per discussions with the Park Manager, these instances appeared to be unintended errors in departure from the established processes. We verified all deposits included in the sampled months were made timely as required in the Division's Operations Manual (OM).

We verified the District completed Fiscal Compliance Reviews for the Park in January 2018 and May 2019 as required in the OM. According to the most recent compliance review, the Park met the requirements, except for areas noted regarding the safe, spot checks for entrance/honor receipts, and documentation of refunds.

Chapter 1.8(n) of the OM requires that each time there is a change in Park Managers, both the outgoing and incoming Managers are required to conduct a property inventory and audit no more than 30 days before departure of the outgoing Manager and within 30 days of arrival of the incoming Manager. Copies of the Managers' Audit are to be submitted to the District Bureau Chief. The Park Manager Audit was signed by both the outgoing and incoming managers on November 16, 2017, and was submitted to the District. However, the property inventory was not conducted.

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. The Park documented 29

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tax-exempt transactions during the sample months. Of the 29 transactions, the park did not retain a tax-exempt form for one.

Attendance Reporting

Daily attendance is recorded directly in the Division-wide Point of Sale system. According to the Park's Attendance Reporting Plan (ARP) approved by the District on December 31, 2014, actual visitors will be counted at the Ranger Station. Estimated visitor counts will be obtained utilizing traffic counters at the Cherokee and River Sinks areas. Per the Division's OM, honor envelope counts are used alternatively if there is a known malfunction with the traffic counter. For the sampled months of May and June 2018, 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 Honor Envelope Documentation Report
May	3,123	2,678
June	2,694	1,434

Reported estimated attendance was not always supported by documented visitor counts. This was due, in part to a greater number of visitors reported than recorded on the Honor Envelope Documentation Reports. In addition, the Park's approved ARP did not include an estimation calculation method for the Emerald Sink location.

Expenditures and P-Card Use

To verify compliance with purchasing requirements, we reviewed three purchase orders processed through MyFloridaMarketPlace (MFMP) and a sample of 14 P-Card expenditures. According to Chapter 60A-1.002, Florida Administrative Code (F.A.C.), purchases which meet

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or exceed \$2,500 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 three purchase orders reviewed were documented as single source contract exceptions. Documentation for one included appropriate justification for the single source nature of the purchase. The Emergency/Single Source/Contract Exception form (DEP 55-201) was included with the second purchase order, which was for tractor repair services. However, the Park had not documented on the form justification as to why the vendor was the only source available for service. The third purchase order, for elevator repair, included form DEP 55-201 with justification that the Park had a contract with the vendor. The contract referenced was a purchase order for on-going elevator maintenance. The purchase order was also approved after the invoice date; however, the DEP 55-201 form did not document justification for use of the vendor as a single source for repairs and did not indicate that the purchase was an after the fact contract exception.

According to Chapter 60A-1.002(5), F.A.C., *When determining the amount or amounts of purchases for the purpose of applying the threshold categories, [established under Chapter 60A-1.002(2)-(4)] agencies shall follow the definitions and classes and groups of commodities or contractual services established by the Department. A purchasing office shall not divide its purchases or its purchasing operations to circumvent these requirements.* According to Section 1.4 of the Department's P-Card training, at the time of these purchases the Department had set a \$2,499.99 limit for all purchases with a P-Card. According to the Department's P-Card training,

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a cardholder may not split transactions to stay within their limits. For the 14 P-Card transactions reviewed, 13 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. Of the 14 expenditures, two were for tree service removal to a single vendor. Payment for these services was processed using two separate P-Cards transactions made five days apart in June 2018. The expenditures amounts were \$2,100.00 and \$1,925.00, which collectively totaled \$4,025.00. According to the Department's P-Card training, a cardholder may not split transactions to stay within their limits. The Park Manager could not provide additional justification for the separate transactions.

State Property and Equipment Management

To verify compliance with Department requirements regarding property, we reviewed a sample of 46 property items from the Park's Master Property file. We verified 39 items were located at the Park. Surplus Property paperwork was verified for seven items. During our review, we noted that other surplus items were donated to the CSO. All firearms on the Master Property File were kept in a locked safe in a secure location. We verified that required firearm certification and qualification documents were on file for authorized staff and firearm use was supported by firearm logs. For Park staff located in Park housing during the audit period, we verified that Agreements of Occupancy and annual inspections were completed and approved as required.

Volunteers

We reviewed volunteer records provided by the Park and in the Volunteer Service Tracking System (V Sys) for 66 volunteers during the audit period. Of these, 49 were

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documented under Group Volunteer Agreements and 17 were regular service volunteers. For regular service volunteers, Chapter 1.6(d)(1) of the OM requires that a Volunteer Agreement be completed annually. The Agreement should be completed in VSys. Of the 17 regular service volunteers, Agreements for ten had not been updated annually consistent with the volunteers' documented service hours. In addition, ten volunteer profiles in VSys did not include the Agreements. 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 VSys by electronic documentation maintained in the volunteer's VSys profile. Of the 17 regular service volunteers, we verified documentation demonstrating that the required searches had been conducted. However, four were not documented in VSys.

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 verified 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 Annual Program Plan for 2018 was submitted and approved by the Park Manager as required in December 2017.
- The CSO had an approved budget for the audit period that identified the specific needs and costs associated with supporting Park projects.

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- The CSO paid sales tax to the Department of Revenue, as required during the audit period.

CSO Income and Expenses

During the audit period, the CSO received revenue through annual Park events, grants, donations and CSO membership dues. According to the 2017- 2018 Profit and Loss Report, CSO income and expenses were as follows.

FY 2017-2018 CSO Income and Expenses	
Total Income	\$82,844.54
Total Expense	\$35,607.54
Net Income	\$47,237.00

We compared amounts documented in the Profit and Loss Report to the CSO's general ledger for 2017-2018 and compared the general ledger to bank statements and source documentation for the sampled months of May and June 2018. 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.

The CSO maintains a checking account for operating expenses. The CSO also has a secondary checking, savings, money market, grants and Certificate of Deposit (CD) accounts as follows.

Type of Account	Balance as of 6/30/18
Centennial Banking Checking	\$43,250.54
Centennial Banking Grants	\$100.00
First Commerce Credit Union Checking	\$100.00
First Commerce Credit Union Savings	\$5.08
First Commerce Credit Union CD	\$10,217.82
Vanguard Money Market Account	\$37,147.20

According to the CSO's bank statements, no funds were distributed from the CSO's savings, secondary checking or money market accounts for use in CSO operations during July 2017 – June 2018.

The CSO's By-Laws reflect financial best practices as stated in the current CSO Handbook. Per the CSO Treasurer, the Board is in the process of drafting an official CSO financial policy. This had not been finalized at the time of our audit.

We reviewed documentation for the 15 expenditures made during the sampled months of May and June 2018. All expenditures were supported by invoices and receipts and appeared to benefit the Park directly or indirectly. We verified that all checks included two CSO Officer signatures, as required. Monthly bank statements are addressed to the CSO and mailed to the Park. Based on discussion with CSO Officers, the statements are available to the CSO President and Treasurer.

Park Management Oversight of CSO Activities

CSO Officers include a President, Vice President, Secretary, and Treasurer. We verified that sexual predator checks were conducted for all CSO Officers and Board Members, and their volunteer Agreements were current. 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. During the sampled months, Park management attended the monthly board meetings. Meeting minutes were retained by the CSO and provided for the audit period.

Section 1.4 of the OM requires the District to conduct a CSO Management Review every four years. The last review was conducted on June 12, 2013. An updated review was completed May 1, 2019. The review reflected positive results, with the exception of a comment regarding the needed financial policy.

Conclusions

Based on our audit, the Park was generally in compliance with Division requirements regarding revenue collection and reporting, tax exempt transactions, staff housing requirements and deposits with minor exceptions. However, we noted control weaknesses regarding expenditures, attendance reporting, and volunteer documentation.

The CSO demonstrated compliance with the Agreement and statutory requirements. Based on our review of financial records, the CSO maintained a sound record keeping system incorporating fiscal controls despite the lack of a written financial policy.

Findings and Recommendations

Finding 1: Expenditures and P-Card Use

According to Chapter 60A-1.002, F.A.C., purchases which meet or exceed \$2,500 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. During our review of purchase orders exceeding \$2,500, two quotes were not obtained for one purchase for tractor repairs. The Park included form DEP 55-201 with the purchase as required for the exception; however, the form did not include justification as to why the vendor was the only source available for the service. The Park has also not obtained two quotes for a purchase order for elevator repair but had included form DEP 55-201 for the exception with justification that the Park had a contract with the vendor. The contract referenced was a purchase order for on-going elevator maintenance. The purchase order had been approved after the invoice date; however, the DEP 55-201 form did not document justification for use of the vendor as a single source for

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repairs and did not indicate that the purchase was an after the fact contract exception. An after the fact exception requires documentation of the reason and steps taken to prevent future occurrences.

Two P-Card transactions reviewed were for tree service removal to a single vendor. Payment for these services was processed through two separate P-Cards transactions which were made five days apart in June 2018. The expenditures amounts collectively totaled \$4,025.00. Per Chapter 60A-1.002(5), F.A.C., *When determining the amount or amounts of purchases for the purpose of applying the threshold categories, [established under Chapter 60A-1.002(2)-(4)] agencies shall follow the definitions and classes and groups of commodities or contractual services established by the Department. A purchasing office shall not divide its purchases or its purchasing operations to circumvent these requirements.* Per Section 1.4 of the Department's P-Card training, the Department had set a \$2,499.99 limit for all purchases with a P-Card. According to the Department's P-Card training, a cardholder may not split transactions to stay within their limits.

Recommendation:

We recommend the Division ensure that Park procurement practices comply with Chapter 60A-1.002(5), F.A.C. and Department P-Card training. To promote cost-effective use of resources, the Division should ensure that purchases for Park projects are procured in a competitive manner consistent with the project's expected cost.

Finding 2: Attendance Reporting

Based on our review of estimated attendance during the sampled months, reported estimates were not always supported by visitor counts recorded on Honor Envelope

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Documentation Reports. In addition, the Park's approved ARP did not include an estimation calculation method for the Park's Emerald Sink location, which was part of the reported estimated attendance.

Recommendation:

We recommend that the Division work with the Park to ensure reported estimated counts are calculated and supported consistent with the Park's ARP and OM. Additionally, we recommend the Division work with the District and Park to update the Park's ARP to include methodology for estimating attendance at the Emerald Sink location.

Finding 3: Park Manager Property Inventory

Chapter 1.8(n) of the OM requires that each time there is a change in Park Managers, both the outgoing and incoming Managers are required to conduct a property inventory and audit no more than 30 days before departure of the outgoing Manager and within 30 days of arrival of the incoming Manager. We verified that the Park Manager Audit was signed by both the outgoing and incoming Managers on November 16, 2017, and was submitted to the District. However, the property inventory was not conducted.

Recommendation:

Going forward, we recommend the Division work with the Park and District to ensure property inventories are conducted as required under the OM when there is a change in the Park Manager position.

Finding 4: Volunteer Records

Chapter 1.6(d)(1) of the OM requires that a Volunteer Agreement be completed annually for all regular service volunteers. The Agreement should be completed in VSys. Of the 17

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regular service volunteers documented during the audit period, Agreements for ten had not been updated annually consistent with the volunteers' documented service hours. In addition, ten volunteer profiles in VSys did not include the Agreements. 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 VSys by electronic documentation maintained in the volunteer's VSys profile. While these searches had been conducted for the regular service volunteers, four were not documented in VSys.

Recommendation:

We recommend the Division work with the Park to ensure that all Volunteer Agreements are completed annually and volunteer profiles in VSys contain documentation as required in the OM.

Management Comment

Park Surplus and CSO Sale of Surplus Property

With respect to surplus property, Section 274.05, F.S., states that a *governmental unit may offer the property to other governmental units in the county or district for sale or donation or may offer the property to private nonprofit agencies as defined in s.273.01(03) by sale or donation*. During the audit period, the Park donated various surplus property items such as pavers, marble tiles, furniture, and miscellaneous warehouse items to the CSO. According to the general ledger, the CSO sold the items and documented \$4,567.00 in income from the sale during FY 2017-2018. A CSO Board Member was among the individuals and entities who purchased these items. While donation of surplus items to the CSO is allowed under Section

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274.05, F.S., an inherent risk exists when the entity with authority to surplus property also receives the direct or indirect benefit of the sale. The purpose of this comment is to bring these circumstances to the attention of Division management so that additional controls and oversight can be incorporated in the process of donating surplus property to the CSO, in order to ensure full transparency, independent review, and approval.

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 Cindy Newsome 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, Director *ED 103019*
Division of Recreation and Parks

SUBJECT: Audit of Wakulla Springs State Park and the
Friends of Wakulla Springs State Park, Inc. Citizen Support Organization

DATE: October 30, 2019

This memorandum will serve as the Division's response to the following subject audit findings and recommendations:

Finding 1: Expenditures and P-Card Use

According to Chapter 60A-1.002, F.A.C., purchases which meet or exceed \$2,500 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. During our review of purchase orders exceeding \$2,500, two quotes were not obtained for one purchase for tractor repairs. The Park included form DEP 55-201 with the purchase as required for the exception; however, the form did not include justification as to why the vendor was the only source available for the service. The Park has also not obtained two quotes for a purchase order for elevator repair but had included form DEP 55-201 for the exception with justification that the Park had a contract with the vendor. The contract referenced was a purchase order for on-going elevator maintenance. The purchase order had been approved after the invoice date; however, the DEP 55-201 form did not document justification for use of the vendor as a single source for repairs and did not indicate that the purchase was an after the fact contract exception. An after the fact exception requires documentation of the reason and steps taken to prevent future occurrences.

Two P-Card transactions reviewed were for tree service removal to a single vendor. Payment for these services was processed through two separate P-Cards transactions which were made five days apart in June 2018. The expenditures amounts collectively totaled \$4,025.00. Per Chapter 60A-1.002(5), F.A.C., *When determining the amount or amounts of purchases for the purpose of applying the threshold categories, [established*

under Chapter 60A-1.002(2)-(4)] agencies shall follow the definitions and classes and groups of commodities or contractual services established by the Department. A purchasing office shall not divide its purchases or its purchasing operations to circumvent these requirements. Per Section 1.4 of the Department's P-Card training, the Department had set a \$2,499.99 limit for all purchases with a P-Card. According to the Department's P-Card training, a cardholder may not split transactions to stay within their limits.

Recommendation

We recommend the Division ensure that Park procurement practices comply with Chapter 60A-1.002(5), F.A.C. and Department P-Card training. To promote cost-effective use of resources, the Division should ensure that purchases for Park projects are procured in a competitive manner consistent with the project's expected cost.

Division Response:

Agree. The Division will ensure that Park procurement practices comply with Chapter 60A-1.002(5), F.A.C. and Department P-Card training. To promote cost-effective use of resources, the Division will ensure that purchases for Park projects are procured in a competitive manner consistent with the project's expected cost.

Finding 2: Attendance Reporting

Based on our review of estimated attendance during the sampled months, reported estimates were not always supported by visitor counts recorded on Honor Envelope Documentation Reports. In addition, the Park's approved ARP did not include an estimation calculation method for the Park's Emerald Sink location, which was part of the reported estimated attendance.

Recommendation

We recommend that the Division work with the Park to ensure reported estimated counts are calculated and supported consistent with the Park's ARP and OM. Additionally, we recommend the Division work with the District and Park to update the Park's ARP to include methodology for estimating attendance at the Emerald Sink location.

Division Response:

Agree. The Division will work with the Park to ensure that visitor estimated counts are calculated and supported consistent with the Park's ARP and OM. As of August 2, 2019, the Park's ARP has been updated to include methodology for estimating attendance at the Emerald Sink location.

Finding 3: Park Manager Property Inventory

Chapter 1.8(n) of the OM requires that each time there is a change in Park Managers, both the outgoing and incoming Managers are required to conduct a property inventory and audit no more than 30 days before departure of the outgoing Manager and within 30 days of arrival of the incoming Manager. We verified that the Park Manager Audit

was signed by both the outgoing and incoming Managers on November 16, 2017, and was submitted to the District. However, the property inventory was not conducted.

Recommendation

Going forward, we recommend the Division work with the Park and District to ensure property inventories are conducted as required under the OM when there is a change in the Park Manager position.

Division Response:

Agree. The Division will work with the Park and District to ensure property inventories are conducted as required under the OM when there is a change in the Park Manager position.

Finding 4: Volunteer Records

Chapter 1.6(d)(1) of the OM requires that a Volunteer Agreement be completed annually for all regular service volunteers. The Agreement should be completed in VSys. Of the 17 regular service volunteers documented during the audit period, Agreements for ten had not been updated annually consistent with the volunteers' documented service hours. In addition, ten volunteer profiles in VSys did not include the Agreements. 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 VSys by electronic documentation maintained in the volunteer's VSys profile. While these searches had been conducted for the regular service volunteers, four were not documented in VSys.

Recommendation

We recommend the Division work with the Park to ensure that all Volunteer Agreements are completed annually and volunteer profiles in VSys contain documentation as required in the OM.

Division Response:

Agree. The Division will work with the Park to ensure that all Volunteer Agreements are completed annually and volunteer profiles in VSys contain documentation as required in the OM.