
CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR



Follow-Up Audit of Parks and Recreation

Pool Inspections

Project No. AU21-F03

July 9, 2021

Kevin W. Barthold, CPA, CIA, CISA
City Auditor

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted a follow-up audit of the recommendations made in the Parks and Recreation Pool Inspections audit dated December 02, 2019. The objective for this follow-up audit is:

Determine if recommendations in the most recent Pool Inspections audit have been effectively implemented.

We determined that the Parks and Recreation Department has successfully implemented controls to address all five prior audit recommendations. Specifically, the Parks and Recreation department had improved oversight in the completion of Daily Logs, strengthened controls to oversee certifications of the Aquatics Division, and implemented improved security and signage for confined spaces and pump houses. Furthermore, Parks has implemented group trainings and inspections that involve both Trades and Aquatics Division to better identify general maintenance requirements that directly affect personnel and public safety.

However, improved oversight is required to ensure continuous training requirements are completed by lifeguard personnel.

Parks and Recreation Management agrees with the audit results and has developed a positive action plan to address the audit recommendation. Management's verbatim response is in Appendix C on page 8.

Table of Contents

Executive Summary	i
Background.....	1
Audit Scope and Methodology	2
Prior Audit Recommendations and Status	3
A. Splash Pads.....	3
B. ORM Inspections	3
C. Daily Logs.....	4
D. Personnel Awareness.....	4
E. Lifeguard Certification and Training	5
Appendix A – Recommendation Status Summary	6
Appendix B – Staff Acknowledgement	7
Appendix C – Management Response	8

Background

In December of 2019, the Office of the City Auditor completed an audit of the Parks and Recreation Pool Inspections. The objective of the audit was as follows:

Determine if pools are regularly inspected and adequately maintained.

The Office of the City Auditor concluded that Parks and Recreation had adequate controls to ensure the certifications of Splash Pad Operators as required by the Department of State Health Services (DSHS). Parks and Recreation also utilized the San Antonio Metropolitan Health District (SAMHD) to assist in the identification of public health concerns. Additionally, to report, assign, manage, and track maintenance concerns, a work order management system is integrated with the 311 Call Center and SAP.

However, opportunities to strengthen controls were also identified. Specifically, we recommended that Parks Management:

- Ensure routine, annual inspections for all City Pools and Splash Pads,
- Ensure thorough documentation of issues and resolutions found on daily oversight logs,
- Increase safety awareness for all pool personnel,
- Ensure the certification of on-duty Lifeguards does not lapse.

Parks and Recreation management agreed with the conclusions and developed action plans to address the audit recommendations.

Audit Scope and Methodology

The audit scope was limited to the recommendations and corrective action plans made in the original report for the time frame from October 2019 to current.

Due to the COVID-19 pandemic, all pools and splashpads were closed for the 2020 pool season. In November of 2020, with limited capacity and additional safety measures, the SA Natatorium was able to resume operations. During the time of this review, no other pools or splashpads resumed operations. Closures limited testing protocols; however, the available data allowed for satisfactory review of implemented corrective action plans.

We interviewed staff, conducted physical walkthroughs of select pools, and reviewed inspection, training and daily log supporting documentation. Testing criteria included key department policies and procedures and the Texas Administrative Code as it aligns with public interactive water facilities.

We determined that the following internal control components were significant to the audit objective: the *Control Activities* component in regard to management's responsibility to implement policies and design control activities that ensure the achievement of public safety objectives and risk response; the *Monitoring* component in regard to management's implementation of monitoring activities to ensure the internal control system is effective by evaluating and verifying that all policies, procedures, and best practices are being implemented to ensure public safety is at an optimum; the *Information and Communication* component in regard to management's responsibility to internally communicate the necessary quality information to achieve Parks and Recreation's objectives.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Prior Audit Recommendations and Status

A. Splash Pads

Prior Recommendation:

Parks Management should ensure that inspections are performed, proper inspection records are kept, and required disease testing is performed at the City's splash pads. Furthermore, Parks Management should consider using the Texas Department of State Health Services (DSHS) inspection form for splash pad inspections to ensure compliance with DSHS rules.

Status: Implemented

Due to the declared COVID-19 pandemic, no splash pads have been operational since the 2019 pool season. However, in partnership with the Office of Risk Management (ORM), all splash pads underwent an annual pre-season inspection for fiscal years 2020 and 2021. For routine inspections performed by aquatic personnel, Parks and Recreation has stated an adaptation of the recommended DSHS inspection form will be utilized during operating seasons. Additionally, Parks has ensured that all six City splash pads now have a secondary filtration system in place ensuring state regulations are met and further decreasing contamination risk.

Recommendation

None.

B. ORM Inspections

Prior Recommendation:

Parks Management should work with Risk Management to ensure that regular inspections are performed at the City's pools and splash pads. At a minimum, every pool and splash pad should be inspected by Risk Management at least once during each pool season.

Status: Implemented

For the 2020 pool season, ORM inspected all splash pads and 18 of the 25 City pools. At this time, pools and splash pads are undergoing inspections for the 2021 season.

In response to the COVID-19 pandemic, no pools or splashpads were open during the 2020 pool season. ORM inspection efforts were re-directed towards ensuring proper pandemic safety precautions throughout the City. The SA Natatorium resumed operations in November of 2020 and underwent inspection by both ORM and Program Management. Going forward, Parks will continue to request all pools and splash pads be inspected by ORM on an annual basis. The 2021 season inspections have begun and are scheduled to be completed in May.

Recommendation

None.

C. Daily Logs

Prior Recommendation:

Parks Management should ensure that resolution of issues identified on the Daily and Chemical Logs are documented. In addition, Parks Management should ensure that all required daily logs and chemical logs are completed.

Status: Implemented

We reviewed training rosters and agendas to validate that aquatics staff undergoes routine training to address the importance of Daily and Chemical Log completion. Additionally, through review of daily logs from the SA Natatorium, it is evident that Program Management is actively reviewing and coaching personnel on log completion. Finally, increased communication of daily issues, concerns and their resolution were noted within the logs themselves.

Recommendation

None.

D. Personnel Awareness

Prior Recommendation:

Parks Management should implement periodic safety and awareness training for Parks' pool personnel to ensure that problems identified are addressed timely.

Status: Implemented

Parks Management has implemented pre-season and in-service training requirements for pool personnel. Pre-season trainings are a fusion of personnel

from different departments aimed to aid pool personnel in understanding current/upcoming programs, safety initiatives and to raise mechanical/operational awareness. For example, the Aquatics Orientation may now include a MetroHealth representative, ORM Safety Coordinator, Parks Recreational Management and Trades Supervisors.

Additionally, pool personnel conduct pre-season inspections, bi-monthly inspections, and pool closure inspections to aid in safety awareness and the identification of facility needs.

Recommendation

None.

E. Lifeguard Certification and Training

Prior Recommendation:

Parks Director should implement key policies and procedures to ensure lifeguards are adequately trained and certified during their term of employment.

Status: Partially Implemented

Parks reported 15 active lifeguards being utilized at the SA Natatorium. All 15 lifeguards attended a recent state approved lifeguard certification course. However, it was determined that not all certified personnel completed continuous training as dictated by internal policy and state regulation.

Internal policy states that as a requirement of the American Red Cross and the state of Texas, all lifeguards are mandated to attend a pre-season orientation and 60 minutes of in-service training per week (or for every 40 hours of service).

Per Parks Aquatics Operations Manual, in-service trainings should be offered on a bi-weekly basis and logged on an in-service training report. Since the re-opening of the SA Natatorium in November of 2020, only three in-services were reported. Without lifeguards completing their required continuous training, Parks is in non-compliance with internal policy and state regulation.

Recommendation

Pools Management must ensure sufficient trainings are conducted and completed timely by certified personnel in order to meet internal and state required guidelines.

Appendix A – Recommendation Status Summary

No.	Original Report Recommendation	Current Status
1	A.1 Parks Management should ensure Pool and Splash Pad inspections are performed, Pool and Splash Pad inspection records are retained, Splash Pad disease testing (if required) is performed and that the DSHS recommended inspection criteria is considered for City Splash Pad inspections.	Implemented
2	B.1 Parks Management should work with Risk Management to ensure that all City Pools and Splash Pads are inspected annually.	Implemented
3	C.1 Parks Management should ensure that daily logs and chemical logs are completed and that all reported issues have a documented resolution.	Implemented
4	D.1 Parks Management should implement periodic safety and awareness training for Aquatic Division Personnel to ensure that problems identified are addressed timely.	Implemented
5	E.1 Parks Director should implement key policies and procedures to ensure lifeguards are adequately trained and certified during their term of employment.	Partially Implemented

Appendix B – Staff Acknowledgement

Gabriel Treviño, CISA, Audit Manager
Denise Trejo, Auditor in Charge

Appendix C – Management Response



CITY OF SAN ANTONIO
SAN ANTONIO TEXAS 78283-3966

June 16, 2021

Kevin W. Barthold, CPA, CIA, CISA
 City Auditor
 San Antonio, Texas

RE: Management's Acknowledgment and Corrective Action Plan for the Parks & Recreation Pool Inspection Follow-up Review

Fully Agree (provide detailed comments)

Agree Except For (provide detailed comments)

Do Not Agree (provide detailed comments)

Parks & Recreation has reviewed the audit report and has developed the Corrective Action Plan below for the lifeguard training recommendation.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
1	Lifeguard Certification and Training Pools Management must ensure sufficient trainings are conducted and completed timely by certified personnel in order to meet internal and state required guidelines.	5	Accept	Lyn Kinton/ Parks and Recreation Manager	June 30, 2021

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action Plan: This recommendation is related to ensuring all lifeguards receive continuous training as dictated by internal policy and state regulation. Internal policy states that as a requirement of the American Red Cross and the State of Texas, all lifeguards are mandated to attend a pre-season orientation and 60 minutes of in-service training for per week. The American Red Cross and State of Texas allow training to occur on any schedule so long as it averages out to the minimum 60 minutes per week.</p> <p>The Parks and Recreation Department practice offers monthly in-service trainings year-round at the San Antonio Natatorium and weekly in-service trainings for staff at the summer outdoor pools; however, the monthly in-service trainings were not always averaging the minimum 60 minutes per week or 4 hours per month. The department offered three in-service trainings between November 2020 and January 2021. The November training was only 1.5 hours in length. The December training was a re-certification course for staff which exceeded the minimum requirement by providing 20 hours of review in first aid, cardiopulmonary resuscitation (CPR), automated external defibrillator (AED), and rescue techniques. The January training was 1 hour in length. An in-service was scheduled but not implemented in February 2021 due to the closure for the winter storm.</p> <p>Beginning in March 2021, modifications were implemented for the training of lifeguards. Natatorium and outdoor pool staff complete either a 1-hour in-service training each week, a 2-hour in-service training held twice per month, or a 4-hour in-service training each month depending on the training topics. The in-service training will be offered multiple times during the month in order to accommodate various work schedules.</p> <p>Any staff not completing the in-service training will not continue on the work schedule until the in-service training requirement has been completed. All training will be documented with agendas and participant sign-in sheets.</p>				

We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

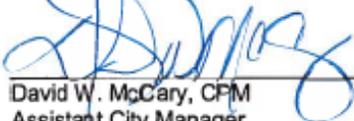
Sincerely,



Homer Garcia, III
Director
Parks & Recreation

6-30-21

Date



David W. McCary, CPM
Assistant City Manager
City Manager's Office

6/30/2021

Date