
Performance Audit of the Park and Recreation Department's Playground Maintenance Program

THE PLAYGROUND MAINTENANCE PROGRAM COULD BE FURTHER
STRENGTHENED TOWARDS PROVIDING SAFE SPACES FOR CHILDREN

JULY 2013

Audit Report
Office of the City Auditor
City of San Diego



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THE CITY OF SAN DIEGO

July 25, 2013

Honorable Mayor, City Council, and Audit Committee Members
City of San Diego, California

Transmitted herewith is an audit report on the Park and Recreation Department's Playground Maintenance Program. This report is in accordance with City Charter Section 39.2. The Results in Brief is presented on page 1. The Administration's response to our audit recommendations can be found after page 28 of the report.

We would like to thank Park and Recreation staff, as well as representatives from other City departments for their assistance and cooperation during this audit. All of their valuable time and efforts spent on providing us information is greatly appreciated. The audit staff responsible for this audit report is Shawneé Pickney, Luis Briseño, Danielle Knighten, and Kyle Elser.

Respectfully submitted,

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Results in Brief

The City of San Diego's Park and Recreation Department (PRD) operates and maintains playgrounds designed to offer the greatest play value for children's recreation and parents' respite. City playgrounds enhance the play and socializing experiences of children by addressing their physical, social, and mental development while providing entertainment. PRD aims to offer safe, durable, vandal-resistant, and aesthetically-pleasing playgrounds through its park maintenance operations program.

During our assessment of playground maintenance operations within the City, we reviewed whether:

- Playground inspections and maintenance conducted by playground maintenance staff are consistent with PRD's policies related to playground safety;
- PRD has mechanisms in place for evaluating playground maintenance program goals; and
- PRD has mechanisms in place for tracking playground equipment in need of replacement.

We found that PRD has the framework for creating a preventative and ongoing playground maintenance program. PRD developed policies and procedures for formalizing routine safety inspections and repairs of all playgrounds under its purview. PRD also developed Park Maintenance Standards specific to playground inspection and repair.

However, we also found that concentrated efforts by PRD to strengthen its playground maintenance program could assist PRD in furthering its progress towards providing safe play spaces for children. PRD could benefit from improving oversight of the playground inspection process, clarifying playground maintenance performance standards, and completing a consistent playground asset inventory.

We made three recommendations intended to enhance PRD's playground maintenance efforts. PRD agrees with those three recommendations.

Background

Community Parks I and Community Parks II Within the City of San Diego (City), the Park and Recreation Department (PRD) operates over 150 Community, Neighborhood, and Mini Parks through its Community Parks I (CPI) and Community Parks II (CPII) Divisions. As detailed in **Exhibit 1**, during FY2012 the Divisions oversaw a combined total of approximately 197 parks¹ and account for approximately \$41.7 million, or 49 percent, of PRD’s \$84.8 million budgeted General Fund expenditures.

Exhibit 1

Division Profiles: Community Parks I and Community Parks II, Fiscal Year 2012

	Community Parks I	Community Parks II	Combined Total
Number of Parks	115	82	197
General Fund Expenditures	\$20,182,236	\$21,474,739	\$41,656,975
Budgeted Full Time Equivalent Positions	153.9	219.86	373.76
Council Districts Covered	1, 2, 5, and 6	3, 4, 7, and 8	Districts 1-8

Source: Auditor-generated from information provided by the Park and Recreation Department

We note that, effective in FY2013, the geographic-based management structure for City parks was changed to reflect the addition of the Ninth Council District. Some of the changes included facility and staff reassignments between the CPI and CPII Divisions, including playgrounds. As of January 2013, the CPI and CPII Divisions oversee approximately 169 playgrounds.

Citywide Park Maintenance Services In addition, the Citywide Park Maintenance Services program (CMS) within the Developed Regional Parks (DRP) Division provides maintenance and support services—including playground maintenance and repair—for park and recreation facilities throughout the City. In FY2012, the DRP Division accounted for approximately \$32.4 million, or 38 percent of PRD’s budgeted General Fund expenditures.

¹ Not all parks contain playgrounds. As of FY2013, within the parks overseen by the CPI and CPII Divisions, there are approximately 169 playgrounds. This does not include playgrounds within the Developed Regional Parks Division or joint use sites.

Asset Management The Asset Management section of PRD's Administrative Services Division currently consists of three staff members and is responsible for park asset inventory of the City's park system, which, in its totality, encompasses over 40,000 acres. Asset Management also provides general planning, design, and construction support for the Department's operating divisions and liaises with other City departments for projects and other issues that impact the park system.

Playground Expenses City playgrounds require routine maintenance and inspections for equipment and surrounding areas to ensure the safety of children and other patrons. Between FY2010 and FY2012, PRD spent an estimated total amount of approximately \$226,000 on playground-equipment and surfacing-related repairs. Additionally, since FY2011, four playground-related claims have been filed against the City. Of those four, two occurred during calendar year 2012.

Laws and Industry Guidelines Playground laws, industry standards, and guidelines, provide public agencies with guidance regarding necessary elements to include in playground maintenance operations. This framework includes the:

- California Health and Safety Code Section 115725— Requires public entities designing and installing playgrounds in California to adhere to the playground-related standards set forth by the Consumer Product Safety Commission (CPSC) and the American Society for Testing and Materials (ASTM);
- United States Consumer Product Safety Commission (CPSC) Playground Safety Handbook—Presents guidelines designed to promote greater safety awareness among those who purchase, install, and maintain public playground equipment;
- American Society for Testing and Materials (ASTM) Standard Specifications—Contains technical requirements, primarily applicable to equipment manufacturers and designers; and
- American with Disabilities Act of 2010 (ADA)—Requires state or local government programs to make facilities readily accessible to individuals with disabilities.

**Department Policies
Related to Playground
Inspection and
Maintenance**

The Department provides instructions to its employees on playground maintenance operations through its policies and procedures, which include the:

- Department Instruction 6.6 (DI) on Safety Inspection of Playgrounds, Facilities, Furnishing and Grounds;
- Daily Playground Inspections/Maintenance Requirements;
- Daily and Weekly Safety Inspections Flow Charts;
- Playground Inspection Tips and Training Materials; and
- Park Maintenance Standards for Conducting Playground Inspection and Repair.

According to Department policies and procedures, playground maintenance staff² must visually inspect all playgrounds on a daily basis. For daily inspections, no written report is required unless a safety hazard or defective equipment is found. If safety hazards are identified, staff must document the observations on the appropriate forms and report the deficiencies to CMS.

Additionally, Department policies and procedures require playground maintenance staff to document inspections at least weekly on an inspection form, whether or not an issue is identified at the playground. Procedures also require that staff keep playground inspection forms on file for three years.

Furthermore, the Department's FY2012 Park Maintenance Standards for Conducting Playground Inspection and Repair require staff to adhere to the response and repair timelines outlined in **Exhibit 2**.

² Hereinafter, playground maintenance staff refers to any Park and Recreation Department personnel involved in playground maintenance operations, which includes, but is not limited to, Grounds Maintenance Workers, Area Managers, and PRD's Citywide Maintenance Repair Facility Mechanics.

Exhibit 2

Park Maintenance Standards Related to Playground Inspection and Repair

Park Maintenance Task	Standard of Care (90% of Time)
Conduct Playground Inspection And Repair	Inspect all play equipment daily in the morning
Identify Safety Hazards	Lock off hazardous play equipment upon identification of hazard
Respond To Safety Hazards–Emergency	Respond immediately
Respond To Potential Safety Hazards –Non-Emergency	Respond to potential safety hazards within two days
Respond To Non-Safety Related Issues	Respond to non-safety related issues within 14 working days
Repair Small/Minor Equipment	Fix within 14 working days of service request received by Citywide Maintenance Repair Facility Mechanics

Source: Park and Recreation Department

Consultant’s Guide In order to address the guidelines outlined in the CPSC and ASTM standards and the ADA, PRD requires City staff, design consultants, and the general public to refer to PRD’s Consultant’s Guide to Park Design and Development (Consultant’s Guide) for the design and development of improvements for City parks. The Consultant’s Guide indicates that all parks shall meet the guidelines and regulations outlined in ADA, ASTM, and CPSC standards. Moreover, the Consultant’s Guide places responsibility on the Design Consultant to develop a project in compliance with current and adopted ADA access law requirements.

Audit Results

Finding 1: The Park and Recreation Department Needs Enhanced Oversight of its Playground Inspection Process

PRD Lacks a Standardized Supervisory Process to Consistently Review Playground Maintenance Operations

Area Managers within the Community Parks I and II Divisions each practice different methods for overseeing the playground inspection process. A standardized supervisory process could help ensure that playground maintenance tasks are completed consistently, even in the presence of rotating supervisors that result from out-of-class assignments.

We found that the playground safety inspection forms completed by playground maintenance staff had deficiencies in both completeness and accuracy. PRD's playground maintenance policies require playground maintenance staff to complete a playground safety inspections form at least weekly. Daily visual inspections require no written report unless maintenance staff identifies a safety hazard or defective equipment, which would then require maintenance staff to complete a playground safety inspection form. Additionally, PRD's policy indicates that staff must promptly report unsafe conditions not repaired immediately to Citywide Park Maintenance Services via a written Service Request form.

We reviewed a sample of 24 groups of inspection forms, categorized by playground, and found that over half of the groups had one or more of the data inaccuracies described in **Exhibit 3**. As a result, we could not determine if PRD completed inspections at the frequency rates detailed in their policies because the information present on the forms was unreliable.

Exhibit 3

Data Inaccuracies in Sample of Inspection Forms

Observations	Data Incomplete/Inaccurate
<i>Service Request Without an Accompanying Inspection Form</i>	<ul style="list-style-type: none"> • A service request is completed. However, an inspection form was not completed when staff identified a safety hazard or defective equipment • This is indicative of having an incomplete sample because all of the forms that should be present are not included
<i>Service Request Completed but Inspection Form Indicates That Equipment is in Passing Condition</i>	<ul style="list-style-type: none"> • A service request is initiated as a result of an identified issue. However, the inspection form indicates equipment is in passing condition • This is indicative of having inaccurate data because the service request and the inspection form do not agree
<i>Area Manager (AM) And Grounds Maintenance Worker (GMW) Inspection Forms Completed on the Same Day Do Not Match</i>	<ul style="list-style-type: none"> • Inspection forms completed by both the AM and GMW on the same day result in different conclusions about the status of playground equipment • This is indicative of having inaccurate data because the inspection forms do not agree
<i>Information Missing</i>	<ul style="list-style-type: none"> • Data is incomplete because forms omit information required by PRD’s policies and items such as inspector signatures, dates, and park names • Data is incomplete because date gaps exist in the inspections forms received
<i>“Time Required” Inconsistently Documented on Inspection Forms</i>	<ul style="list-style-type: none"> • Data is inaccurate because for “time required” staff either enter the amount of time taken to complete the inspection, the time the inspection completed, or leave the item blank • Additionally, two different versions of inspections forms used where “time required” is not included on one of the versions of the forms

Source: Auditor-generated based on information provided by PRD

During our review, we also interviewed 10 Area Managers from Community Parks I and II responsible for supervising the work of recreation center, playground, and grounds and facility maintenance personnel. We found that while each Area Manager has individual methods for overseeing the playgrounds in their areas, there is no standardized supervisory review process that ensures each Area Manager consistently reviews the inspection results of the Grounds Maintenance Workers.

Moreover, Area Managers indicate completing visual inspections of playgrounds as a method of reviewing the inspections completed by Ground Maintenance Workers on a whenever possible, occasional, periodic, or regular basis. In a few instances, the Area Managers report recording their visual observations on a form. Also, throughout our conversations, we

found that Area Managers have served in out-of-class assignments. Due to staff shortages, some Area Managers were assigned to cover other regional areas outside of their normal responsibilities. The lack of standardized procedures may create a lack of continuity for Area Managers in out-of-class assignments. This inconsistency may inadvertently lead to overlooking basic playground maintenance tasks, such as reviewing inspection forms and visiting sites.

PRD's playground inspection forms we reviewed were missing information recommended in industry guidelines, such as inspection times and inspection signatures. The Consumer Product Safety Commission guidelines note that, when any inspection is performed, the person performing the inspection should sign and date the form used. The California Park and Recreation Society guidelines recommend that inspectors should also include the date and time of inspections on forms.

Furthermore, while Area Managers indicate using different methods for overseeing playground maintenance operations, PRD has not established a standardized supervisory review process. The California Park and Recreation Society recommends a periodic review of inspection forms and records by managers to ensure that forms are properly completed and corrections implemented. The California Park and Recreation Society also recommends site visits to observe inspections and validate corrective actions as part of the performance expectations for managers/supervisors responsible for playgrounds.

Recommendation #1 In order to improve oversight of its playground inspection processes, including the accurate completion of inspection forms and a consistent supervisory review process for inspection results, the Park and Recreation Department (PRD) should:

- Re-train staff on the policies and procedures for correctly completing the Weekly Playground Safety Inspection Form.
- Standardize a playground inspection review process by requiring supervisors to visit playground sites and complete a written safety inspection form at least bi-weekly. (Priority 3)

Finding 2: The Park and Recreation Department Needs Clearer Performance Standards Related to Playground Inspection and Repair to Assess Playground Maintenance Operations

PRD Should Clearly Define Performance Standards Related to Playground Inspection and Repair

The lack of clearly-defined performance standards regarding playground maintenance impacts PRD's ability to accurately evaluate its playground maintenance program. Developing clearly-defined performance standards may allow PRD to make well-informed and proactive decisions regarding the City's playground maintenance services, which will help to ensure the safety of playground patrons.

According to annual budget documents, since FY2009, PRD has been in the process of developing guidelines for measuring compliance with their own maintenance standards. However, PRD has not yet to report their results citing that standards were either in development or needing baseline measures, and vacancies and other critical projects would cause delays.

During our review of FY2012 Service Requests, we found that PRD cannot evaluate performance standards related to playground inspection and repair because it is unclear how the "response" and "repair" indicators apply to each Division involved in playground maintenance. Subsequently, the FY2013 Park Maintenance Standards present the same issues. **Exhibit 4** describes the standards that could benefit from more clearly defined language.

Exhibit 4

Performance Standards that Could Benefit from Clearly Defined Language

Standard	Performance Indicators	Area for Improvement
Respond to Safety Hazards	<ul style="list-style-type: none"> • Emergency: Respond immediately • Non-Emergency: Respond to potential safety hazards within two days • Non-Safety: Respond to non-safety related issues within 14 working days 	<p>“Response” indicators do not:</p> <ul style="list-style-type: none"> • Clarify which types of playground-related repairs would be identified as emergency, non-emergency, and non-safety • Clarify whether the response time refers to when onsite staff identifies a hazard and submits a service request to the Citywide Maintenance Services Playground Repair Crew • Clarify whether the response time refers to when the CMS Playground Repair Crew receives a Service Request and either completes a repair or evaluates the playground equipment
Repair Small/Minor Equipment	<ul style="list-style-type: none"> • Fix within 14-working days of service request received by Citywide Maintenance Repair Facility Mechanics 	<ul style="list-style-type: none"> • Indicator does not clearly define “small/minor”

Source: Auditor-generated based on information provided by PRD

The language in the performance standards could benefit from clarification because how an issue is categorized can influence how a repair is prioritized. Without explicit performance standards, PRD’s ability to measure performance is hampered.

For example, we saw a request for repairing the rubberized poured-in-place surfacing at a playground. The request indicated that the surfacing was especially bad under the swings. We calculated that the repair was completed in 11 working days. However, we could not determine if PRD met its performance standard goals detailed in **Exhibit 4** because the type of repair, the party for fixing the repair, and the timeframe for which this item should be repaired are unclear. As a result, PRD is not able to evaluate their efforts for repairing items similar to those that we observed during our playground observations detailed in **Appendix C**.

According to CMS Management, there are no specific instructions for classifying playground issues into categories because of the unique nature of playgrounds and particular situations that may arise. Management further asserts that all parties involved in the playground inspection and maintenance process use a “*common sense*” approach to determine how to

classify and respond to an issue at a playground.

We assert that a common sense approach without clearly defined performance indicators is not the best method for ensuring that safety hazards are appropriately addressed. For example, **Appendix C** shows one of the parks we visited where a poured-in-place rubberized surface was a potential safety hazard.³ However, the Park Maintenance Standards do not provide clear guidance on which response is suitable for this issue. CMS notes that in FY2012, reported issues related to poured-in-place rubberized surfacing experienced delays because these issues are not always safety issues, but are sometimes just aesthetic concerns. Yet, the distinction between poured- in-place issues that are safety hazards, and those that are aesthetic concerns, is not clearly delineated in the Standards.

The California Park and Recreation Society recommends developing and tracking performance measures that are meaningful and easy to collect, monitor, and evaluate. Currently, PRD's Standards are subject to interpretation and would not provide PRD with a clear understanding of the successes and area for improvements within its playground maintenance operations.

Recommendation #2 In order to improve assessment of its playground maintenance program, the Park and Recreation Department (PRD) should:

- **Clarify performance indicators in its Park Maintenance Standards related to playground inspection and repair. Specifically, PRD should:**
 - **Clearly define "response" and which division staff (on-site or Citywide Park Maintenance Services staff) is responsible for meeting the designated timelines.**
 - **Clearly define playground equipment categories for repair (i.e. "small/minor" and other categories established by the Department).**
 - **Develop a rubric for the types of repairs considered "emergency," "non-emergency," and "non-safety,"**

³ According to the Consumer Product Safety Commission, the surfacing under and around playground equipment is one of the most important factors in reducing the likelihood of life-threatening head injuries.

and use the rating system on all inspection forms and service requests. Additionally, communicate the rubric with staff involved in playground maintenance operations.

- **Annually evaluate Park Maintenance Standards related to playground response and repair, and report outcomes to the San Diego Park and Recreation Board. (Priority 3)**

Finding 3: The Park and Recreation Department Needs a Comprehensive and Accurate Assessment of its Playground Equipment

Maintaining an Accurate Playground Equipment Inventory May Assist with Timely Repairs

Without keeping accurate information on the status of playground equipment assets, PRD increases the risks of delaying playground repairs. Repair delays may prolong the length of time that playground equipment is inoperable and prolong the length of time that a playground hazard exists.

Asset management frameworks recommend addressing core concepts that are intended to assist management in making decisions regarding when to rehabilitate, repair, or replace assets. The Enterprise Asset Management Framework (EAM) used as a guiding principle for the City’s Enterprise Asset Management Steering Committee indicates that an entity should develop an asset registry, assess the conditions of equipment, and determine the residual life and replacement cost of equipment.

As seen in **Exhibit 5**, during our review, we found that PRD has conducted five playground inventories and site inspections between calendar years 1989 and 2012.

Exhibit 5

PRD Park and Playground Assessments between 1989 and 2012

Year	Title
1989	Park Playground Equipment Inspection Inventory
1999	Playground Equipment Survey
2000	Playground Audit Report Site Inspection Results
2006	Existing Facility Tot-Lots Survey
2012	Park Amenities Survey Inventory

Source: Auditor-generated based on information provided by PRD

However, as displayed in **Exhibit 6**, these efforts did not consistently inventory items suggested in the EAM framework. Each inventory and inspection was completed ad hoc and based upon different identified needs.

Exhibit 6

Enterprise Asset Management Framework vs. PRD’s Playground Inventories

	1989	1999	2000	2006	2012
Develop an Asset Registry	x	x	x (references 1999)	x	
Assess Conditions		x	x (references 1999)	x	
Determine Residual Life and Life Cycle and Replacement Costs					

Source: Auditor-generated based on information provided by PRD

According to Assets staff, Assets currently does not monitor or otherwise track playground equipment owned or maintained by the Department. Assets staff indicates that such an effort would require a comprehensive conditions assessment of all assets throughout the City. Assets staff expresses a willingness to conduct such an effort for City playgrounds, but notes there are simply not enough budgetary and staff resources to undertake such a task at the present time.

Assets staff indicated that PRD is currently participating in the City’s EAM program to track and maintain information about the City’s assets in a central unified database. PRD is currently requesting funds for a conditions assessment of park assets, including playgrounds. However, as of May 2013, the City’s FY2014 budget has not been finalized.

While waiting for funding to complete a comprehensive conditions assessment, PRD can still collect key information that would guide their playground maintenance efforts. For example, CMS Management explains that, in general, delays in the playground repair process pertaining to play structures, free-standing slides, spring-based equipment, etc. can be attributed to waiting for parts or misordering parts.⁴ In FY2012, we found that, on average, CMS completed playground-related maintenance repairs within 32 working days, which equates to

⁴ As part of the process for initiating repairs, each Division (CPI and CPII) must purchase any playground equipment, parts, or materials before CMS can complete a repair onsite.

approximately 44 calendar days.⁵

In these instances, PRD could benefit from keeping an accurate inventory of playground equipment assets. Currently, when playground equipment breaks, there is no central resource to easily identify the vendors and part numbers, which may contribute to longer repair times.

The City of Portland is in the process of implementing a Citywide Asset Management Work Plan which lays out general approaches and timelines for cross-bureau work to advance asset management principles. Portland's Parks and Recreation Department (PP&R) applies asset management practices to help prioritize capital projects, allocate scarce resources, and determine which assets to acquire and dispose of in order to develop a stable asset portfolio that meets service needs. As of March 2012, PP&R reports that playgrounds have been inventoried and are assessed regularly.

Additionally, PP&R also reports that for many assets, PP&R has completed the initial inventory and conditions assessments and is in the process of inspecting 20 percent of all assets each year. By 2015, PP&R plans to include all remaining assets in the annual rotating schedule, with most assets being inspected at least every five years and more often in many cases.

Recommendation #3 In order to improve efforts to assess playground equipment, the Park and Recreation Department (PRD) should:

- **Inventory playground equipment and surfacing at City playgrounds every three years. At minimum, the inventory should include:**
 - **The type of playground equipment and surfacing;**
 - **The condition of the playground equipment and surfacing; and**
 - **The equipment/surfacing manufacturer or substitute vendors.**
- **The inventory should be updated with new equipment as equipment is replaced.**

⁵ We calculated repair time by calendar days because playgrounds are open seven days per week.

- **Develop or adopt a template for assessing the condition of playground equipment and surfacing.**
- **Comprehensively assess the condition of at least 20 percent of all playground assets and surfacing each year, with 100 percent of playground assets and surfacing being inspected at least once every 5 years.**
- **Continue efforts with the Enterprise Asset Management System (EAM) and, when EAM becomes live, expand assessments to include calculating the useful life and value of playground inventory. (Priority 3)**

Conclusion

While PRD has developed the framework for creating a preventative and ongoing playground maintenance program, we identified specific elements of current practices that could be strengthened.

First, PRD could benefit from standardizing a supervisory process for reviewing inspection results. Currently, supervisors overseeing playground maintenance each have their own methods and individual timelines for reviewing the playground inspections completed by onsite staff. However, out-of-class assignments, which are beyond the Area Manager's control, create a lack of continuity and consistency that may lead to overlooking basic playground maintenance tasks. Such variation can adversely affect the accurate completion of inspection forms, which may affect PRD's ability to address playground safety hazards in a timely manner.

Secondly, PRD has created Park Maintenance Standards related to playground inspection and repair. However, within the Standards, PRD should clarify the types of repairs for each category and timelines outlined. Additionally, unclear and unquantifiable indicators diminish PRD's ability to evaluate how well PRD manages playground hazards.

Lastly, PRD's mechanisms for assessing playground equipment need improvement. Between 1989 and 2012, PRD completed five playground inventories and/or site inspections, which, in some instances, identified information such as playground equipment and conditions. However, these assessments were ad hoc, with each having a different scope and purpose. Implementing a consistent inventory could help improve the playground maintenance program.

PRD is currently in a position to further enhance existing playground maintenance practices and develop a more robust assessment of playground equipment assets. By strengthening its playground maintenance program, PRD can prolong the life of playground assets. PRD can also continue making progress towards its goal of providing safe and aesthetically-pleasing playgrounds that offer the greatest play value for children.

Recommendations

We made three recommendations intended to enhance PRD's playground maintenance efforts.

Recommendation #1 In order to improve oversight of its playground inspection processes, including the accurate completion of inspection forms and a consistent supervisory review process for inspection results, the Park and Recreation Department (PRD) should:

- Re-train staff on the policies and procedures for correctly completing the Weekly Playground Safety Inspection Form.
- Standardize a playground inspection review process by requiring supervisors to visit playground sites and complete a written safety inspection form at least bi-weekly. (Priority 3)

Recommendation #2 In order to improve assessment of its playground maintenance program, the Park and Recreation Department (PRD) should:

- Clarify performance indicators in its Park Maintenance Standards related to playground inspection and repair. Specifically, PRD should:
 - Clearly define "response" and which division staff (on-site or Citywide Park Maintenance Services staff) is responsible for meeting the designated timelines.
 - Clearly define playground equipment categories for repair (i.e. "small/minor" and other categories established by the Department).
 - Develop a rubric for the types of repairs considered "emergency," "non-emergency," and "non-safety," and use the rating system on all inspection forms and service requests. Additionally, communicate the rubric with staff involved in playground maintenance operations.
- Annually evaluate Park Maintenance Standards related to playground response and repair, and report outcomes to the San Diego Park and Recreation Board. (Priority 3)

- Recommendation #3** In order to improve efforts to assess playground equipment, the Park and Recreation Department (PRD) should:
- Inventory playground equipment and surfacing at City playgrounds every three years. At minimum, the inventory should include:
 - The type of playground equipment and surfacing;
 - The condition of the playground equipment and surfacing; and
 - The equipment/surfacing manufacturer or substitute vendors.
 - The inventory should be updated with new equipment as equipment is replaced.
 - Develop or adopt a template for assessing the condition of playground equipment and surfacing.
 - Comprehensively assess the condition of at least 20 percent of all playground assets and surfacing each year, with 100 percent of playground assets and surfacing being inspected at least once every 5 years.
 - Continue efforts with the Enterprise Asset Management System (EAM) and, when EAM becomes live, expand assessments to include calculating the useful life and value of playground inventory. (Priority 3)

Appendix A: Definition of Audit Recommendation Priorities

DEFINITIONS OF PRIORITY 1, 2, AND 3 AUDIT RECOMMENDATIONS

The Office of the City Auditor maintains a classification scheme applicable to audit recommendations and the appropriate corrective actions as follows:

Priority Class ⁶	Description ⁷	Implementation Action ⁸
1	Fraud or serious violations are being committed, significant fiscal or equivalent non-fiscal losses are occurring.	Immediate
2	A potential for incurring significant or equivalent fiscal and/or non-fiscal losses exist.	Six months
3	Operation or administrative process will be improved.	Six months to one year

⁶ The City Auditor is responsible for assigning audit recommendation priority class numbers. A recommendation which clearly fits the description for more than one priority class shall be assigned the higher number.

⁷ For an audit recommendation to be considered related to a significant fiscal loss, it will usually be necessary for an actual loss of \$50,000 or more to be involved or for a potential loss (including unrealized revenue increases) of \$100,000 to be involved. Equivalent non-fiscal losses would include, but not be limited to, omission or commission of acts by or on behalf of the City which would be likely to expose the City to adverse criticism in the eyes of its residents.

⁸ The implementation time frame indicated for each priority class is intended as a guideline for establishing implementation target dates. While prioritizing recommendations is the responsibility of the City Auditor, determining implementation dates is the responsibility of the City Administration.

Appendix B: Objectives, Scope, and Methodology

The purpose of this audit was to determine the efficiency and effectiveness of the City's playground maintenance program. Specifically, we reviewed the following three objectives that examined whether:

- Playground inspections and maintenance conducted by playground maintenance staff is consistent with PRD's policies related to playground safety (Objective 1);
- PRD has mechanisms in place for evaluating playground maintenance program goals (Objective 2); and
- PRD has mechanisms in place for tracking playground equipment in need of replacement (Objective 3).

To address Objective 1, we reviewed PRD's policies and procedures related to playground inspection and maintenance which included the Department Instruction on Safety Inspection of Playgrounds, Facilities, Furnishings, and Grounds, training materials for daily and weekly inspections playground maintenance; and PRD's Park Maintenance Standards related to playground inspection and repair. To determine whether PRD's established policies addressed applicable federal and state laws and industry guidelines, we also reviewed documents that included the:

- California Health and Safety Code Section 115725-115735;
- Consumer Product Safety Commission (CPSC) Public Playground Safety Handbook (2010);
- California Park and Recreation Society Creating Community with Best Practices Benchmarking Project (2001);
- Relevant sections of the American with Disabilities Act of 2010 (ADA); and
- Relevant Sections of the American Society for Testing and Materials guidelines.

Additionally, to determine if inspections occur at the frequency required by PRD policies, we randomly selected parks for review evenly split between the CPI and CPII Divisions. We interviewed Area Managers to gain insight regarding playground maintenance oversight procedures, reviewed inspection forms to determine if inspections occur at levels required by PRD policies, and conducted site visits between February-March 2013 to observe current conditions of City playground equipment and surfacing. We reviewed a sample of 24 groups of inspection forms and found that over half of the groups had data inaccuracies. The issue has been addressed within our recommendations. Lastly, we reviewed FY2012 service requests to determine the length of time taken to complete playground-related repairs.

To address Objective 2, we reviewed PRD's Park Maintenance Standards related to playground inspection and repair. We also interviewed PRD's Management in order to gain an

understanding of the performance indicators used and how the indicators are measured and communicated to staff.

To address Objective 3, we interviewed Management and Staff within the Assets and CPI and CPII Divisions to discuss PRD's efforts to track playground equipment inventory and playground equipment due for replacement. Additionally, we reviewed park and playground inventories and site inspections conducted by PRD between calendar years 1989 and 2013.

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 reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C: Playground Observations

To observe the conditions of playgrounds throughout the City, between February and March 2013, we visited 20 sites within the CPI and CPII Divisions. As displayed in **Exhibit C1**, we grouped our observations of playground equipment into categories of good, fair, and poor based on the rubric outlined in **Appendix D**. Most of the playground equipment we observed rated in good to fair condition. However, we rated a small portion of the equipment as poor. The pictures on the following pages serve as visual examples of the types of playground equipment we rated as poor.

Exhibit C1

Playground Observations

Equipment	Good	Fair	Poor
Rubberized Poured-in-Place Surfacing	8	1	5
Sand	13	4	1
Spring-based	8	4	1
Play Structures	4	9	4
Swings	8	11	1
Totals	41	29	12
Percentage of Total	50%	35%	15%

Source: Auditor-generated based on playground visitations

Wooden Teeter Totter



We observed a piece of wooden playground equipment, which, according to the PRD's Consultant Guide is prohibited. We rated the equipment as poor because of the raised wooden edges that could cause cuts, scrapes, and splinters.

Source: Auditor-generated

Playground Structure



Source: Auditor-generated

We rated this structure as poor because the equipment is completely barricaded, the metal on the platform is extensively corroded, and the plastic panel has been burned.

Rubberized Poured in Place Surface



We rated this surface as poor because extreme cracking, ripping, or tearing was evident and the subsurface was exposed and trenched.

Source: Auditor-generated

Sand



We rated the sand as poor because compaction and weeds were present.

Source: Auditor-generated

Appendix D: Playground Observations Rubric

	Good	Fair	Poor
Rubberized Poured-in-Place Surface (PIP)	<ul style="list-style-type: none"> No cracking, ripping, or tearing Generally free of noticeable vandalism (e.g. graffiti, burned areas, etc.) 	<ul style="list-style-type: none"> Some cracking, ripping, or tearing Some noticeable vandalism (e.g. graffiti, burned areas, etc.) 	<ul style="list-style-type: none"> Extreme cracking, ripping, or tearing Subsurface exposed or trenched Vandalism is widespread (e.g. graffiti, burned areas, etc.)
Sand	<ul style="list-style-type: none"> Generally free of compaction or weeds Sand under swing is not trenched 	<ul style="list-style-type: none"> Some compaction or weeds present Sand under swing shows signs of trenching 	<ul style="list-style-type: none"> Compaction or weeds widespread Sand under swing shows extreme trenching
Spring-based	<ul style="list-style-type: none"> Sturdy (e.g. bolts firmly in place and seat(s) shows no signs of cracks or breakage) Spring(s) firmly rooted in ground Spring(s) not rusted or corroded All components present (e.g. seat, grips, etc.) 	<ul style="list-style-type: none"> Questionable (e.g. loose bolts and/or seat(s) shows signs of cracks or breakage) Spring(s) show signs of rising from the ground Spring(s) show discoloration but are not rusted or corroded All components present (e.g. seat, grips, etc.) but show signs of wear and tear 	<ul style="list-style-type: none"> Unstable (e.g. loose bolts and/or cracked or broken seat(s)) Spring(s) rising from the ground Spring(s) may be rusted or corroded Components missing (e.g. seat, grips, etc.) or show signs of extreme wear and tear
Play Structure	<ul style="list-style-type: none"> Sturdy (e.g. bolts and individual structural pieces firmly in place and no signs of cracks or breakage) Plastic- or rubber-covered pieces are generally free of exposed metal parts None of the structural pieces are barricaded or missing Generally free of noticeable vandalism (e.g. graffiti, burned areas, etc.) 	<ul style="list-style-type: none"> Questionable (e.g. loose bolts and/or individual structural pieces show signs of cracks or breakage) Metal parts of a plastic- or rubber-covered piece may be minimally exposed in multiple areas A structural piece may be barricaded, but other structural pieces are minimally affected Some noticeable vandalism (e.g. graffiti, burned areas, etc.) 	<ul style="list-style-type: none"> Unstable (e.g. loose bolts and/or cracked or broken seat(s)) Metal parts of a plastic- or rubber-covered piece are extensively exposed A structural piece is barricaded, and other structural pieces are affected Vandalism is widespread (e.g. graffiti, burned areas, etc.)
Swing	<ul style="list-style-type: none"> Chains not rusted or corroded Seats expose no metal and show no signs of cracks or breakage Frame newly or fully painted and generally free of corrosion and/or noticeable vandalism (e.g. graffiti, burned areas, etc.) 	<ul style="list-style-type: none"> Chains show signs of rust or corrosion Seats may expose metal and/or show signs of cracks or breakage Frame paint deteriorating and/or some corrosion and/or noticeable vandalism (e.g. graffiti, burned areas, etc.) 	<ul style="list-style-type: none"> Chains are rusted or corroded Seats expose metal and/or are cracked or broken Frame paint gone and/or widespread corrosion and/or vandalism (e.g. graffiti, burned areas, etc.)

Source: Auditor-generated



THE CITY OF SAN DIEGO
M E M O R A N D U M

DATE: July 24, 2013
TO: Eduardo Luna, City Auditor
FROM: Stacey LoMedico, Park and Recreation Director
SUBJECT: Management Response to the Performance Audit of the Playground Maintenance Program dated June 11, 2103

The Park and Recreation Department (PRD) has reviewed the City Auditor's recommendations in the audit report for the Department's Playground Maintenance Program. Our response to each of the audit recommendations is documented below.

Finding 1:

Recommendation #1

In order to improve oversight of its playground inspection processes, including the accurate completion of inspection forms and a consistent supervisory review process for inspection results, the Park and Recreation Department (PRD) should:

- Re-train staff on the policies and procedures for correctly completing the Weekly Playground Safety Inspection Form.
- Standardize a playground inspection review process by requiring supervisors to visit playground sites and complete a written safety inspection form at least bi-weekly. (Priority 3)

Management Response: **Agreed**

The PRD has experienced a significant change in all levels of staff over the last several years, including nearly a 20% turn-over in supervisors from 2009 to 2011. During this time frame and through 2012 PRD experienced nearly a 50% turnover in the 21 budgeted Area Manager positions, one of the lead supervisory positions that has the oversight responsibility of the maintenance staff who oversee the daily maintenance of playgrounds.

Finding 2:

Recommendation #2

In order to improve assessment of its playground maintenance program, the Park and Recreation Department (PRD) should:

- Clarify performance indicators in its Park Maintenance Standards related to playground inspection and repair. Specifically, PRD should

- Clearly define “response” and which division staff (on-site or Citywide Park Maintenance Services staff) is responsible for meeting the designated timelines.
- Clearly define playground equipment categories for repair (i.e. “small/minor” and other categories established by the Department).
- Develop a rubric for the types of repairs considered “*emergency*,” “*non-emergency*,” and “*non-safety*,” and use the rating system on all inspection forms and service requests. Additionally, communicate the rubric with staff involved in playground maintenance operations.
- Annually evaluate Park Maintenance Standards related to playground response and repair, and report outcomes to the San Diego Park and Recreation Board. (Priority 3)

Management Response: **Agreed**

PRD will evaluate and consider the suggestion by the City Auditor to better define response times and playground ground categories. The PRD will develop these and other items within this recommendation for a report to the Park and Recreation Board, as recommended, in FY15.

Finding 3:

Recommendation #3

In order to improve efforts to assess playground equipment, the Park and Recreation Department (PRD) should:

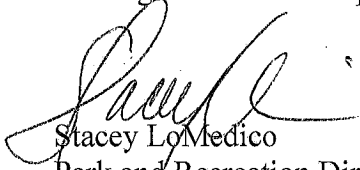
- Inventory playground equipment and surfacing at City playgrounds every three years. At minimum, the inventory should include:
 - The type of playground equipment and surfacing;
 - The condition of the playground equipment and surfacing; and
 - The equipment/surfacing manufacturer or substitute vendors.
- The inventory should be updated with new equipment as equipment is replaced.
- Develop or adopt a template for assessing the condition of playground equipment and surfacing.
- Comprehensively assess the condition of at least 20 percent of all playground assets and surfacing each year, with 100 percent of playground assets and surfacing being inspected at least once every 5 years.
- Continue efforts with the Enterprise Asset Management System (EAM) and, when EAM becomes live, expand assessments to include calculating the useful life and value of playground inventory. (Priority 3)

Management Response: **Agreed**

In FY14 the City Council provided funds for PRD to begin a process to inventory park assets, including playgrounds, and conduct limited conditions assessments on those assets. The conditions assessments will initially be conducted on those assets identified as most critical in achieving PRD’s primary mission. This is the initial step in creating an asset management

Eduardo Luna, City Auditor
July 24, 2013

system for the city's expansive park system, known as the largest municipal park system in the nation. In addition, to ensure we comply with this and other recommendations outlined in the report, PRD will ask for additional staff in the FY15 budget process and search for additional funding to continue the park asset conditions assessments.



Stacey LoMedico
Park and Recreation Director

- cc: Walt Ekard, Interim Chief Operating Officer
- Scott Chadwick, Assistant Chief Operating Officer
- Nelson Hernandez, Director of Policy
- Kyle Elser, Assistant City Auditor
- Park and Recreation Management Team
- Jim Winter, Project Officer II