

**DEPARTMENT OF PARKS,
RECREATION & ENTERTAINMENT
OPEN WATER LIFEGUARDS
REPORT NO. 521
DECEMBER 19, 2000**

OFFICE OF THE COUNCIL AUDITOR
Suite 200, St. James Building



December 19, 2000

Report No. 521

Honorable Members of the City Council
City of Jacksonville

INTRODUCTION

Pursuant to Section 5.10 of the Charter of the City of Jacksonville and Chapter 102 of the Jacksonville Municipal Code, we examined the activities of the open water lifeguards with the Recreation Activities Division of the Department of Parks, Recreation and Entertainment for the City of Jacksonville and present this report thereon. The Department's response to our recommendations have been inserted into the body of the report. Their response memorandum is also attached as Exhibit A.

The City currently staffs open water lifeguards at Kathryn Abbey Hanna Park (Hanna) and Huguenot Memorial Park (Huguenot). The guarding of Huguenot Park first began in 1999. Hanna Park has approximately two miles of waterfront beach, which it staffs with twelve to fourteen lifeguards on weekdays and fourteen to sixteen lifeguards on weekends. Huguenot Park is approximately one mile in length and staffs sixteen to eighteen lifeguards on weekdays and eighteen to twenty lifeguards on weekends. In addition to the regular lifeguards on duty, each beach typically has at least one beach manager, at least one lifeguard captain and at least one lifeguard lieutenant on duty for supervision of the lifeguards. The lifeguards are seasonal employees, with both beaches being guarded starting on Memorial Day weekend and lasting through Labor Day weekend. The beaches are staffed only on weekends until school is out for the summer, at which point the beaches are staffed daily.

The lifeguard program for the City of Jacksonville's beaches has certification from the United States Lifeguarding Association (USLA). This certification requires that certain requirements be met for lifeguard instructors, lifeguard training and lifeguard equipment requirements.

STATEMENT OF OBJECTIVES

The objectives of the audit were as follows:

1. To determine that the cost of providing lifeguard services to the City's beaches is appropriate to ensure the most efficient and economical use of resources.
2. To determine that lifeguards are adequately trained in accordance with national standards to perform their required duties and ensure their own safety and that of the public.

STATEMENT OF SCOPE

The audit period of our detailed testing was the summer of 1999 and 2000, and for training for the summer of 2000.

STATEMENT OF METHODOLOGY

All of the random samples used for testing purposes were selected using the Stats program. We obtained a list of all of the lifeguard employees for the 1999 and 2000 seasons from the Aquatics Activity. We used the payroll system to pull the information regarding payroll amounts for each of the lifeguards. We selected a random sample of employees from the entire population of lifeguards to test various steps of our audit program. We selected two observation days for the lifeguards based on how busy we thought the beaches would be and the availability of the auditors to make the observations. We selected a random sample of days from the population of days during the season to test some steps in the audit program. We used the three other beaches in Duval County (Jacksonville Beach, Atlantic Beach and Neptune Beach) as well as the American Red Cross for comparison purposes. We obtained a list of the capital outlay expenditures for 1999 and 2000 for the lifeguard programs from Aquatics and selected those over \$1,000 to test. We obtained information regarding privatization from the Internet and prior work performed in the area. We obtained the requirements of the USLA standards from the Internet. We also contacted the appropriate personnel in order to review any problems that occurred with equipment operation and any worker's compensation and public liability claims related to the beaches.

STATEMENT OF AUDITING STANDARDS

We conducted our audit in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to afford a reasonable basis for our judgements and conclusions regarding the organization, program, activity, or function under audit. This audit also included an assessment of applicable management controls and compliance with requirements of laws and regulations when necessary to satisfy audit objectives. We believe that our audit provides a reasonable basis for our conclusions.

AUDIT CONCLUSIONS

The conclusions for our objectives are as follows:

1. Based on our testing, the cost of providing lifeguard services to the City's beaches is appropriate. We did note some areas of improvement for ensuring the most efficient and economical use of resources. These areas are noted below in our findings for this objective and our opportunity for improvement section of this report.
2. Except for our findings noted below, the lifeguards are being adequately trained in accordance with national standards to perform their required duties and ensure their own safety and that of the public.

AUDIT OBJECTIVE #1

In order to test audit objective #1, we first obtained a list of all of the lifeguard employees for the 1999 and 2000 seasons from the Aquatics Activity. We used this list to determine the total wages that were paid to each employee for the 1999 and 2000 seasons. We used the payroll system to pull the information regarding payroll amounts for each of the lifeguards. From our random sample of employees, we tested for agreement of the hours that the employees worked to the Personnel Document Number 10s (PD-10s) and the attendance reports. From our random sample of days selected during the season, we tested to determine that the number of lifeguards on duty agreed to the number per the Aquatics Standard Operating Procedures. We observed the lifeguards on two separate occasions to determine the number of chairs used at each beach and the number of lifeguards on duty. We also compared the work schedules and costs for Jacksonville's beaches to the other beaches in Duval County—Jacksonville Beach, Atlantic Beach and Neptune Beach. We obtained a list of the capital outlay expenditures for 1999 and 2000 for the lifeguard programs from Aquatics and tested those expenditures over \$1,000 for reasonableness and accuracy. We also contacted the Red Cross to determine the cost and feasibility of contracting with them to provide lifeguard services. We examined the prior work performed by the Administration in the area of privatization and examined information regarding other beaches that privatize their services.

Our findings relating to audit objective #1 are listed below.

Finding #1

Upon review of the payroll records for 1999, we found that attendance records were not used to support the hours recorded on the PD-10s. The Supervisors recorded the hours on the PD-10s at the beaches without any supporting documentation for them. The hours reported on the PD-10s and the hours paid per the payroll system were materially in agreement with one another for the season.

Recommendation #1

For 2000, attendance sheets were used. However, these sheets did not always support the amounts recorded on the PD-10s (see Finding #2). We recommend that a system be developed which allows lifeguards to document the hours they work each day which would be approved by the supervisor on duty and then be used to document the information on the PD-10s. A time clock would be a good solution to keeping record of the hours the employees work. The PD-10s would then be used to determine the number of hours for which the employees would be paid. All three of these should agree in amount.

Finding #2

Through our testing of the payroll system, PD-10s and attendance reports for 2000, we found that the hours documented on the attendance reports did not always support the hours worked per the PD-10s and the hours paid per the payroll system. The hours worked per the PD-10s and the hours paid per the payroll system were materially in agreement with one another for the season.

Recommendation #2

Although attendance sheets were used for support of the PD-10s for 2000, the hours recorded were not always accurate. We recommend that a system be developed which allows lifeguards to document the hours they work each day, which would be approved by the supervisor on duty and then be used to document the information on the PD-10s. A time clock would be a good solution to keeping record of the hours the employees work. The PD-10s would then be used to determine the number of hours for which the employees would be paid. All three of these should agree in amount and pay rate each pay period.

Auditee's Response to Recommendations #1 and #2

Open Water Lifeguards will use time clocks to record their time beginning in the 2001 season. This will ensure that all attendance and payroll records are substantiated with sufficient support documentation of attendance. Careful attention to the information reported on these documents will ensure that all records report identical information.

Finding #3

For the payroll period ending June 23, 2000, all of the lifeguards were paid a rate of \$7.00 per hour regardless of the park in which they worked. Lifeguards were receiving a rate of \$8.00 per hour for the 1999 season for working at Huguenot due to the driving distance and the more intense working conditions. The rate of \$8.00 per hour was implemented for Huguenot after the pay period ending June 23, 2000, but not all lifeguards received a retroactive pay increase for the hours paid in the prior period at the lower rate. In addition we noted that the rate stated on the PD-10s did not agree to the rate per the payroll system approximately 30% of the time (118 out of 395 instances).

Recommendation #3

We recommend that the amount be calculated and paid that is owed to any of the lifeguards who worked at Huguenot Park but were paid the Hanna Park rate. We also recommend that in the future the pay rate shown on the PD-10 be verified for correctness.

Auditee's Response to Recommendation #3

The Department Business Office has corrected all underpayments. To prevent this same error in the future, both beaches will operate under the same pay scale, beginning with the 2001 season.

Finding #4

We found that the salaries for both Hanna and Huguenot Park were being charged to index code PRRA011AD (Recreation Activities) for the 2000 season through the pay period ending September 15, 2000. This is the correct index code for Hanna Park, but the salaries for Huguenot Park are budgeted in the Huguenot Park Trust Fund as a transfer from the Hanna Park Trust Fund (per Ordinance requirements), and accordingly should be charged to index code PRPM1D2.

Recommendation #4

This issue is under review by the business office for the Department of Parks, Recreation and Entertainment. They are going to prepare a journal entry to transfer the cost of the

lifeguards from the Recreation Activities account to the Huguenot Park Trust Fund account. We concur with this treatment of the finding.

Auditee's Response to Recommendation #4

The Department Business Office has corrected the error by transferring funds from PRPMID2 to PRRA011AD.

Finding #5

Through our testing we found that there were lifeguards working excessive hours during the season. Because the lifeguards are on duty 7 days a week from 9 a.m. to 6 p.m. during the regular season, causing them to work some overtime, we considered over 100 hours in a pay period to be excessive. For 1999 we examined a total of 86 lifeguards and found that 20 lifeguards (23%) worked over 100 hours in at least one pay period for the season. For 2000 we examined a total of 87 lifeguards and found that 22 lifeguards (25%) worked over 100 hours in at least one pay period for the season. The safety of the public may be jeopardized if the lifeguards are tired and not alert for their shifts.

Recommendation #5

We recommend that the lifeguards do not work more than 100 hours during any pay period. This can be accomplished through rotation in the scheduling of lifeguards so that all lifeguards on duty are alert and able to be responsive to the needs of the public.

Auditee's Response to Recommendation #5

The 2001 schedule has been developed to change the way shifts are scheduled for lifeguards. The new scheduling strategy should result in the typical work week being 40 hours. Additionally, some new equipment will be purchased to minimize trips between the two beaches, which can take inordinate amounts of time due to the ferry schedule.

Finding #6

We examined the work schedules to determine that the number of lifeguards on duty corresponded to the number of lifeguards per the Aquatics Standard Operating Procedures (SOP). After examining the work schedules, we compared them to the PD-10s to confirm the number of lifeguards that worked. Per the Aquatics SOP, Hanna Park should operate with between 12 to 14 lifeguards on weekdays and 14 to 16 lifeguards on weekend days. Per the Aquatics SOP, Huguenot should operate with 16 to 18 lifeguards on weekdays and 18 to 20 lifeguards on weekend days. Through our testing we found that of the 36 days tested, Hanna Park operated with less than 12 lifeguards on weekdays and less than 14 lifeguards on weekends on 23 (64%) of the 36 days. Specifically, we noted at Hanna Park that in one instance on 6/24/00, the PD-10 showed that there was only one lifeguard on duty. In another instance on 7/1/00, there were only two lifeguards on duty per the PD-10s. Through our testing we found that Huguenot Park operated with less than 16 lifeguards on weekdays or less than 18 lifeguards on weekends on 20 (56%) of the 36 days. Understaffing of the beaches may result in jeopardizing the safety of the public.

Recommendation #6

We recommend that the Aquatics Activity adhere to its Standard Operating Procedures when determining the number of lifeguards to have on duty at the beaches, and make certain that an adequate number of lifeguards are on duty to ensure public safety.

Auditee's Response to Recommendation #6

Maintaining adequate staffing is an important risk reduction and safety consideration. The Aquatics Supervisor has analyzed the attendance, coverage and incident records and calculated the coverage rates that will be reflected in the updated 2001 Aquatics Standard Operating Procedures (SOP). Based on previous records, we believe we can reduce the number of lifeguards on the beach without jeopardizing public safety. This slight reduction will make higher hourly rates possible, as a means of enticing the best candidates in a highly competitive labor environment.

Finding #7

On June 16, 2000, we observed the activities at both Hanna and Huguenot Parks to determine how the parks functioned and note any instances of problems we saw. While at Hanna Park we found that on the southernmost access point to the beach, a sign is posted stating, "No Lifeguard on Duty, Swim at Your Own Risk." However, a lifeguard was on duty within a short distance from the sign.

Recommendation #7

We recommend that the Aquatics Activity remove the signs if in fact a lifeguard is on duty in the area so that beach patrons are properly informed.

Auditee's Response to Recommendation #7

The Aquatics Supervisor will ensure that training covers the removal of signs when lifeguards are on duty in the area.

Finding #8

On June 16, 2000 we observed the activities at both Hanna and Huguenot Parks to determine how the parks functioned and note any instances of problems we saw. Through our observations we found that at Huguenot Park there were signs posted stating, "Danger Stay Off the Rocks," and "Danger Stay Off Jetty Rocks." However, there were small children and adults swimming within 30 feet of the rocks, with some actually standing on the rocks within view of a lifeguard, without receiving any warning from the lifeguards. Our review of 75 incident reports for the beaches for 1999 revealed that 14 injuries (19%) were incurred as a result of being on or around the jetties at Huguenot Park.

Recommendation #8

We recommend that in the future the lifeguard on duty near the jetty rocks instruct patrons to swim the appropriate distance away from the rocks and not allow persons to climb on the jetty rocks. Cooperation may be needed from the Jacksonville Sheriff's Officers monitoring the beach to enforce these procedures, but it should be the responsibility of the lifeguards to notify the officers.

Auditee's Response to Recommendation #8

The use of the jetty by park patrons has always been a concern. Fishermen want to fish there and swimmers use the jetty as well. The rocks collect barnacles, which are the primary source of injuries on the jetty (cuts, abrasions, etc.). A lifeguard's primary responsibility is watching the water, since risk of drowning is our primary concern. If a lifeguard changes focus from the water to the jetty, we face greater drowning risks. A land-based lifeguard supervisor periodically warns patrons off the jetty. Since there is no ordinance prohibiting the public from accessing the jetty, JSO officers will not enforce such a prohibition. We could include in the Huguenot Park rules a prohibition from the jetty. These rules are printed in a brochure that is given to park patrons when they come through the admission gate. However, such a prohibition will not be popular with the Huguenot Park customers. We will continue to work on a solution to this situation.

Finding #9

On June 16, 2000, we observed the activities at both Hanna and Huguenot Parks to determine how the parks functioned and note any instances of problems we saw. We found that at the North end of Huguenot Park there are signs posted stating, "Strong Currents, No Swimming." However, there was a woman allowing her young children to swim there, and there was no enforcement of the rule.

Recommendation #9

We recommend that the lifeguards at both Hanna and Huguenot Park enforce all rules, and when necessary invoke the cooperation of the Jacksonville Sheriff's Officer on duty at the park to ensure that all patrons follow the rules of the park.

Auditee's Response to Recommendation #9

Park rules that are not stated in an ordinance cannot be enforced by JSO. The Aquatics Supervisor will ensure that training covers the enforcement of park rules that are reflected in posted signs. We will also revise the brochure to reflect these posted areas.

Finding #10

We reviewed the Privatization report from the committee formed by the Administration to discuss privatization of the lifeguards at Hanna and Huguenot Parks. There appeared to be a conflict of interest for some members of the committee because the Open Water Specialist and the Aquatics Supervisor for the beaches both served on the committee. Privatization would likely eliminate or reduce the duties associated with these positions.

Recommendation #10

We recommend that in the future if privatization is considered for the lifeguard program, that a committee is selected that is more independent of the situation.

Auditee's Response to Recommendation #10

Recommendation noted.

Finding #11

We reviewed the Privatization report from the committee formed to discuss privatization of the lifeguards at Hanna and Huguenot Parks. It appeared that the method used for

determining the cost of the programs was not a very sound method. The measurement used for comparison was the total cost for the program divided by the total number of lifeguards to give a cost per lifeguard ratio. The more lifeguards that are used, the lower your fixed cost items will be per lifeguard because you are dividing the cost by a larger number. The main costs that actually vary based on the number of lifeguards are the cost of salaries, benefits, and the supplies for individual lifeguards. Items such as electricity, rent for buildings, capital assets, vehicles and costs for repair and maintenance of vehicles do not vary depending on the number of lifeguards. Those costs are essentially fixed. By dividing these costs by a larger number of lifeguards, we have a lower cost per lifeguard than the other Cities that employ a fewer number of lifeguards. In addition to this, Jacksonville Beach's costs were based on 12 months while the Cities used in the comparison were only based on the summer months.

Recommendation #11

We recommend that if privatization is considered again in the future, a more accurate and sound method be used to determine the cost per lifeguard.

Auditee's Response to Recommendation #11

Recommendation noted.

AUDIT OBJECTIVE #2

Our second objective was to determine that lifeguards are adequately trained in accordance with national standards to perform their required duties and ensure their own safety and that of the public. In order to test this objective, we obtained the requirements of the USLA standards and tested them against the requirements that are being used by the City for instructor qualifications, lifeguard training and requirements and equipment standards. We verified that lifeguards received the training required by the USLA standards and the Aquatics Activity standards through distribution of a questionnaire to all of the lifeguards for the 2000 season. We also obtained the attendance records for the training courses and verified that a sample of lifeguards attended all of the required training, and we reviewed the personnel files of the lifeguards and the officers for training certification. In addition we compared the training requirements to the requirements of other beaches in Duval County and the requirements of the Red Cross. We also reviewed any problems that occurred with equipment operation and any workers' compensation and public liability claims related to the beaches.

Our findings relating to audit objective #2 are listed below.

Finding #12

We mailed questionnaires to a total of 74 lifeguards for the 2000 season to determine if the USLA standards were being followed for instructor qualifications, lifeguard training and equipment. We received responses from eight lifeguards. Although we did not receive enough responses to draw definite conclusions about training, based on the responses received we felt some areas may need further examination by Aquatics in preparation of its training requirements for future seasons. We determined that the following areas needed further consideration by the Aquatics Activity:

- Ensuring that marker buoys are readily available for submerged victim search and rescue.
- Providing sunscreen and other protection from sun exposure, and informing lifeguards of the items available.
- Providing a copy of the USLA Manual of Open Water Lifesaving to all lifeguards.
- Ensuring that the lifeguards understand the donning and clearing of mask and snorkel, and the surface dive to recover a minimum 159-pound victim from a depth of at least ten feet of water.
- Ensuring that the lifeguards understand and know how to use range marks.

Recommendation #12

We recommend that the Aquatics Activity consider the above mentioned areas in preparing for the 2001 season.

Auditee's Response to Recommendation #12

Marker buoys are kept in the back of the lifeguard trucks, per recommendation of the United States Lifesaving Association (USLA). The Department provides umbrellas, hats and sunscreen.. The umbrellas are affixed to the lifeguard chairs. Lifeguards are required to wear hats and sunscreen products are provided in the lifeguard station. All lifeguards are provided a copy of the USLA Manual of Open Water Lifesaving during their training. We will enhance 2001 training on surface dive to recover victim, use of the mask, fins, snorkel and range markers.

Finding #13

We examined the attendance reports and compared them to the training schedules for the 2000 preseason. Of the 33 lifeguards tested, 3 (9%) did not have proper documentation of receiving enough hours of training to meet the requirements of the USLA standards. Of the 33 lifeguards tested, 7 (21%) did not have proper documentation of receiving the adequate amount of training as required by the Aquatics Activity training schedule, but did receive enough hours to meet the USLA Standards.

Recommendation #13

We recommend that all lifeguards receive the appropriate training dictated by the Aquatics training schedules and the USLA standards, and that proper documentation of this training be maintained in the lifeguard's personnel file.

Auditee's Response to Recommendation #13

All lifeguards who worked during the 2000 season received both the required USLA and Department training elements. We will improve filing procedures so that the documentation reflects that all lifeguards have received the requisite training.

Finding #14

We examined the Red Cross Course Records for 2000 and found that of the 70 lifeguards who should have received the Red Cross CPR training, 2 (3%) did not have certification of receiving it.

Recommendation #14

We recommend that all lifeguards receive the training dictated by the Aquatics Activity requirements, and evidence of this training should be maintained in the lifeguard's personnel file.

Auditee's Response to Recommendation #14

Our records did not reflect that 2 individuals received the Red Cross CPR training and certification. One individual quit prior to completing training. This individual did not guard the beach. The second individual received American Heart Association CPR training, a nationally recognized training course.

Finding #15

We examined the files of the lifeguards to determine if they met the USLA's age requirement. We tested 70 lifeguards to determine if they met the USLA's age requirement of being at least 16 years of age. Of the 70 tested, 6 (9%) lifeguards did not have a copy of a driver's license or birth certificate in their personnel file to ensure that they were over the age of 16. Subsequent to our testing information was submitted by the lifeguards to provide evidence that all 6 were at least 16 years old during the season.

Recommendation #15

We recommend that all lifeguards submit a copy of their driver's license or birth certificate prior to being hired, and that this documentation be maintained in their personnel file.

Auditee's Response to Recommendation #15

All lifeguards working during the 2000 season were at least 16 years of age, which is the USLA's minimum age requirement. Filing procedures have been improved so that the documentation relating to age will be maintained in personnel files.

Finding #16

We examined the USLA training requirements worksheet and the Open Water training requirements worksheet prepared by the Aquatics Activity to verify that all lifeguards initialed stating that they received the training in each of these areas, and felt competent in the area. We tested 69 lifeguards to verify that they initialed the USLA training requirements worksheet and the Open Water training worksheet. Of the 69 lifeguards, 6 (9%) did not initial the spreadsheet to indicate that they met the training requirements for the USLA standards and 5 (7%) did not initial the worksheet for Open Water life guarding. The Aquatics Activity states that the lifeguards did not initial these sheets until after the season started. As a result, some lifeguards quit prior to initialing the sheets.

Recommendation #16

Because the initialing by the lifeguard of the USLA training requirements worksheet and the Open Water training worksheet is an indication that the lifeguard feels competent in the areas in which they were trained, we recommend that all lifeguards initial these two worksheets upon completion of their training. The Aquatics Activity should verify that all lifeguards allowed to work at the beaches have initialed these worksheets indicating their training and competency prior to commencement of work on the beach as a lifeguard.

Auditee's Response to Recommendation #16

This recommendation relates to having lifeguards initial training worksheets to indicate that they feel competent in the area. This practice has been followed for the past two years. In the instances where the training worksheets were not initialed, the individuals quit the training prior to self-evaluation. These individuals did not guard the beach.

Finding #17

We examined the Aquatics Activity's records to verify that all of the lifeguards met the requirement of having documentation of being physically fit to perform the duties of a lifeguard as certified by a medical or osteopathic physician. This requirement is dictated by the USLA standards. Through examination of the records, we found that 27 of the 69 lifeguards tested (39%) did not have the proper physician documentation in their personnel files.

Recommendation #17

We recommend that all lifeguards submit proof of physical fitness as certified by a medical or osteopathic physician prior to allowing them to commence work on the beaches as a lifeguard. Documentation should be maintained in the lifeguard's personnel file.

Auditee's Response to Recommendation #17

We will ensure that lifeguards do not begin physical training until certified fit. Filing improvements will ensure that these records are maintained in personnel files.

OPPORTUNITY FOR IMPROVEMENT

During our examination of the lifeguard program for the City of Jacksonville, we noted one opportunity for improvement. The Aquatics Activity has difficulty maintaining an adequate number of lifeguards near the end of the season. Because lifeguards are seasonal employees, they are only hired and trained once per year. Therefore, dismissals and resignations throughout the season are not easily replaced. Many lifeguards are college students who must return to school during the month of August. The remaining lifeguards are left shorthanded and must work more hours. At the same time, Supervisors lose their leverage when it comes to employee discipline, because every remaining lifeguard is needed and the lifeguards know this.

The Aquatics Activity needs the flexibility to implement incentives that will help it to maintain a sufficient number of lifeguards near the end of the season. Possible incentives include a higher rate of pay for each season of lifeguard service. Lifeguards who wished to be rehired for future seasons would likely be better employees, and in future seasons, their experience would make them better lifeguards. Another possible incentive would be an end of season bonus dependent on length of service. Lifeguards who must leave to return to school would still be eligible for a percentage of the bonus, but terminated lifeguards would not.

In conclusion to our report, we would like to thank the Aquatics Activity staff for their cooperation throughout the course of our audit. We feel that overall the Aquatics Activity staff is doing a good job of ensuring that the lifeguards staffed at the City's beaches are adequately trained. The training requirements of the Aquatics Activity go beyond the requirements set forth by the USLA.

Respectfully Submitted,

Robert O. Johnson, CPA
Council Auditor

Audit Performed by:

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EXHIBIT A

DEPARTMENT OF PARKS, RECREATION AND ENTERTAINMENT
Office of the Director



TO: Robert Johnson, Council Auditor
Pamela Markham, Principal Auditor

FROM: Anne Peery, Director *Anne Peery*

RE: Department Response to Report #521 Open Water Lifeguards

DATE: December 18, 2000

CC: Sam Mousa, Chief Administrative Officer
Mike McDonald, Aquatics Supervisor
John Kelly, Athletics Supervisor

Thank you for the opportunity to respond to Audit Report #521 relating to the Open Water Lifeguard program of the Department of Parks, Recreation and Entertainment. As stated at the opening and exit conferences with the staff, we welcome the audit as a means of determining ways to improve this program. Your positive comments, both in the report and during our exit meeting, are appreciated. You noted "overall the Aquatics Activity staff is doing a good job of ensuring that the lifeguards staffed at the City's Beaches are adequately trained." As you noted, "the training requirements of the Aquatics Activity go beyond the requirements set forth by the USLA."

Your observations in the Opportunity for Improvement section are much appreciated. You have succinctly summarized the challenge we face in keeping the beaches covered through the entire season at the maximum standard of service. An incentive program, while not currently allowed, would be a useful tool in maintaining a full complement of qualified guards throughout the entire season.

The following responses indicate how the Department intends to implement your recommendations:

Recommendations #1 and #2—Open Water Lifeguards will use time clocks to record their time beginning in the 2001 season. This will ensure that all attendance and payroll records are substantiated with sufficient support documentation of attendance. Careful attention to the information reported on these documents will ensure that all records report identical information.

Recommendation #3—The Department Business Office has corrected all underpayments. To prevent this same error in the future, both beaches will operate under the same pay scale, beginning with the 2001 season.



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EXHIBIT A

Recommendation #4—The Department Business Office has corrected the error by transferring funds from PRPM1D2 to PRRA011AD.

Recommendation #5—The 2001 schedule has been developed to change the way shifts are scheduled for lifeguards. The new scheduling strategy should result in the typical work week being 40 hours. Additionally, some new equipment will be purchased to minimize trips between the two beaches, which can take inordinate amounts of time due to the ferry schedule.

Recommendation #6—Maintaining adequate staffing is an important risk reduction and safety consideration. The Aquatics Supervisor has analyzed the attendance, coverage and incident records and calculated the coverage rates that will be reflected in the updated 2001 Aquatics Standard Operating Procedures (SOP). Based on previous records, we believe we can reduce the number of lifeguards on the beach without jeopardizing public safety. This slight reduction will make higher hourly rates possible, as a means of enticing the best candidates in a highly competitive labor environment.

Recommendation #7—The Aquatics Supervisor will ensure that training covers the removal of signs when lifeguards are on duty in the area.

Recommendation #8—The use of the jetty by park patrons has always been a concern. Fishermen want to fish there and swimmers use the jetty as well. The rocks collect barnacles, which are the primary source of injuries on the jetty (cuts, abrasions, etc.). A lifeguard's primary responsibility is watching the water, since risk of drowning is our primary concern. If a lifeguard changes focus from the water to the jetty, we face greater drowning risks. A land-based lifeguard supervisor periodically warns patrons off the jetty. Since there is no ordinance prohibiting the public from accessing the jetty, JSO officers will not enforce such a prohibition. We could include in the Huguenot Park rules a prohibition from the jetty. These rules are printed in a brochure that is given to park patrons when they come through the admission gate. However, such a prohibition will not be popular with the Huguenot Park customers. We will continue to work on a solution to this situation.

Recommendation #9—Park rules that are not stated in an ordinance cannot be enforced by JSO. The Aquatics Supervisor will ensure that training covers the enforcement of park rules that are reflected in posted signs. We will also revise the brochure to reflect these posted areas.

Recommendation #10—Recommendation noted.

Recommendation #11—Recommendation noted.

Recommendation #12—Marker buoys are kept in the back of the lifeguard trucks, per recommendation of the United States Lifesaving Association (USLA). The Department provides umbrellas, hats and sunscreen. The umbrellas are affixed to the lifeguard

chairs. Lifeguards are required to wear hats and sunscreen products are provided in the lifeguard station. All lifeguards are provided a copy of the USLA Manual of Open Water Lifesaving during their training. We will enhance 2001 training on surface dive to recover victim, use of the mask, fins, snorkel and range markers.

Recommendation #13—All lifeguards who worked during the 2000 season received both the required USLA and Department training elements. We will improve filing procedures so that the documentation reflects that all lifeguards have received the requisite training.

Recommendation #14—Our records did not reflect that 2 individuals received the Red Cross CPR training and certification. One individual quit prior to completing training. This individual did not guard the beach. The second individual received American Heart Association CPR training, a nationally recognized training course.

Recommendation #15—All lifeguards working during the 2000 season were at least 16 years of age, which is the USLA's minimum age requirement. Filing procedures have been improved so that the documentation relating to age will be maintained in personnel files.

Recommendation #16—This recommendation relates to having lifeguards initial training worksheets to indicate that they feel competent in the area. This practice has been followed for the past two years. In the instances where the training worksheets were not initialed, the individuals quit the training prior to self-evaluation. These individuals did not guard the beach.

Recommendation #17—We will ensure that lifeguards do not begin physical training until certified fit. Filing improvements will ensure that these records are maintained in personnel files.