

AUDIT REPORT



CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BUREAU OF MANAGEMENT AUDIT
WILLIAM C. THOMPSON, JR., COMPTROLLER

Audit Report on the Parks Enforcement Patrol of the Department of Parks and Recreation

MD03-176A

April 9, 2004



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
1 CENTRE STREET
NEW YORK, N.Y. 10007-2341

WILLIAM C. THOMPSON, JR.
COMPTROLLER

To the Citizens of the City of New York

Ladies and Gentlemen:

In accordance with the Comptroller's responsibilities contained in Chapter 5, § 93, of the New York City Charter, my office has audited the Parks Enforcement Patrol (PEP) of the Department of Parks and Recreation. We determined whether PEP is in compliance with its policies and procedures as specified in the Parks *Urban Parks Service Officer's Field Manual* and whether PEP has adequate operating controls in place for the issuance of summonses and the handling of "requests for services."

The results of our audit, which are presented in this report, have been discussed with Parks officials, and their comments have been considered in the preparation of this report.

Audits such as this provide a means of ensuring that City funds are used efficiently, effectively, and in the best interest of the public.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at audit@comptroller.nyc.gov or telephone my office at 212-669-3747.

Very truly yours,

A handwritten signature in cursive script that reads "William C. Thompson, Jr.".

William C. Thompson, Jr.

WCT/fh

Report: MD03-176A
Filed: April 9, 2004

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*The City of New York
Office of the Comptroller
Bureau of Management Audit*

**Audit Report on the Parks Enforcement Patrol
Of the Department of Parks and Recreation**

MD03-176A

AUDIT REPORT IN BRIEF

This audit determined whether the Parks Enforcement Patrol (PEP) of the Department of Parks and Recreation (Parks) is in compliance with its own policies and procedures as specified in the *Parks Urban Parks Service (UPS) Officer's Field Manual* and whether PEP has adequate operating controls in place for the issuance of summonses and the handling of "requests for services."

Audit Findings and Conclusions

In general, PEP is in compliance with its policies and procedures as specified in the *Parks UPS Officer's Field Manual*. However, our review disclosed the following weaknesses:

- One of PEP's functions is to handle requests for services that come from the public or from the Parks Central Communications Division. Of the 960 requests for services reported in the PEP June 2003 Monthly Productivity Report, 747 (78%) were not recorded in borough offices' Request for Service Logs or other request-recording documents.
- Two borough offices (Manhattan and the Bronx) do not show any evidence that they follow up the requests for services that they have recorded.
- Four (16%) of 25 sampled officers' memo books were missing.
- Seventeen (89%) of 19 inspected officers' memo books lacked required supervisory reviews.

Based on the findings for our sample, we make the following recommendations, namely, that Parks officials should ensure that:

- Requests for services are recorded accurately and timely in Request for Service Logs.
- PEP officers adequately document action taken on requests for services.
- Memo books are completed and safeguarded against loss.

- Memo books are properly reviewed and signed by designated supervisors as required.

Parks Response

The matters covered in this report were discussed with Parks officials during and at the conclusion of this audit. A preliminary draft report was sent to Parks officials on February 6, 2004, and was discussed at an exit conference held on March 5, 2004. On March 12, 2004, we submitted a draft report to Parks officials with a request for comments. On March 24, 2004, we received a written response from Parks officials. In their response, Parks officials agreed with the audit's findings and stated that they have already taken steps to implement the audit's recommendations.

The full text of the Parks response is included as an addendum to this report.

INTRODUCTION

Background

The Department of Parks and Recreation (Parks) is responsible for the maintenance and operation of more than 28,000 acres of City parkland. The City's park system includes greenstreet sites, ball fields, tennis courts, recreation centers, golf courses, ice rinks, sports stadiums, zoos, beaches, and indoor and outdoor pools.

The Parks Enforcement Patrol (PEP), a uniformed and unarmed division of the Parks Urban Park Service, was created in 1981 to promote proper use and enjoyment of City parks by enforcing park rules and regulations as well as health, traffic and sanitation codes. PEP focuses on quality of life issues and coordinates its work with the Police Department to ensure public safety in City parks.

PEP officers work five days a week in eight-hour shifts. They patrol the City's park system daily on foot and by horseback, bicycle, and vehicle to monitor patrons, ensuring that they obey park rules as stipulated in the *Rules and Regulations Handbook*. They also review park facilities for health and safety issues, such as broken tree limbs and broken glass.

During Fiscal Year 2003, the City-funded PEP force consisted of approximately 85 full-time employees, including captains, sergeants, and officers. In addition, during the summer season approximately 180 seasonal employees were hired to provide additional enforcement patrols as well as to monitor the City's pools and beaches. PEP officers work out of a unit in each of the City's boroughs. Some PEP officers are paid by privately funded grants and are deployed to sites such as Battery Park City, Hudson River Park, and Madison Square Park. City-funded PEP officers are deployed to the City's parks, pools, and beaches.

PEP officers have the authority to arrest or issue summonses to anyone violating Parks rules and regulations. They issue Environmental Control Board summonses (ECBs) for activities such as illegal postings, illegal dumping, unleashed dogs, alcohol possession, and unauthorized vending. They can issue universal summonses for parking violations (PVBs), as well as for vehicular moving violations. They can also issue criminal court summonses for offenses such as disorderly conduct and unlawful possession of a weapon.

The PEP Division is not responsible for collecting the fines stated on the summonses. It forwards the various summonses to different adjudicating agencies for processing. The Environmental Control Board processes ECB summonses and the Department of Finance processes PVBs and moving violations. Local precincts handle PEP arrests for criminal conduct.

In addition to their enforcement duties PEP officers provide directions and information to park patrons; assist the homeless; assist in crowd control during major public events, such as concerts and parades; and deter, identify, and report activities that require police attention. PEP staff also handle requests for services that are telephoned into PEP borough offices from the public or from Parks Central Communications Division. Such requests can be for help in finding missing persons, or to investigate complaints, such as those for disorderly conduct, or to rescue animals.

During Fiscal Year 2003, PEP issued more than 28,000 summonses, made 75 arrests, and handled 8,247 requests for services.

Objective

The objective of this audit was to determine whether PEP is in compliance with its own policies and procedures as specified in the Parks *UPS Officer's Field Manual* and whether PEP has adequate operating controls in place for the issuance of summonses and the handling of requests for services.

Scope and Methodology

The period covered by the audit was Fiscal Year 2003.

We limited our sample to PEP operations paid by City funds. We did not review grant-funded PEP activities.

To obtain an understanding of the PEP operations, we reviewed the Parks *UPS Officer's Field Manual* of the Urban Park Service. The manual specifies the general PEP patrol duties, policies and procedures, and responsibilities of PEP officers when they are confronted with special circumstances. We interviewed the PEP deputy inspector and the captains at each of the five PEP borough offices. We also reviewed the *Park Rules & Regulations Handbook* and the PEP Citywide Monthly Productivity Report dated June 2003.

From each of the PEP borough offices, we obtained and reviewed copies of June 2003 daily deployment forms showing how sergeants, officers, and seasonal employees are assigned to various posts by borough captains. We chose June 2003 because it was the last month in our audit scope. We reviewed the June 2003 biweekly timesheets of all PEP staff showing their daily work hours. We also obtained and reviewed daily summons logs maintained by each borough office for June 2003.

To verify PEP staff presence in the field, on August 28, 2003, we performed unannounced observations at 12 outdoor pools—four in Manhattan and two in each of the other boroughs. We observed the 26 officers and sergeants monitoring the pools and determined whether they were in full uniform and had the required standard equipment as specified in the *UPS Officer's Field Manual*. We determined whether they recorded their daily activities in their memo books as required and whether the memo books showed a supervisory sign-off.

During these observations, we determined whether officers and sergeants accurately, completely, and legibly filled out summons forms for different types of violations. If a Parks vehicle was in use by a PEP staff, we determined whether a trip ticket was completed and whether the vehicle was equipped with a first-aid kit for use in an emergency. We also observed the patrons and ambience at the pools.

To determine how PEP staff assist in resolving complaints and incidents and whether they handled them in a timely fashion, we obtained and reviewed copies of the Request for Service Logs and Request for Service Forms for June 2003. We also obtained June 2003 productivity reports from individual borough offices and noted the number of request for services received. We reconciled the

number of requests on the June 2003 Request for Service Logs to the numbers reported in the June 2003 PEP productivity report, and noted any differences.

To select our audit sample for survey purposes, we obtained a list of the population of 80 officers and sergeants employed during June 2003, the last month in our audit scope and randomly selected five full-time officers from each borough. To verify the hours worked and locations of assignments reported in the sampled officers' memo books, we compared their memo book entries for June 2003 to the hours reported on their timecards, the borough offices' daily deployment logs, the summonses issued, and the trip tickets for the same time period. We also determined whether entries in their June 2003 memo books contained a supervisory sign-off.

We inspected copies of summonses issued by sampled PEP staff during June 2003 to determine whether the summonses were legibly and accurately completed and were approved by a supervisor.

Because the findings were not significant or monetary in nature, we decided not to expand our sample so as to project sample results to the entire population.

This audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of the records and other auditing procedures considered necessary. This audit was performed in accordance with the responsibilities of the City Comptroller as set forth in Chapter 5, § 93, of the New York City Charter.

Parks Response

The matters covered in this report were discussed with Parks officials during and at the conclusion of this audit. A preliminary draft report was sent to Parks officials on February 6, 2004, and was discussed at an exit conference held on March 5, 2004. On March 12, 2004, we submitted a draft report to Parks officials with a request for comments. On March 24, 2004, we received a written response from Parks officials. In their response, Parks officials agreed with the audit's findings and stated that they have already taken steps to implement the audit's recommendations.

The full text of the Parks response is included as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

In general, PEP is in compliance with its policies and procedures as specified in the *UPS Officer's Field Manual*. Specifically,

- Summonses issued were accurate, complete, and approved according to prescribed procedures.
- PEP work hours and assignments to work sites were adequately supported by biweekly timesheets and approved timecards.

- Officers were present during our pool observations.

However, our review disclosed the following weaknesses:

- One of PEP’s functions is to handle requests for services that come from the public or from the Parks Central Communications Division. Of 960 requests for services reported in the June 2003 PEP Monthly Productivity Report, 747 (78%) were not recorded in borough offices’ Request for Service Logs or other request-recording documents.
- Two borough offices (Manhattan and the Bronx) do not show any evidence that they follow up on the requests for services that they have recorded.
- Four (16%) of 25 sampled officers’ memo books were missing.
- Seventeen (89%) of 19 inspected officers’ memo books lacked required supervisory reviews.

These issues are discussed in the following sections of the report.

Requests for Services Lacked Supporting and Follow-Up Documentation

Of the 960 requests for services reported in the June 2003 Monthly Productivity Report, 747 (78%) were not recorded in borough offices’ Request for Service Logs or other request-recording documents. In addition, the Manhattan and the Bronx borough offices do not show any evidence that they follow up on the requests for services that they have recorded.

Table I, following, details by individual PEP borough offices our findings for requests for services:

Table I

Sampled June 2003 Requests for Services

Borough	Request for Service Recorded in Monthly Productivity Report	Request for Service Recorded in Request for Service Logs or Other Request-Recording documents	Request for Service Not Recorded in Request for Service Logs or Other Request-Recording Documents	No Evidence of Follow-up Action Taken by PEP Officers
Manhattan	640	17 (3%)	623 (97%)	17 (100%)
Bronx	30	15 (50%)	15 (50%)	15 (100%)

Brooklyn	64	63(98%)	1 (2%)	0
Queens	123	58 (47%)	65 (53%)	0
Staten Island	103	60 (58%)	43 (42%)	0
Totals	960	213 (22%)	747(78%)	32 (15%)

As shown in the above table, the Brooklyn and the Staten Island borough offices have records supporting most of the requests they have reported in the June Monthly Productivity Report. However, other borough offices, such as Manhattan, do not have adequate records to support the number of requests they have reported. In addition, two borough offices (Manhattan and the Bronx) do not show any evidence that they follow up on the requests for services that they have recorded.

According to the manual, all requests for services should be recorded in a Request for Services Log that indicates the following: name of the requester, date request was taken, exact nature or detail concerning the request, as is relevant.

The borough captains stated that not all requests for services are logged in their Request for Service Logs. They stated that some requests are documented in request forms or letters received from community districts, Parks offices, and Central Communications, and that requests received by telephone are recorded temporarily on scrap paper. After completing the monthly productivity report, the scrap papers are discarded.

According to PEP operating procedures, when a recommended action is taken by a PEP officer in response to a request or to resolve a complaint or an incident, the officer must complete a report showing the date of the investigation and a summary of findings and action taken, if any. However, since such reports were missing for the Manhattan and the Bronx borough offices, we were unable to determine whether PEP officers for these two boroughs were following up on any requests for services they received. For example: in the Bronx, there were disorderly conduct complaints on June 23 and 24, 2003. However, we found no evidence that they were investigated and followed up.

PEP officers should record all requests for services received in Request for Service Logs to track any ongoing condition at park properties that require PEP attention. Any actions taken by PEP officers regarding a complaint or request also are to be recorded. Such documentation provides an audit trail to ensure that these actions are appropriately handled. In addition, the documentation adds credence to the figures reported by PEP on its Monthly Productivity Report. Furthermore, with complete and accurate logs, PEP can gather statistical data for occurrences and services rendered at each borough.

Recommendations

1. Parks officials should ensure that all requests for services are recorded accurately and in a timely fashion in Request for Service Logs.

Parks Response: “Parks will ensure that all requests are properly recorded.”

2. Parks officials should ensure that PEP officers adequately document action taken on requests for services.

Parks Response: ‘Parks will ensure that all PEP officers follow the procedure for summarizing actions taken, as defined in the PEP manual.

Missing Memo Books and Lack of Supervisory Review

Four (16%) of our 25 sampled officers’ memo books were missing. In addition, 17 (89%) of 19 inspected memo books lacked evidence of required supervisory reviews.

PEP officers must legibly record their daily activities in memo books, including the nature of their assignment, its location, tasks performed, other pertinent information, and mealtime taken. Our findings relating to individual PEP borough offices are detailed in Table II, following:

Table II

Memo Book Inspection

Borough	# of Sampled Memo Books	# of Missing Memo books	# of Inspected Memo Books	# of Memo Books Lacking Supervisory Signatures
Manhattan	5		5	5
Bronx	5	1	3 *	2
Brooklyn	5		5	4
Queens	5	3	2	2
Staten Island	5		4 *	4
Totals	25	4	19*	17

* We were unable to obtain the memo books of two PEP officers who were transferred from these offices.

Missing Memo Books

Four PEP officers were not able to find their memo books for June 2003. By reviewing and comparing the work hours reported on timecards, deployment forms, and summonses issued, we confirmed that these employees worked the compensated hours. We also verified that these four officers had filled out memo books for the current month (November). However, because of the missing memo books, we were unable to determine whether assigned PEP duties were properly performed during this period.

According to the PEP manual, active or completed memo books must be stored in lockers and be made available for inspection at all times.

Memo books must be safeguarded against loss. They provide evidence of work performed and are an aid in the evaluation of PEP officers. In addition, memo books may include pertinent narratives or other important information related to a PEP violation issued that may be needed in a court proceeding.

Recommendation

3. Parks officials should ensure that all PEP memo books are completed and safeguarded against loss.

Parks Response: "Parks will endeavor to ensure that all officers follow the rules set forth in the PEP manual."

Memo Books Lacked Supervisory Signatures

Seventeen (89%) of 19 inspected memo books lacked evidence of required supervisory reviews.

All PEP staff below the rank of captain, except those performing permanent administrative or clerical duties, must record their daily activities in their memo books. To ensure that memo books are prepared accordingly, the *UPS Officer's Field Manual* requires that these memo books show daily supervisory review by entry of the designated supervisor's signature, the supervisor's rank, and the date and time on the next open line in the memo book.

The manual further states, "Upon completion of a memo book, a PEP staff must complete the memo book cover sheet and submit it to his designated supervisor for review. After reviewing and ascertaining that all required information has been entered on the cover of the memo book, the supervisor will enter his signature on the last page and cover of the memo book and issue a new log to the member."

Of the 17 memo books lacking required reviews, 11 (65%) had neither daily supervisory signatures nor signatures affixed upon completion of the books; four (23%) had no daily supervisory signatures; and two (12%) had no signatures affixed upon completion of the books. Without the supervisory signatures to document reviews, we could not determine whether daily entries in these memo books were accurate and complete.

Recommendation

4. Parks officials should ensure that all PEP memo books are properly reviewed and signed by designated supervisors, as required.

Parks Response: "Parks will again stress the importance of memo books being properly reviewed by supervisors as stated in the field officers manual."



City of New York
Parks & Recreation

Addendum page 1 of 4

The Arsenal
Central Park
New York, New York 10021

Adrian Benepe
Commissioner

David L. Stark
Chief Fiscal Officer

(212) 360-8265
david.stark@parks.nyc.gov

March 18, 2004

Mr. Greg Brooks
Deputy Comptroller
City of New York
Office of the Comptroller
1 Centre Street
NY NY 10007

Re: Audit Report on the Parks Enforcement Patrol of the
Department of Parks and Recreation
AUDIT NUMBER: MD03-176A

Dear Mr. Brooks,

Thank you for the opportunity to review and comment on your draft report before its public release. The attached response (Attachment I) describes our comments to your findings and response to the recommendations. Additionally, we have included the Agency Implementation Plan (AIP) in Attachment II.

We are pleased that your findings depict a process that, despite some minor weaknesses, works smoothly. Furthermore, your staff offers some recommendations that Parks agrees with. Parks has already taken steps to correct these minor deficiencies.

If you have any questions, please call me at 212-360-8265. Thank you.

Sincerely,

David Stark
Chief Fiscal Officer

cc: Judy Rubin, Audit Manager
Yudelka Tapia, Auditor
Peggy Viera, Mayor's Office of Operations

ATTACHMENT I

Parks' Response to the
Audit Report on the Parks Enforcement Patrol
AUDIT NUMBER MD03-176A

Recommendation 1: **All requests for service are recorded accurately and in a timely fashion in Request for Service logs.**

The Request for Service Log is designed to accurately document service requests received. The Urban Park Services Field Officer's Manual defines the procedures for completing the log. Although some requests are documented on request forms or letters received from community districts, Parks will ensure that all requests are properly recorded.

Recommendation 2: **PEP Officers should adequately document action taken on requests for service.**

Although two boroughs (Manhattan and The Bronx) failed to meet the test for follow-up action taken, three boroughs were satisfactory. Parks will ensure that all PEP officers follow the procedure for summarizing actions taken, as defined in the PEP manual.

Recommendation 3: **Parks officials should ensure that all PEP memo books are completed and safeguarded against loss.**

All PEP officers, except those that are assigned to clerical or administrative functions, are required to complete and store memo books in lockers. As evidenced by the fact that only 4 of the 25 sampled (16%) were missing, this important function is generally being adhered to. However, Parks will endeavor to ensure that all officers follow the rules set forth in the PEP manual.

Recommendation 4: **Parks officials should ensure that all PEP memo books are properly reviewed and signed by designated supervisors, as required.**

Parks will again stress the importance of memo books being properly reviewed by supervisors as stated in the field officers manual.

AUDIT IMPLEMENTATION PLAN
AUDIT TITLE: Audit Report on the Parks Enforcement Patrol of the Department of Parks & Recreation
Office of the City Comptroller
Audit No. MD03-176A
Date: March 12, 2004

Findings	Recommendations/Agency Response	Corrective Action Plan/Date Implemented
<p>1) Of the 960 requests for services reported in the June 2003 PEP Monthly Productivity Report, 747 (78%) were not recorded in borough officers' Request for Service Logs or other request-recording documents. The Brooklyn and Staten Island borough offices have records supporting most of the requests they have reported in the June Monthly Productivity Report. However, Manhattan does not have adequate records to support the number of requests they have reported. In addition, the Manhattan and the Bronx borough offices do not show any evidence that they follow up on the requests for services that they have recorded.</p>	<p>Parks officials should ensure that:</p> <p>1) All requests for services are recorded accurately and in a timely fashion in Request for Service Logs. Agency Response: DPR agreed.</p> <p>2) PEP officers adequately document action taken on request for services. Agency Response: DPR agreed.</p>	<p>1) The Request for Service Log is designed to accurately document service requests received. The Urban Park Services Field Officer's Manual defines the procedures for completing the log. Although some requests are documented on request forms or letters received from community districts, Parks will ensure that all requests are properly recorded. Date Implemented: February 11, 2004</p> <p>2) Although two boroughs (Manhattan and the Bronx) failed to meet the test for follow-up action taken, three boroughs were satisfactory. Parks will ensure that all PEP officers follow the procedure for summarizing actions taken as defined in the PEP manual. Date Implemented: February 11, 2004</p>
<p>2) Four PEP officers were not able to find their memo books for June 2003. By reviewing and comparing the work hours reported on timecards, deployment forms, and summonses issued, employees who worked the compensated hours can be confirmed. However, because of the missing memo books, proper performance of assigned PEP duties could not be determined. Memo books must be safeguarded against loss. They provide evidence of work performed and are an</p>	<p>3) Parks officials should ensure that all PEP memo books are completed and safeguarded against loss. Agency Response: DPR agreed.</p>	<p>3) All PEP officers, except those that are assigned to clerical or administrative functions, are required to complete and store memo books in lockers. As evidenced by the fact that only 4 of 25 sampled (16%) were missing, this important function is generally being adhered to. However, Parks will endeavor to ensure that all officers follow the rules set forth in the PEP manual. Date Implemented: February 11, 2004.</p>

Findings	Recommendations/Agency Response	Corrective Action Plan/Date Implemented
<p>aid in the evaluation of PEP officers. In addition, memo books may include pertinent narratives or other important information related to a PEP violation issued that may be needed in a court proceeding.</p> <p>3) Seventeen (89%) of 19 inspected memo books lacked evidence of required supervisory reviews. All PEP staff below the rank of captain, except those performing permanent administrative or clerical duties, must record their daily activities in their memo books. To ensure that memo books are prepared accordingly, the UPS Officer's Field Manual requires that these memo books show daily supervisory review by entry of the designated supervisor's signature, the supervisor's rank, and the date and time on the next open line in the memo book. Of the 17 memo books lacking required reviews, 11 (65%) had neither daily supervisory neither signatures nor signatures affixed upon completion of the books. four (23%) had no daily supervisory signatures, and two (12%) had no signatures affixed upon completion of the books. Without the supervisory signatures to document reviews, accuracy and completeness of the daily entries in these memo books could not be determined.</p>	<p>4) Parks officials should ensure that all PEP memo books are properly reviewed and signed by designated supervisors, as required.</p> <p>Agency Response: DPR agreed.</p>	<p>4) Parks will again stress the importance of memo books being properly reviewed by supervisors as stated in the field officers manual.</p> <p>Date Implemented: February 11, 2004</p>