



**Audit Recommendations  
Follow-Up Report  
For the Period January 1, 2015  
Through March 31, 2015**

**Project #15-09**

**Prepared by  
Office of Inspector General**


**J. Timothy Beirnes, CPA, Inspector General  
Ann E. Haga, Executive Assistant**



# SOUTH FLORIDA WATER MANAGEMENT DISTRICT

## Memorandum

**To:** Governing Board Members

**From:** J. Timothy Beirnes, CPA, Inspector General  
Office of Inspector General 

**Date:** June 2, 2015

**Subject:** Audit Recommendations Follow-Up Report -  
For the Period January 1, 2015 through March 31, 2015  
Project No. 15-09

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This audit was performed pursuant to the Inspector General's authority set forth in Section 20.055, F.S. Enclosed is the subject report that was conducted to assess the progress made in implementing audit recommendations.

In our efforts to continue to improve the audit process we utilize an audit recommendations tracking database as an integral part of monitoring the implementation status of audit recommendations. This database contains the basic audit information and recommendations. This system provides us with a vehicle to communicate and gather feedback on the status of the audit recommendations with the Governing Board, District management, and the audited organizational units.

Should you have any questions concerning the enclosed report, please feel free to call me at (561) 682-6398.

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Terrie Bates  
Kirk Burns  
Doug Bergstrom  
Dan DeLisi  
Karen Estock  
Jeff Kivett  
Len Lindahl  
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## EXECUTIVE SUMMARY

Audit recommendations target the economy and efficiency of District operations and compliance with our policies and statutory responsibilities. Our recommendations also focus on providing District management with suggestions that facilitate their achievement of program goals and objectives. To be effective, audit recommendations must be implemented. Additionally, *Government Auditing Standards* require following up on audit recommendations in previously issued audit reports. Accordingly, the Office of Inspector General has performed follow-up audit work since the office was established in 1996. Every quarter our office surveys departments to determine the implementation status of recommendations and to encourage their completion. This information is maintained in the Inspector General's audit recommendation tracking system. The system allows each audit staff member to update the recommendation's "status" after reviewing information provided by the departments and offices.

This report on the implementation status of audit recommendations is for the period January 1, 2015 through March 31, 2015 (the "Reporting Period"). As shown in Exhibit 1, as of January 1, 2015 there were 11 recommendations that were not yet Fully Implemented, consisting of nine (9) that were In-Process and two (2) that were Partially Implemented. Since then, one (1) of these recommendations has been Fully Implemented and one (1) is no longer applicable. During the Reporting Period, 15 recommendations were added from a newly issued report. As of March 31, 2015, nine (9) of these recommendations have been Fully Implemented. In total from all reports, 15 recommendations are In-Process of being Implemented or have been Partially Implemented as of March 31, 2015.

One recommendation was changed to the "No Longer Applicable" status during the current Reporting Period due to determining that the resources to implement the recommendation exceeded the expected benefit. The "No Longer Applicable" category includes items where conditions have changed subsequent to issuance of the audit report that rendered the recommendation no longer relevant, such as:

- Alternative compensating controls have been put in place.
- A decision was made to implement a new system that will address the issue making it impractical to retrofit the existing system.

- 
- The policy, statute, or rule has changed.
  - Change in strategic direction.

Our office is also monitoring the implementation status of the 10 recommendations made in the Operational Audit performed by the State of Florida Auditor General. Nine (9) of these recommendations were fully implemented during prior quarters and one (1) is in process of implementation as of March 31, 2015.

Following is a brief description of the attached exhibits:

- **Exhibit 1:** Displays a summary of recommendation statuses for all audit reports with recommendations in process of implementation. Exhibit 1 also shows the changes in the status of recommendations from the beginning of the period to the end of the period.
- **Exhibit 2:** Shows a summary of the changes in the status of recommendations by each audit report. Exhibit 2 shows only those audit reports that contained one or more recommendations that had not been fully implemented at the beginning of the reporting period.
- **Exhibit 3:** Displays detail information regarding the status of each audit recommendation. This includes the status of the recommendation for the prior reporting period and the status at the end of the current period. The comment column provides narrative information regarding implementation progress.
- **Exhibit 4:** Displays detail information regarding the status of each audit recommendation contained in the Operational Audit performed by the State of Florida Auditor General. The comment column provides narrative information regarding implementation progress.

# **EXHIBIT 1** **Summary of Recommendations Status**

As of March 31, 2015

	In	Partially	
<b>Prior Period Reports</b>	<b>Process</b>	<b>Implemented</b>	<b>Total</b>
Status Prior Period (December 31, 2014)	9	2	11
Implemented or Partially Implemented During Period	(1)	(1)	(2)
Remaining Recommendations to be Fully Implemented	8	1	9
<b>Reports Issued During Current Period</b>			
New Recommendations*	15	-	15
Implemented or Partially Implemented	(9)	-	(9)
Remaining Recommendations to be Fully Implemented	6	-	6
<b>Current Status</b>			
<b>Remaining Recommendations to be Fully Implemented</b>	<b>14</b>	<b>1</b>	<b>15</b>

\* Initial Status is set as "In-Process"

**EXHIBIT 2**  
**Audit Reports With Implementation of Recommendations in Progress**  
**As of March 31, 2015**

Audit No.	Audit Title	No. of Recs		In Process	Partially Implemented	No Longer Applicable	Implemented	
	<b>Recommendations - Prior Period Reports</b>							
08-09	Review of Internal Controls Over Fuel Inventory	5	Initial Status	0	1	0	4	Open
			Change in Status	0	0	0	0	
			Current Period Status	0	1	0	4	
11-14	Audit of CERP Cost Share Status	9	Initial Status	0	1	0	9	Complete
			Change in Status	0	-1	0	0	
			Current Period Status	0	0	0	9	
12-29	Audit of Contract Monitoring	9	Initial Status	1	0	0	8	Open
			Change in Status	0	0	0	0	
			Current Period Status	1	0	0	8	
12-30	Audit of Grant Monitoring	2	Initial Status	1	0	0	1	Open
			Change in Status	0	0	0	0	
			Current Period Status	1	0	0	1	
13-16	Audit of Fixed Assets Processes and Procedures	9	Initial Status	5	0	0	2	Open
			Change in Status	-1	0	1	2	
			Current Period Status	4	0	1	4	
13-19	Audit of Land Lease Financial Provisions	3	Initial Status	2	0	0	1	Open
			Change in Status	0	0	0	0	
			Current Period Status	2	0	0	1	
	<b>Recommendations - Reports Issued During Current Period</b>							
14-07	Audit of Dispersed Water Management Program	15	Initial Status	15	0	0	9	Open
			Change in Status	-9	0	0	0	
			Current Period Status	6	0	0	9	
	<b>Recommendations - All Reports</b>							
	<b>TOTAL</b>	52	Prior/Initial Status	24	2	0	34	
			Change in Status	-10	-1	1	2	
			Status Current Period	14	1	1	36	
	<b>Number of Recommendations Remaining to Be Fully Implemented</b>	<b>15</b>		<b>14</b>	<b>1</b>			

Prior Period = As of December 31, 2014

**EXHIBIT 3**  
**Detail of In-Process and Partially Implemented Audit Recommendations**  
As of March 31, 2015

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
					Original	Revised			
08-09	2	Review of Internal Controls Over Fuel Inventory	Partially Implemented	Partially Implemented	9/30/2009	9/8/2015	Implement physical security measures that were identified by Emergency/Security Management.	Fencing repairs will be done in FY2010. New fences will be deferred to future years due to FY2010 budget constraints. For security systems, we will coordinate with Security Management to have them budget for these systems in future years.	The fencing for the north shore pump station (i.e. 127, 129, 131, 133, and 193) has been added to the trash rake projects at each of the sites. Due to funding constraints, estimated completion dates for S133 and S135 is 6/9/2015 and S129 and S131 is 9/8/2015.
11-14	5	Audit of the CERP Cost Share Status	In Process	Implemented	12/31/2013	3/31/2015	Follow up with the Corps to establish a CERP Guidance Memorandum which specifies the procedures to be followed for certifying construction and Acceler8 expenditures for cost share credit.	Everglades Policy & Coordination will work with the Corps staff to develop a draft construction CERP Guidance memorandum for review and approval by September 30, 2013 and finalize the CGM by December 31, 2013. This process should not delay receiving construction credit on projects with an approved PPA.	<b>Completed</b> - CGM#43 - Certification of CERP Construction Work-In-Kind Expenditures was finalized and signed off by the District and USACE in February 2015.
12-29	3	Audit of Contract Monitoring	In Process	In Process	7/11/2013	5/15/2015	Ensure that all project managers are aware of the District's responsibilities relating to sales and other types of taxes.	Management agrees. Procurement will update PM training documentation; PM training will be scheduled for all District PMs.	Training on PM and other topics is in progress.
12-30	1	Audit of Grant Monitoring	In Process	In Process	12/30/2013	6/30/2015	Update the District's grant procedures and add a section for when the District is, or acts, as a grantor. The State of Florida's Contract and Grant User Guide is a good reference for updating the procedures.	Management agrees with the recommendation. Finance will revise the District grant procedures to include a section for when the District acts as a grantor.	A draft of a revised Grant Procedure, including when the District acts as a grantor, is completed and awaiting final approval.
13-16	1	Audit of Fixed Assets Processes and Procedures	In Process	In Process	4/10/2014	6/30/2015	Update the written policies and procedures to properly reflect the assignment of fixed asset responsibilities.	Management concurs with the recommendation. The fixed asset policies and procedures are in the process of being updated for changes in responsibilities, changes in the organization, and changes in processes.	The fixed asset policy and procedures have been updated and are awaiting final approval.
13-16	2	Audit of Fixed Assets Processes and Procedures	In Process	In Process	4/10/2014	6/30/2015	Update the written policies and procedures to reference and cite the applicability of Chapter 69I-73 F.A.C. and document compliance with the code requirements	Management concurs with the recommendation. The District's Fixed Assets Policy, Sec. 110-61 through Sec. 110-66, is in the process of being updated to include the District's responsibilities under Chapter 69I-73 F.A.C.	The fixed asset policy and procedures have been updated and are awaiting final approval.



Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
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13-16	3	Audit of Fixed Assets Processes and Procedures	In Process	No Longer Applicable	4/10/2014	3/31/2015	Establish policies and procedures to ensure contractors maintain adequate records and documentation to account for District property in their possession.	Management concurs with the recommendation and is evaluating its options to determine the most effective and efficient way to implement this recommendation.	<b>No Longer Applicable</b> - It was concluded that the risk of a contractor having custody of District fixed assets was remote and as such, no action is necessary.
13-16	5	Audit of Fixed Assets Processes and Procedures	In Process	In Process	4/10/2014	6/30/2015	Adopt procedures to document the research of missing inventory items, identify causes for the missing items, and take immediate corrective action.	Management concurs with the recommendation. The Fixed Asset procedures are being amended to require that the following steps be taken and documented when an asset is deemed missing: - Continue to search for the asset - Make inquiries to determine where it was last seen and who had possession of it - Contact all known users to see if anyone has knowledge of its whereabouts - Speculate as to what may have happened to the asset in order to determine if internal controls need to be strengthened - If there was evidence that the asset was stolen contact District Security Management and the appropriate law enforcement agency. - Indicate in the fixed asset records that the asset is in missing status - If the asset isn't found after two subsequent inventory counts then propose writing it off.	The fixed asset policy and procedures have been updated and are awaiting final approval.
13-16	7	Audit of Fixed Assets Processes and Procedures	In Process	In Process	4/10/2014	6/30/2015	Establish procedures to perform an inventory whenever there is a change in custodian or custodian's delegate.	Management concurs with the recommendation and will work with Human Resources to determine how Finance will be notified when there are changes in asset custodians.	The fixed asset policy and procedures have been updated and are awaiting final approval.
13-19	1	Audit of Land Lease Financial Provisions	In Process	In Process	4/10/2014	9/30/2015	Update IRIS database functionality to include lessee compliance with financial provisions and establish a single point record of lessee compliance with all lease provisions.	Management concurs with the recommendation that using one software program to administer the District is preferred as it would streamline the number of processes necessary to administer real estate lease agreements. Acknowledging that the use of multiple software programs is less efficient in the management of the real estate leasing program, staff submitted to the Information Technology (IT) Bureau in August of 2012, a Project Charter for the inclusion of the leasing administration procedures into the IRIS (Integrated Real Estate Information Systems) database. The purpose was to enhance the application features or functions in IRIS to support the Section's additional tracking needs. However, the additional work by IT to modify the IRIS application fell below the current prioritized list of District software modifications that IT has the staffing capability to complete. In concurrence with the audit recommendation Information Technology and Leasing will work together to map the lessee compliance process to identify potential efficiencies gained by updating the IRIS application. When completed, a new work request will be prepared and presented to management for approval. If funded, IT will schedule resources according to management guidance.	IT has not received guidance or funding to schedule the proposed work to include lease data into the IRIS database system. Will continue to monitor quarterly.

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
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13-19	2	Audit of Land Lease Financial Provisions	In Process	In Process	4/10/2014	9/30/2015	Amend the District leasing policy to allow the District staff to use lessee deposited funds for property damage, land clean-up and other mitigation purposes. Further, the policy should also be amended to authorize staff to increase staff to increase lessee required deposits on a case by case basis to mitigate land use risk.	Management concurs with the audit recommendation and will direct staff to begin preparation of a Governing Board resolution to amend the leasing policy as proposed.	District Leadership recommended a hold on any proposed change to the leasing policy at this time. Will review with Leadership again during 2nd quarter of FY15.
14-07	1	Audit of Dispersed Water Management Program	In Process	In Process	12/31/2017	12/31/2017	Ensure the storage needs assessment for north of Lake Okeechobee (LO) is completed in a timely manner.	The Storage Needs North of the Lake project is a comprehensive, long term effort to reassess total storage needed north and south of LO to maintain the lake within the established stage envelope and minimize damaging discharges to the estuaries; identify the best combination of storage by sub-watershed to meet the total storage goal; perform a water storage technology suitability analysis specific to north of LO; and determine the best tools to accomplish storage needs. Storage features being considered are deep and shallow storage, Aquifer Storage and Recovery and Dispersed Water Management (DWM). Completion of this effort will require the commitment of resources from multiple resource areas across the District as well as external contractor support.	<b>Updated 5/27/15:</b> Draft of Northern Everglades Water Storage (NEWS) report addressing suitability of sites north of Lake Okeechobee for Dispersed Water Management projects is complete and undergoing internal review.
14-07	2	Audit of Dispersed Water Management Program	In Process	In Process	9/30/2015	9/30/2015	If the suitability analysis for north of Lake Okeechobee concludes that certain operational DWM projects in specific sub-watersheds are not in the preferred mix of projects to meet storage goals, then consider terminating the contracts.	One component of the suitability analysis for the Storage Needs North of the Lake Project is to identify the primary criteria needed to successfully implement DWM projects and limitations of DWM, which will in turn be used to locate areas north of LO where DWM would be most feasible and necessary. Development of suitability criteria will consider key cost and feasibility drivers such as hydrology, engineering constraints, topography, soils, and land use. The purpose of the knowledge gained with this analysis is to assist with prioritizing areas of focus for future DWM expansion. The suitability analysis will not provide information at the individual project level; it will provide information at the sub- watershed level. The DWM program will use the results from this effort along with the actual project data to evaluate existing contracts.	<b>Updated 5/27/15:</b> Internal review of the draft section described needs to be completed prior to analyzing existing operational projects. However, initial review indicates that no operational projects would be recommended for termination based on this criteria.
14-07	3	Audit of Dispersed Water Management Program	In Process	In Process	9/30/2016	9/30/2016	Consider performing the same storage needs assessment for the St. Lucie and the Caloosahatchee River Watersheds.	One component of the suitability analysis for the Storage Needs North of the Lake Project is to identify the primary criteria needed to successfully implement DWM projects and limitations of DWM, which will in turn be used to locate areas north of LO where DWM would be most feasible and necessary. Development of suitability criteria will consider key cost and feasibility drivers such as hydrology, engineering constraints, topography, soils, and land use. The purpose of the knowledge gained with this analysis is to assist with prioritizing areas of focus for future DWM expansion. The suitability analysis will not provide information at the individual project level; it will provide information at the sub- watershed level. The DWM program will use the results from this effort along with the actual project data to evaluate existing contracts.	<b>Updated 5/27/15:</b> Storage needs assessments for the St. Lucie and Caloosahatchee River Watersheds will be initiated upon completion of the North of the Lake assessment, utilizing lessons learned in that process.

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
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14-07	4	Audit of Dispersed Water Management Program	In Process	Implemented (On-going)	12/31/2017	12/31/2017	Continue working with the Florida Department of Environmental Protection as part of the District's budget cycle, to identify funding mechanisms for the DWM Program, to address the budget shortfall from Fiscal Year 2018 to Fiscal Year 2024.	Agreed. Staff will work with FDEP to address future funding shortfalls in the DWM program for Fiscal Years 2018 to 2024.	<b>Updated 5/27/15:</b> Staff continues to work with FDEP and Governor's staff to identify funding mechanisms for the DWM Program. Actions to implement recommendations are on-going.
14-07	5	Audit of Dispersed Water Management Program	In Process	Implemented (On-going)	On-going	On-going	Increase efforts to cost share the expenses of DWM projects by obtaining grants and partnering with public and private entities and other stakeholders.	The DWM program has and will continue to seek grant opportunities to fund projects. For example, the Water Farming Pilot Project Program is funded through a Section 319 grant that was finalized in April 2014 for \$3,087,401 with the District contributing \$1,581,000 in cash or in-kind work. In addition, the DWM program is actively working with a local government entity to provide technical support for the local government to develop a DWM project on its lands. In addition, cost share opportunities with private entities and local governments will be pursued where possible as these projects result in overall lower costs to the District on a project by project basis.	Actions to implement recommendation are on-going.
14-07	6	Audit of Dispersed Water Management Program	In Process	Implemented (On-Going)	11/13/14	11/13/2014	Perform an updated comprehensive analysis of all District-owned pre-project land parcels and other publicly owned lands to determine whether there are feasible sites that can be used for interim water retention.	The District conducted its latest focused evaluation of District owned parcels to determine where storage could occur by undertaking minimal capital improvements in 2011. Based on this evaluation, the District selected sites where storage could be brought on-line quickly for the initial storage of water on public lands. The District is in the process of conducting an assessment of all District owned pre-project land parcels, including District lands leased for cattle grazing, to determine whether there are sites that can be used for interim water retention which will include an analysis of the engineering and construction efforts and costs associated with these sites to determine their feasibility for water storage. The District will initially focus its efforts on evaluating lands in the C-23 and C-24 sub-watersheds of the St. Lucie Watershed based on availability of lands due to expiring lease terms.	<b>Updated 5/27/15:</b> Actions to implement recommendations are on-going.

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
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14-07	7	Audit of Dispersed Water Management Program	In Process	Implemented (On-going)	3/31/2015	3/31/2015	Include District lands leased for cattle grazing as part of the comprehensive analysis of all District-owned pre-project land parcels and other publicly owned lands to determine whether there are feasible sites that can be used for interim water retention.	The District conducted its latest focused evaluation of District owned parcels to determine where storage could occur by undertaking minimal capital improvements in 2011. Based on this evaluation, the District selected sites where storage could be brought on-line quickly for the initial storage of water on public lands. The District is in the process of conducting an assessment of all District owned pre-project land parcels, including District lands leased for cattle grazing, to determine whether there are sites that can be used for interim water retention which will include an analysis of the engineering and construction efforts and costs associated with these sites to determine their feasibility for water storage. The District will initially focus its efforts on evaluating lands in the C-23 and C-24 sub-watersheds of the St. Lucie Watershed based on availability of lands due to expiring lease terms.	<b>Updated 5/27/15:</b> Actions to implement recommendations are on-going.
14-07	8	Audit of Dispersed Water Management Program	In Process	In Process	6/30/2015	6/30/2015	Consider revising the water retention model used to estimate water retention capacities for the NE-PES projects by taking into account cascading basins, actual data, and stakeholder concerns.	The District has created a project to analyze if the Potential Water Retention Model (PWRM), developed specifically for the NE-PES projects, will be used to evaluate future private projects on ranchlands or whether another methodology is more appropriate. In addition, this effort will look at the appropriate model to use to evaluate other DWM projects, such as water farming and storage on public lands. If the PWRM tool is chosen for future use, the model will be refined as appropriate.	<b>Updated 5/27/15:</b> A replacement model has been developed by District modeling staff and is currently under and internal review/iterative testing process. Testing should be completed within two to three months.
14-07	9	Audit of Dispersed Water Management Program	In Process	In Process	9/30/2015	6/30/2015	Train staff to use the model so that water retention capacities can be closely monitored.	Staff training will take place on the selected model developed in response to Recommendation #8 above.	<b>Updated 5/27/15:</b> Staff training will take place on the selected model developed in response to Recommendation #8 above. Completion date updated to reflect schedule delay on Recommendation #8.

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
					Original	Revised			
14-07	10	Audit of Dispersed Water Management Program	In Process	In Process	12/31/2015	12/31/2015	Ensure that contractors are submitting all contractually required data and that DWM Program staff are reviewing the data in a timely manner.	DWM Program management and staff have discussed in detail the contract reporting requirements and the deliverable dates for each of the contract types within the DWM program. A master tracking spreadsheet which contains the due dates and required data submission for all DWM contract deliverables has been created and is actively being used by management to track due dates for contract deliverables and to track staff review to ensure that the deliverables conform to contract requirements. Most importantly, the DWM program has created a centralized database for the storage of DWM program information. The program has developed a Standard Operating Procedure for use of this database by DWM staff. This database includes centralized critical program information, including project specific information such as the executed contract, certification documents, all required reports and project data, invoices, inspection results and permits. It also includes programmatic information such as overall program costs and budgetary data. The database continues to be populated by DWM program staff. The database will be continually updated as new information is generated.	<b>Updated 5/27/15:</b> Staff has been trained and standardized contract deliverables have been put in place and discussed with contractors. Centralized database will continue to be populated by DWM staff as new information is generated.
14-07	11	Audit of Dispersed Water Management Program	In Process	Implemented	11/13/2014	11/13/2014	Require DWM Program staff to perform and document periodic site visits to all DWM project sites and document such visits.	The DWM program staff has conducted regular site visits to both public and private lands projects since the inception of the program in 2006; however, project managers did not have standard methods of performing or documenting these site visits. Recently, the program has developed a Standard Operating Procedure for site visits documenting the inspection dates, project schedule, compliance checks, and site pictures, follow up items and next scheduled inspection. Management met with the program staff to discuss the use of this Standard Operating Procedure to conduct wet and dry season inspections of operational projects. Inspections of projects that are in the construction phase or are in a pilot project program will occur on a weekly basis to ensure construction deadlines are being met and to oversee pilot project implementation.	Recommendation was implemented at time of report issuance.
14-07	12	Audit of Dispersed Water Management Program	In Process	Implemented	11/13/114	11/13/2014	Require DWM staff to ensure that construction costs are adequately substantiated before payments are made.	A Standard Operating Procedure for Invoicing has been developed so that each project manager is aware of the requirements for submission of materials from the contractors necessary to support the efficient processing of invoices. This SOP requires coordination with budget staff to ensure that the invoicing packages submitted by the contractor contain all required information to meet District payment requirements as well as documentation required for the District to seek reimbursement for costs under applicable grant agreements.	Recommendation was implemented at time of report issuance.

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Due Date		Recommendation	Management Response	Current Period Comments Regarding Status
					Original	Revised			
14-07	13	Audit of Dispersed Water Management Program	In Process	Implemented	11/13/2014	11/13/2014	Consult with Engineering and Construction Bureau's agricultural engineer to determine the reasonableness of proposed construction cost prior to contract negotiations, as necessary.	The DWM program has an established relationship with an Agricultural Engineer in the Engineering and Construction Bureau which has focused on project implementation on District and other publically owned lands. Staff will expand this relationship to include consultation as necessary for construction costs proposed by Respondents to future Requests for Proposals that the District issues involving construction costs on private lands. The team for the ongoing contract negotiations for the Northern Everglades Payment for Environmental Services Program second solicitation included two Agricultural Engineers who reviewed proposed costs for reasonableness prior to contract negotiations.	Recommendation was implemented at time of report issuance.
14-07	14	Audit of Dispersed Water Management Program	In Process	Implemented	11/13/2014	11/13/2014	Consider amending contract #OT061107/3600001161 to increase District responsibilities and reduce necessary costs.	The contract agreement between the District, Highlands Soil and Water Conservation District (HSWCD) and Lykes Brothers, Inc. (Lykes) was amended and restated on September 12, 2014 to remove HSWCD from the contract and have the District assume the administrative responsibilities as recommended. In addition, the revised contract now specifies the activities for which Lykes may apply the 17% general and administrative fee of total reimbursable operations and maintenance costs as recommended in the audit.	Recommendation was implemented at time of report issuance.
14-07	15	Audit of Dispersed Water Management Program	In Process	Implemented	11/13/2014	11/13/2014	Ensure that all future DWM contracts specify allowable general and administrative costs.	Future DWM contracts will specify allowable general and administrative costs where it is appropriate for a general and administrative fee to be paid by the District as part of the contract. For example, General and Administrative fees are not included as part of the Northern Everglades Payment for Environmental Services contracts because there is a fixed payment associated with Operations and Maintenance costs for these projects. For projects where Operations and Maintenance costs are variable and dependent, for example, on pumping rates, such contracts will include the specific activities against which the general and administrative costs may be assessed.	Recommendation was implemented at time of report issuance.

**EXHIBIT 4**  
**Auditor General Recommendations**  
As of March 31, 2015

Audit No.	Rec No.	Audit Title	Status Prior Report	Status Current Report	Recommendation	Management Response	Current Period Comments Regarding Status
	2	Auditor General Operational Audit	In- Process	In-Process	The District should develop or enhance written procedures for Accounts Receivable and Key Permit Access Refunds and ensure that these procedures are continuously updated for changes in key controls or personnel.	<b>Accounts Receivable</b> - The Districts concurs with the recommendation and will be evaluating the accounts receivable process and procedures and make the appropriate changes. <b>Key Permit Access Refunds</b> - The District has assembled a team to re-evaluate and document the key deposit process. The goal is to design a process that is efficient and which contains internal controls to ensure that District stakeholder assets are properly safeguarded. Once completed, this process will become the basis for a procedure that will be included in the District Policies and Procedures Manual.	<b>Accounts Receivable:</b> In Process Estimated Completion Date - June 30, 2015 <b>Key Permit Access Refunds:</b> In Progress. A new process has been mapped and implemented but it has not yet been incorporated in the District's procedures. Estimated Completion Date - June 30, 2015