




Memorandum



Miami-Dade County Office of the Inspector General
A State of Florida Commission on Law Enforcement Accredited Agency
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To: Maria I. Nardi, Director
Parks, Recreation and Open Spaces (PROS)

From: Felix Jimenez, Inspector General 

Date: April 11, 2025

Subject: OIG Review of Tropical Park's Shelter Rental Operations & PROS' Internal Investigation Thereof; Ref. IG24-0001-A

The Office of the Inspector General (OIG) is in receipt of the Miami-Dade Parks, Recreation and Open Spaces Department's (PROS') most recent response, dated January 10, 2025, to our second request for information, dated December 6, 2024. (Attachments A¹ and B, respectively)

Regarding OIG Request #1, we appreciate the examples provided in PROS' Attachment 1 demonstrating approval for each shelter fee waiver coming from the Director or the Director's designee. We trust that these individual email approvals will be transferred onto a log for each park/region or department-wide so that PROS is able to account for the fiscal impact of the waivers. Further in response, it states:

We intend to continue to review the department's monitoring and control of these activities as directed by leadership. This initiative has been conveyed to our performance review team, with the intention of incorporating it into their comprehensive facility audits.

We believe that having logs of the waivers (with the estimated waived amounts) will be beneficial to the aforementioned audits. Last, we noted a discrepancy in the second email thread example provided in PROS' Attachment 1. The requester comes from the City of Miami Police Department; however, later in the email thread MDPD is erroneously added to the subject line, leading the approver to believe that the requestor is the Miami-Dade Police Department. We would highly recommend that the fee waiver log be corrected.

Regarding OIG Request #2, the OIG accepts PROS' explanation regarding the manual reconciliations that would have been required of shelter rental reservation system against the daily shelter rental activity logs. In the case of Tropical Park, these daily logs were furnished by the anonymous complainant. We acknowledge that for other parks, they

¹ Only PROS' two-page memorandum response, without its 41 pages of attachments, is included herein.

would have to be painstakingly gathered and that PROS' priority was to "implement control and policy changes to avoid the continuation of this practice."

Regarding OIG Request #3 asking whether other employees were interviewed as part of PROS' internal investigation, the OIG acknowledges PROS' explanation as to why the internal investigation did not need to be expanded to interviewing other employees.

Regarding OIG Request #4 inquiring about the estimated time frame for implementing new controls within the Park Link system, PROS' response states that "While we do not have a timeline for the requested enhancement, we have received acknowledgment and approval of the enhancement from the system vender [sic]." Upon further review of the supplied email communications, however, it appeared that the vendor was (at that time, in January 2025) still estimating the level of effort required to develop the requested control functionality. The vendor had not committed to the customized enhancement.

OIG auditors recently reached out to PROS Strategic Technology Office staff to inquire about the status of implementing the new controls. Staff advised of an upcoming meeting with the vendor and assured us that development of the controls would be a priority. Staff also advised that the Strategic Technology Office was proactively developing an in-house solution designed to address fundamental internal controls, ensuring a robust audit trail, which would identify users blocking and/or modifying shelter reservations. A few days later, OIG auditors were informed that the vendor committed to completing the enhancements by June 30, 2025.

By way of this memorandum, the OIG advises that our review of the above-captioned subject is complete and, as such, this review is closed. We would like to thank PROS staff for their cooperation and for the courtesies extended to us throughout this review. Please do not hesitate to contact Arleen Rose Stanek, OIG Audit Supervisor, via email at Arleen.RoseStanek@miamidade.gov or telephone at (305) 375-1946, if you have any questions or require further information.

Attachments

Cc: Roy Coley, Chief Utilities and Regulatory Services Officer
Brian Eichler, Assistant Director Operations, PROS
Beatriz Lee, Chief Human Resources, PROS
Ofelia Tamayo, Director, Internal Compliance Department
Yinka Majekodunmi, Commission Auditor, Office of the Commission Auditor

Memorandum

Date: January 10, 2025

To: Felix Jimenez, Inspector General
Miami-Dade County Office of the Inspector General

From: Beatriz M. Lee, Chief, Human Resources and Performance Excellence
Parks, Recreation and Open Spaces Department

Subject: OIG Request for Additional Information – Tropical Park’s Shelter Rental Operations –
OIG Ref: IG 24-0001-A

On December 6, 2024, your office requested additional information concerning the investigation conducted in response to the original complaint received on or around November 27, 2023. We are pleased to provide the available information relevant to the issues and gaps identified during the complaint review process.

Responses:

In response to your inquiry regarding communications with all PROS staff about the new policies on shelter rental fee waivers, we provide the following detailed account:

During tiered management meetings with Chiefs and Managers responsible for revenue-driven amenities, the following directives were conveyed:

- The free use of shelters or other amenities was strictly prohibited unless expressly approved by the Department Director or her designee.
- Managers were instructed to submit any requests for reduced or waived fees for shelters or other amenities to the Director's designee via email. Examples of this process are attached for reference (see Attachment 1).
- The OPS Manual entry was amended to reflect that the Director or her designee were the only individuals authorized for any fee waivers or reductions. This was distributed to all managers with facility amenities in the Operations Division. The email officially communicating the revision of the policy is provided for your review (See Attachment 2).
- On November 13, 2024, this information was reiterated during a management meeting, as documented in the meeting agenda (see Attachment 3).

We hope this outlines the measures implemented to ensure clarity and compliance with the new policies. Please let us know if further clarification or additional documentation is required.

In response to the question concerning the department’s efforts to identify inappropriate use of shelters in other facilities, we provide the following:

As stated in our initial response, we identified system limitations regarding user identification, as it pertained to edits made to the system, such as internal holds of facilities.

During this review, we enlisted the assistance of our financial auditor, Mr. Aguero, who analyzed the system activity report to identify similar transactions in other areas. His findings revealed an incident involving one of the individuals named in the complaint (Mera), who appeared in the system as having paid a same-day fee for a shelter at Larry & Penny.

We determined that the only feasible control mechanism would involve consistently monitoring and reconciling daily shelter rental activity logs with the shelter reservation system. However, we found it unlikely that this approach would allow us to identify similar usage across other facilities. The information provided in this complaint was derived from the daily activity logs, which identify the individual or party utilizing the shelter. This information is not captured in the shelter reservation report.

We welcome the opportunity to conduct further reviews of this process. We intend to continue to review the department's monitoring and control of these activities as directed by leadership. This initiative has been conveyed to our performance review team, with the intention of incorporating it into their comprehensive facility audits.

At the time of the review, we did not conduct an examination of additional sites as our focus was to implement controls and policy changes to avoid the continuance of this practice.

In response to the question concerning other employees interviewed in addition to Mr. Capiro and Mr. Johnson, we provide the following:

At the time of this review, most of the information had been corroborated by Mr. Capiro and Mr. Johnson. The findings were promptly communicated to Mr. Cardenas and Mr. Eichler, who proposed potential solutions to implement controls aimed at preventing the continuation of this practice.

Subsequently, Mr. Eichler held a meeting with the managers and the individuals identified as recipients of the free shelters to address the impropriety of their actions, emphasizing that it created a perception of abuse of authority. The individuals responded that they had believed this benefit was available to them as PROS employees, while also acknowledging their understanding of why their actions may have reflected poor judgment.

Once this information was communicated to leadership, there was a clear understanding that the matter would be addressed by discontinuing the practice.

In response to your inquiry regarding the estimated time frame for implementation of new controls within the Park Link system, we provide the following:

While we do not have a timeline for the requested enhancement, we have received acknowledgment and approval of the enhancement from the system vendor. This acknowledgment is attached for your review (see Attachment 4).

The Department looks forward to your review of this information and further guidance.

Attachments




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To: Maria I. Nardi, Director
Parks, Recreation and Open Spaces (PROS)

From: Felix Jimenez, Inspector General 

Date: December 6, 2024

Subject: Follow-up: OIG Request for Information Regarding PROS' Investigation of Tropical Park's Shelter Rental Operations, OIG Ref: IG24-0001-A

On August 20, 2024, the OIG requested information concerning PROS' internal investigation of the anonymous complaint received relating to the above-captioned subject. The OIG thanks PROS for its response dated October 7, 2024. We have reviewed the response and are pleased with the corrective actions taken by PROS.

By way of this memorandum, the OIG is respectfully requesting additional information relating to PROS' internal investigation into shelter rental fee waivers. The OIG makes this request pursuant to Section 2-1076(d)(2) of the Code of Miami-Dade County, which authorizes the OIG to request such reports.

- 1) Communications with all PROS staff advising of the new policies concerning shelter rental fee waivers.
- 2) Details on whether other parks, outside of Tropical Park, were also granting waivers on shelter rentals without the Director's or designee's approval.
- 3) Details concerning other employees interviewed in addition to Mr. Capiro and Mr. Johnson.
- 4) The estimated time frame for implementation of new controls within the Park Link system.

The OIG kindly asks to be provided with a response on or before December 20, 2024. Please do not hesitate to contact Arleen Rose Stanek, Audit Supervisor, via email at Arleen.RoseStanek@miamidade.gov or telephone at (305) 375-1946, if you have any questions or require further information.

Cc: David Cardenas, Deputy Director, PROS
Brian Eichler, Assistant Director Operations, PROS
Beatriz Lee, Chief Human Resources, PROS