



# Audit of Youth Services – Dallas Park and Recreation and Dallas Public Library

June 9, 2025

Mark S. Swann, City Auditor

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## Executive Summary

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### Objectives and Scope

The objectives of this audit were to determine if: 1) performance measures exist to gauge the efficiency and effectiveness of youth services programs; 2) opportunities exist to increase the efficiency and effectiveness of youth services programs; and 3) processes exist to avoid or reduce duplication of youth services programs offered by Dallas Park and Recreation and Dallas Public Library.

The scope of the audit was October 1, 2021, through September 30, 2023, and covers youth services programs offered by Dallas Park and Recreation and Dallas Public Library only.

### Recommendations

Management should:

- Revise procedures to ensure compliance with safe environment procedures.
- Revise procedures to ensure accuracy of performance measures and supporting data.
- Revise procedures to ensure key operating manuals are updated when significant changes occur.
- Implement periodic reviews (annual or biennial) of user access to identify unauthorized and/or inappropriate access.

### Background

Dallas Park and Recreation offers educational and recreational youth services programs to children/youth, up to age 17, who reside within the City of Dallas or attend school in the Dallas Independent School District. Most programs are offered to Dallas residents for free or for a nominal fee. Non-Dallas residents may enroll and participate in the programs offered but at a higher fee.

Dallas Public Library youth programs are free to all children and youth in accordance with the Texas Administrative Code.

Revenues generated and operating expenses incurred for youth services programs are not tracked separately in the departments' financial budgets.

### Observed Conditions

Both Dallas Park and Recreation and Dallas Public Library have procedures in place to review their youth services programs performance results, as well as determine the efficiency and effectiveness of those programs.

However, opportunities exist for both departments to improve the accuracy of their performance measurement results and ensure the safety and security of youth participants by monitoring and enforcement of established safety and security procedures.



## Objectives and Conclusions

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1. Do performance measures exist to gauge the efficiency and effectiveness of Dallas Park and Recreation and Dallas Public Library youth services programs?

**Generally, Yes.** Both Dallas Park and Recreation and Dallas Public Library have established performance measurements to gauge the efficiency and effectiveness of their youth services programs. Though, some published results were not accurate. (See [Observation B](#)).

2. Do opportunities exist to increase the efficiency and effectiveness of youth services programs?

**Generally, Yes.** Opportunities exist to improve the safe environment of participants in Dallas Park and Recreation and Dallas Public Library youth services programs by monitoring and enforcing compliance with established policies and procedures. (See [Observation A](#), [Observation C](#), and [Observation D](#)).

3. Do processes exist to avoid or reduce duplication of youth service programs offered by Dallas Park and Recreation and Dallas Public Library?

**Generally, Yes.** Informal collaboration between Dallas Park and Recreation and Dallas Public Library exists to reduce or avoid duplication of youth services programs, and a review of youth services programs offered by both departments showed minimal duplication.

Additional analysis was performed to determine if youth services programs offered by Dallas Park and Recreation and Dallas Public Library were duplicated by nearby community organizations, with the potential of redirecting City resources to other programs or operations. (See [Duplicate Services Further Considerations](#))



## Audit Results

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Both *City Council Resolution 88-3428* and Administrative Directive 4-09, *Internal Control* prescribe policy for the City to establish and maintain an internal control system. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

### Observation A: Compliance with Safe Environment Procedures

Dallas Park and Recreation and Dallas Public Library are not completely complying with their safe environment procedures. As a result, participants may face an increased risk of physical and/or mental hazards.

#### Dallas Park and Recreation

Vendors and volunteers were tested for required background screenings and risk assessments with the following results:

- One of three (33 percent) contract fee instructor packets tested did not have documentation that the Office of Risk Management had performed a risk review. Additionally, an adverse result was noted on the background screening but there was no evidence provided that management reviewed the adverse result prior to approving the contract fee instructor.
- Three of twenty-five (12 percent) volunteers tested had adverse results noted on their background screenings but there was no evidence provided that management reviewed the adverse results prior to approving the volunteer for service.

The following are the results of testing Primary Drivers (drivers authorized to transport children and youth to/from various recreation programs) for compliance with Dallas Park and Recreation's *Department Procedures for Transporting Participants*.

- Two of twenty (10 percent) Primary Driver background screenings were ordered after the hire date on the Dallas Park and Recreation Position Report, and one of twenty (5 percent) Primary Drivers had no evidence that a screening had been ordered.
- Eight of twenty (40 percent) Primary Drivers had no evidence of taking an approved/certified defensive driving course.
- Four of twenty (20 percent) Primary Drivers had no evidence of a physical exam, or no record was provided, and six of twenty (30 percent) were overdue for their next physical exam.
- Four of twenty (20 percent) Primary Drivers had no evidence of a valid driver's license.
- Three of twenty (15 percent) Primary Drivers had no evidence showing completion of a CPR/First Aid/AED training course.



### Dallas Public Library

The following are the results of testing vendors and volunteers for compliance with background screening and risk assessment procedures:

- One of six (16.7 percent) paid performer/presenter packets did not have documentation that the Office of Risk Management had performed a risk review.
- Five of sixteen (31.3 percent) volunteers were incorrectly labeled as "minors" (17 years of age or younger) and did not receive a background check, since minors at the time were exempt from background checks. However, volunteer procedures during the scope period in Fiscal Year 2022 indicated all in-person volunteers (regardless of age) required a background check and in Fiscal Year 2023, volunteers aged 17 or older required a background check.
- One of sixteen (6.25 percent) volunteers had no evidence of a background check having been performed.

### Criteria

- ❖ Dallas City Code, Chapter 12, *City Youth Programs Standards of Care*
- ❖ LIB-PRO-404 – Paid Performer/Presenter Procedure
- ❖ LIB-PRO-408 – Performer and Presenter Background Screening Procedure
- ❖ LIB-WKI-418 – Volunteer and Community Service Assistance
- ❖ LIB-WKI-418 – Volunteer and Community Service Assistance – CERVIS Procedure
- ❖ LIB-PRO-443 – Programming Manual
- ❖ Standards of Internal Control in the Federal Government:
  - *Principle 10 – Design Control Activities*
  - *Principle 12 – Implement Control Activities*



Assessed Risk Rating:

**High**

We recommend the **Director of Dallas Park and Recreation:**

**A.1:** Revise procedures to ensure that management documents its review of background screening adverse results and decision to approve the contract fee instructor or volunteer.

**A.2:** Revise procedures to ensure compliance with Dallas Park and Recreation *Department Procedures for Transporting Participants*.

We recommend the **Director of the Dallas Public Library:**

**A.3:** Revise procedures to ensure that management documents its review of background screening adverse results and decision to approve the paid performer/presenter or volunteer.

**A.4:** Revise procedures to ensure compliance with Dallas Public Library background screening procedures.

**Note:** New hire onboarding requires coordination with Human Resources and the Office of Risk Management. As such, we also recommend that both Dallas Park and Recreation and Dallas Public Library work with management in both departments to implement the recommendations noted above.



## Observation B: Calculation Errors in Performance Measure Results

Dallas Park and Recreation and Dallas Public Library have established internal performance measures to gauge the efficiency and effectiveness of their youth service programs. The performance results are reported under the City's Annual Budget Book and Dallas 365 initiatives but are not always accurately calculated. As a result, there is increased risk that the wrong conclusion on the efficiency and effectiveness of their youth service programs may be made.

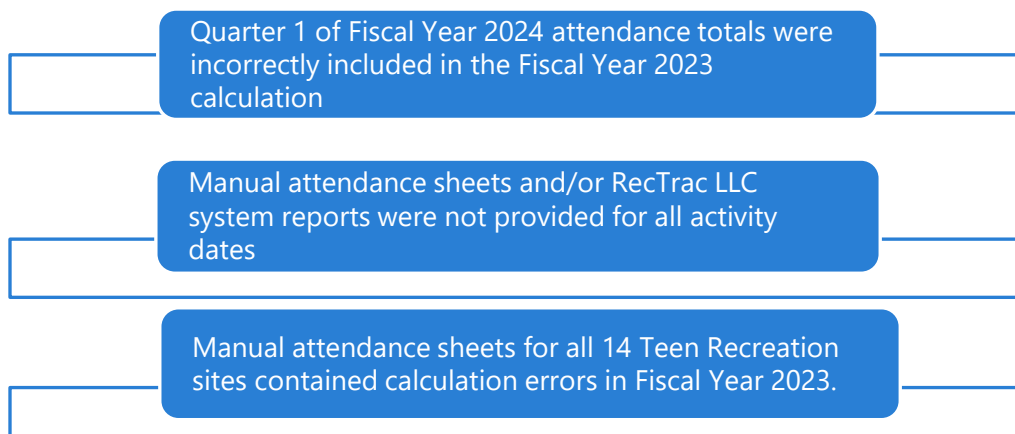
### Dallas Park and Recreation

Dallas Park and Recreation provides late-night teen programming for teens aged 13-17 at 14 recreation centers. The reported Fiscal Year 2023 attendance percentage of 37.20 percent for performance measure *Participation Rate at Late-Night Teen Recreation Sites* could not be recalculated. Using the manual attendance sheets and/or RecTrac LLC system reports provided, the percentage should have been 20.39 percent. Several factors contributed to the errors noted when recalculating the percentage, see [Exhibit 1](#) below.

In addition to the calculation errors, the manual attendance sheets used to capture teen census data, parental contact information and recreation card identification numbers were not consistent across the 14 Teen recreation sites. Many of the forms did not have input fields to capture this required information, or the input fields were not filled out, hindering recreation employees' ability to contact parents in case of an emergency.

### Exhibit 1:

#### Factors Contributing to Calculation Errors



Source: Dallas Park and Recreation; Office of the City Auditor Analysis

Results for Fiscal Year 2023 performance measure *Percentage Increase in Youth Athletic Activities Registrations* (a year-over-year calculation) were not accurate as the registration totals used in the calculations did not agree to the source data in nine of twelve months (75 percent).



Dallas Park and Recreation also reports key recreation center activity results (performance indicators) each month using data pulled from the RecTrac LLC system. Of the 11 youth services program performance indicators reported for Fiscal Year 2023, eight (72.70 percent) did not agree with the reported results (see [Exhibit 2](#), denoted by \*).

## Exhibit 2:

Youth Performance Indicators

Recreation Card Sales	Recreation Out of School Time	Summer Camp	Citywide Sports
Preschool	Enrollment*	Enrollment*	Baseball*
Youth Jr.*	Revenue*	Revenue*	Basketball
Youth			Flag Football*
			Soccer*

Source: Dallas Park and Recreation Annual Performance Indicators (Youth Programs only)

## Dallas Public Library

During Fiscal Year 2022, Dallas Public Library offered child literacy activities at branches across the City, and selected attendance at these programs as a performance measure for Fiscal Year 2022.

The annual attendance number for Fiscal Year 2022 for performance measure *Number of Children in Attendance at Child Literacy Programs* exceeded the target goal but did not agree to the supporting documentation provided by Dallas Public Library or the Auditor recalculated number using the same supporting documentation.

The Fiscal Year 2023 performance measure *Satisfaction Rate for Library Programs* could not be verified since the supporting data could not be located.

## Criteria

- ❖ Dallas City Code Chapter 12, *City Youth Program Standards of Care Article I Sec. 2-6 Enrollment*
- ❖ Texas Public Library Standards
- ❖ Standards of Internal Control in the Federal Government:
  - *Principle 10 – Design Control Activities*
  - *Principle 16 – Perform Monitoring Activities*



Assessed Risk Rating:

**Moderate**

We recommend the **Director of Dallas Park and Recreation**:

**B.1:** Implement a review procedure to ensure the accuracy of performance measure results.

**B.2:** Develop a standard method to capture attendance at all Late-Night Teen Recreation program sites that complies with the requirements of Dallas City Code, Chapter 12, *City Youth Program Standards of Care, Article I Sec. 2-6*

We recommend the **Director of the Dallas Public Library**:

**B.3:** Implement a review procedure to ensure the accuracy of performance measure results.



## Observation C: Updates to Key Policies and Procedures

Dallas Park and Recreation has documented policies and procedures to ensure operational consistency throughout their facilities but does not always update those documents when changes occur. As a result, there is an increased risk that due to conflicting information, youth service programs may not provide a positive experience for participants.

Dallas Park and Recreation did not provide updated copies of the *Recreation Center Operations Manual* (dated 2020) and the *RecTrac LLC User Operating Manual*, which are key to operational consistency at the recreation centers. The *Recreation Center Operations Manual* provided did not include significant changes to the afterschool and summer camp programs that were implemented in January 2020, and the *RecTrac LLC User Operating Manual* had not been revised since the implementation of the cloud-based version of the software in July 2023.

### Criteria

- ❖ Dallas City Code, Chapter 12, *City Youth Programs Standards of Care*
- ❖ Standards of Internal Control in the Federal Government:
  - *Principle 10 – Design Control Activities*
  - *Principle 12 – Implement Control Activities*

### Assessed Risk Rating

**Moderate**

We recommend the **Director of Dallas Park and Recreation**:

**C.1:** Revise procedures to ensure operating manuals are updated when significant changes occur to maintain operational consistency in recreation center operations and youth service programs.



## Observation D: System User Access Controls

Dallas Park and Recreation and Dallas Public Library provided no evidence that periodic reviews (annual or biennial) of system access roles occurred. As a result, there is an increased risk that unauthorized and/or inappropriate access may occur.

### Dallas Park and Recreation

Dallas Park and Recreation primarily utilizes the RecTrac LLC system application to manage daily operations including account and membership management, program activities and course registration, facility reservations, sports league management, marketing and communication, instructor management, ticketing and point of sale transactions, payment processing compliance and financial accounting.

The following are the results of testing RecTrac LLC access roles/authorizations:

- System user access for three of five (60 percent) employees designated as Sharks does not appear reasonable for their current job titles (Administrative Specialists and Office Assistants) as Sharks have access to all modules and menu options in RecTrac LLC.
- System user access for two of eight (25 percent) employees designated as ZZZZZs was changed at the time of audit inquiry indicating RecTrac LLC user access is not reviewed on a periodic basis for inappropriate or unauthorized access. This user access role allows direct access to the RecTrac LLC production environment.

### Dallas Public Library

Dallas Public Library utilizes three systems (Library Aware, Library Market and Beanstack) to administer and manage library programs (including youth services programs). The following are the results of testing user access in all three systems (see [Exhibit 3](#) on the following page).



**Exhibit 3:**

## System User Access Control Testing

## Library Aware

**- Templates to create custom program newsletters and book displays**

- 4/68 (5.9%) users with Editor access were not found in Outlook Directory or on the DPL HR Position Report
- 5/68 (7.3%) users with Editor access were set-up incorrectly with branch email addresses and individual user (vs branch) names
- 3/52 (5.8%) users assigned Editor access did not appear to need this level of access based on their job positions

## Library Market

**- Administration and management of programming event calendars and public use room management**

- No user access role issues identified.

## Beanstack

**- Administration and management of all reading challenges**

- 2/15 (13.3%) users with Library Admin access roles were not found on the DPL HR Position Report

## Criteria

- ❖ Commission for Accreditation of Park and Recreation Standards, Section 3.6, *Records Management Policy and Procedures*
- ❖ Texas Public Library Standards
- ❖ Standards of Internal Control in the Federal Government:
  - *Principle 11 – Design Activities for the Information System*
  - *Principle 12 – Implement Control Activities*



Assessed Risk Rating:

**Moderate**

We recommend the **Director of Dallas Park and Recreation:**

**D.1:** Implement periodic reviews (annual or biennial) of user access to identify unauthorized and/or inappropriate access.

Assessed Risk Rating:

**Low**

We recommend the **Director of the Dallas Public Library:**

**D.2:** Implement periodic reviews (annual or biennial) of user access to identify unauthorized and/or inappropriate access to system data.



## **Duplicate Services - Further Considerations**

Additional analysis was performed to determine if youth services programs offered by Dallas Park and Recreation and Dallas Public Library were duplicated by nearby community organizations, with the potential of redirecting City resources to other programs or operations.

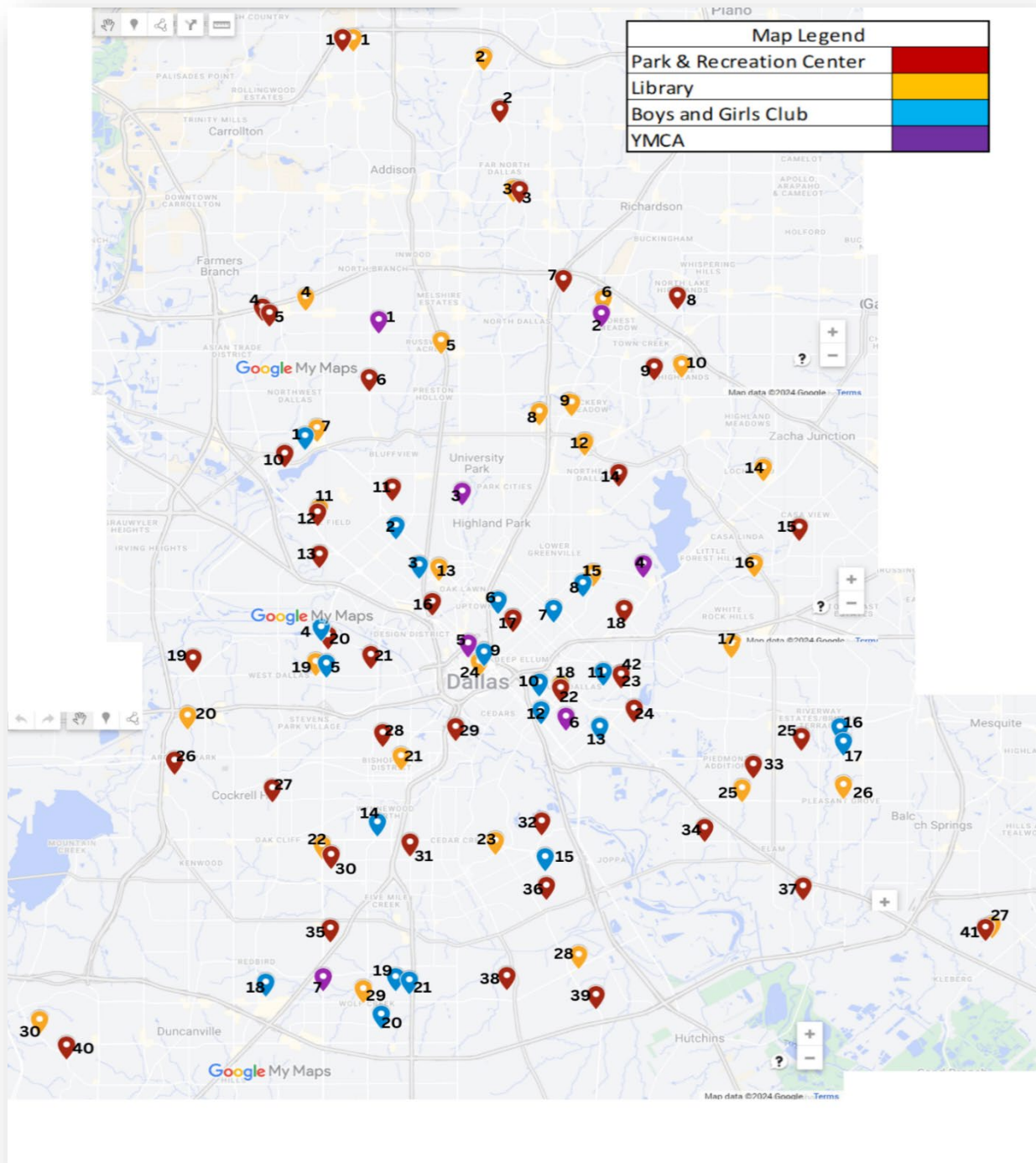
To perform the analysis, Dallas Park and Recreation centers were designated as the focal point, and using a three-mile radius, Dallas Public Library, Boys and Girls Clubs and YMCA locations were identified. Youth services programs for 11 Dallas Park and Recreation centers were selected and compared to youth programs offered by the Dallas Public Library, Boys and Girls Clubs and YMCAs for duplication.

The analysis shows areas of Dallas with more than one Dallas Park and Recreation center and/or Library branch within a three-mile radius of each other, as well as Boys and Girls Clubs and YMCA locations within the same three-mile radius offering many of the same youth service programs offered by the City. The following Exhibits (beginning on the next page) give the results of this analysis.



**Exhibit 4:**

**Youth Services Programs Locations**



Source: Office of the City Auditor



Numbered map locations above correspond to the following table:

No.	Park & Recreation Centers	Library Branches	Boys and Girls Clubs	YMCAs
1	Timberglen Recreation Center	Timberglen	Uplift Triumph	Semones Family YMCA
2	Campbell Green Recreation Center	Renner Frankford	Maple Lawn Elementary School	Lake Highlands Family YMCA
3	Fretz Recreation Center	Fretz Park	Cedar Springs	Moody Family YMCA
4	Marcus Annex Recreation Center (1)	Park Forest	Uplift Heights	White Rock YMCA
5	Marcus Recreation Center	Preston Royal	West Dallas	T. Boone Pickens YMCA
6	Walnut Hill Recreation Center	Forest Green	Roseland	Park South Family YMCA
7	Willie B. Johnson Recreation Center	Bachman Lake	East Dallas	Moorland Family YMCA at Oak Cliff
8	Churchill Recreation Center	Bookmarks in NorthPark Center	William Lipscomb Elementary	
9	Lake Highlands Recreation Center	Vickery Park	Downtown Montessori at Ida B. Wells Academy	
10	Bachman Recreation Center	Audelia Road	Billy Earl Dade Middle School	
11	K.B. Polk Recreation Center	Grauwyler Park	Paul L. Dunbar Learning Center	
12	Grauwyler Recreation Center	Skillman Southwestern	Dr. Martin Luther King, Jr. Arts Academy	
13	Arlington Park Recreation Center	Oak Lawn	Lincoln High School	
14	Ridgewood Belcher Recreation Center	Lochwood	Uplift Pinnacle Prep	
15	Harry Stone Recreation Center	Lakewood	Oak Cliff	
16	Reverchon Recreation Center	White Rock Hills	Edward Titche Elementary School	
17	Exall Recreation Center	Skyline	KIPP Pleasant Grove Primary	
18	Samuell Grand Recreation Center	Martin Luther King, Jr.	KIPP Destiny Elementary	
19	Jaycee Zaragoza Recreation Center	Dallas West	T.G. Terry Elementary School	
20	Nash-Davis Recreation Center	Arcadia Park	Umphrey Lee Elementary School	
21	Anita Martinez Recreation Center	North Oak Cliff	Uplift Wisdom	
22	Martin Luther King Jr. Recreation Center	Hampton-Illinois		
23	Juanita J. Craft Recreation Center	Paul Laurence Dunbar Lancaster-Kiest		



No.	Park & Recreation Centers	Library Branches	Boys and Girls Clubs	YMCAs
24	Larry Johnson Recreation Center	J. Erik Jonsson Central Library		
25	Pleasant Oaks Recreation Center	Pleasant Grove		
26	Arcadia Recreation Center	Prairie Creek		
27	Martin Weiss Recreation Center	Kleberg Rylie		
28	Kidd Springs Recreation Center	Highland Hills		
29	Eloise Lundy Recreation Center	Polk-Wisdom		
30	Kiest Recreation Center	Mountain Creek		
31	Beckley-Saner Recreation Center			
32	John C. Phelps Recreation Center			
33	Umpress Recreation Center			
34	Janie C. Turner Recreation Center			
35	Thurgood Marshall Recreation Center			
36	Hiawatha Williams Recreation Center			
37	Fireside Recreation Center			
38	Singing Hills Recreation Center			
39	Tommie M. Allen Recreation Center			
40	Park in the Woods Recreation Center			
41	Kleberg-Rylie Recreation Center			
42	Exline Recreation Center			

Source: Dallas Park and Recreation; Office of the City Auditor Analysis

(1): Marcus Annex Recreation Center offers Senior Adult programs only.



**Exhibit 5:****Demographics by Council Districts**

This Exhibit shows demographic data by council district, and only certain demographics are highlighted in our graphic displays. For full screen and an interactive version of the Demographic Summary - Council Districts 2023 map go to: <https://dallas-census-datahub-dallasgis.hub.arcgis.com/>

Council district graphics begin on the following page.



# DISTRICT DEMOGRAPHICS

## District 1



### District 1 Summary Analysis:

The 2022 Child Population (Age <18) was 30%.

**Recreation Centers:** Kidd Springs Recreation Center and Martin Weiss Recreation Center.

**Library:** North Oak Cliff Branch

**Boys and Girls Clubs:** Uplift Pinnacle Prep



# DISTRICT DEMOGRAPHICS

## District 2



### District 2 Summary Analysis:

The 2022 Child Population (Age <18) was 22%.

**Recreation Centers:** Reverchon Recreation Center, K.B. Polk Recreation Center, Samuell Grand Recreation Center, Arlington Park Recreation Center, Grauwyler Recreation Center, and Harry Stone Recreation Center

**Libraries:** J. Erik Jonsson Central Library, Grauwyler Park Branch

**Boys and Girls Clubs:** Cedar Springs, East Dallas, Maple Lawn Elementary School



# DISTRICT DEMOGRAPHICS

## District 3



### District 3 Summary Analysis:

The 2022 Child Population (Age <18) was 27%.

**Recreation Centers:** Arcadia Park Recreation Center, Park in the Woods Recreation Center, Thurgood Marshall Recreation Center

**Libraries:** Hampton-Illinois Branch, Mountain Creek Branch

**Boys and Girls Clubs:** T.G. Terry Elementary School, Uplift Wisdom

**YMCA:** Moorland Family YMCA at Oak Cliff



# DISTRICT DEMOGRAPHICS

## District 4



### District 4 Summary Analysis:

The 2022 Child Population (Age <18) was 28%.

**Recreation Centers:** Beckley Saner Recreation Center, Kiest Park Recreation Center, Eloise Lundy Recreation Center, Hiawatha Recreation Center, John C. Phelps Recreation Center

**Library:** Paul Laurence Dunbar Lancaster-Kiest Branch

**Boys and Girls Clubs:** Oak Cliff



# DISTRICT DEMOGRAPHICS

## District 5



### District 5 Summary Analysis:

The 2022 Child Population (Age <18) was 32%.

**Recreation Centers:** Umphress Recreation Center, Pleasant Oaks Recreation Center

**Libraries:** Pleasant Grove Branch, Prairie Creek Branch



# DISTRICT DEMOGRAPHICS

## District 6



### District 6 Summary Analysis:

The 2022 Child Population (Age <18) was 29%.

**Recreation Centers:** Jaycee Zaragoza Recreation Center, Anita Martinez Recreation Center, Bachman Recreation Center, Nash Davis Recreation Center

**Libraries:** Arcadia Park Branch, Bachman Lake Branch, Dallas West Branch

**Boys and Girls Clubs:** West Dallas, Uplift Heights, Uplift Triumph



# DISTRICT DEMOGRAPHICS

## District 7



### District 7 Summary Analysis:

The 2022 Child Population (Age <18) was 28%.

**Recreation Centers:** MLK Jr. Recreation Center, Juanita J Craft Recreation Center, Larry Johnson Recreation Center, and Exline Recreation Center.

**Libraries:** Martin Luther King, Jr Branch, Skyline Branch, White Rock Hills Branch

**Boys and Girls Clubs:** Billy Earl Dade Middle School, Dr. Martin Luther King Jr. Arts Academy, Edward Titcher Elementary School, KIPP Pleasant Grove Primary, Lincoln High School, Paul L. Dunbar Learning Center

**YMCA:** Park South Family YMCA



# DISTRICT DEMOGRAPHICS

## District 8



### District 8 Summary Analysis:

The 2022 Child Population (Age <18) was 31%.

**Recreation Centers:** Singing Hills Recreation Center, Fireside Recreation Center, Janie C. Turner Recreation Center, Kleberg Rylie Recreation Center, Tommie Allen Recreation Center

**Libraries:** Highland Hills Branch, Kleberg Rylie Branch, Polk-Wisdom Branch

**Boys and Girls Clubs:** Umphrey Lee Elementary School



# DISTRICT DEMOGRAPHICS

## Districts 9



### District 9 Summary Analysis:

The 2022 Child Population (Age <18) was 22%.

**Recreation Center:** Ridgewood/Belcher Recreation Center

**Libraries:** Lochwood Branch, Skillman Southwestern Branch



# DISTRICT DEMOGRAPHICS

## District 10



### District 10 Summary Analysis:

The 2022 Child Population (Age <18) was 26%.

**Recreation Centers:** Lake Highlands Recreation Center, Willie B. Johnson Recreation Center

**Libraries:** Audelia Road Branch, Forest Green Branch

**YMCA:** Lake Highlands Family YMCA



# DISTRICT DEMOGRAPHICS

## District 11



### District 11 Summary Analysis:

The 2022 Child Population (Age <18) was 21%.

**Recreation Centers:** Churchill Recreation Center, Fretz Recreation Center

**Library:** Fretz Park Branch



# DISTRICT DEMOGRAPHICS

## District 12



### District 12 Summary Analysis:

The 2022 Child Population (Age <18) was 18%.

**Recreation Centers:** Campbell Green Recreation Center, Timberglen Recreation Center

**Libraries:** Renner Frankford Branch, Timberglen Branch



# DISTRICT DEMOGRAPHICS

## District 13



### District 13 Summary Analysis:

The 2022 Child Population (Age <18) was 25%.

**Recreation Centers:** Walnut Hill Recreation Center, Marcus Recreation Center, Marcus Annex Recreation Center

**Libraries:** Bookmarks Branch, Park Forest Branch, Preston Royal Branch, Vickery Park Branch

**YMCA:** Semones Family YMCA



# DISTRICT DEMOGRAPHICS

## District 14



### District 14 Summary Analysis:

The 2022 Child Population (Age <18) was 12%.

**Recreation Centers:** Exall Recreation Center

**Libraries:** Lakewood Branch, Oak Lawn Branch

**Boys and Girls Clubs:** Roseland, Downtown Montessori at Ida B. Wells Academy, William Lipscomb Elementary

**YMCAs:** White Rock YMCA, T. Boone Pickens YMCA



**Exhibit 6:**

## General Observations

## Recreation Center location without Boys and Girls Clubs within 3 miles

- Lake Highlands Recreation Center does not have a Boys and Girls Clubs location within three miles.

## Fitness/Health/Wellness Programming

- 7 of 11 (64 percent) Recreation Centers in the sample provide Fitness/Health/Wellness programming that is similar to the Fitness/Health/Wellness programs available through the Boys and Girls Clubs and YMCAs within a 3 mile distance.

## Arts and Crafts Programming

- 4 of 11 (36 percent) Recreation Centers in the sample provide Arts and Crafts programming. Dallas Public Library locations and all connecting Boys and Girls Clubs and YMCA locations offer Arts and Crafts programming.

## Summer Camp Programming

- All 11 (100 percent) Recreation Centers in the sample provide Summer Camp programming that is similar to the Summer Camps available through the Boys and Girls Clubs and YMCAs. However, 4 of the 11 were not at capacity.

## Afterschool Programming

- All 11 (100 percent) Recreation Centers in the sample provide Afterschool programming (with school pickup) that is similar to the Afterschool programs available through the Boys and Girls Clubs and YMCAs within a 3 mile distance. However, of the 11 Recreation Centers tested, the Dallas Park and Recreation website shows that 9 Recreation Center Afterschool programs that offer school pickup are not full.

## Science, Math, Art, Reading, Technology (S.M.A.R.T) Summer Initiative / Science, Technology, Engineering, Art, Math (STEAM) Programs

- Samuell Grand Recreation Center and Larry Johnson Recreation Center offer S.M.A.R.T./STEAM programming similar to the S.M.A.R.T./STEAM programs available through the Boys and Girls Clubs and YMCAs, and the Dallas Public Library's *S.M.A.R.T Summer* initiative.

## Program Pricing

- The Boys and Girls Clubs offer pricing within a similar range to Dallas Park and Recreation programs. YMCA pricing is notably higher than both Dallas Park and Recreation and Boys and Girls Clubs pricing. All three offer financial assistance, discounts, and scholarships for some of their programming. Dallas Public Library does not charge for any programs.

## Summer Camp Pricing

- The Boys and Girls Clubs offer their Summer Camp for 7 weeks with one fee of \$200 for ages 6-12 or \$125 for ages 13-18. Dallas Park and Recreation offers their Summer Camp for ages 5-12 for 9 weeks with a weekly fee of \$75. Dallas Park and Recreation's Teen Camp and Discover Dallas Summer Camps are free.

**Source:** Office of the City Auditor Analysis

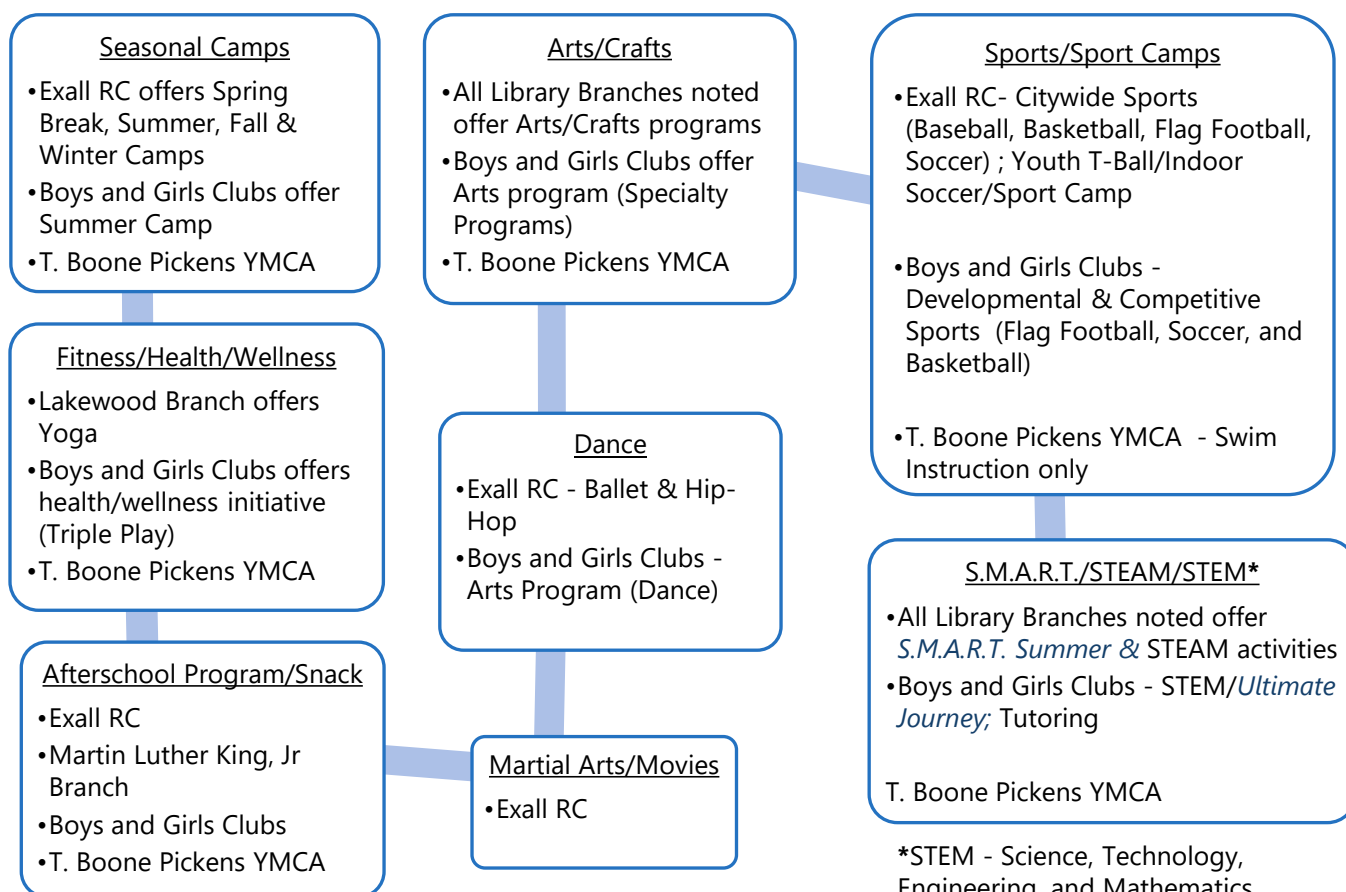


**Exhibit 7:**

## Facilities within 3 Miles –Details

### EXALL Recreation Center (Facilities ≤ 3 Miles) Program Duplications

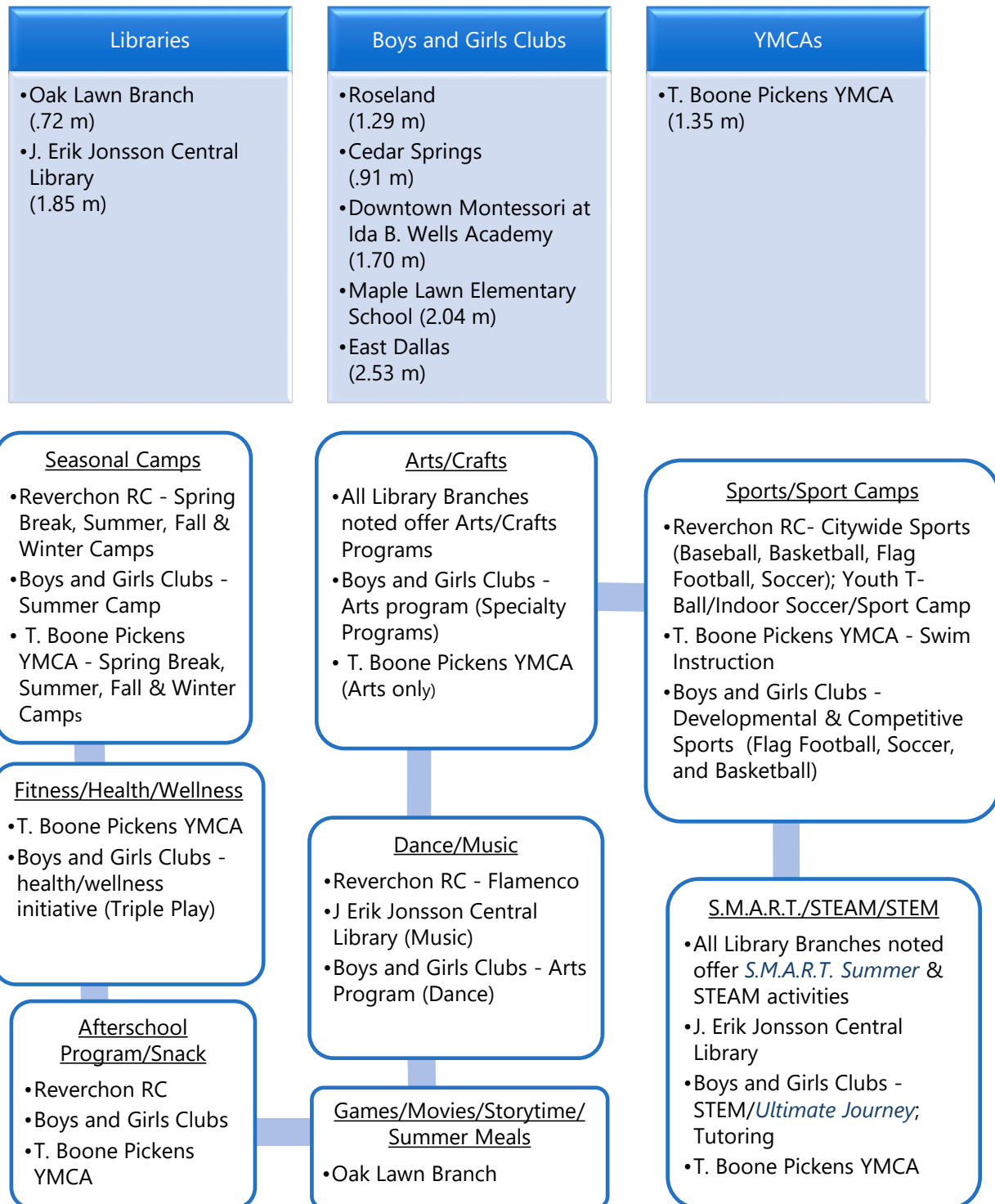
Libraries	Boys and Girls Clubs	YMCAs
<ul style="list-style-type: none"> <li>•Lakewood Branch (2.11 m)</li> <li>•J. Erik Jonsson Central Library (1.32 m)</li> <li>•Martin Luther King, Jr. Branch (1.98 m)</li> <li>•Oak Lawn Branch (2.09 m)</li> </ul>	<ul style="list-style-type: none"> <li>•Roseland (.58 m)</li> <li>•East Dallas (.92 m)</li> <li>•William Lipscomb Elem. (1.81 m)</li> <li>•Downtown Montessori-Ida B. Wells Academy (1.09 m)</li> <li>•Billy Earl Dade Middle School (1.73 m)</li> <li>•Dr. Martin Luther King Jr Academy (2.36 m)</li> <li>•Paul L. Dunbar (2.39 m)</li> </ul>	<ul style="list-style-type: none"> <li>•T. Boone Pickens YMCA (1.17 m)</li> </ul>





## REVERCHON Recreation Center

(Facilities  $\leq 3$  Miles)  
Program Duplications

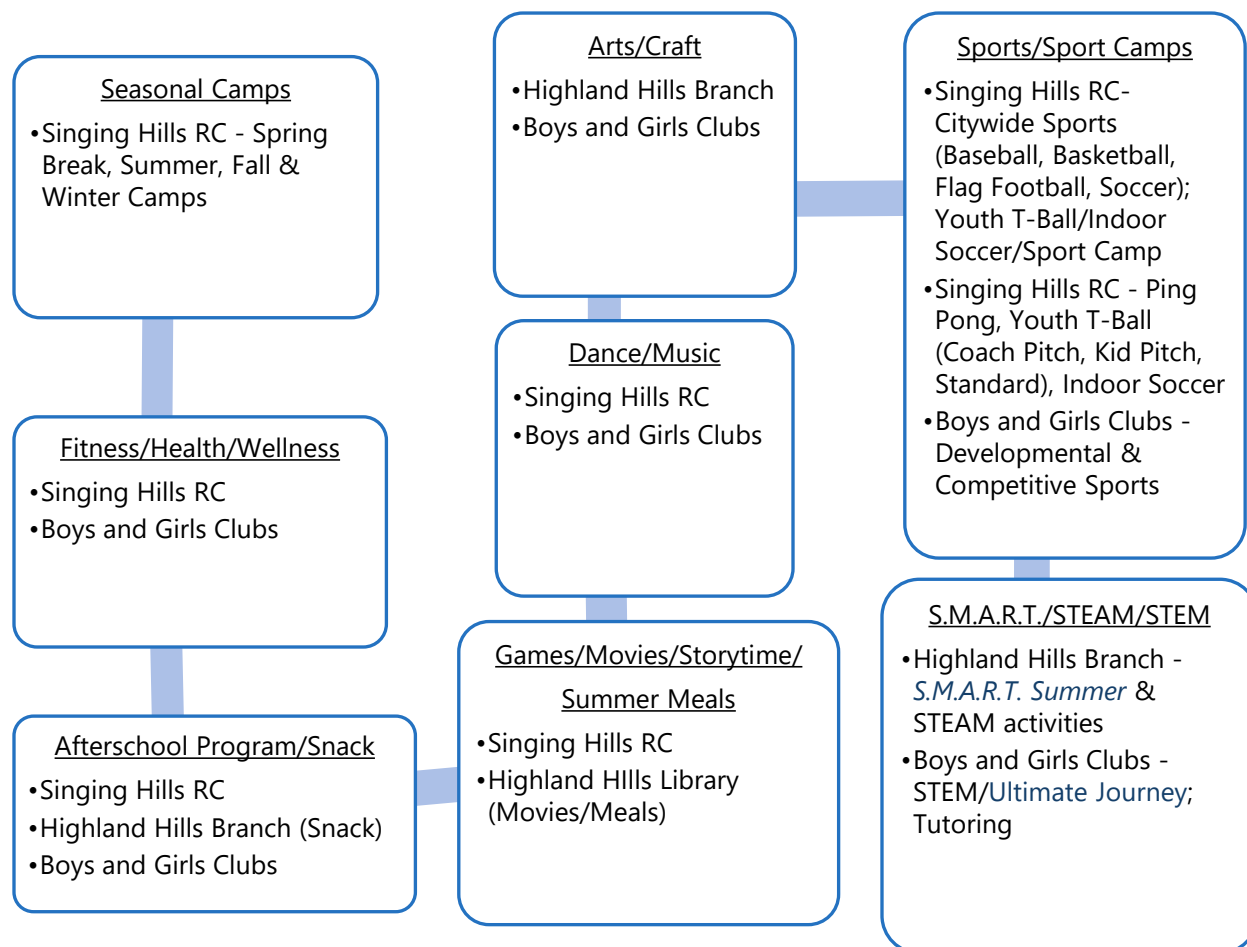




## SINGING HILLS Recreation Center

(Facilities  $\leq$  3 Miles)  
Program Duplications

Libraries	Boys and Girls Clubs	YMCAs
<ul style="list-style-type: none"> <li>• Highland Hills Branch (1.78 m)</li> </ul>	<ul style="list-style-type: none"> <li>• T. G. Terry Elementary School (2.37 m)</li> <li>• Uplift Wisdom (2.10 m)</li> <li>• Umphrey Lee Elementary School (2.84 m)</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>





## LAKE HIGHLANDS Recreation Center (Facilities $\leq 3$ Miles) Program Duplications

Libraries	Boys and Girls Clubs	YMCA's
<ul style="list-style-type: none"> <li>•Audelia Road Branch (.69 m)</li> <li>•Bookmarks Branch (2.74 m)</li> <li>•Vickery Park Branch (2.00 m)</li> <li>•Skillman Southwestern Branch (2.35 m)</li> <li>•Forest Green Branch (2.10 m)</li> </ul>	<ul style="list-style-type: none"> <li>•N/A</li> </ul>	<ul style="list-style-type: none"> <li>•Lake Highlands Family YMCA (1.81 m)</li> </ul>

### Seasonal Camps

- Lake Highlands RC- Spring Break, Summer, Fall & Winter Camps
- Lake Highlands Family YMCA

### Arts/Crafts

- Lake Highlands RC (Arts)
- All Library Branches noted offer Arts/Crafts Programs

### Sports/Sport Camps

- Lake Highlands RC- Citywide Sports (Baseball, Basketball, Flag Football, Soccer)
- Lake Highlands RC- Youth T-Ball/ WallBallClinic/ Volleyball/Basketball; Archery/Middle School Baseball Sports Camp
- Lake Highlands Family YMCA - Citywide Sports, Volleyball, Swimming

### Fitness/Health/Wellness

- Lake Highlands RC
- Bookmarks Branch
- Lake Highlands Family YMCA

### Dance

- Lake Highlands RC- Dance Classes
- All Library Branches noted offer Dance Programs (excluding Forest Green Branch)
- Lake Highlands Family YMCA

### Afterschool Program/Snack

- Lake Highlands RC
- Vickery Park Branch (Snack)
- Lake Highland Family YMCA

### Games/Movies/Storytime/Summer Meals

- Audelia Road Branch
- Bookmarks Branch
- Vickery Park Branch (Movies/Meals)
- Skillman Southwestern Branch (Movies)

### S.M.A.R.T./STEAM/STEM

- All Library Branches noted offer *S.M.A.R.T. Summer* & STEAM activities



## K. B. POLK Recreation Center

(Facilities  $\leq$  3 Miles)  
Program Duplications

### Libraries

- Grauwlyer Park Branch (1.70 m)
- Bachman Lake Branch (2.26 m)
- Oak Lawn Branch (2.23 m)

### Boys and Girls Clubs

- Maple Lawn Elementary (.94 m)
- Uplift Triumph (2.33 m)
- Cedar Springs (2.02 m)

### YMCAs

- Moody Family YMCA (1.55 m)

### Seasonal Camps

- K. B. Polk RC - Spring Break, Summer, Fall & Winter Camps
- Moody Family YMCA
- Boys and Girls Clubs (Summer Camp)

### Arts/Crafts

- All Library Branches noted offer Arts/Crafts Programs
- Boys and Girls Clubs
- Moody Family YMCA

### Sports/Sport Camps

- K. B. Polk RC- Citywide Sports (Baseball, Basketball, Flag Football, Soccer); Youth T-Ball (Coach/Kid Pitch, Standard), Archery, Boxing for Fitness, Lacrosse, Basketball 11U & 14U, Drills and Skills, and Volleyball
- Boys and Girls Clubs - Developmental and Competitive Leagues
- Moody Family YMCA - Citywide Sports, TBall, Softball, Volleyball, Cheerleading, Tackle Football, Swim Team and Instruction

### Fitness/Health/Wellness

- K. B. Polk RC
- Moody Family YMCA
- Boys and Girls Clubs

### Dance/Martial Arts

- K.B. Polk RC - Dance Classes
- Boys and Girls Clubs
- Moody Family YMCA (Martial Arts)

### Afterschool Program/Snack

- K. B. Polk RC
- Grauwlyer Park Branch (Snack only)
- Boys and Girls Clubs
- Moody Family YMCA

### Movies/Summer Meals

- Grauwlyer Park Branch

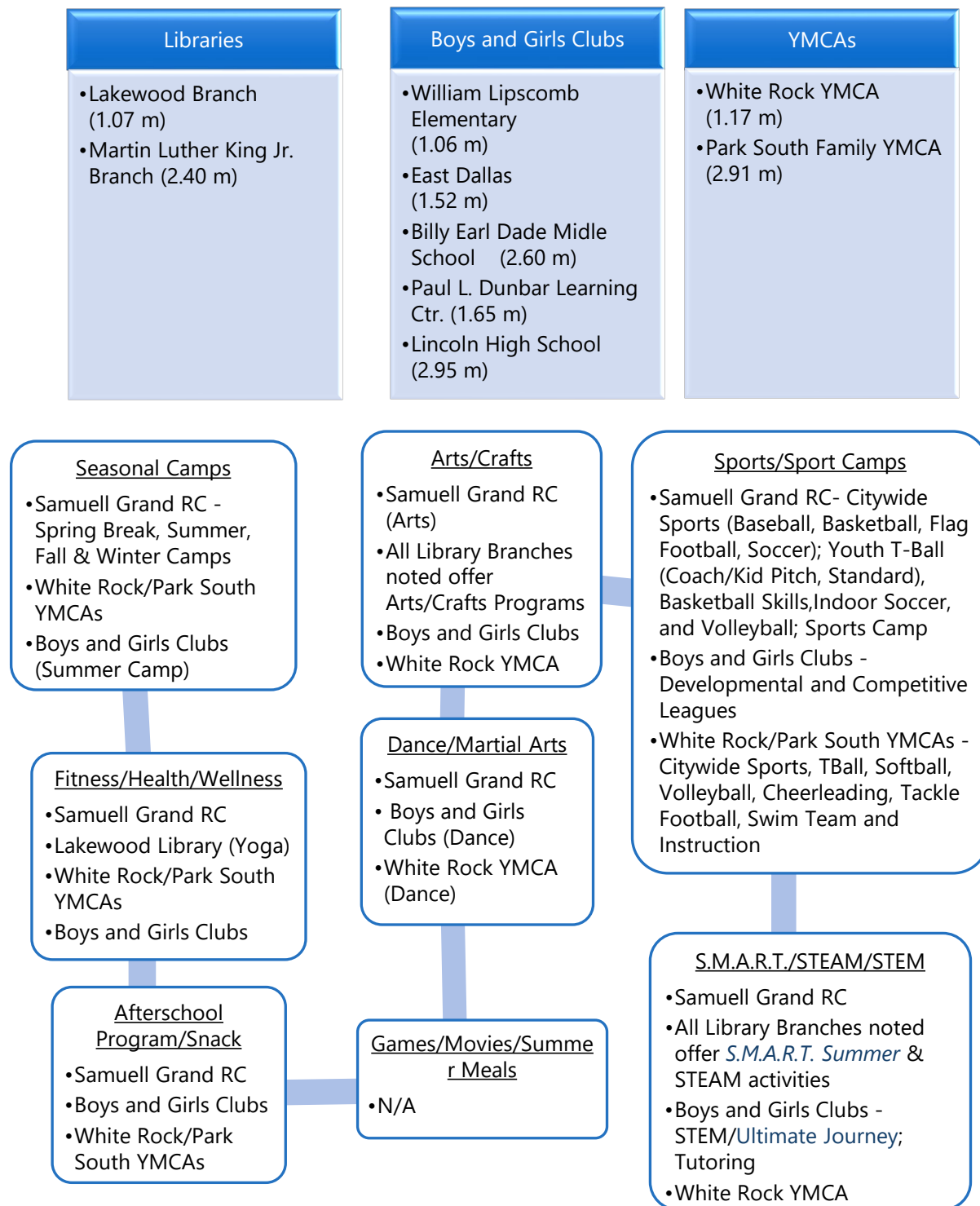
### S.M.A.R.T./STEAM/STEM

- All Library Branches noted offer *S.M.A.R.T. Summer & STEAM* activities
- Boys and Girls Clubs- STEM/Ultimate Journey; Tutoring
- Moody Family YMCA
- K. B. Polk (Tutoring only)



## SAMUELL GRAND Recreation Center

(Facilities  $\leq$  3 Miles)  
Program Duplications





**(Facilities  $\leq$  3 Miles)  
Program Duplications**

YMCA's

- Park South YMCA (.63 m)

## Sports/Sport Camps

- Martin Luther King, Jr. RC - Citywide Sports (Baseball, Basketball, Flag Football, Soccer); Youth T-Ball (Coach/Kid Pitch, Standard), Basketball Skills, Indoor Soccer; Sports Camp
- Boys and Girls Clubs - Developmental and Competitive Leagues
- Park South YMCA -Citywide Sports, TBall, Softball, Swim Team

- Martin Luther King, Jr RC
- Boys and Girls Clubs (Dance)

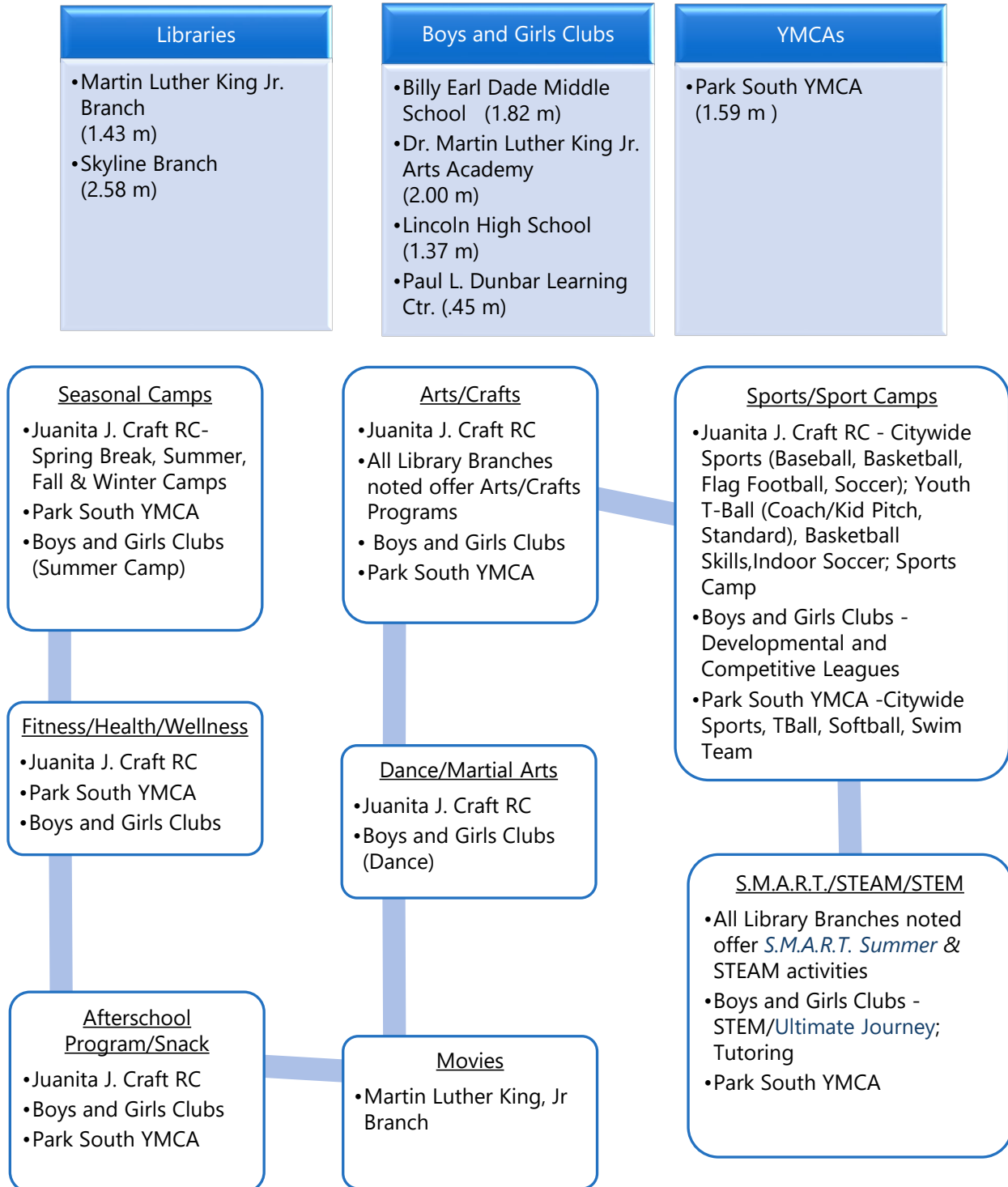
- Martin Luther King, Jr. Library

- All Library Branches noted offer *S.M.A.R.T. Summer* & STEAM activities
- Boys and Girls Clubs - STEM/*Ultimate Journey*; Tutoring
- Park South YMCA



## JUANITA J. CRAFT Recreation Center

(Facilities  $\leq$  3 Miles)  
Program Duplications

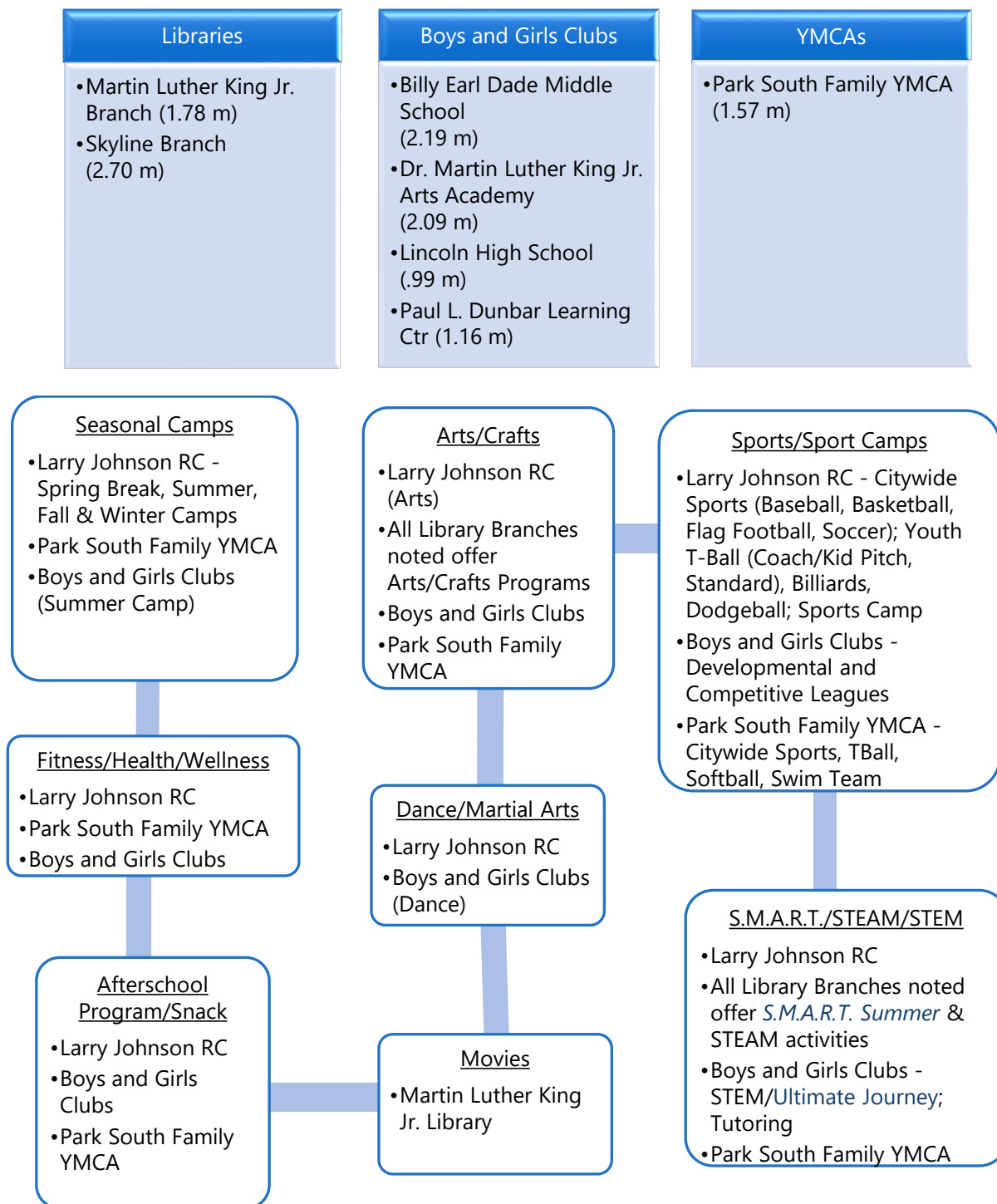




## LARRY JOHNSON Recreation Center

(Facilities  $\leq$  3 Miles)

### Program Duplications

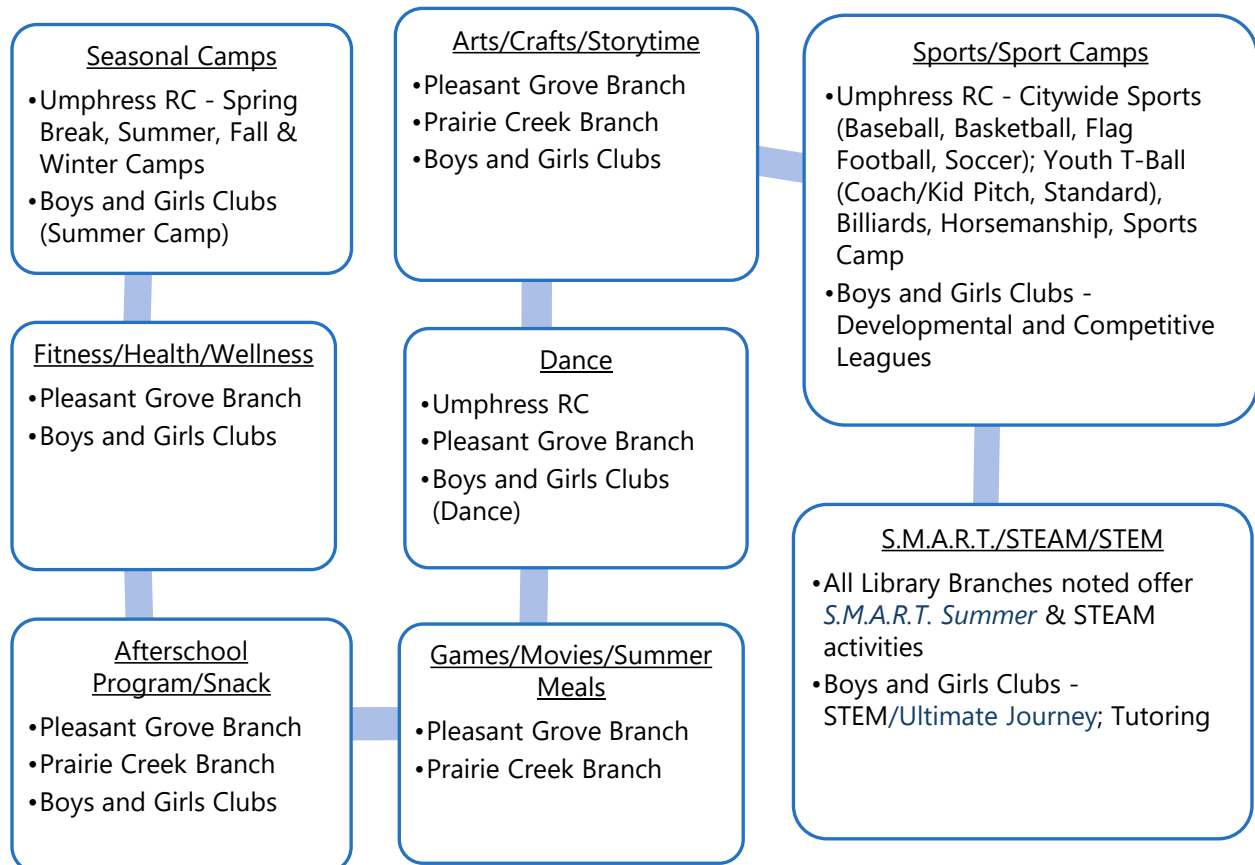




## UMPHRESS Recreation Center

(Facilities  $\leq$  3 Miles)  
Program Duplications

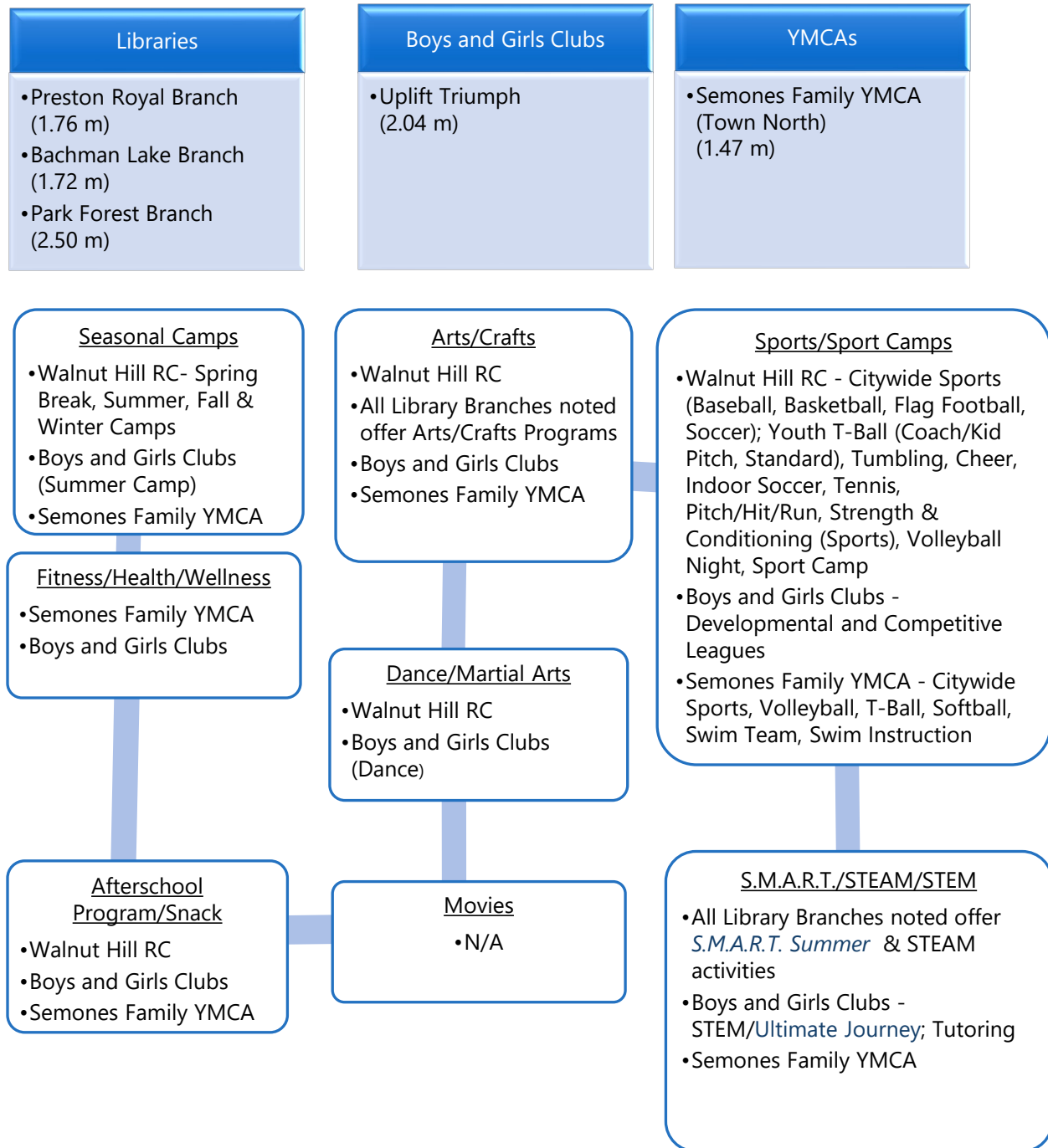
Libraries	Boys and Girls Clubs	YMCAs
<ul style="list-style-type: none"> <li>•Pleasant Grove Branch (.59 m)</li> <li>•Prairie Creek Branch (2.10 m)</li> </ul>	<ul style="list-style-type: none"> <li>•KIPP Pleasant Grove Primary School (2.06 m)</li> <li>•Edward Titcher Elementary (2.07 m)</li> </ul>	<ul style="list-style-type: none"> <li>•N/A</li> </ul>





## WALNUT HILL Recreation Center

(Facilities  $\leq$  3 Miles)  
Program Duplications





**Recreation Center to Recreation Center  
Connections**  
(Facilities  $\leq$  3 Miles)

Recreation Center (RC)	RC to RC Connections
<b>Exall RC</b>	Martin Luther King Jr., Reverchon RC, Samuel Grand RC, Juanita J. Craft, Exline RC
<b>Reverchon RC</b>	Anita Martinez RC, Exall RC, Nash-Davis RC, Arlington Park RC, K. B. Polk RC
<b>Singing Hills RC</b>	Tommie Allen RC, Hiawatha Williams RC
<b>Lake Highlands RC</b>	Ridgewood Belcher RC, Willie B. Johnson RC
<b>K. B. Polk RC</b>	Grauwylers RC, Arlington Park RC, Bachman RC, Reverchon RC
<b>Samuel Grand RC</b>	Juanita J. Craft RC, Larry Johnson RC, Exall RC, Martin Luther King Jr RC
<b>Martin Luther King Jr. RC</b>	Juanita J. Craft RC, Larry Johnson RC, Exall RC, Samuel Grand RC, Eloise Lundy RC
<b>Juanita J. Craft RC</b>	Martin Luther King Jr RC, Larry Johnson RC, Exall RC, Samuel Grand RC, Exline RC
<b>Larry Johnson RC</b>	Martin Luther King Jr RC, Juanita J. Craft, Samuel Grand RC, Umphress RC, Exline RC
<b>Umphress RC</b>	Pleasant Oaks RC, Janie C. Turner RC, Larry Johnson RC
<b>Walnut Hill RC</b>	Marcus RC, Bachman RC, K. B. Polk RC,

Source: Office of the City Auditor Analysis



## Library to Library Connections

(Facilities  $\leq$  3 Miles)

Library (LB)	LB to LB Connections
<b>Bookmarks in NorthPark Ctr.</b>	Preston Royal, Vickery Park, Skillman Southwestern
<b>Vickery Park</b>	Forest Green, Bookmarks in NorthPark Ctr., Skillman Southwestern
<b>Audelia Road</b>	Forest Green, Vickery Park, Skillman Southwestern
<b>Skillman Southwestern</b>	Vickery Park, Bookmarks in NorthPark Ctr., Audelia Road
<b>North Oak Cliff</b>	J. Erik Jonsson Central Library, Hampton-Illinois, Paul Laurence Dunbar – Lancaster/Kiest
<b>J. Erik Jonsson Central Library</b>	Oak Lawn, North Oak Cliff, Martin Luther King Jr.

Source: Office of the City Auditor Analysis



## Appendix A: Background and Methodology

### Background

#### Dallas Park and Recreation

Dallas Park and Recreation is divided into six service divisions with most youth services programs administered in the Recreation Services (recreation centers) and Citywide Athletic Reservation Events (C.A.R.E.S.) divisions (city-wide outdoor sports).

Recreation Services operates 42 recreation centers (offering 16,800 programs) and serves more than 1.4 million participants annually, while the Citywide Athletic Reservation Events division manages the city-wide youth sports programs (baseball, basketball, flag football and soccer) and all other outdoor sports activities including aquatics, skating, golf, tennis and oversees the Special Events Division. See the list of recreation centers below.

#### Recreation Centers

Service Area 1	Service Area 2	Service Area 3
<ul style="list-style-type: none"> <li>• Anita Martinez</li> <li>• Arcadia</li> <li>• Arlington Park</li> <li>• Bachman</li> <li>• Campbell Green</li> <li>• Churchill</li> <li>• Forest Audelia</li> <li>• Fretz</li> <li>• Grauwylar</li> <li>• Jaycee Zaragoza</li> <li>• Marcus Annex</li> <li>• Marcus</li> <li>• Nash Davis</li> <li>• Polk</li> <li>• Timberglen</li> <li>• Walnut Hill</li> </ul>	<ul style="list-style-type: none"> <li>• Exall</li> <li>• Fireside</li> <li>• Harry Stone</li> <li>• Juanita J. Craft</li> <li>• Janie C. Turner</li> <li>• Kleberg Rylie</li> <li>• Lake Highlands</li> <li>• M.L. King, Jr.</li> <li>• Pleasant Oaks</li> <li>• Reverchon</li> <li>• Ridgewood</li> <li>• Samuel Grand</li> <li>• Umphress</li> <li>• Willie B. Johnson</li> </ul>	<ul style="list-style-type: none"> <li>• Beckley Saner</li> <li>• Hiawatha Williams</li> <li>• Eloise Lundy</li> <li>• Exline</li> <li>• J.C. Phelps</li> <li>• Kidd Springs</li> <li>• Kiest</li> <li>• Larry Johnson</li> <li>• Martin Weiss</li> <li>• Park in the Woods</li> <li>• Singing Hills</li> <li>• Tommie Allen</li> <li>• Thurgood Marshall</li> </ul>

#### Dallas Public Library

Dallas Public Library is divided into three service divisions with youth service programs administered in the Library Operations and Public Service and Literacy Initiatives, Education, and Community Engagement divisions. Some youth service programs are also funded by Friends of the Dallas Public Library.

Dallas Public Library operates 30 library branches across the City including the J. Erik Jonsson Central Library (located in downtown Dallas) and the Bookmarks at NorthPark Center locations.



In addition to the Dallas Public Library’s traditional children/youth programs (i.e., *S.M.A.R.T Summer*, Reading Challenges, etc.), new programs geared toward children aged 0-5 were added in 2023 including installation of 29 *Reading Ready Play Spaces*, the distribution of 10,000 *Reading Ready Kits* to families in neighborhoods identified by the Racial Equity Plan, and *Here Comes Kindergarten* in 6 locations. See the list of library branches below which exclude the J. Erik Jonsson Central Library and the Bookmarks by NorthPark branch locations.

### Library Branches

East District	West District
<ul style="list-style-type: none"> <li>•Audelia Road</li> <li>•Forest Green</li> <li>•Fretz Park</li> <li>•Kleberg-Rylie</li> <li>•Lakewood</li> <li>•Lochwood</li> <li>•Martin Luther King, Jr.</li> <li>•Pleasant Grove</li> <li>•Prairie Creek</li> <li>•Renner Frankford</li> <li>•Skillman Southwestern</li> <li>•Skyline</li> <li>•Vickery Park</li> <li>•White Rock Hills</li> </ul>	<ul style="list-style-type: none"> <li>•Arcadia Park</li> <li>•Bachman Lake</li> <li>•Dallas West</li> <li>•Grauwylar Park</li> <li>•Hampton-Illinois</li> <li>•Highland Hills</li> <li>•Lancaster-Kiest</li> <li>•Mountain Creek</li> <li>•North Oak Cliff</li> <li>•Oak Lawn</li> <li>•Park Forest</li> <li>•Polk-Wisdom</li> <li>•Preston Royal</li> <li>•Timberglen</li> </ul>

## Methodology

The audit methodology included:

- (1) Interviewing personnel from Dallas Park and Recreation, Dallas Public Library, Human Resources, and other City departments
- (2) Reviewing policies and procedures, the *Texas Local Government Code*, applicable Administrative Directives, City Code and Association Accreditation standards
- (3) Performing various analyses.

In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.



We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

### Major Contributors to the Report

Carron Perry, CIA – In-Charge Auditor

Rory Galter, CPA – Engagement Manager

Natalie Martinez, CTCM – Auditor



## Appendix B: Management's Response

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### Memorandum



**DATE:** June 4, 2025  
**TO:** Mark S. Swann – City Auditor  
**SUBJECT:** Response to Audit of Youth Services – Dallas Park and Recreation and Dallas Public Library

This letter acknowledges that the City Manager's Office received the *Audit of Youth Services – Dallas Park and Recreation and Dallas Public Library* and submitted responses to the recommendations in consultation with Dallas Park and Recreation and the Dallas Public Library.

Dallas Park and Recreation and the Dallas Public Library are committed to offering engaging, compelling, and safe programs for qualifying youth. Dallas Park and Recreation and the Dallas Public Library have procedures in place to review their youth services programs' performance results, as well as determine the efficiency and effectiveness of those programs.

However, we recognize there are opportunities to further improve the administration of these programs and agree to implement the auditor's recommendations.

Specifically, Dallas Park and Recreation agrees to:

- Improve its existing procedures to ensure management documents its review of contract fee instructors' and volunteers' background screening results and related management decisions;
- Improve its existing procedures and ensure effective and appropriate background checks for City staff;
- Develop a procedure to ensure performance measures are thoroughly vetted prior to publication;
- Develop a process for capturing Late-Night Teen Recreation program attendance. In addition, PKR will develop a standardized procedure for recording registration and attendance data for Late-Nite Teen Recreation;
- Reinforce process owners' responsibility to perform a periodic review of policies and procedures and to make timely revisions as needed; and
- Formalize its process and implement a procedure for performing periodic user access reviews for the RecTrac LLC system.

"Service First, Now!"  
Connect – Collaborate – Communicate



Response to Audit of Youth Services – Dallas Park and Recreation and Dallas Public Library

June 4, 2025

Page 2 of 2

In addition, Dallas Public Library agrees to:

- Improve existing procedures to ensure management documents its review of paid performers'/presenters' and volunteers' background screening results and related management decisions;
- Improve existing procedures to ensure compliance with DPL's background screening procedures;
- Develop a procedure to ensure performance measures are thoroughly vetted prior to publication; and
- Implement a procedure for performing periodic user access reviews for its systems.

Please let me or my team know if you have any questions.

Service First, Now!

Sincerely,



Kimberly Bizer-Tolbert (Jun 4, 2025 12:21 CDT)

Kimberly Bizer Tolbert

City Manager



John D. Jenkins (Jun 4, 2025 14:02 CDT)

John D. Jenkins, Director

Dallas Park and Recreation

C: Jack Ireland, Chief Financial Officer  
Liz Cedillo-Pereira, Assistant City Manager  
Heather Lowe, Director of Libraries (I), Dallas Public Library

"Service First, Now!"

Connect – Collaborate – Communicate



Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date
Recommendations – Dallas Park and Recreation:				
High	We recommend the <b>Director of Dallas Park and Recreation:</b>			
	<b>A.1:</b> Revise procedures to ensure that management documents its review of background screening adverse results and decision to approve the contract fee instructor or volunteer.	Agree	Dallas Park and Recreation (PKR) will improve the documentation and retention of reviewing background checks. PKR will document the revised process in a procedure to ensure consistency.	9/30/2025 3/31/2026
	<b>A.2:</b> Revise procedures to ensure compliance with Dallas Park and Recreation <i>Department Procedures for Transporting Participants</i> .	Agree	PKR will develop procedures that ensure the consistent performance of background checks in compliance with PKR's Department Procedures for Transporting Participants.	9/30/2025 3/31/2026
Moderate	We recommend the <b>Director of Dallas Park and Recreation:</b>			
	<b>B.1:</b> Implement a review procedure to ensure the accuracy of performance measure results.	Agree	PKR will develop a procedure to ensure performance measures are thoroughly vetted prior to publication.	9/30/2025 3/31/2026
	<b>B.2:</b> Develop a standard method to capture attendance at all Late-Night Teen Recreation program sites that complies with the requirements of Dallas City Code, Chapter 12, <i>City Youth Program Standards of Care, Article 1, Sec. 2-6</i> .	Agree	PKR will develop a standardized procedure for recording attendance data for Late-Nite Teen Recreation programs, capture this process in a procedure, and ensure staff training is completed.	9/30/2025 3/31/2026



Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
Recommendations – Dallas Park and Recreation:					
	<b>C.1:</b> Revise procedures to ensure key operating manuals are updated when significant changes occur.	Agree	PKR will reinforce process owners' responsibility to periodically review policies and procedures and make timely revisions as needed. Revised procedures will be communicated to applicable employees, and complex process changes will be supported by documented employee training on the revised process.	12/31/2025	6/30/2026
	<b>D.1:</b> Implement periodic reviews of user access (annual or biennial) to identify unauthorized and/or inappropriate access.	Agree	PKR will formalize its process and implement a procedure for performing periodic user access reviews for the RecTrac LLC system. The procedure will assign responsibility for ensuring employee access is needed, and the employee is assigned to the appropriate role.	12/31/2025	6/30/2026



Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date
Recommendations – Dallas Public Library				
High	We recommend the <b>Director of the Dallas Public Library:</b>			
	<b>A.3:</b> Revise procedures to ensure that management documents its review of background screening adverse results and decision to approve the paid performer/presenter or volunteer.	Agree	Dallas Public Library (DPL) will improve the documentation and retention of background checks. To ensure a consistent process, DPL will document the revised process in a procedure.	9/30/2025 3/31/2026
	<b>A.4:</b> Revise procedures to ensure compliance with Dallas Public Library background screening procedures.	Agree	DPL will revise procedures to ensure consistent performance of background checks in compliance with the DPL background screening procedures.	9/30/2025 3/31/2026
Moderate	We recommend the <b>Director of the Dallas Public Library:</b>			
	<b>B.3:</b> Implement a review procedure to ensure the accuracy of performance measure results.	Agree	DPL will develop a procedure to ensure performance measures are thoroughly vetted prior to publication.	9/30/2025 3/31/2026
Low	We recommend the <b>Director of the Dallas Public Library:</b>			
	<b>D.2:</b> Implement periodic user access reviews (annual or biennial) to identify unauthorized and/or inappropriate access to system data.	Agree	DPL will implement a procedure for performing periodic user access reviews for its systems. The procedure will assign responsibility for ensuring employee access is needed and that the employee is assigned to the appropriate role. The director or assistant director will approve any	12/31/2025 6/30/2026



			variance from the procedure due to low-risk and operational needs.		
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