
PERFORMANCE AUDIT OF EQUITY IN RECREATION PROGRAMMING

Finding 1: Although the Parks and Recreation Department solicits participant feedback, it is likely not aware of broader community recreational needs and lacks a strategic plan and adequate resources to provide recreation programs more equitably.

Finding 2: The Parks and Recreation Department's approach to resource allocation and program quality is incomplete and limits its ability to provide equitable recreation programming.

Finding 3: The Parks and Recreation Department's approach to community engagement and marketing is decentralized and inconsistent, which results in diminished access to programming.

Finding 4: The Parks and Recreation Department has made efforts to ensure certain communities can participate in recreation programs, but significant barriers remain that may preclude other groups from participating.

Finding 5: Although the Parks and Recreation Department tracks certain program information, current practices diminish its ability to implement a data-driven approach for resource allocation, monitoring, evaluation, and reporting.

**Office of the
City Auditor**

City of San Diego



Performance Audit of Equity in Recreation Programming

Why OCA Did This Study

Recreation is a core public service that provides numerous health and social benefits to individuals and communities. We conducted this audit to determine whether the Parks and Recreation Department (Parks & Rec) (1) effectively identifies recreation programming equity needs in each community; (2) meets identified programming needs equitably via resource allocations; and (3) provides residents with equitable access to recreation programs.

What OCA Found

As shown in the graphic below, providing equitable recreation programming requires a comprehensive, strategic approach.



Source: OCA generated based on audit findings.

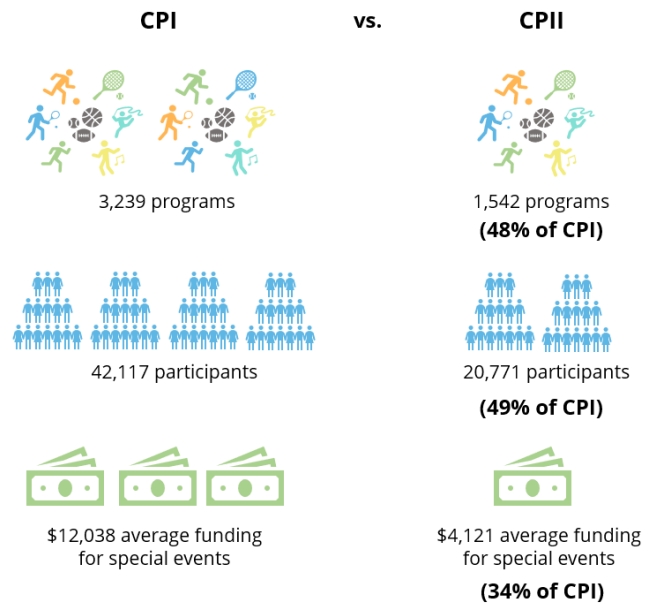
Parks & Rec has made notable progress in several of these areas. However, we found that significant inequities in recreation programming remain, and the City will likely need to invest substantial resources and effort to successfully address them.

Finding 1: Understanding community needs is essential to making recreation programming more equitable. Parks & Rec and the City solicit participant and resident feedback about recreation programs, but Parks & Rec’s current feedback mechanism excludes individuals not actively engaged in programs. This means their needs—and any barriers they may face in accessing recreation programs—are

unknown. In addition, we found that Parks & Rec does not have a strategic plan or performance measures that address recreation programming equity.

Finally, Parks & Rec needs to analyze the extent of the resources needed to comprehensively improve equity so that it can support any future funding requests.

Finding 2: After identifying each community’s recreation programming needs, efforts to address those needs should be funded equitably. We found large funding disparities between recreation centers in the northern part of the City, Community Parks I Division (CPI), and those in the southern part of the City, Community Parks II Division (CPII). Current program spending per recreation center is 47 percent higher in CPI than in CPII, and recreation centers in CPI offer twice as many programs and have twice as many participants as those in CPII, as shown in the graphic below.



Source: OCA generated based on 2019 Parks and Recreation Equity Report and RCF Budgets.

Funding and programming disparities are even more significant when broken down by Council District and are primarily based on the occurrence of contracted programs, which participants pay for. In 2019, almost all contracted programs took place in CPI. Recreation

centers without a history of contracted programs—such as those in CPII—may find it challenging to establish these programs without additional General Fund investments.

Parks & Rec also lacks a comprehensive process for assessing program quality to ensure quality is comparable across recreation programs Citywide.

Finding 3: Informing the community of available programming is another important step toward improving equity in recreation programming. We found that Parks & Rec’s approach to community engagement and marketing is decentralized and inconsistent, which results in diminished awareness of, and access to, programming. For example, 55 percent of City residents indicated they did not attend more Parks & Rec programs because they were not aware of program offerings, which is over twice as high as the national average of 24 percent. Parks & Rec can improve efforts to increase awareness of its recreation programs by analyzing demographic data, standardizing marketing efforts, and centralizing aspects of the marketing process.

Finding 4: For recreation programs to be equitable, they should be accessible to all groups. We found that Parks & Rec makes efforts to ensure certain communities can participate in programs, but significant barriers remain for others. We found that Parks & Rec limits fee waiver availability to a small subset of recreation programs and that the fee waiver application process is burdensome for the customer. These issues limit low-income households’ access to recreational programming and result in assisting relatively few participants.

In addition, we found that recreation program information is not equally accessible to people with limited English proficiency. While Parks & Rec employs a variety of tools to make recreation programming inclusive of those who have limited English proficiency, those tools are not consistent across recreation centers. For example, only 17 percent of recreation centers that serve significant populations with limited English proficiency provide program guides in other languages.

Finding 5: Taking a more comprehensive approach to improving equity in recreation programming requires collecting and analyzing data to monitor, evaluate, and report on progress. We found that errors and inconsistencies in Parks & Rec’s data limit its ability to pursue a data-driven approach to improving equity through systematic efforts such as strategic planning and resource allocation.

What OCA Recommends

We made 16 recommendations to improve recreation programming equity, and management agreed to implement all 16. Key recommendations include to:

- Conduct a community needs assessment to identify recreational needs and access barriers;
- Develop a strategic plan for addressing recreational equity that includes goals and performance measures and identifies resources needed to address current inequities;
- Develop a resource allocation model to evaluate funding equity between recreation facilities based on community-specific and site-specific criteria, and direct resources toward specific steps to eliminate identified disparities;
- Create a strategic marketing plan and hire a marketing professional to manage online and physical content, coordinate the department’s marketing efforts, and lead strategic marketing initiatives;
- Revise fee waiver procedures to make them customer-friendly, and consider expanding fee waiver eligibility to additional recreation programs, including contracted programs;
- Create a department-wide language access plan that includes policies and procedures for translation services; and
- Implement internal controls to ensure data from its recreation program management software can be used for strategic planning and resource allocation efforts.

For more information, contact Andy Hanau, City Auditor at (619) 533-3165 or cityauditor@sandiego.gov.



THE CITY OF SAN DIEGO

November 10, 2021

Honorable Mayor, City Council, and Audit Committee Members
City of San Diego, California

Transmitted herewith is a performance audit report of equity in the City's recreation programming. This report was conducted in accordance with the City Auditor's Fiscal Year 2021 Audit Work Plan, and the report is presented in accordance with City Charter Section 39.2. Audit Objectives, Scope, and Methodology are presented in Appendix B. Management's responses to our audit recommendations are presented starting on page 66 of this report.

We would like to thank staff from the Parks and Recreation Department for their assistance and cooperation during this audit. All of their valuable time and efforts spent on providing us information is greatly appreciated. The audit staff members responsible for this audit report are Andrew Reeves, Marye Sanchez, Danielle Novokolsky, Luis Briseño, and Kyle Elser.

Respectfully submitted,

Andy Hanau
City Auditor

cc: Honorable City Attorney, Mara Elliot
Jay Goldstone, Chief Operating Officer
Kristina Peralta, Deputy Chief Operating Officer
Christiana Gauger, Chief Compliance Officer
Andy Field, Director, Parks and Recreation Department
Karen Dennison, Assistant Director, Parks and Recreation Department
Shelly Stowell, Deputy Director, Parks and Recreation Department
Gina Dulay, Deputy Director, Parks and Recreation Department
Sarah Erazo, Program Manager, Parks and Recreation Department
Heather Ferbert, Chief Deputy City Attorney
Andrea Tevlin, Independent Budget Analyst
Matt Yagyagan, Deputy Director of Policy, Office of the Mayor



OFFICE OF THE CITY AUDITOR
600 B STREET, SUITE 1350 • SAN DIEGO, CA 92101
PHONE (619) 533-3165 • CityAuditor@sandiego.gov

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Background

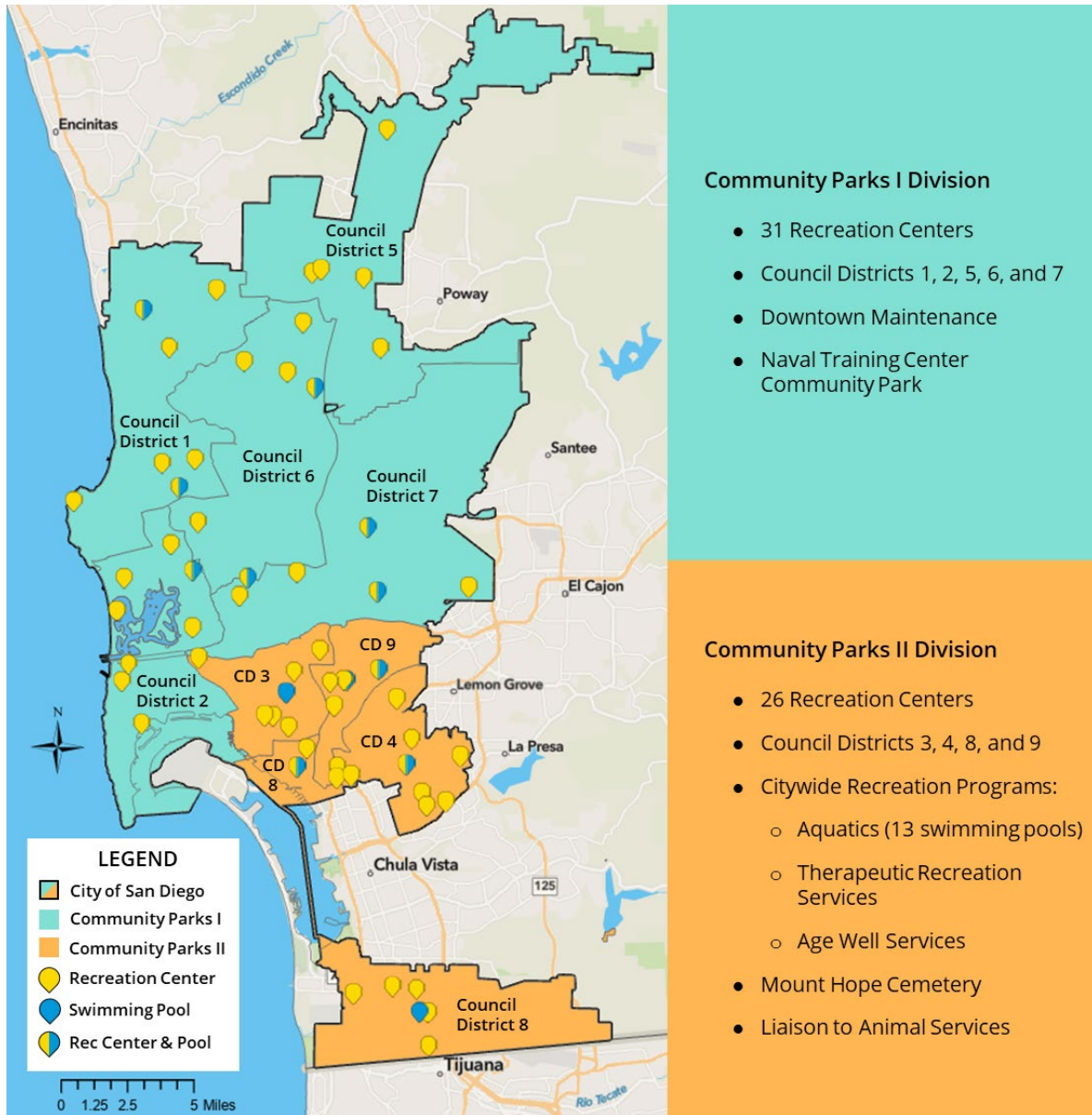
Recreation has positive impacts on the physical, mental, and social health of individuals and their communities. For individuals, participation in recreational activities helps improve physical health, reduce depression, relieve stress, build self-esteem, and encourage personal growth. For communities, recreation helps promote social bonds by uniting families, encouraging cultural sensitivity, supporting seniors and individuals with disabilities, helping lower crime, instilling a sense of public pride, and contributing positively to the economy.

The City of San Diego (City) provides residents with opportunities for recreation. Specifically, the Parks and Recreation Department (Parks & Rec) manages recreational programs across the City's 59 recreation centers and 13 aquatic centers. The vast majority of recreation centers are managed by either the Community Parks I Division (CPI) or the Community Parks II Division (CPII), depending on their geographic location within the City—CPI manages recreation centers in the northern part of the City while CPII manages those in the southern part of the City.¹ Aquatic centers are managed by CPII but are split into two groups, North and South. **Exhibit 1** provides an overview of the facilities and programs managed by CPI and CPII.

¹ Two recreational facilities in Balboa Park are managed by the Developed Regional Parks Division.

Exhibit 1:

The Community Parks I and II Divisions Manage Recreation Centers in Different Areas of the City



Note: In addition to recreation centers and swimming pools, Community Parks I and II Divisions also oversee Neighborhood, Community, and Mini Parks; Joint Use Operations; and After School Programs in their respective areas of the City.

Note: Two recreational facilities in Balboa Park—the Activity Center and the Municipal Gymnasium—are reflected in the map but not in the count of recreation centers above, since those are managed by the Developed Regional Parks Division.

Source: OCA generated based on data from the [SanGIS](#) Regional Data Warehouse and information from the Parks and Recreation Department’s website.

The transfer of recreation programming funds from Recreation Councils to the City shed light on funding disparities.

Before 2018, programming at recreation centers was primarily planned as a partnership between recreation center directors and a corresponding Recreation Council. Recreation Councils were self-organized groups made up of volunteer community members with the purpose of promoting recreation programs in the community through planning, publicizing, coordinating, and providing community programs. Recreation Councils advised the City on park development, provided recreational programming at City park facilities, and controlled funds raised primarily through surcharges on recreation programs and facility rentals and through fundraising activities. The use of these funds was restricted to the geographic area in which they were raised.

In December 2017, based on the City Attorney's Memorandum of Law MS-2017-20 concerning the legality of this structure, the City Council adopted Resolution 311478 to take control of these funds and create center-specific Recreation Center Funds (RCFs). As in the previous arrangement, the use of these funds is restricted to the geographic area in which they are raised. The transition of control of these funds from Recreation Councils to the City has made it clear that some recreation centers raise more money—and can therefore enjoy larger and more diverse expenditures—than others.² A substantial part of this disparity is made up of money paid by customers to a contracted program instructor but that simply passes through the City's financial infrastructure first. Parks & Rec management indicated that the funds remaining after money is paid to contractors are primarily used to pay for the maintenance, equipment, and supplies that correspond to the increased usage of recreational facilities by contracted programs. Nevertheless, these apparent funding disparities led to an audit request for our office to review the equity of funding between recreation centers in different parts of the City, primarily the difference between those in CPI and those in CPII.

² The average size of RCFs in CPII are only 34 percent of the size of RCFs in CPI. The RCF expenditures in each council district generally increase as the median income of the district increases.

Equity in recreation programming means all individuals and communities can access and enjoy the same benefits from recreation programs.

According to the National Recreation and Park Association (NRPA):

Equity and equality are often used interchangeably, but they mean different things. Equality is when everyone receives the equal amount of investment. While that sounds fair, it assumes that all people start from the same place, which isn't true. Equity is about ensuring everyone receives the appropriate investment for where they are.

This concept, and the distinction between equity and equality, is illustrated below in **Exhibit 2**. Because the individuals are different, they would benefit from different investments—in this case, different sizes and styles of bicycles—to be able to participate in the activity of bicycling and enjoy its benefits.

Exhibit 2:

Equity Recognizes Everyone Starts from a Different Place and Different Investments May Be Necessary So All Can Enjoy the Benefits of Recreation



Source: Robert Wood Johnson Foundation.

Since communities are different, different levels of investment would allow each community to fully access and share in the benefits of recreation. Some communities will need more investment because they have been historically underserved.

According to Parks & Rec management, Parks & Rec's definition of equity flows from this concept. Parks & Rec defines equity as the principle that public parks and recreation services should be available and accessible to all people regardless of income, ethnicity, gender, ability, or age. Parks & Rec acknowledges that, to achieve equity, more attention should be provided to the communities that are underinvested, which is something the City will move toward under the newly adopted Parks Master Plan.³ For example, the Parks Master Plan includes the following goal related to equity:

[Address] long-standing inequities experienced by people in Communities of Concern⁴ and other marginalized populations allowing everyone to fairly share the same benefits from parks and attain full and equal access to recreational opportunities regardless of one's background, identity, ability, and location.

Therefore, recreation programming equity is about making appropriate recreational investments in each community so that all communities can access and enjoy the same recreation benefits. It is important to note that this approach to equity involves addressing the quality and type of recreation programming and not just the facilities available for recreation.

³ The City's Parks Master Plan was adopted by the City Council in August 2021 and is available online at <https://www.sandiego.gov/parks-for-all-of-us>.

⁴ According to the Parks Master Plan, communities of concern are neighborhoods that have historically experienced lower levels of public and private investment in development and supporting infrastructure, including parks. Residents in communities of concern often rely more on public or nonprofit recreation facilities. In San Diego, the City's central and southern areas tend to have a greater need for additional recreational opportunities based on historical disinvestments.

In contrast to staff-run recreation programs, contractual recreation programs are more specialized and are fully paid by program participants.

Parks & Rec offers staff-run and contractual recreation programs. Staff-run programs are subsidized by the General Fund and consist primarily of sports programs, cooking classes, basic art classes, table games, teen activities, afterschool clubs, and exercise activities. In contrast, contractual programs tend to be more specialized and are led by instructors who typically have a high degree of experience and/or specialized training. Examples of contractual programs include oil painting, gymnastics, yoga, guitar lessons, and others. Contractual programs may be offered when recreational programs requested by the community are beyond the skillsets of Parks & Rec staff. Unlike staff-run programs, participants are required to pay the full cost of contractual programs.

Parks & Rec has taken some steps to standardize aspects of recreation programming, which may assist strategic planning efforts.

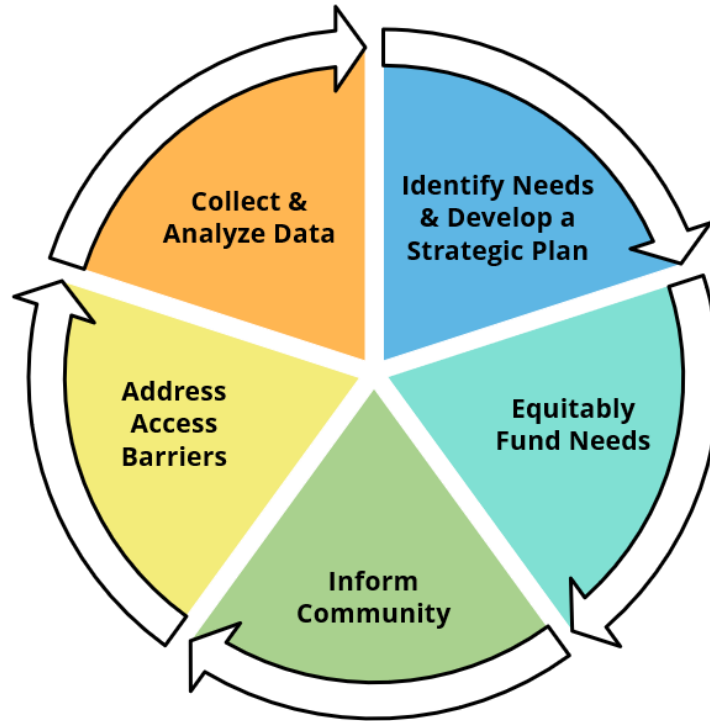
Parks & Rec has begun centralizing some aspects of recreation programming, which could help coordinate responses to many of our recommendations that appear later in this report. In 2018, Parks & Rec created a Recreation Program Manager position to help ease the transfer of RCF control to the City. According to Parks & Rec management, this position is also overseeing recent efforts to standardize some aspects of programming, such as staff training, user fees, and program offerings. These programmatic changes could help management better collect, analyze, and monitor system-wide information, which can inform strategic planning efforts and decision-making around programming equity.

Equitable recreation programming requires a comprehensive approach.

To equitably offer recreation programs, Parks & Rec must take a comprehensive approach including identifying each community's programming needs, equitably funding those needs, informing the community of the programming available, addressing any barriers to accessing the programming, and implementing data-driven decision-making. A strategic plan involving these steps can help align Parks & Rec with its equity goals and objectives. These steps are displayed in **Exhibit 3** below and serve as a roadmap for our findings.

Exhibit 3:

Equitable Recreation Programming Requires a Comprehensive Approach



Source: OCA generated based on audit findings.

Audit Results

Finding 1: Although the Parks and Recreation Department solicits participant feedback, it is likely not aware of broader community recreational needs and lacks a strategic plan and adequate resources to provide recreation programs more equitably.

Understanding community needs is essential to making recreation programming more equitable. By understanding community needs, the Parks and Recreation Department (Parks & Rec) can strategically plan for and gauge progress towards addressing inequities. Parks & Rec and the City of San Diego (City) have made efforts to obtain participant and resident feedback regarding the City’s recreation programs, but these may exclude voices from the community at large. Further, we found that Parks & Rec does not have a strategic plan or performance measures to address recreation programming equity. Additionally, a significant investment of resources is likely necessary to address the issues identified in this report. Therefore, Parks & Rec would benefit from analyzing the extent of its resource needs so that it can articulate requests in future budget years. The following sections discuss these issues in more detail.



Parks & Rec does not have sufficient information to identify communities’ needs and priorities for equitable recreation programming.

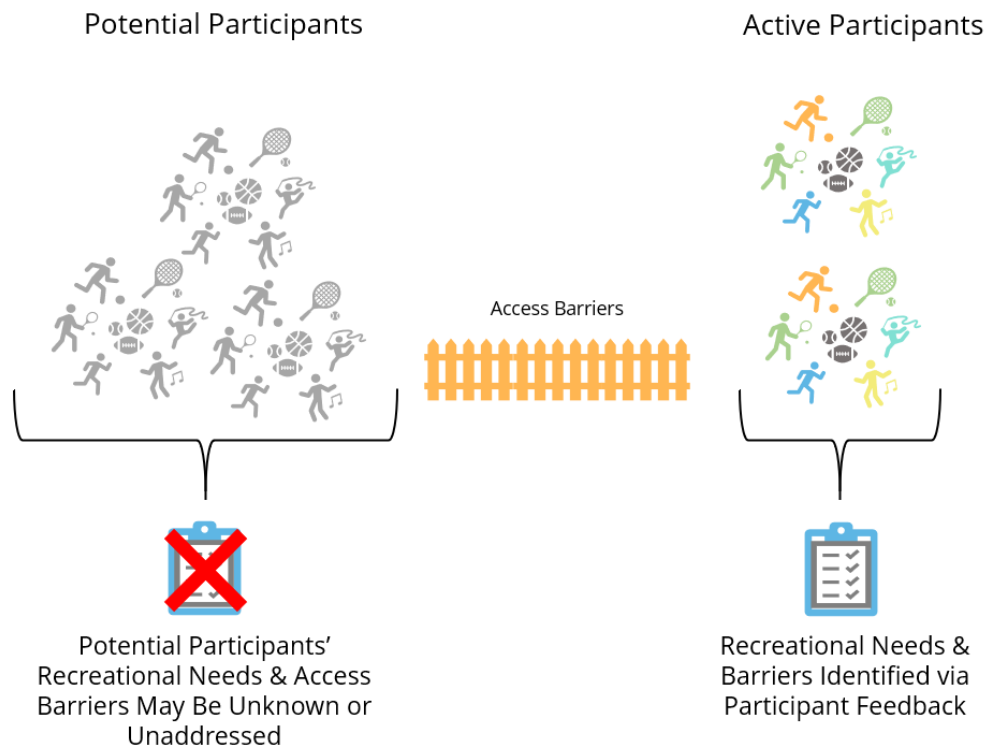
Parks & Rec solicits participant feedback on recreation programs; however, its approach may exclude voices from the community at large. Parks & Rec has several ways for receiving feedback from program participants: through optional tabletop surveys conducted at the end of a program, through regular communication with Community Recreation Groups (CRGs), and incidentally during interactions with program participants and park patrons.⁵ **However, these methods capture feedback**

⁵ The role of CRGs is to make recommendations to City Council, Parks & Rec, and its various boards with respect to recreation programs in the community, provide recommendations on the expenditures of Recreation Center Funds, and promote recreation programs in the community through planning, publicizing, and coordinating community programming. The CRGs hold public meetings where the community can provide public comments.

from program participants or other individuals who actively engage with Parks & Rec, not from other individuals in the larger community who may not be engaging with Parks & Rec for some reason. Understanding the recreational needs of such potential participants and identifying access barriers would help ensure equitable programming. However, as shown in **Exhibit 4**, Parks & Rec currently only surveys active participants, which means the needs of those not surveyed—and any access barriers preventing them from participating—are unknown.

Exhibit 4

Parks & Rec’s Current Feedback Mechanism Excludes Individuals Not Actively Engaged in Programs, Which Means Their Needs and Any Access Barriers They May Face are Unknown



Note: “Active participants” refers to individuals who are currently taking part in recreation programs. “Potential participants” refers to individuals who would like to participate in recreation programs but are unable to do so for some reason (i.e., an access barrier).

Source: OCA generated based on review of the City’s 2015 and 2018 Resident Satisfaction surveys, the Community Interest and Opinion Survey, and the National Recreation and Park Association Community Assessment guide.

For the City’s recreation programming to be equitable, it is important that it be accessible and inclusive. Part of this depends on Parks & Rec’s ability to understand the recreational needs and priorities of not only actual participants, but potential participants as well—and to make efforts to minimize any barriers to preventing their participation. Specifically, surveys could ask about not only the types of programs residents desire but also what barriers may prevent them from participating, such as cost, location, times, and awareness. While some residents may not want to participate under any circumstances, Parks & Rec should understand who these individuals are, and then focus equitable programming efforts on active and potential participants.

Recent survey results may not offer insights into the recreational needs of all groups, including disadvantaged groups.

Using an outside consultant, the City conducted a Resident Satisfaction Survey (satisfaction survey) in 2015 and again in 2018 to assess satisfaction with the delivery of City programs and services, the quality of customer service provided by City staff, and preferences about how City officials should prioritize programs and services.⁶ Additionally, the City’s recent efforts to update the Parks Master Plan (PMP) included the Community Interest and Opinion Survey (community survey) to identify and explore the recreational needs and priorities of residents and develop recommendations for addressing these needs and priorities.⁷

The satisfaction surveys and community survey were similar in design; each was mailed to a random sample of 15,000 households in the City to ensure the completion of at least 200 surveys in each of the nine Council Districts. However, this approach did not ensure that respondents were representative of the population within each Council District along socio-economic variables such as race, income, education, etc. Therefore, certain segments of the population may have been over- or under-represented in the results, which means the results may not offer insights into the recreational needs of all

⁶ The City mailed the survey to a stratified random sample of 15,000 households in the City. A total of 2,478 and 1,953 households completed the survey in 2015 and 2018 respectively.

⁷ The City conducted the community survey in Spring 2018, and the City Council adopted the PMP in August 2021.

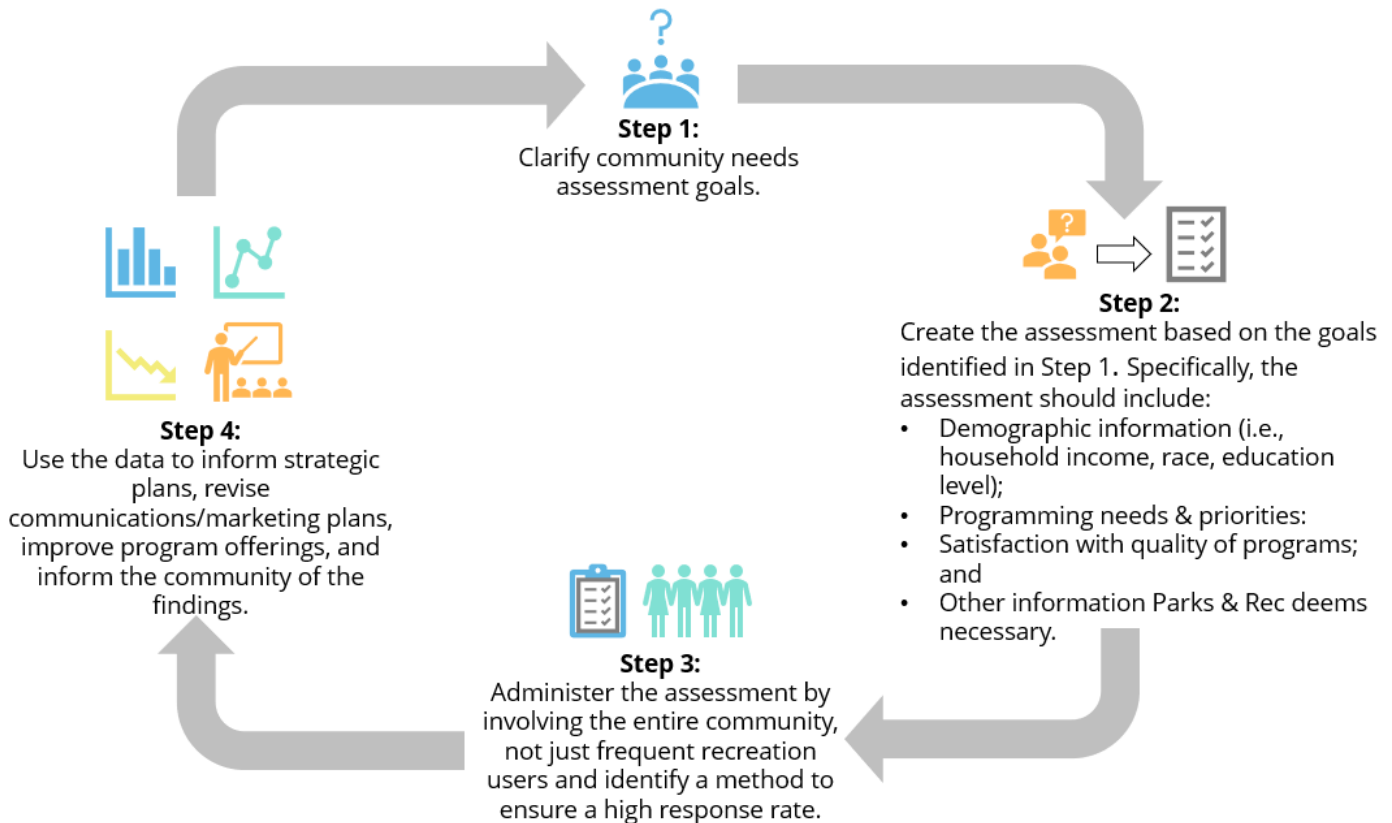
groups, including disadvantaged groups. Additionally, because these surveys did not collect demographic information from respondents, Parks & Rec cannot analyze the results to identify recreational equity needs across demographic variables.

While Parks & Rec collects some useful information, it should adopt a more robust approach to assessing community recreation needs.

According to the National Recreation and Park Association (NRPA), community needs assessments are vital for strategic planning because they identify community needs and priorities and provide data on residents' satisfaction with recreation offerings. The NRPA lays out a four-step approach to guide park and recreation agencies through the community needs assessment lifecycle, which includes clarifying assessment goals, creating the assessment, administering the assessment, and using the data to inform strategic planning efforts. **Exhibit 5** below describes an ideal approach to conducting a community needs assessment.

Exhibit 5

Ideal Approach to Conducting a Community Needs Assessment



Source: OCA generated based on review of NRPA Community Assessment Needs guidelines.

Additionally, the NRPA notes the importance of reaching non-users and underinvested community members, such as seniors, those living with disabilities, people of color, and non-English speakers in the assessment process so that that response pool represents the most diverse cross section possible.

Other municipalities conduct community needs assessments to identify recreation needs.

Mecklenburg County's Park and Recreation Department (Mecklenburg), which serves the City of Charlotte, North Carolina and surrounding areas, indicated that it uses its countywide community needs assessment to evaluate how well it meets the recreational needs identified in the assessment. Mecklenburg indicated that, as of December 2020, it was meeting most of these needs.

The City and County of Denver's Parks and Recreation Department (Denver) also conducted a community needs assessment to plan for the future of parks and recreation opportunities. In addition to ensuring at least a minimum number of responses, Denver collected demographic information such as age, gender, and race, allowing it to analyze responses through the lens of different groups.

Strategic planning helps ensure agencies have a sense of direction and measurable goals to guide decision-making.

Parks & Rec has initiated efforts to examine recreation equity; however, it does not have a strategic plan with performance measures to assist in decision-making. In 2019, in response to a request from the Public Safety and Livable Neighborhoods Committee, Parks & Rec published its Recreation Equity Report (Equity Report), which identified disparities in recreation programming across the City. The Equity Report also contains a set of goals for ensuring that all communities have similar levels of specialized programs. Some of these goals include to:

- Evaluate recreation facilities and community interest in specialized programs;
- Support recreation centers with low participation in creating specialized programs;
- Introduce contractual programs at sites that traditionally have not had them; and
- Identify alternate methods to fund specialized programs in low-income areas.

The Equity Report was an important first step in addressing inequities in recreation programming. However, the COVID-19 pandemic and the associated directives from the state and county governments caused Parks & Rec to close recreation centers in March 2020 and refocus its efforts instead on public health and safety. According to Parks & Rec, efforts to address programming equity resumed over the summer, with recreation centers across the City having reopened as of June 2021. Even though the Equity Report includes some goals, Parks & Rec does not have a strategic plan or key performance indicators (KPIs) to drive decision-making and gauge progress in this area.

Specifically, although 5 of Parks & Rec's 10 KPIs pertain to recreation facilities or programs, none of them address or measure equity.⁸ In addition, while the PMP includes general objectives and goals for addressing equity, it does not specify steps or actions that Parks & Rec should take to achieve them. Therefore, absent a strategic plan or KPIs that address equity, Parks & Rec lacks a reference point from which to clearly articulate the extent to which its efforts address recreation programming equity concerns. For example, as part of the Come Play Outside initiative that took place in summer of 2021, Parks & Rec received a grant to provide specialized programming at 21 recreation facilities in Communities of Concern. Although staff indicated the initiative was beneficial and well-received in those communities, its impact cannot be measured against goals or other baselines because those have not been established.⁹ In addition, without a strategic plan that includes specific goals and performance metrics, many programming decisions are, by default, made operationally and on an ad hoc basis by recreation center directors. However, this is not the best approach for ensuring programming equity because center directors lack a systemwide viewpoint. Instead, developing a strategic plan that focuses on ensuring equity in recreational

⁸ The five KPIs that pertain to recreation facilities or programs are: 1) Percentage customer satisfaction with park system; 2) Percentage of increase with on-line registration participation; 3) Percentage of customer satisfaction with recreation program activities; 4) Number of aquatic users; and 5) Number of hours of operation of recreation centers.

⁹ According to Parks & Rec, the Performance and Analytics Department surveyed participants in the Come Play Outside initiative over the summer. The Performance and Analytics Department completed this analysis shortly before this audit report was published.

programming across the City can help guide programming decisions across the organization.

Other municipalities have strategic plans with equity metrics that assist decision-makers in providing quality recreation programs for their diverse communities.

The City of Sacramento's Department of Youth, Parks, & Community Enrichment (Sacramento) has adopted a five-year strategic plan, with annual updates to inform on the status of its performance measures. The plan aims to prioritize the delivery of parks, facilities, and services that support, enhance, and empower its residents, including residents of different ethnicities, cultures, and people of different abilities, interests, and incomes. The strategic plan includes a framework with goals, objectives, performance measures, and strategic directions, as shown in **Exhibit 6**. These elements are intended to help the department secure resources and support so that it can deliver quality recreation experiences to its communities.

Exhibit 6

The City of Sacramento's Department of Youth, Parks, & Community Enrichment Created a Strategic Plan with Goals, Objectives, Performance Measures, and Strategic Directions

Goal 03 Promote lifelong recreation and learning.

OBJECTIVE **3.1** *By 2020, increase in participation by diversifying and or marketing the numbers and types of social and recreational programs, enrichment classes and sports for adults and seniors*

PERFORMANCE MEASURES

- # of participants in recreation programs annually (by category, e.g., families, young adults, 50+ adults, people with disabilities and targeted underserved groups)
- % of participants by age and ethnic diversity in comparison to City demographics
- #'s of different programs offered annually by core service area (e.g., aquatics, access leisure, cultural and fine arts, environmental education and nature interpretation, special interest, sports and fitness, and Camp Sacramento).
- % of repeat participants who have been involved in 1-3 other programs, or more than 3 programs

STRATEGIC DIRECTIONS THAT SUPPORT THIS OBJECTIVE

- 1.1** Expand access to programs and services that support youth development, safety and health.
- 3.1** Provide programs, services and events to support lifelong learning for all ages.
- 3.2** Plan, manage and regularly evaluate the delivery of programs, events and services.



Source: City of Sacramento Youth, Parks, & Community Enrichment Department Strategic Plan.

Similarly, the City and County of San Francisco’s Recreation and Parks Department (San Francisco) also has a five-year strategic plan. San Francisco updates this plan annually, and the plan establishes initiatives and objectives that guide decisionmakers in ensuring that everyone, including people in disadvantaged communities, has access to recreational programs and services. As part of its strategic plan, San Francisco uses equity zones—which are identified as census tracts that scored high across various inequity characteristics—to prioritize resources in these communities relative to the rest of the city and county. As shown in **Exhibit 7**, San Francisco measures its progress in addressing equity by comparing data from its equity zones to the rest of the city on various recreation initiatives. According to San Francisco, this approach allows it to prioritize funding and resources in equity zones to improve recreational equity.

Exhibit 7

The City and County of San Francisco’s Recreation and Parks Department Compares Data from Its Equity Zones to the Rest of the City to Measure Its Progress in Addressing Equity

EQUITY METRICS WITH FY19 DATA				
DEMOGRAPHICS		Equity Zone	Non-Equity Zone	City as a Whole
	Population	178,000	712,000	890,000
	% of Population	20%	80%	100%
METRICS				
PARK ACCESS	Number of Parks	89	130	219
	% of Parks	41%	59%	100%
	Number of Parks / 1,000 People	.5	.18	.25
	Park Acreage	671	2,603	3,274
	% of Park Acreage	20%	80%	100%
	Acres of Park / 1,000 People	3.8	3.7	3.7
SAFETY	SFPD Incidents within 500’ of Parks / 1,000 People	30,508	22,668	53,176
	% of Incidents within 500’ of Parks	57%	43%	100%
MAINTENANCE	Park Evaluation Scores	91%	92%	92%
	Maintenance and Repair Requests Completed	91%	91%	91%
INVESTMENT	Capital Investment / 1,000 People	\$161,251	\$33,032	\$58,675
	% of Capital Investment	55%	45%	100%
VOLUNTEERS	Recreation Volunteers Hours / 1,000 People	130	61	75
	Park Volunteers Hours / Acre	19	35	32
	% of Total Volunteer Hours	28%	72%	100%
RECREATION	Hours of Recreational Resources / 1,000 People	894	343	1,237
	% of Recreational Resources	72%	28%	100%
	Scholarships Granted / 1,000 People	4.7	.6	1.4
	% of Scholarships	66%	34%	100%
KIDS & NATURE	Outdoor Recreation Registrants 18 and Under	743	2,407	3,150
	% of Outdoor Recreation Registrants 18 and Under	24%	76%	100%

Source: City and County of San Francisco, Recreation and Parks Department, 2020–2024 Strategic Plan Update.

Denver's strategic plan notes that focusing on equitable distribution of resources and programming throughout the city, especially for currently underserved communities, will help support healthy and cohesive communities. As such, the strategic plan contains equity-specific strategies and recommendations to help address equity concerns. Some of these strategies include to:

- Set and achieve target service levels for facilities and programming that ensure equity; and
- Identify and focus park and programmatic resources in underserved neighborhoods.

Like San Francisco, Denver uses equity maps with demographic indicators, such as ethnicity, race, and household income, to assist with decision-making. Denver's strategic plan notes the importance of prioritizing unmet recreational needs in high-need neighborhoods. Therefore, Denver uses these maps, along with data, to guide recreation programming and capital investment decisions.

Other cities coordinate equity-driven initiatives through a central department or office.

We found that other cities coordinate strategic planning and performance management efforts focused on race and equity through a central department or office. For example, San Francisco's Office of Racial Equity has the authority to enact a Citywide Racial Equity Framework and to direct departments to develop and implement mandated Racial Equity Action Plans (REAP). In December 2020, and in response to this mandate, San Francisco's Recreation and Parks Department completed the first phase of its REAP. The plan contains metrics for current conditions as well as impacts, goals, and objectives resulting from changes made within programs or policy. Initiatives from the REAP will be incorporated into San Francisco's Recreation and Parks Department's updated FY2022–FY2026 Strategic Plan.

In the City and County of Denver, the Mayor's Office of Social Equity and Innovation works with city agencies and departments to advance systems, policies, and practices that sustain equity and social justice. The office oversees the effort to improve policy, service delivery, and equitable distribution of resources. As part of this effort, each city department and agency must

develop an Equity Plan and include goals and strategies to eliminate inequity and social injustices from their systems, policies, and practices. In 2019, Denver published its *Game Plan for a Healthy City*, a strategic master plan providing a roadmap for the future of parks, facilities, and recreation programs. Equity is one of the plan's core guiding principles, and one-quarter of the plan's overarching goals concern ensuring equity in the distribution of parks, resources, and programming.

The City of Austin's Equity Office was created in 2016 to focus on advancing equity in all aspects of city operations. The Equity Office built an Equity Assessment Tool, which is a self-assessment where each department examines its policies, procedures, planning, programs, personnel, and budgeting through a lens of equity. Austin's Parks and Recreation Department completed its first assessment in 2017 and developed an Equity Action Plan, including action items and performance measures, as part of this effort. As of July 2021, the City of Austin's Parks and Recreation Department was in the process of hiring an equity program manager to focus its ongoing efforts toward addressing equity and coordinate those efforts with the central Equity Office.

In San Diego, the City's Office of Race and Equity was established in FY2021 to advance racial and social equity through initiatives that reduce and eliminate systemic racism and barriers to the fair distribution of resources, access, and opportunity. The office intends to drive change within the City organization and achieve the City's goal of providing services equitably to all residents. The office is still relatively new and in the process of developing a tactical plan that defines its vision, mission, goals, objectives, and key performance indicators. The City's first Chief Officer of Race and Equity began leading the office in August 2021. This new function within the City presents an opportunity for collaboration between Parks & Rec and the Office of Race and Equity to focus future recreation programming efforts toward achieving more equitable outcomes.

Parks & Rec will likely need significant resource investments to improve recreation programming equity and resolve the issues we identify in this report.

We found that Parks & Rec would benefit from identifying resource needs. Parks & Rec indicated that it has begun making efforts to address some of the issues discussed in this audit report. As part of these efforts, Parks & Rec management acknowledged the need to leverage the knowledge and expertise of other City departments, including the new Office of Race and Equity and the Performance and Analytics Department. Beyond leveraging existing resources, Parks & Rec management also indicated that additional resources are necessary to implement the recommendations we make throughout this report. For example, assessing community needs, funding programs more equitably, expanding fee waivers, improving marketing, and conducting data analysis are all efforts that will require resources. However, the precise extent of Parks & Rec's resource needs to achieve the recommendations in this report are currently unknown.

According to the Government Finance Officers Association (GFOA), strategic planning is focused on aligning resources to bridge the gap between present conditions and the envisioned future. **Importantly, even though the vision should be balanced with available resources, the resources available should not inhibit the vision.** Therefore, GFOA recommends the preparation of a long-term funding strategy as an important complement to a strategic plan. Such a strategy involves financial planning to allocate finite resources—including money, employees, and equipment—over time to achieve the broad goals set up through the strategic planning process. GFOA also recommends that policymakers formally approve a strategic plan so it can provide the context for policy decisions and budget decisions. Therefore, Parks & Rec would benefit from developing a strategic plan to address recreation programming equity that includes financial planning and an analysis of resource needs.

Recommendation 1

To ensure a formalized approach for obtaining recreation programming feedback from the community at-large, the Parks and Recreation Department should:

- Develop, document, and implement a process for conducting a community needs assessment that includes identifying the types of programs communities need, satisfaction levels, effectiveness, and recreation priorities, and demographic information such as race, income, education level, age, etc.; and
- Conduct this assessment at least every five years to re-evaluate the data and update strategic plan efforts.
(Priority #1)

Recommendation 2

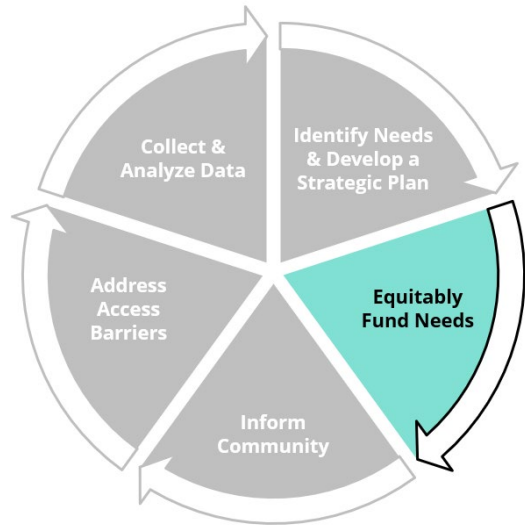
Once the Parks and Recreation Department (Parks & Rec) completes a community needs assessment, it should develop a strategic plan for addressing recreational equity that:

- Defines Parks & Rec's vision for equitable recreational programming;
- Includes objectives and goals with performance measures to gauge progress;
- Identifies resource needs to implement:
- The goals and objectives of the strategic plan;
- The recommendations in this audit report; and
- Any other strategies Parks & Rec plans to pursue to improve recreation programming equity;
- Requires Parks & Rec to annually update progress on its performance measures; and
- Requires Parks & Rec to update its objectives, goals, and performance measures every five years and incorporate findings from the community needs assessment.

Parks & Rec should present the strategic plan to the City Council for approval. (Priority #1)

Finding 2: The Parks and Recreation Department’s approach to resource allocation and program quality is incomplete and limits its ability to provide equitable recreation programming.

After identifying each community’s programming needs, efforts to address those needs should be funded equitably. We found large funding disparities between recreation centers in the northern part of the City, Community Parks I Division (CPI), and those in the southern part of the City, Community Parks II Division (CP II). Recreation centers in CPI offer twice as many programs and have twice as many participants as those in CP II.



Funding and programming disparities are even more significant when broken down by Council District and are primarily based on the occurrence of contracted programs. In 2019, almost all contracted programs took place in CPI. Recreation centers without a history of contracted programs—such as those in CP II—may find it challenging to establish these programs without additional General Fund investments. The Parks and Recreation Department (Parks & Rec) also lacks a comprehensive process for assessing program quality to ensure quality is comparable across recreation programs Citywide.

Therefore, to address inequities, Parks & Rec can take action to more equitably fund current program offerings, use data-driven budgeting, measure quality in a comprehensive manner, and fully recover the City’s costs for contracted programming.

Disparities in funding and in the availability of contracted programs lead to inequities in recreation programming.

Parks & Rec offers two types of recreation programs: staff-run and contracted. As mentioned in the Background, staff-run programs are offered by City employees and are heavily subsidized by the General Fund. In contrast, contracted programs are run by third-party contractors and are paid for by program participants.¹⁰ Fees from contracted program participants are collected and expended by each recreation center’s Recreation Center Fund (RCF).

¹⁰ Income-qualified participants can apply for a fee waiver to waive the surcharge of \$2.75 per person per meeting that is assessed on contractual programs. In addition, as discussed later in this finding, we found that the program surcharges may not be recovering the full General Fund cost of administering contracted programs.

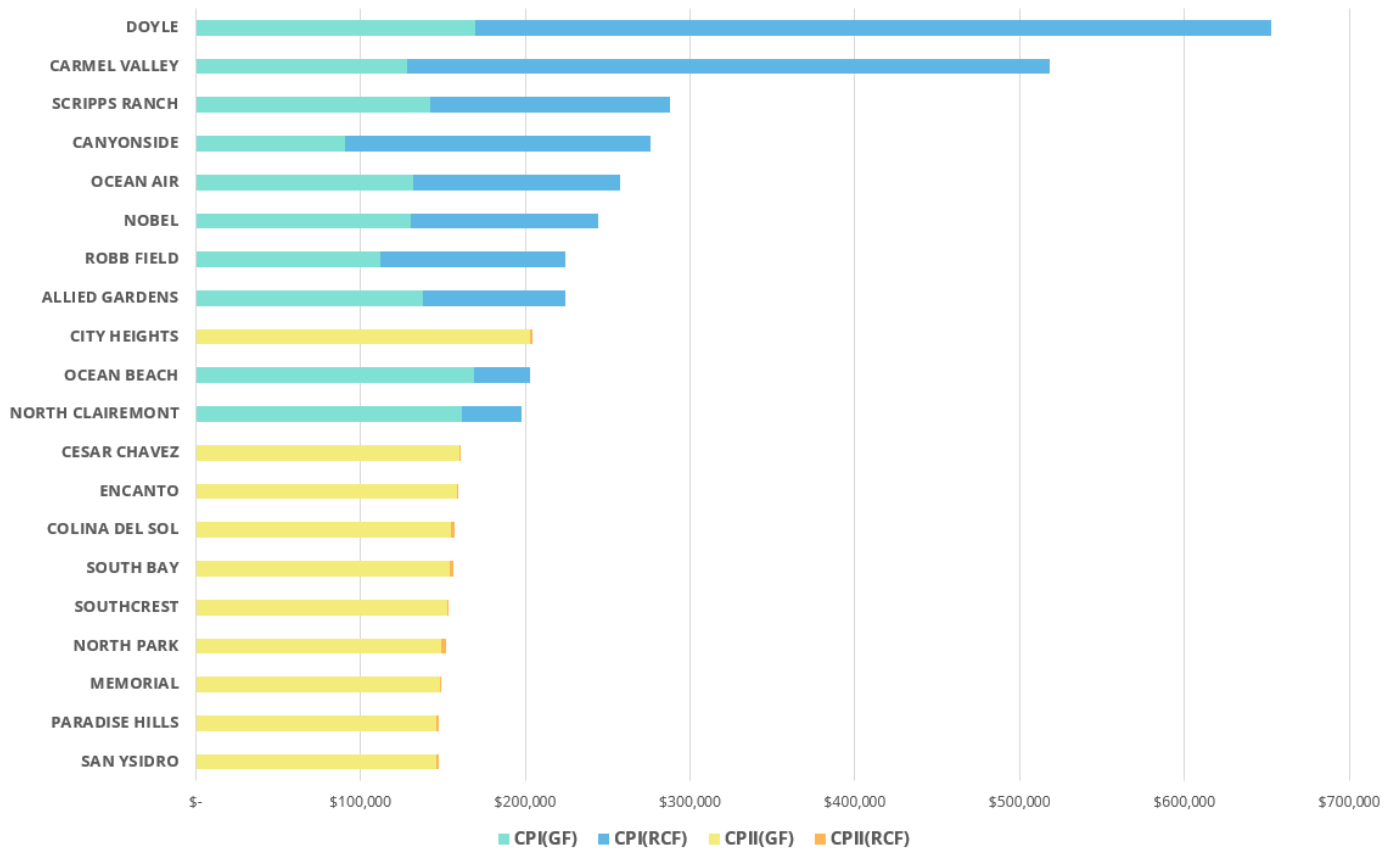
While recreation centers can offer both types of programs, there is a disparity between recreation centers in Community Parks I Division (CPI) and Community Parks II Division (CPII) in terms of the number of each type of program offered. On average, recreation centers in CPI spent \$193,514 on programming per year, 47 percent more than the average of \$131,827 in CPII.¹¹

Exhibit 8 below illustrates the disparity by listing the top ten recreation centers in CPI and the top ten recreation centers in CPII in terms of total programming expenditures, which are broken down by spending through the General Fund or the center's RCF. In CPII, recreation centers are reliant almost entirely on the General Fund, as shown by the yellow bars. In CPI, there is a mix of programs paid for by the General Fund and programs paid for by participants; there are even some recreation centers that spend over twice as much on contracted programs as they do on staff-run programs.

¹¹ Programming expenses in CPI totaled \$5,611,896 across 29 recreation centers. Programming expenditures in CPII totaled \$2,900,203 across 22 recreation centers. Refer to **Appendix C** for a complete list of all recreation centers, programming expenses, and programmable space by Council District and Community Parks Division.

Exhibit 8

Current Spending on Recreation Programming is Higher in CPI than in CPII



Note: Spending amounts only reflect General Fund wages and RCF contract expenditures. Other expenditure categories were omitted because they were accounted for differently across CPI and CPII fund centers and because the purpose of some RCF expenditures was unclear (e.g., programming vs. maintenance).

Note: Refer to **Appendix C** for a complete list of all recreation centers, programming expenses, and programmable space by Council District and Community Parks Division.

Source: OCA generated based on SAP.

Parks & Rec noted programming at some recreation centers is constrained by the availability of facilities, including rooms and park acreage.¹² We accounted for this by dividing expenditures by recreation center square footage and completed the analysis again. We found that recreation centers in CPI spent 46 percent more per square foot than in CPII (\$17.17 vs. \$11.74), indicating

¹² While facilities provide the necessary space for recreation programs to take place, our review excluded facilities because other efforts focused on park and recreation facilities, including the adoption of the City's new [Parks Master Plan](#), were underway at the time of our review.

that funding disparities are significant even when accounting for differences in facility capacities.^{13,14}

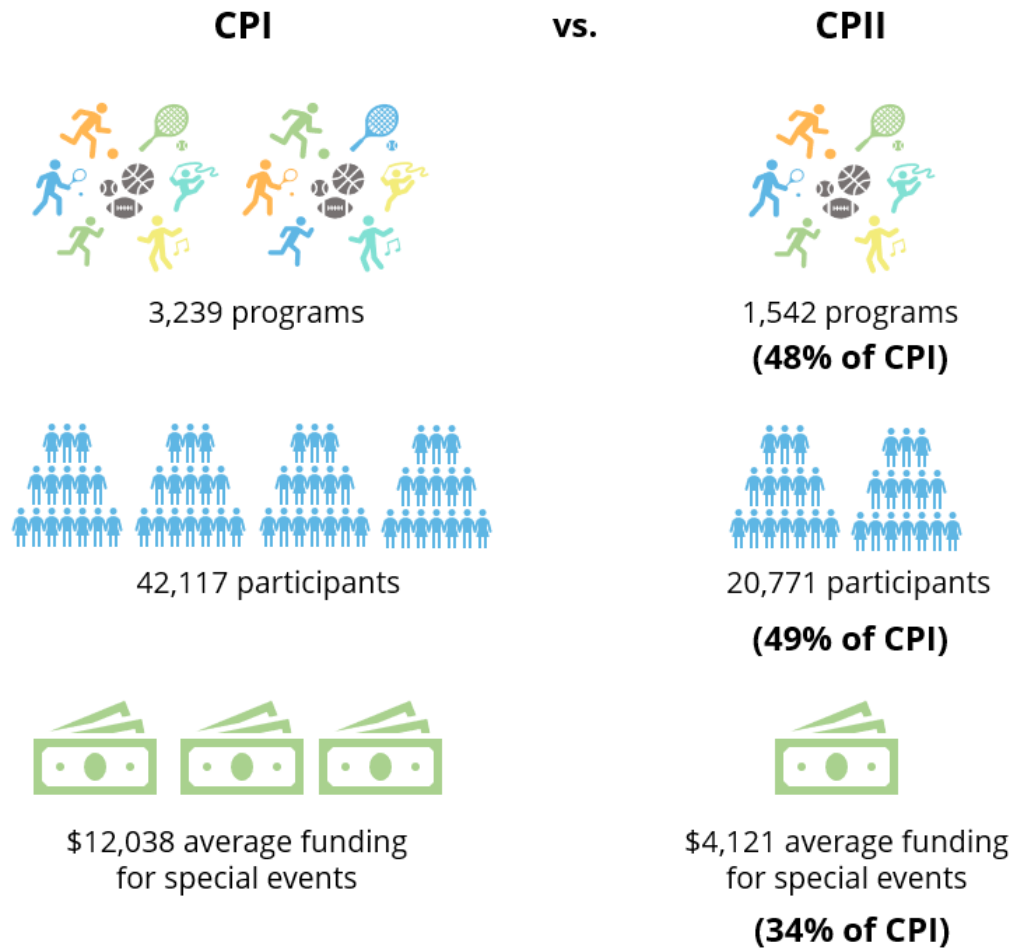
Staff in CPII indicated that, although they want to bring more contracted programs to CPII, they cannot because they believe community members are unable to pay. Thus, according to Parks & Rec's Equity Report, in 2018 there were over twice as many programs in CPI as there were in CPII. **Exhibit 9** shows the breakdown of the number of programs, number of participants, and the amount of money (on average) spent on special events in the two recreation divisions. Programs in CPI have a one-to-one ratio in terms of staff-run programs to contracted programs (49 percent to 51 percent), while programs in CPII are almost entirely staff-run (98 percent).

¹³ We used the recreation facility square footage and park acreage information noted in the Parks and Recreation Department's 2019 Equity Report.

¹⁴ Recreation facility square footage and park acreage may not denote how much of this space is available for recreation programming or permitted events. Not all the square footage in a building or acreage of parkland can be used for programming.

Exhibit 9

Recreation Centers in CPI Offer Twice as Many Programs and Have Twice as Many Participants as Those in CPII



Note: The number of programs in this graphic reflect those recorded in ActiveNet, which requires participants to register for the program. In addition to these programs, Parks & Rec offers a number of drop-in programs (e.g., Teen Centers, homework assistance, open gym, etc.) that do not require or capture participant registration. Drop-in programs occur in both CPI and CPII. While Parks & Rec stated that drop-in programs are more common in CPII, we could not verify this because drop-in programs are not recorded in ActiveNet.

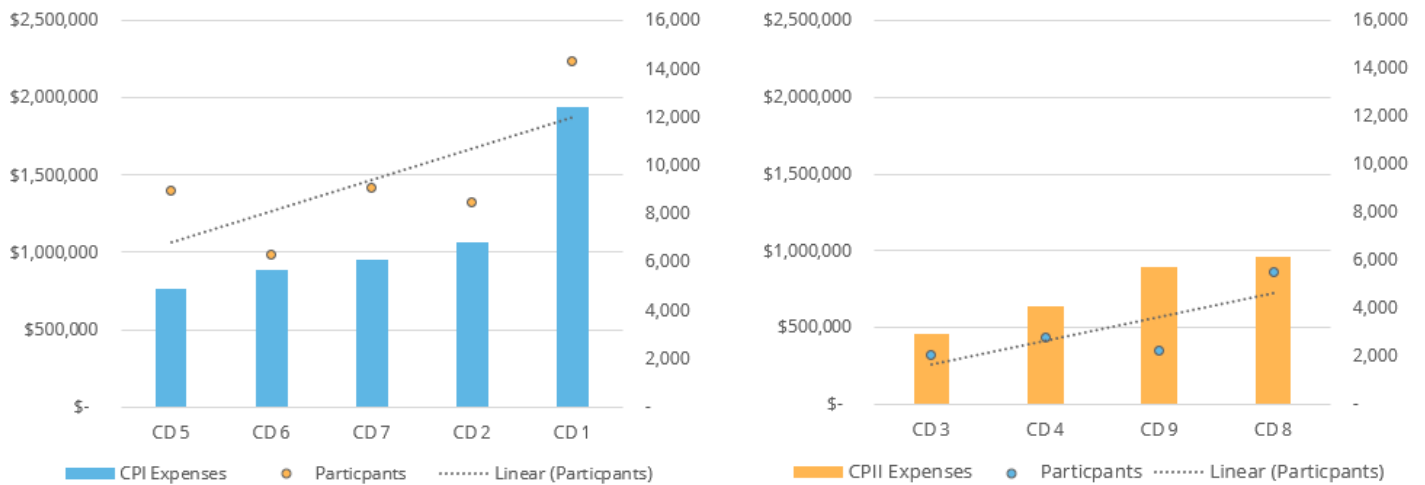
Source: OCA generated based on 2019 Parks and Recreation Equity Report and RCF Budgets.

The disparity in spending, programming, and participation becomes even more stark when comparing Council Districts. As shown in **Exhibit 10**, the Council Districts with the lowest spending (District 3 and District 4) spent less than \$650,000 in

2019,¹⁵ while the highest two (Districts 1 and 2) spent over \$1 million each. In addition, the exhibit illustrates that spending and participation are related; as spending increases, so does the number of participants.

Exhibit 10

Spending and Participation Vary by Council District



Note: Refer to Appendix C for a complete List of All Recreation Centers, Programming Expenses, and Programmable Space by Council District and Community Parks Division.

Source: OCA generated based on 2019 Parks and Recreation Equity Report and data from SAP.

Funding disparities are primarily based on the occurrence of contracted programs and are exacerbated by missed revenue opportunities.

Recreation centers without a history of contracted programs may find it challenging to establish these programs, grow program offerings, and expand participation without additional General Fund investments.

In 2019, 98 percent of expenditures on contractual programs occurred in CPI. According to Parks & Rec management, staff at all recreation centers may propose new contracted programs regardless of the recreation center’s current RCF balance and so long as the proposed program projects enough revenue to cover the program’s costs. However, staff at recreation centers in CPII informed us that, although they have pursued contractual programs in the past, they have been unable to set any up due to a lack of interest from contractors.

¹⁵ District 3 includes two rec centers managed by Developed Regional Parks and those are not accounted for here. Therefore, actual spending is somewhat higher.

In addition, management believes many residents in the areas with less contractual programs are unable or unwilling to pay the costs necessary for contracted programs, but also acknowledged there is not enough information on these communities' willingness to participate in higher fee programs. In this regard, the Come Play Outside Initiative indicated there is some interest from both the community and contractors in bringing and using contracted programs in CPII, but the results are still being analyzed to understand the extent to which this is viable.¹⁶ Since the portion of the RCFs generated by contracted recreation programs are restricted for use in the geographic area where the program takes place, those funds cannot be transferred from one geographic area to another to help provide contracted programs in areas that do not currently offer them.¹⁷ Therefore, expanding the availability of contracted programs in CPII may require additional General Fund investments to fund fee reductions or waivers, which is discussed in more detail in Finding 4.

Program surcharges may not be recovering the full cost to the taxpayer of providing contracted programs. The full cost of contracted programs includes not only the fee that goes to the contractor, but also staff-time. The Recreation Equity Report states that participants pay the full cost of contracted programs. To achieve this, Parks & Rec collects a registration fee, which includes a surcharge of \$2.75 per person per meeting that goes to the General Fund,¹⁸ and a surcharge that goes to the Recreation Center Fund. Parks & Rec informed us that the surcharge that goes to the Recreation Center Fund varies

¹⁶ The Performance and Analytics Department completed this analysis shortly before the audit report was published.

¹⁷ According to Council Resolution R-313105, which was adopted in 2020, the City of San Diego is authorized to spend money generated from permit revenue outside the geographic area in which it was generated. In our benchmarking with other parks and recreation agencies, none indicated currently operating geographically restricted special revenue funds such as RCFs.

¹⁸ Revenue from the General Fund program surcharge totaled approximately \$282,000 in 2019.

between 10 and 20 percent, depending on the recreation center, and pays for program-related expenses.^{19,20}

The most recent Parks & Rec User Fee Study, completed in 2020 by a consultant, did not include a calculation of either program surcharge because of timing issues with the transition from Recreation Councils. Therefore, Parks & Rec currently does not know to what extent the City is recovering the cost of providing contracted programs.²¹ We note that it may be possible to increase the surcharge and associated revenue, as staff indicated the surcharge most likely offsets some but not all of the costs associated with providing contracted programs. If this is the case, recovering more of the City's cost would provide additional funding for recreation programming.

Parks & Rec has started distributing funds more equitably and can take additional measures to further improve.

Parks & Rec's personnel costs demonstrate an increasing shift towards equitable distribution. As shown in **Exhibit 11**, personnel costs for recreation staff at recreation centers across the City shifted from generally equal spending, on average, to more spending at recreation centers within CPII. Between 2016 and 2018, the difference in General Fund recreation center spending between divisions never surpassed \$7,000. However, by 2020, this gap increased to about \$12,500.²²

¹⁹ We were told this variation remains from when the funds were controlled by Recreation Councils and that Parks & Rec is working to standardize this fee at 15 percent.

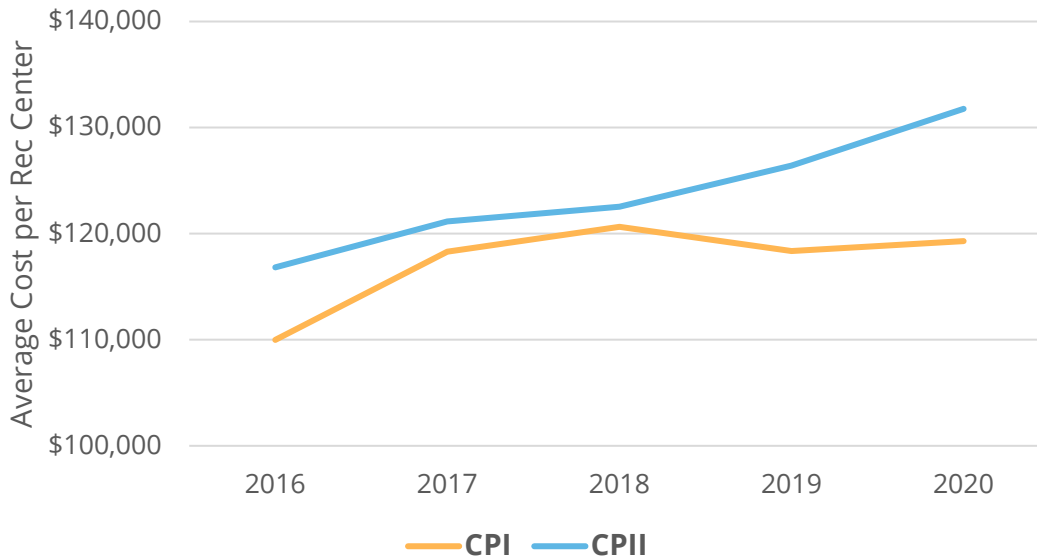
²⁰ The City of Dallas and the City of Sacramento employ a 70/30 split when working with program contractors. This means that the contractor sets a fee and retains 70 percent of that fee, while the city gets the remaining 30 percent. Parks & Rec management indicated that it retains around 30 percent of the registration fee (approximately 14 percent in the Recreation Center Funds and 16 percent in the General Fund).

²¹ According to Parks & Rec management, both program surcharges meet the requirements of Proposition 26, which prohibits charging more than the cost of operating the program.

²² In 2021, this gap reached \$23,000 in favor of CPII, but the COVID-19 pandemic was a confounding factor. Many recreation centers were closed for a majority of the year, which could lead to wide variance in the amount of expenditures by recreation center. Spending on hourly wages decreased 51 percent in CPI but only 20 percent in CPII.

Exhibit 11

Average General Fund Wage Expenditures for Recreation Center Operations



Source: OCA generated based on data from SAP.

Including a more data-driven approach could address inequities.

Parks & Rec’s budget is largely based on the prior year’s allocations; adjustments are made to account for changes such as special initiatives, new programs, inflationary increases, and staffing reductions. According to the GFOA, using a data-driven approach improves the budgeting process to ensure equitable outcomes. Maintaining current budget practices presents a risk that resources could be misaligned. For example, it is possible that recreation centers located in areas with a higher ratio of contractual programs to staff-run programs—and with more than a minimum staffing level—are not being identified for possible staffing reductions, while those in areas with a smaller ratio are not being identified for staffing increases.

Department management informed us that outside of one-time funding discussed below, Parks & Rec does not include data-driven equity metrics in any funding or staffing allocation. According to the National Recreation and Parks Association’s report titled *Diversity, Equity, and Inclusion in Parks and Recreation*, 38 percent of agencies surveyed have established recreation programming policies around diversity, equity, and inclusion (DEI). Additionally, 25 percent of these agencies have DEI policies

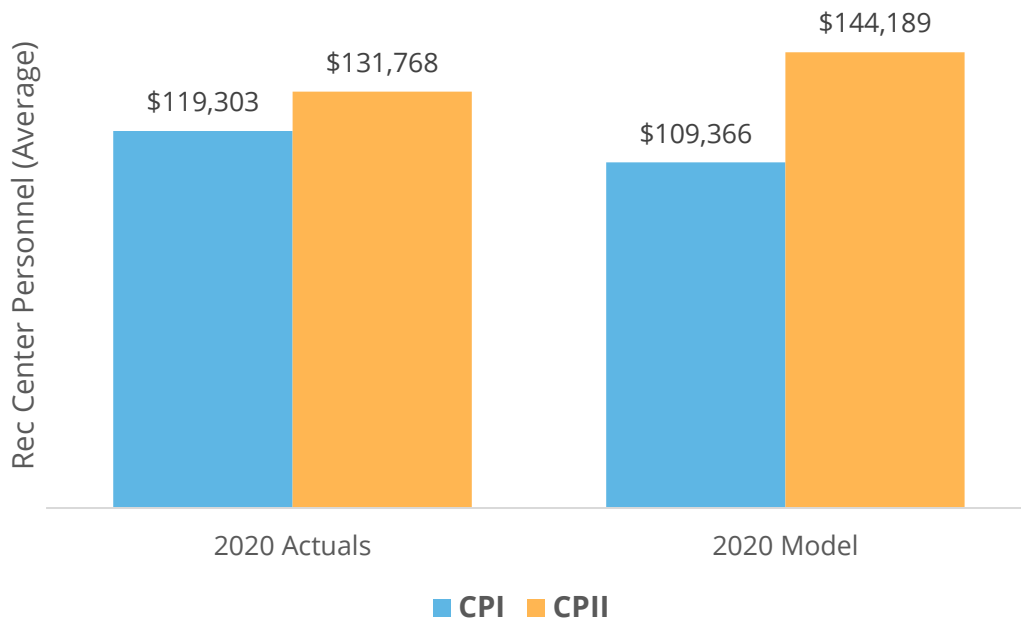
around organizational structure or operations, and 14 percent have formal, established DEI policies around investment or funding.

The City of Minneapolis' Parks and Recreation Department (Minneapolis) recently created an equity matrix to make its resource allocation more equitable and make data-driven budgetary decisions. The matrix provides a baseline to keep all recreation centers operational and spreads additional funding to different recreation centers: community-specific characteristics (e.g., health metrics, income, vehicle access) drive 50 percent of the funding, and site-specific characteristics (e.g., number of visitors, programs, amenities) drive the rest. Although we acknowledge that any such model needs fine tuning to each jurisdiction, we loosely applied this model to Parks & Rec and found a potential shift of nearly \$300,000 in personnel expenditures from CPI to CPII.²³ **Exhibit 12** below shows average personnel expenditures by recreation center in CPI and CPII. Actual spending in FY2020 was fairly even; however, when the model is applied, there is a difference of over \$34,000, on average, between recreation centers in CPI and CPII.

²³ Since Parks & Rec does not budget for each recreation center, the model is based solely on General Fund personnel costs reported by Org Unit.

Exhibit 12

Applying an Equity Matrix Funding Model Results in a Large Funding Shift



Source: OCA generated based on Census Bureau data, City of San Diego budget information, and ActiveNet.

Shifting funding between divisions may help but would not solve inequities on its own.

Additional funding for personnel costs in CPII would potentially allow for more staff-run programming, but would not necessarily provide opportunities for contracted programs in areas with small RCFs. Therefore, shifting personnel funds between CPI and CPII would likely not address programming inequity on its own. This is because, according to the City Charter, personnel funds cannot be used for non-personnel expenditures. So, for example, any extra personnel funds identified in CPI through an equity-based resource allocation model could not be used to directly fund contracted classes in CPII. Instead, Parks & Rec might consider using any excess personnel funds to hire specialized staff with the ability and experience to lead the types of recreation programs that are often contracted.

Other parks and recreation agencies have taken this approach. In San Francisco, for example, the Recreation and Parks Department hires specialized recreation leaders and assigns them to lead recreation programs across the city and not just in one particular recreation center. Parks & Rec could consider

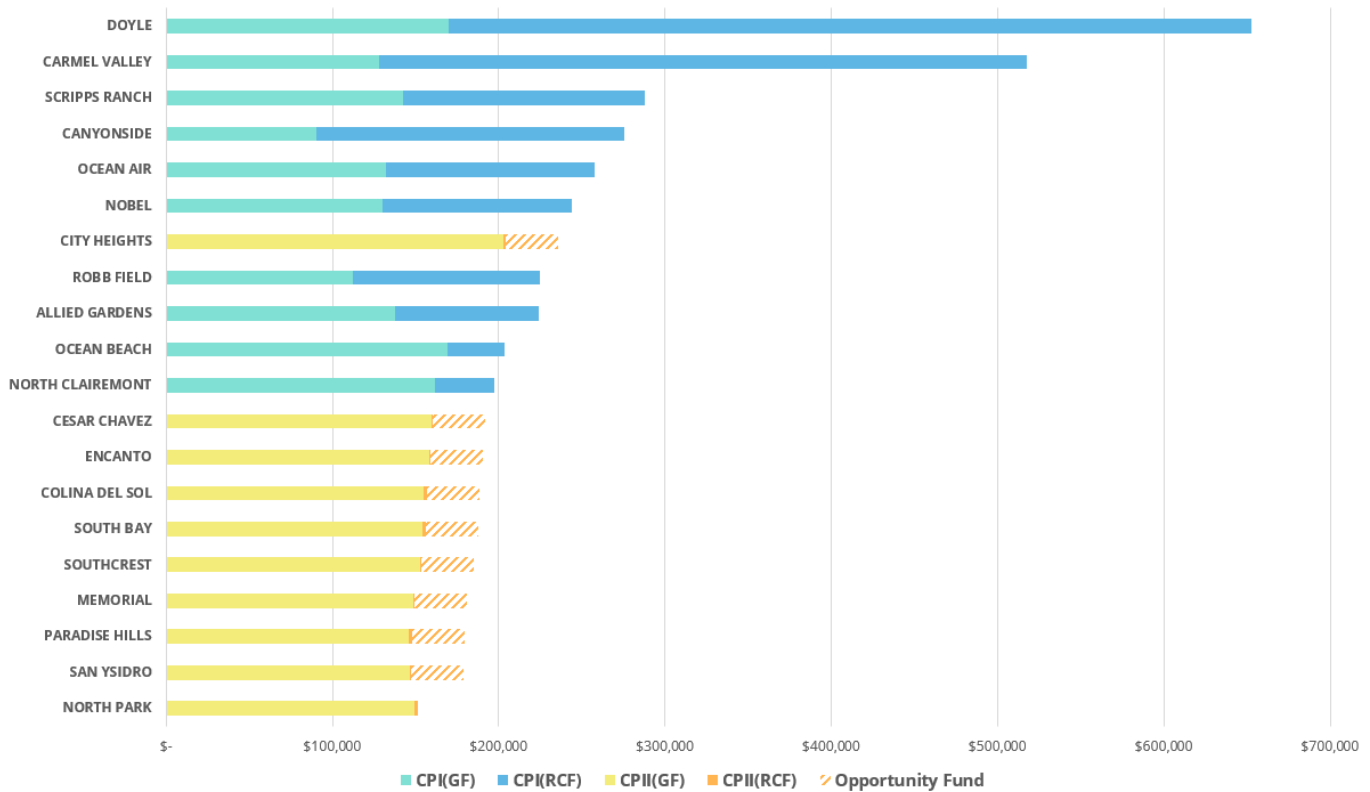
taking a similar approach with existing personnel funds and assign those specialized recreation professionals in areas of the City that would otherwise not be able to provide specialized programming through an RCF. Parks & Rec management noted that, although they have previously considered this strategy, creating new classifications for recreation professionals would require coordination with the Personnel Department and would likely require salary increases for supervisors above the new classifications.

Over the past year, Parks & Rec took steps to increase funding for specialized programs in CPII. First, the department secured one-time grant funding for the Come Play Outside Initiative, which took place in Summer 2021.²⁴ Under this initiative, recreation centers received funding to either expand staff-run programming or provide contracted programs to participants at a subsidized rate. Staff indicated generally positive results from the extra funding in terms of increased participation and program variety. In addition to this initiative, Parks & Rec is developing an Opportunity Fund to help fund equity-based programs. The Opportunity Fund would be made up of revenues generated from a surcharge on permits for fields and recreation facilities. The details are still being finalized, but Parks & Rec estimates that the Opportunity Fund will provide an additional \$600,000 per year to expand programming in Communities of Concern. Parks & Rec is in the process of proposing the Opportunity Fund to the City Council for approval. **Exhibit 13** below shows that the Opportunity Fund would narrow the gap, but most of the recreation centers receiving this funding would still fall below the highest funded centers: eight of the top nine funds would still be in CPI (all but City Heights), and the top two funds still far surpass any recreation center from the Southern part of the City.

²⁴ Funding for this program came primarily from the County of San Diego, the San Diego Parks Foundation, the San Diego Foundation, and Price Philanthropies.

Exhibit 13

Additional Funding Opportunities May Narrow the Gap between CPI and CPII



Note: Since Parks & Rec is currently creating a plan to use Opportunity Fund revenues, these estimates are based on a \$600,000 projected revenue distributed equally among the 19 recreation centers that received Come Play Outside funding.

Source: OCA generated based on data from SAP.

Parks & Rec could use this fund in a similar way to the Come Play Outside Initiative, allowing residents to attend contracted programs for a reduced rate. This strategy would allow Parks & Rec to collect some of the money back from participants who are able to pay, which would allow the money to go even farther.²⁵ In addition, this could let low-income families who live outside of Communities of Concern to attend the contracted programs in their area for a lower price. Parks & Rec provided a timeline that shows when it expects feedback from the Mayor’s Office and from the community, but did not state a starting point on how to best use the fund.

²⁵ The Come Play Outside Initiative collected over \$95,000 in program fees beyond the grant money received by Parks & Rec.

Staff-run and contracted programs likely provide different levels of quality, which is not systematically monitored by department staff.

Although all recreation centers offer staff-run programs, not all offer contractual programs—which means not all communities can access the same quality of programs.

Unlike CPI, where many recreation centers offer contractual programs based on requests from the community and their willingness to pay the full cost for those programs, CPII generally must rely on staff to deliver programs. This is because, according to Parks & Rec, households in CPII may be unable to bear the cost of contractual programs. According to staff, recreation centers that provide only staff-run programs—such as those in CPII—are limited by staff capabilities when deciding which programs they can offer. While understandable, this approach may not result in programming that reflects community needs. Additionally, because contractual programs are generally taught by instructors with a high degree of experience or specialized training, staff noted that the quality of programs in CPI and CPII differ, with the former being able to provide higher quality programs.

Despite the differences in the quality of staff-run and contractual programs, Parks & Rec does not have a comprehensive process in place to assess or otherwise measure program quality.²⁶ Although the City's resident satisfaction surveys capture the extent to which residents are satisfied with the quality of recreation programs, due to the survey design issues noted in Finding 1 and because the surveys did not actually measure program quality but rather residents' opinions about it, Parks & Rec may not be able to rely on this information to accurately assess the quality of its recreation programs.²⁷ Instead, an assessment focused on objectively measuring program quality based on data, metrics, and other indicators can demonstrate

²⁶ According to management, Parks & Rec has always considered two indicators to measure the success of recreation programs: program enrollment and customer satisfaction. However, Parks & Rec management acknowledged that staff do not conduct a formal life cycle analysis for programs, which could include analysis over time, comparisons with other recreation centers, interviews with staff, and observation of program operations.

²⁷ The 2015 satisfaction survey indicated that 51 percent of survey respondents were either very satisfied or satisfied with the quality of recreation programs; this percentage increased to 57 percent in 2018. These totals do not include respondents who answered "Don't Know" when asked to rate their satisfaction with the quality of recreation center programs and classes, which may be indicative of people who may have participated previously but no longer do or people who have never participated. Including "Don't Know" answers lowers the rate of satisfaction to 33 and 35 percent, respectively, in the 2015 and 2018 surveys.

whether staff-run and contractual programs are generally on par with each other in terms of quality.

The City of Austin's Parks and Recreation Department (Austin) uses a program assessment designed by the Forum for Youth Investment's David P. Weikart Center for Youth Program Quality to assess the quality of its recreation programs.²⁸ According to Austin, conducting these assessments helps ensure that the quality of programs is consistent across the city.

By improving program quality (i.e., instruction, content, context), agencies can increase engagement, skills, and eventually the outcomes associated with recreation. Moreover, because recreation provides youth with learning opportunities beyond the classroom, the quality of recreation programs can affect social disparities. Therefore, ensuring that staff-run and contractual programs consistently provide the same level of quality throughout the City is essential to equitable recreation programming.

The disparity in number and quality of programs may contribute to different outcomes in mental and physical health, social and familial ties, and public safety.

The large number of contracted recreation programs could result in the privatization of the recreation sector. In general, privatization of government resources can harm poor individuals and families by the creation of parallel systems that are separated and not equal to each other. If there are budget cuts to the parks system as a whole, this quasi-privatized system can survive on private donations and user fees, while the public system loses funding and the ability to continue operations.

If communities that rely solely on the City for recreational opportunities are not provided equitable funding and programming, they do not have access to the same quality and scope of recreation programs. This diminishes the ability of those communities to fully enjoy the many benefits of recreation, which include strengthened social and familial bonds, improvement of mental and physical health, and measurable decreases in crime.

²⁸ The assessment is done by taking notes, observing activities, and conducting interviews. These are combined to evaluate and score programs on different levels and aggregated to create a program profile. These assessments are used in a larger process to plan for goals and steps, which translate into continuous improvement practices.

Recommendation 3

To fully recover taxpayer money spent on contracted recreation programs, the Parks and Recreation Department should include contracted recreation programs in its next User Fee Study and increase the program surcharge, if necessary, in order to reach 100 percent cost recovery on these programs. (Priority #1)

Recommendation 4

To identify disparities in equitable funding, the Parks and Recreation Department should develop, document, and implement a resource allocation model that will evaluate resource equity between recreation facilities. The model should be based on:

- Community-specific criteria (e.g., health indicators, poverty, transportation access, etc.); and
- Site-specific criteria (e.g., size, frequency of visitors, amenities, etc.). (Priority #1)

Recommendation 5

To monitor the quality of staff-run and contractual programs, the Parks and Recreation Department should develop, document, and implement a comprehensive method for measuring the quality of all recreation programs. This should include training staff to conduct these program quality assessments in a way that is standardized and incorporates notes, observations, and interview data. (Priority #2)

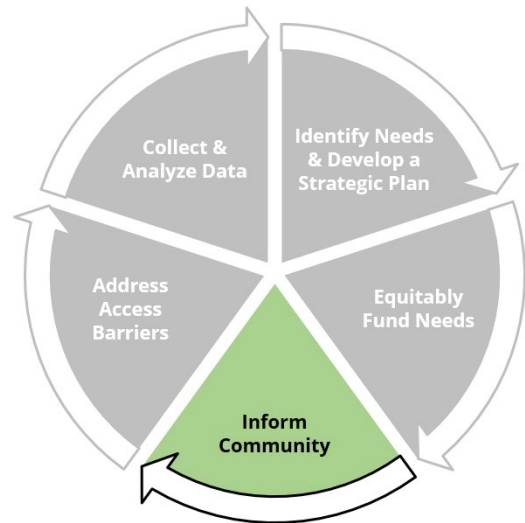
Recommendation 6

To address the resource disparities identified in Recommendation #4 and the disparities in program quality identified in Recommendation #5, the Parks and Recreation Department should develop, document, and implement a plan for directing resources, including any equity-based funding, toward specific steps to eliminate identified disparities. Steps taken to address disparities should:

- Consider using equity-based funding for scholarships that apply to contracted programs;
- Incorporate community feedback;
- Include measurable metrics;
- Report on the effectiveness of the Opportunity Fund in addressing inequities; and
- Be included in any update to the strategic plan developed in response to Recommendation #2. (Priority #1)

Finding 3: The Parks and Recreation Department's approach to community engagement and marketing is decentralized and inconsistent, which results in diminished access to programming.

Informing the community of available programming is another important step toward improving equity in recreation programming. Disparities in the quality and extent of community engagement can impact program participation. We found that the Parks and Recreation Department (Parks & Rec) can improve efforts to increase awareness of its recreation programs by collecting and using demographic data, standardizing marketing efforts, and centralizing some aspects of the marketing process.



The lack of department-wide standards and requirements results in different levels and quality of marketing and outreach.

Parks & Rec has not clearly established requirements for conducting community engagement efforts, which results in varied efforts across recreation facilities. Recreation facilities drive their own community engagement efforts due to a lack of department-wide policies and direction. These efforts result in a wide range of outputs. For example, some staff indicated that they visit schools, approach parents at the recreation center, and attend special events in the community to promote recreation programs at their facility, while others indicated they send flyers to the neighboring school or place banners at the entrance of the recreation facility. Other recreation facilities indicated that staff are expected to canvass in their community. Several staff indicated that they generally have time to do more marketing activities but that they are missing department-level direction on best practices and guidelines. Although area and district managers oversee any ad-hoc community engagement efforts that recreation facilities decide to carry out, because these efforts are decentralized, some communities may be more or less informed than others. As a result, a lack of awareness in recreation programs may increase the disparities in equitable recreation programs.

Other municipalities have more formalized methods for ensuring consistent community engagement and outreach efforts across their city or county. For example, according to the City and County of Denver (Denver), staff are responsible for completing and annually updating community engagement plans, and these plans are tied to their performance reviews. These plans capture community engagement and outreach efforts that staff plan to undertake, such as attending community meetings, school events, and setting up tables outside grocery stores, among others. Denver also indicated it employs community engagement specialists to help staff complete these plans. Similarly, the City of Sacramento (Sacramento) aims to improve external communication and promote recreation services to residents via community engagement plans.

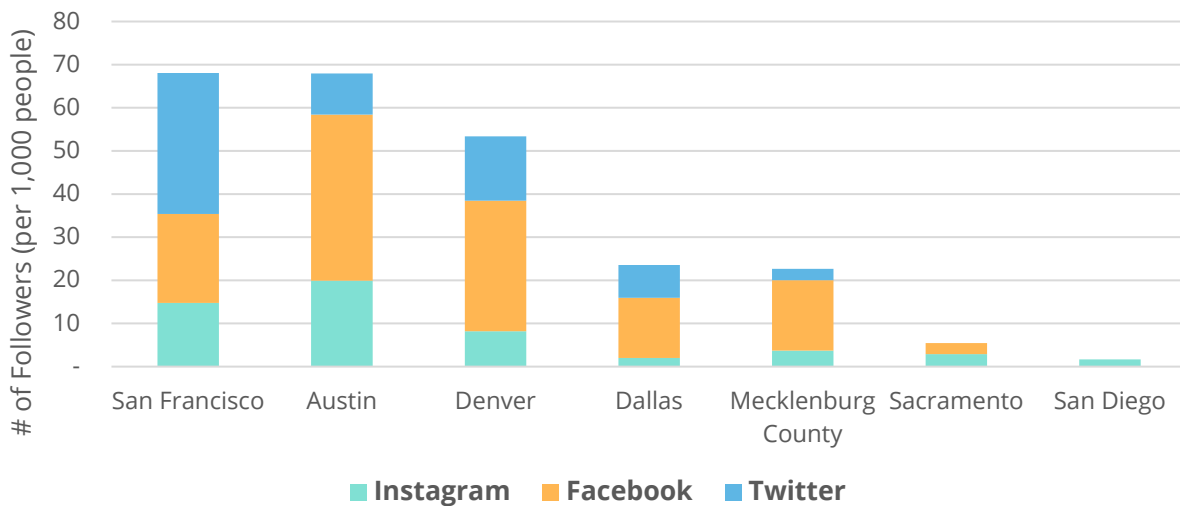
Recreation facilities put different levels of emphasis on marketing, which is led by center staff members with varying degrees of experience. Staff create program brochures and flyers to market programs offered at their recreation centers. However, because staff possess varied levels of marketing expertise, the quality of program brochures and flyers varies across recreation centers. Additionally, staff indicated that marketing, graphic design, and social media training would be helpful. Management indicated staff have not received trainings on brochures recently. Management also indicated having written department guidelines for producing program flyers; while these guidelines have not yet been shared systemwide, management plans to incorporate them in future trainings.

In addition to physical marketing materials, all digital media and information sharing are developed by recreation staff. Staff informed us that recreation centers have an “Instagram Committee” composed of recreation staff that get together every two weeks to plan and create social media content. Swimming pool staff stated that they have a monthly marketing meeting between all pools to share information, and they piggyback on Citywide social media for any posts. Social media posts from recreation facilities are made in partnership with a Public Information Officer (PIO) from the Communications Department, but their involvement is not extensive.

While recreation staff efforts in this area are commendable, we found that Parks & Rec is far behind its peers in terms of social media engagement. Parks & Rec only has one department-specific social media account, and its 2,394 followers ranks it last among our benchmarked cities.^{29,30} Parks & Rec’s followers are less than 10 percent of the followers of recreational agencies in benchmark agencies.³¹ **Exhibit 14** below shows the total number of followers per 1,000 people that each benchmarked agency has on three major social media platforms (i.e., Instagram, Facebook, and Twitter). Although some of these followers might not be unique, the exhibit is still indicative of each agency’s social media engagement more generally.

Exhibit 14:

The City’s Parks and Recreation Department Has Less Social Media Engagement than Benchmark Agencies



Source: OCA generated based on web searches (data is current as of September 21, 2021).

²⁹ Although Parks & Rec management mentioned that the City’s overall social media policy hinders Parks & Rec’s ability to post on its own accounts, we found that other City departments, including the Library and Police Departments, operate their own Facebook pages and Twitter accounts.

³⁰ The National Recreation and Park Association also reports that 89 percent of park and recreation agencies with annual operating budgets over \$10 million use Twitter, 92 percent use Instagram, and 99 percent use Facebook to reach their audiences.

³¹ Some recreation centers operate specific Facebook pages, but it appears most of them are location-only pages rather than actively posting pages. In addition, the main City of San Diego account occasionally posts Parks & Rec-related material. Neither of these practices is any different than the benchmarked cities and therefore does not impact the results of the analysis.

We found that Parks & Rec could expand marketing efforts as a first step to increasing program awareness, access, and attendance across the City. In a survey of recreation staff, a majority of respondents indicated they believed their communities were at least moderately informed about Parks & Rec programming. However, when asked in a Citywide survey, 55 percent of residents indicated they did not attend more Parks & Rec programs because they were not aware of what was offered. This figure is over twice as high as the national average (24 percent). In addition, 20 percent of residents that participated in the Citywide survey indicated that not knowing where facilities are is a reason preventing them from using more programs (the national average is 12 percent).

Parks & Rec’s marketing efforts are under-resourced and lack a plan for Citywide campaigns.

We found other park and recreation agencies tend to have more staff members dedicated to marketing and social media.

Parks & Rec is assigned a single PIO from the Communications Department and does the rest of the work in-house with recreation staff. Parks & Rec staff indicated that, in the past, a majority of marketing was done by the Recreation Councils, and that the City assumed these responsibilities when they were dissolved in 2018. Benchmarked cities indicated that they have between one and four full-time staff members in the department working on marketing and social media. Furthermore, a benchmarking report from NRPA shows that only 25 percent of respondents from cities said their agency uses program managers for marketing efforts rather than dedicated marketing staff. The same report stated that park and recreation agencies with over \$10 million in operating budgets had a median of three full-time employees dedicated to marketing and communications.

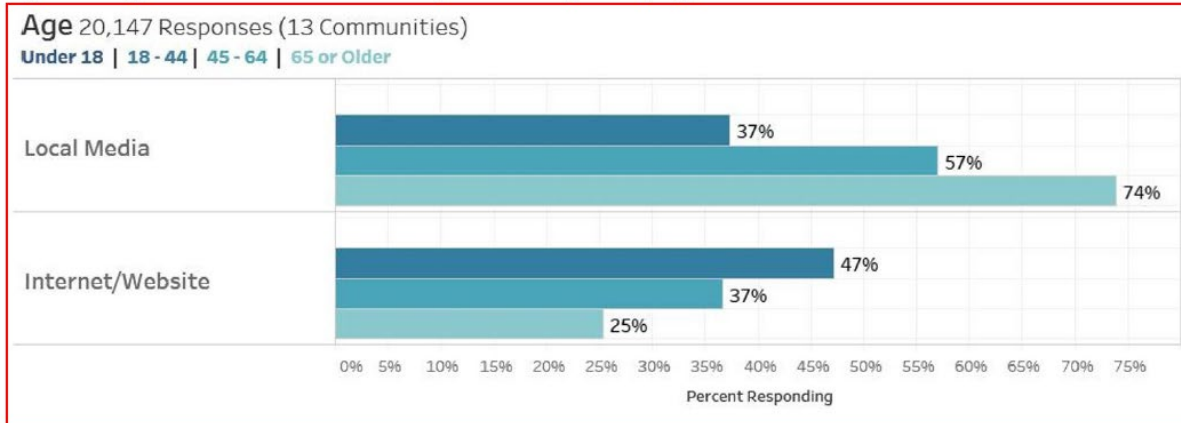
Segmenting data and tailoring messaging on a Citywide basis may help drive engagement. Best practice would be for marketing staff to be responsible for data collection and analysis, but the lack of such staff also plays a part in a lack of information and a targeted plan. As mentioned in Finding 1, although Parks & Rec collects some basic demographic data, it does not currently use this data to target marketing to specific groups. An NRPA report on awareness showed that different demographic groups (e.g., groups based on age, race, income,

etc.) find out about parks and recreation programs in different ways. For example, **Exhibit 15** shows a large majority of the senior population finds out about programs from local media, whereas the biggest source of information for those under 18 is the internet/website.

Exhibit 15:

Different Age Groups Learn About Recreation Programs from Different Sources

Figure 9: Significant Difference in Ways of Finding out by Age



Note: This graphic is intended to illustrate that different groups find out about parks and recreation programs in different ways. We did not evaluate the effectiveness of Park & Rec’s marketing through local media.

Source: NRPA Report on Awareness and Proximity.

The Citywide survey mentioned above provides some information, but without a central plan, this cannot be used effectively to segment and target the population. For example, benchmarked cities indicated they use specific campaigns to drive attendance through blogs, radio spots, and social media. However, without segmented information and a plan to address any inequities, there is a risk that information is not being disseminated effectively to specific audiences, resulting in inequitable distribution of information. This, in turn, might contribute to lower participation by certain groups and, thus, inequitable outcomes.

Recommendation 7

In order to increase and standardize marketing efforts, the Parks and Recreation Department (Parks & Rec) should hire a marketing professional to:

- Manage online (e.g., social media, websites) and physical (e.g., flyers, banners) content; coordinate marketing efforts across Parks & Rec; and lead strategic marketing initiatives for Parks & Rec (e.g., public relations, educational campaigns, etc.). (Priority #3)

Recommendation 8

In order to effectively market recreation programs to all residents, the Parks and Recreation Department should:

- Direct individual recreation centers to collect demographic information on participants and the surrounding community, including age, gender, race, and other demographics;
- Use collected information to create a strategic marketing plan that:
- Sets goals and objectives for marketing efforts;
- Creates steps for Citywide marketing plans; and
- Develops policies for individual recreation center marketing plans; and
- Use demographic information to tailor marketing efforts towards specific segments of the population, with the goal of promoting engagement through awareness, access, and participation. (Priority #2)

Finding 4: The Parks and Recreation Department has made efforts to ensure certain communities can participate in recreation programs, but significant barriers remain that may preclude other groups from participating.

For recreation programs to be equitable, they should be accessible to all groups that wish to participate. These groups can vary based on race, gender, income, ability, English language proficiency, and many other factors. The Parks and Recreation Department (Parks & Rec) has policies and programs allowing for the inclusion of many of these groups.

For example, Parks & Rec’s Therapeutic Recreation Services (TRS) has been crucial in ensuring people with physical, emotional, or mental disabilities have access to social and recreation programs.³² In addition, Parks & Rec’s AgeWell Services provide recreation, health and wellness opportunities, and community resources for older adults.

While these programs and services represent important components of Parks & Rec’s efforts toward ensuring equity in recreation programming, efforts to expand access to low-income households and people who do not speak English can benefit from improvement.



³² When a need for TRS is identified, recreation center staff and TRS staff coordinate an assessment for the participant, which is based on the participant’s ability, the requirements of the activity, and TRS staff’s specialized knowledge and skills for accommodating their involvement. TRS has specialized recreation aides on staff that can be present with the participant during the activity and facilitate their involvement directly. Recreation center staff indicated that the TRS Division responds to identified needs quickly and allows participants equitable access based on ability.

Sub-Finding 1: Parks & Rec’s approach to low-income fee waivers is inconsistent and does not maximize their impact.

We found that Parks & Rec’s policy limits the scope of fee waivers to certain recreation programs and results in assisting relatively few participants.

Municipal Code §22.1502 gives the Parks & Rec Director authority to establish fees for the use of park and recreation facilities and services. Parks & Rec has some flexibility in determining which programs are eligible for the low-income fee waiver. Parks & Rec’s fee schedule states:

Not all Parks and Recreation Department programs are eligible for low income fee waivers. Fees for City-conducted Parks and Recreation Department programs and the City surcharge on City of San Diego contractual programs are waived for individuals from families whose gross income in the past twelve months falls within the Lower Living Standard Income Level.

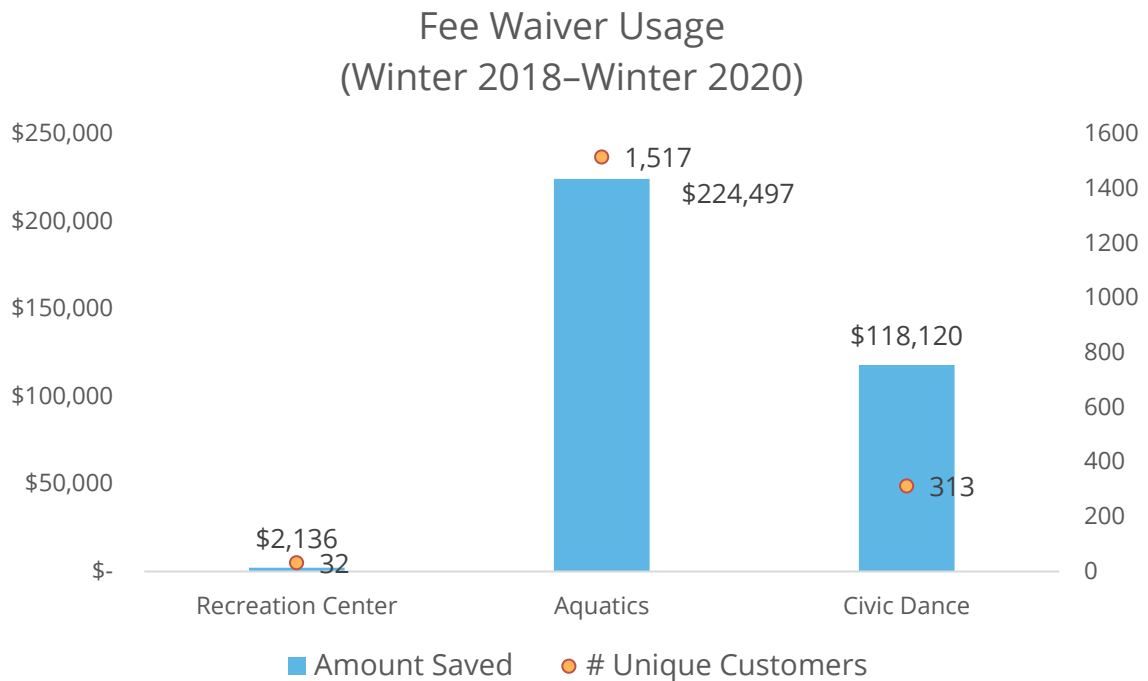
While Parks & Rec indicated that only programs listed in the fee schedule are eligible for fee waivers, we did not find any such written policies that confirm this at the time of the audit. Parks & Rec would promote transparency and oversight by specifically stating—in the fee schedule and/or in an associated written policy—which programs qualify for the fee waiver and the rationale for excluding other programs from the waiver.

As a result of this policy, and although Parks & Rec offers a wide variety of staff-run and contracted programs, from the Winter 2018 season to the Winter 2020 season, Parks & Rec issued fee waivers almost exclusively for Civic Dance and Aquatics programs, as shown in **Exhibit 16**.³³

³³ We found that 32 unique customers at recreation centers received fee waivers (totaling \$2,136); Parks & Rec management indicated these might be for customers waiving the program surcharge on contracted programs.

Exhibit 16

Recreation Center Programs Use Almost No Fee Waivers Compared to Other Programs



Source: OCA generated based on data from ActiveNet.

Limiting access to fee waivers poses the risk of excluding individuals based on their inability to pay the full cost of the program. Individuals who are unable to pay, and do not receive a fee waiver, cannot participate and do not enjoy the benefits of the program. In contrast to Park & Rec’s regular practice, fee waiver (scholarship) applications were accepted for all programs, including contracted programs, under Parks & Rec’s Come Play Outside initiative in Summer 2021, and fee waiver availability was broadcast on the Come Play Outside website. These scholarships allowed 552 participants (13 percent of all participants) to attend the program for a discounted rate of \$10. According to Parks & Rec, some additional participants were

able to attend for free.^{34,35} Based on conversations with recreation staff and the large number of scholarship recipients from the Come Play Outside Initiative, there is a strong demand for these fee waivers by program participants.

Benchmarked cities provide different tiers of discounts and one even has higher maximum income guidelines for providing the basic discount or scholarship. Other cities use annual membership passes that give access to fitness centers, recreation centers, and recreation activities. These cities discount the passes for low-income residents, children, or seniors. Denver even goes as far as providing free membership passes to qualified persons between 6 and 18 years old and those over 60.

The application process for the fee waivers is burdensome for the customer, which also limits low-income households' access to recreational programming.

We found that Parks & Rec's policy states that a new fee waiver application must be submitted at a recreation facility for each individual course taken, which results in an inefficient process. Aquatics staff informed us that at their center, large lines of people wanting fee waivers will form outside of the pool center in the hours before registration opens, and that many times there are too many people and not enough registration spots open. Therefore, pool staff sometimes create lottery systems for the open spots for these fee waiver customers. However, any customer is free to pay full price and register online. Such customers can take open spots sooner because they avoid having to be at the facility to complete and submit a fee waiver application. This presents a risk that, in order to enroll for the class in a timely fashion, customers are foregoing the fee waiver process entirely. In cases where low-income fee waivers were not offered, recreation center staff informed us that they historically identified individuals who cannot afford staff-run programs and are put in a position where they need to turn people away or let them in without the proper forms (assuming space is available).

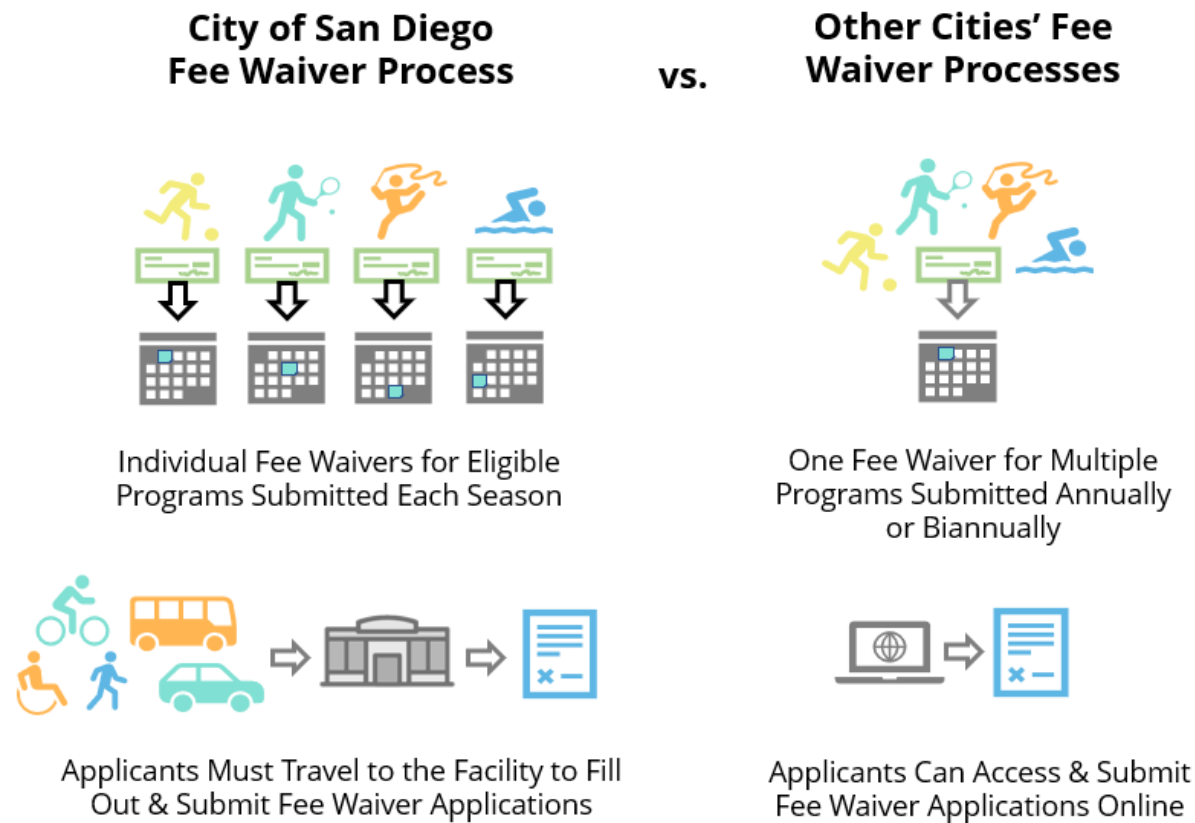
³⁴ For recreational programs, the summer season takes place between June 1 and August 31.

³⁵ The audit team was unable to calculate customer savings that resulted from these scholarships due to the varied prices of the Come Play Outside programs. The number of people that got scholarships vs. the number of people who paid full price for each individual program could not be separated.

As shown in **Exhibit 17** below, we found that the process to obtain fee waivers is less burdensome in other cities. For San Diego, the fee waiver does not appear on any individual recreation center website, on ActiveNet, or on Parks & Rec’s landing page, but the audit team did find copies of the Come Play Outside scholarship form at multiple recreation centers in CPII.³⁶ Civic Dance provides copies of the fee waiver and instructions for getting it accepted in both English and Spanish on their non-City affiliated website. Other park and recreation agencies make fee waivers easily accessible online and allow applicants to email or fax the necessary paperwork, in addition to allowing in-person submissions. Austin, Denver, and San Francisco allow residents to maintain fee waiver eligibility for at least one year, rather than requiring them to renew for every program or season.

Exhibit 17

The Process to Obtain Fee Waivers for Recreation Programs is Easier in Other Cities



³⁶ Although not identical to the fee waiver, the income guidelines and documentation requirements are the same.

Source: OCA generated based on interviews with staff and other parks and recreation agencies.

The burdensome fee waiver process makes people spend time and travel resources in order to ensure they have the best chance at enrolling. Parks & Rec indicated that it is currently revamping its fee waiver process. Part of this process includes expanding the fee waiver approval period from a per-program basis to a yearly basis and allowing the public to submit income and residency documentation online. Parks & Rec anticipates completing this process sometime during FY2022.

Recommendation 9

To ensure that eligible program participants can receive the fee waiver, the Parks and Recreation Department should develop, document, and implement procedures that allow residents to:

- Apply fee waivers to all eligible programs on an annual basis; and
- Register for classes online while using the fee waiver. (Priority #3)

Recommendation 10

To ensure recreation programs are accessible to people at all income levels, the Parks and Recreation Department (Parks & Rec) should reevaluate its current practice of only allowing the fee waiver for Civic Dance and Aquatics programs and expand eligibility to other recreation programs. As part of this, Parks & Rec should:

- Analyze alternative agency fee waiver models—including higher income limits, tiered systems, and membership passes—and recommend adoption of a decided-upon model; and
- Develop, document, and implement guidelines that specify which programs and costs fee waivers can be applied to and the rationale for leaving other programs and costs ineligible for fee waivers and include them in Park & Rec's fee schedule. (Priority #3)

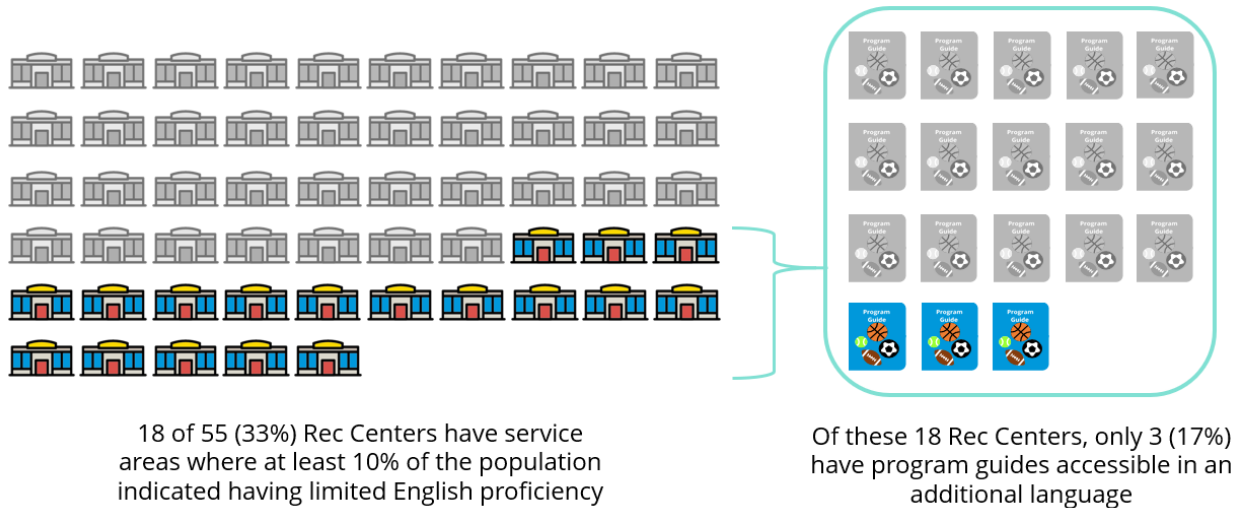
Sub-Finding 2: Recreation program information is not equally accessible to people who do not speak English.

Parks & Rec has tools to increase access for limited English speakers but lacks sufficient knowledge and controls to maximize their effectiveness.

Based on a review of census data, **Exhibit 18** shows that almost a third of recreation centers—18 of 55—have service areas where at least 10 percent of the population indicated having limited English proficiency.³⁷ As shown in the exhibit, we found that out of these 18 recreation centers, only 3 have program guides accessible in an additional language. Additionally, we found that 10 of these recreation centers have registration information directly on the website, which can be translated.

Exhibit 18

People Who Speak Limited English Have Limited Access to Programming Information



Source: OCA generated based on Climate Equity Index data, Census Bureau data, and website observations.

Spanish is the primary language spoken in these areas, but there is a significant percentage of people that speak other languages. Staff indicated that most of their knowledge of different communities and languages spoken in their area comes from interactions with the surrounding community, but this information is based primarily on the people who attend

³⁷ The recreation center service area average is calculated by averaging the percent of limited English proficiency of each census tract within one mile of each recreation center.

recreation center or park events—not the community at large. Although Parks & Rec collects basic demographic data through ActiveNet, only some of this data is required for registration.

A National Recreation and Park Association article on best practices in multicultural marketing lays out the information and steps necessary to effectively market to different identities. The first step is to collect basic demographic information and analyze it to see which demographics are attending which programs. Then, marketing efforts like social media posts and flyers for specific programs, can be targeted toward those demographics.

Parks & Rec employs a variety of tools to make recreation programming inclusive of those who have limited English proficiency, including Google Translate, bilingual front-line staff, and some document translation. Parks & Rec's Google Translate option on its website automatically translates text to the selected language, but it can only translate text that is directly typed onto the webpage. Attached or linked documents in English are not translated using this tool. Each recreation center has their own website that uses this feature, but the information posted on these websites varies by relevancy and detail. While some recreation centers may have information on specific classes (e.g., dates, times, location, cost), others may just have the recreation center's address and hours.

Multiple benchmarked cities mentioned access to translation services as important tools in their efforts to ensure language access. Parks & Rec recently began working with the City's Communications Department to obtain access to a Citywide translation service. However, Parks & Rec informed us it currently relies on recreation center staff who can perform any necessary translation services, including communicating with patrons and translating documents. The department indicated front-line recreation staff may translate documents and obtain approval from supervisors. When asked how they know which staff have bilingual ability, Parks & Rec management pointed to the bilingual add-on pay indicator from the Personnel Department. However, this does not account for staff that may not be completely fluent or certified, since not all staff are receiving this add-on pay. In addition, we were told that Parks & Rec has no policy to tell recreation center staff which documents

need to be translated into which languages. This means some recreation centers in areas with limited English speakers may respond to the need for translated documents while others may not.

A lack of comprehensive language access strategy creates inconsistent treatment of different communities.

Parks & Rec's decentralized response to language access creates a risk that individuals or communities that have limited English proficiency cannot access the same resources as everyone else. Some recreation center staff indicated that some parents elect to come into the office and register their children in person rather than online because program information is not available in their language on the website. Additionally, staff also indicated parents would have their children or someone else with them serve as interpreters so that staff could understand them and get them the information they need. In addition, one staff member indicated that, although they have made attempts to reach out to certain demographic groups, the lack of representation of some languages and cultures within the recreation center has resulted in low attendance from these groups. Therefore, developing a language access plan that standardizes requirements for translation services can help improve access to recreation programs for people with limited English proficiency.

When local government agencies serve a "substantial" number of non-English speakers, California's Bilingual Services Act requires those agencies to have enough qualified bilingual employees or interpreters to provide information and services in the language of the non-English speaking person.³⁸ If the agency is required to provide language access services, they must translate materials explaining the services into each of the languages required. The lack of strategy from Parks & Rec as a whole means that some recreation centers are at risk of not providing enough resources to satisfy these language access requirements.

³⁸ While it is left up to the agency to define what "substantial" means, the State of California defined this for its own agencies to mean 5 percent of the people they serve.

Recommendation 11

To gain insight into the languages spoken in each community, the Parks and Recreation Department (Parks & Rec) should develop, document, and implement a plan to identify recreation center service areas and the languages spoken by individuals or households in those areas. Parks & Rec should update and review the results of this analysis at least biannually to determine which translation and interpretation languages are necessary in the service areas. (Priority #2)

Recommendation 12

To ensure that the Parks and Recreation Department (Parks & Rec) meets community language needs, Parks & Rec should:

- Develop, document, and implement, a department-wide language access plan that includes at least the following elements:
 - Establishment of a threshold at which languages must be spoken in the service area to be considered a substantial number of customers;
 - Policies for recreation center staff that specify which written materials need to be translated into the languages identified in Recommendation #11; and
 - Procedures for getting documents translated and approved by qualified bilingual staff or professional translators. (Priority #2)

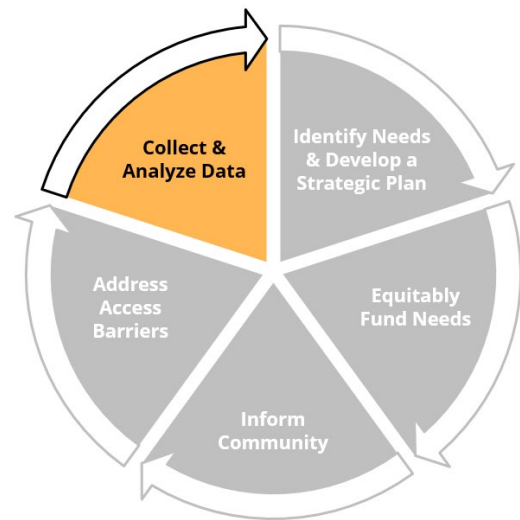
Recommendation 13

To provide high-quality customer service to residents who speak languages other than English, the Parks and Recreation Department should:

- Work with the Communications Department to obtain access to a contract for over-the-phone interpretation services and written materials translation. (Priority #2)

Finding 5: Although the Parks and Recreation Department tracks certain program information, current practices diminish its ability to implement a data-driven approach for resource allocation, monitoring, evaluation, and reporting.

Taking a more comprehensive approach to improving equity in recreation programming involves collecting and analyzing data. We found that the Parks and Recreation Department (Parks & Rec) can improve its data management practices in this regard. Specifically, implementing automated controls, regular staff trainings, and improved monitoring activities can help Parks & Rec ensure accurate programming data. These changes can help Parks & Rec position itself to take on systematic efforts toward improving equity in recreation programming, including strategic planning efforts.



Data-driven decision-making allows park and recreation agencies to use facts, metrics, and data to guide strategic decisions that align with their goals and objectives.

According to the National Recreation and Park Association (NRPA), park and recreation agencies should conduct data collection and analysis to understand where gaps and inequities in distribution of recreation programs may exist. In fact, an NRPA's survey of data and park and recreation agencies found that those agencies are using data for master planning, to measure facility usage, inform programming decisions, and support increased funding.³⁹ Although the survey noted that park and recreation agencies lack time, resources, and analytical skills to conduct proper analysis, it also noted that department and program managers frequently use Excel to conduct much of the data analysis. Furthermore, because the Parks Master Plan directs the City to prepare a report that examines equity and access within the City's recreation centers, aquatic complexes,

³⁹ See NRPA's report on Using Data at Park and Recreation Agencies at: <https://www.nrpa.org/contentassets/f768428a39aa4035ae55b2aaff372617/data-analysis-park-and-recreation.pdf>

and programs, it is imperative for Parks & Rec to track accurate and consistent program data to meet this requirement.

Although Parks & Rec tracks program data, due to accuracy and consistency issues, certain key data fields cannot easily be used in systematic efforts towards improving equity.

Parks & Rec currently uses the Active Network (ActiveNet) recreation management software to track program information, including activity name, start and end date, primary instructor, activity site, and participant enrollment numbers, among other data fields. We reviewed 17,593 records of programs that Parks & Rec offered from Winter 2018 through Winter 2020. According to Parks & Rec management, Area Managers are supposed to verify the accuracy of program information entered in ActiveNet. However, we found inaccurate and inconsistent information pertaining to the activity name, start date, program instructor, and activity status.⁴⁰ For example:

- Naming conventions for the same or similar programs were inconsistent and, in some instances, lacked information;
- Some program start dates reflected the date when program registration opened instead of capturing when the program actually started;
- Information in the primary instructor data field did not accurately differentiate between staff and contractual instructors; and
- Activity status did not always accurately capture when recreation centers cancelled, closed, or placed classes on hold.

Additionally, we attempted to review program data based on activity site (i.e., recreational facility) and found that our totals did not match with those reported in Parks & Rec's 2019 Equity Report (Equity Report). Parks & Rec also noted that compiling the Equity Report was labor intensive and challenging due in part to reporting limitations from the ActiveNet system. Therefore, the lack of accurate and consistent program data creates additional work for management, as management indicated it must follow up with staff to get detailed information and ensure the accuracy of the information being reported.

⁴⁰ These 17,593 records reflect all program statuses and include records for programs that took place; records for programs that were cancelled, on-hold, or tentative.

These issues diminish Parks & Rec's ability to use programming data in systematic efforts towards improving equity, including strategic planning and resource allocation. For example, Parks & Rec cannot easily determine the number of program types (e.g., basketball, gymnastics, tennis, etc.), distinguish between staff-run and contracted programs, or determine the number of programs conducted during a specified period (i.e., season, year, etc.). Inconsistencies in the data make program analysis and reporting at the aggregate, system-wide level more difficult. Lacking system-wide analysis, in turn, diminishes management's ability to effectively assess recreation program performance and resource needs. This makes establishing baselines difficult and would also complicate Parks & Rec's ability to report on its progress in meeting any future strategic planning goals. In addition, as discussed in Finding 2, data collection and analysis can support more equitable resource allocation efforts through data-driven budgetary decisions. However, without reliable key data fields, Parks & Rec cannot effectively analyze aggregate data for comparison across all recreation centers to identify areas of need.

Automated controls, regular staff trainings, and improved monitoring activities can help Parks & Rec ensure accurate programming data.

According to management, in 2015, Parks & Rec implemented ActiveNet in all recreation centers as a tool to register participants and improve financial controls, not to track data. In fact, management indicated that it had not extracted program data from ActiveNet prior to 2019. Despite not currently using ActiveNet as a data tracking tool, Parks & Rec can implement some measures—such as automated controls, regular staff trainings, and improved monitoring—to help ensure that program data in ActiveNet is accurate and useful. For example, automated controls can ensure that required fields are not left blank, date fields do not contain a date outside the corresponding season date, or that program statuses automatically update based on parameters such as the number of registered participants.

Additionally, regular staff trainings on ActiveNet can help ensure that staff receive necessary guidance and knowledge to remain up to date on procedural changes and standards. According to management, Parks & Rec began training efforts in 2021 by identifying ActiveNet “super users” to lead training sessions. Staff

indicated that Parks & Rec had not provided training to staff on ActiveNet since 2016 and instead indicated that they relied on institutional knowledge from center directors to navigate ActiveNet. Parks & Rec plans to provide an initial training to all ActiveNet users and offer periodic refresher trainings in the future.

Further, improving monitoring activities to ensure that information in ActiveNet is accurate is essential. As previously mentioned, Area Managers are responsible for verifying the accuracy of program information entered in ActiveNet. We reviewed Parks & Rec's training materials related to ActiveNet and found that these do not contain guidance specifying how Area Managers should conduct this monitoring. A formalized method to ensure that Area Managers conduct this type of monitoring can help minimize data-entry errors.

Recommendation 14

To facilitate data analysis efforts, the Parks and Recreation Department should develop, document, and implement naming conventions for the same or similar recreation programs in its recreation program management software, and train staff on these naming conventions as part of Recommendation #16. (Priority #3)

Recommendation 15

To ensure the accuracy of key data fields in the Parks and Recreation Department's (Parks & Rec) recreation program management software, Parks & Rec should:

- Develop automated controls, where possible, to ensure that recreation staff enter program information in the recreation program management software consistently and accurately; and
- Develop policies and procedures that require Area Managers to regularly review program information captured in Parks & Rec's recreation program management software—such as dates, season, and class status, among others—for consistency and accuracy. These policies and procedures should specify how Area Managers should select data entries for review, require this review to be documented, and identify corrective actions where necessary. (Priority #2)

Recommendation 16

To ensure that staff are adequately trained on how to enter program information into its recreation program management software, the Parks and Recreation Department should:

- Provide an updated (current) training on its recreation program management software to all users that includes documenting the appropriate program name, primary program instructor, and noting the appropriate activity status; and
- Annually provide a recreation program management software refresher training to all users. (Priority #3)

Other Pertinent Information

We found that, historically, each recreation center sets its own fees for staff-run programs. We were told this is usually based on the cost to fund the program beyond staff time and facility usage, but some programs have different fee amounts at different recreation centers. This creates a risk that some recreation centers are less accessible to participants than others due to higher fee amounts for the same programs. Other cities we benchmarked with took a variety of different actions to combat this. Denver and San Francisco set fee amounts for programming city and countywide by ordinance and central programming office, respectively. Mecklenburg County has different cost recovery goals for specific recreation centers depending on the demographics of the surrounding community. Austin categorizes each program into different cost recovery tiers. However different, each of these strategies requires some sort of program planning with standardized guidelines to help set each program's cost.

While price standardization for recreation programs was out of our audit scope, we included the above information so that Parks & Rec may consider pursuing a price standardization system to recover more revenue in areas or programs that can stand the increase in price. Additionally, this scheme may increase access to programs where the price may be a barrier.

Appendix A: Definition of Audit Recommendation Priorities

DEFINITIONS OF PRIORITY 1, 2, AND 3

AUDIT RECOMMENDATIONS

The Office of the City Auditor maintains a priority classification scheme for audit recommendations based on the importance of each recommendation to the City, as described in the table below. While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration’s responsibility to establish a target date to implement each recommendation taking into consideration its priority. The City Auditor requests that target dates be included in the Administration’s official response to the audit findings and recommendations.

Priority Class ⁴¹	Description
1	Fraud or serious violations are being committed. Significant fiscal and/or equivalent non-fiscal losses are occurring. Costly and/or detrimental operational inefficiencies are taking place. A significant internal control weakness has been identified.
2	The potential for incurring significant fiscal and/or equivalent non-fiscal losses exists. The potential for costly and/or detrimental operational inefficiencies exists. The potential for strengthening or improving internal controls exists.
3	Operation or administrative process will be improved.

⁴¹ The City Auditor is responsible for assigning audit recommendation priority class numbers. A recommendation which clearly fits the description for more than one priority class shall be assigned the higher priority.

Appendix B: Objectives, Scope, and Methodology

Objectives In accordance with the Office of the City Auditor’s Fiscal Year (FY) 2021 Audit Work Plan, we conducted a performance audit of the City of San Diego’s Parks and Recreation Department’s (Parks & Rec) Recreation Programming Equity. Our objectives were to:

- Determine whether Parks & Rec effectively identifies recreation programming equity needs in each community;
- Determine whether Parks & Rec meets identified programming needs equitably through funding and staffing allocations; and
- Determine whether Parks & Rec provides residents with equitable access to recreation programs.

Scope We reviewed the department’s efforts to provide recreation programs equitably across the City between December 2018 and February 2020. In addition, in July and August 2021, we visited several recreation facilities across the City and interviewed staff on site. While facilities provide the necessary space for recreation programs to take place, our review excluded facilities because other efforts focused on park and recreation facilities—including the adoption of the City’s new Parks Master Plan, the new Citywide Park Development Impact Fee, and the Final Report on Park Amenity Condition Assessments—were underway at the time of our review. Our scope was therefore focused on recreation programming to avoid duplicating efforts.

Methodology Our findings, conclusions, and recommendations are included in the audit report. Our methodology to evaluate these internal controls is described in the following table.

Objective	Methodology
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Determine whether Parks & Rec effectively identifies recreation	
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| | <ul style="list-style-type: none">• Reviewed Citywide and departmentwide surveys, methodologies, results, and follow-up actions to determine the extent to which they are used to identify need. |
|--|--|

programming equity needs in each community.

- Reviewed Parks & Rec documents (strategic plans, objectives, key performance indicators, Master Plans, etc.) for goals, objectives, and action steps to capture community need and address equity.
- Interviewed recreation facility staff and Parks & Rec management to determine how feedback is obtained from the community and used to determine need, and how equity is used in goals, objectives, and strategic plans.
- Benchmarked Park & Rec's needs assessment process and strategic planning process by interviewing management and staff from park and recreation departments from the City of Austin, the City of Dallas, the City and County of Denver, Mecklenburg County, the City of Sacramento, and the City and County of San Francisco.
- Compared best practices of National Park and Recreation Associations' needs assessment processes to Parks & Rec's process.
- Tested the reliability of certain data fields from Park & Rec's program management software, ActiveNet, including the number of programs per activity site (i.e., recreation center), activity season and date, and activity instructor.
- Analyzed City budget data to determine the amount of General Fund expenditures and Recreation Center Fund expenditures at each recreation center.
- Benchmarked Park & Rec's budget and resource allocation process and quality assessment process by interviewing management and staff from park and recreation departments from the City of Austin, the City of Dallas, the City and County of Denver, Mecklenburg County, the City of Sacramento, and the City and County of San Francisco.
- Modeled resources necessary for each recreation center using Minneapolis' equity-based resource allocation model.
- Interviewed recreation facility staff and Parks & Rec management to determine which types of programs are offered at each recreation center, how programs are started and evaluated, and how programs are funded.

Determine whether Parks & Rec meets identified programming needs equitably through funding and staffing allocations.

Determine whether Parks & Rec provides residents with equitable access to recreation programs.

- Reviewed best practices from the National Recreation and Park Association related to marketing and outreach strategies and language access policies.
- Interviewed recreation facility staff and Parks & Rec management to determine how outreach and marketing is conducted at an individual recreation center level and Citywide.
- Benchmarked Parks & Rec’s marketing and outreach process, language access policies, and fee waiver process by interviewing management and staff from park and recreation departments from the City of Austin, the City of Dallas, the City and County of Denver, Mecklenburg County, the City of Sacramento, and the City and County of San Francisco.
- Identified the extent of limited English proficiency for each recreation center and compared against widely accessible informational materials available on the Parks & Rec’s website.
- Reviewed historical usage of the low-income fee waiver and compared across different recreation center programs.

Internal Controls Statement

Our internal controls testing was limited to specific controls relevant to our audit objectives, including controls for identifying recreation programming equity needs; controls for aligning funding and staffing allocations equitably with identified needs; and controls to ensure marketing and outreach efforts are equitable and provide all communities with access to information and programs.

Compliance Statement

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 on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C: List of All Recreation Centers, Programming Expenses, and Programmable Space by Council District and Community Parks Division

Community Parks I

Rec Center Name	2019 RCF Contracts	2019 General Fund Wages	Total Expenses	Sq Ft	Total Expenses per Sq Ft	Managed / Permitted Acres	Total Expenses per Acre
CARMEL VALLEY	\$ 389,832	\$ 128,034	\$ 517,866	17,250	\$ 30	106	\$ 4,886
DOYLE	\$ 482,976	\$ 169,858	\$ 652,834	17,590	\$ 37	46	\$ 14,192
LA JOLLA	\$ 3,767	\$ 128,462	\$ 132,230	9,160	\$ 14	26	\$ 5,086
NOBEL	\$ 113,856	\$ 130,437	\$ 244,293	10,200	\$ 24	46	\$ 5,311
OCEAN AIR	\$ 125,201	\$ 132,305	\$ 257,506	16,500	\$ 16	43	\$ 5,989
STANDLEY	\$ 31,031	\$ 108,794	\$ 139,824	18,870	\$ 7	63	\$ 2,219
COUNCIL DISTRICT 1	\$ 1,146,664	\$ 797,890	\$ 1,944,554	89,570	\$ 22	330	\$ 5,893
CABRILLO	\$ 77,785	\$ 75,962	\$ 153,747	1,980	\$ 78	61	\$ 2,520
CADMAN	\$ 335	\$ 137,691	\$ 138,026	2,570	\$ 54	16	\$ 8,627
OCEAN BEACH	\$ 34,016	\$ 169,206	\$ 203,222	10,090	\$ 20	57	\$ 3,565
PACIFIC BEACH	\$ 27,863	\$ 86,682	\$ 114,545	15,040	\$ 8	26	\$ 4,406
ROBB FIELD	\$ 112,114	\$ 112,365	\$ 224,479	3,210	\$ 70	114	\$ 1,969
SANTA CLARA	\$ 2,804	\$ 81,208	\$ 84,012	8,790	\$ 10	43	\$ 1,954
SOUTH CLAIREMONT	\$ 5,803	\$ 108,993	\$ 114,796	6,560	\$ 17	13	\$ 8,830
TECOLOTE	\$ 741	\$ 29,378	\$ 30,120	1,700	\$ 18	33	\$ 913
COUNCIL DISTRICT 2	\$ 261,461	\$ 801,485	\$ 1,062,946	49,940	\$ 21	363	\$ 2,928
CARMEL MTN RANCH/SABRE	\$ 53,389	\$ 126,013	\$ 179,402	17,590	\$ 10	46	\$ 3,900
HILLTOP	\$ 4,201	\$ 145,025	\$ 149,226	5,330	\$ 28	23	\$ 6,488
RANCHO BERNARDO	\$ 8,316	\$ 139,059	\$ 147,375	14,750	\$ 10	44	\$ 3,349
SCRIPPS RANCH	\$ 145,752	\$ 142,285	\$ 288,037	12,080	\$ 24	104	\$ 2,770
COUNCIL DISTRICT 5	\$ 211,659	\$ 552,382	\$ 764,040	49,750	\$ 15	217	\$ 3,521
CANYONSIDE	\$ 185,327	\$ 90,448	\$ 275,775	15,560	\$ 18	140	\$ 1,970
HOURLASS FIELD	\$ 31,735	\$ 133,791	\$ 165,527	25,000	\$ 7	66	\$ 2,508
LOPEZ RIDGE	\$ 2,229	\$ 106,144	\$ 108,374	2,590	\$ 42	23	\$ 4,712
MIRA MESA	\$ 5,985	\$ 132,591	\$ 138,576	10,810	\$ 13	81	\$ 1,711
NORTH CLAIREMONT	\$ 35,548	\$ 161,773	\$ 197,320	9,810	\$ 20	100	\$ 1,973
COUNCIL DISTRICT 6	\$ 260,825	\$ 624,747	\$ 885,572	63,770	\$ 14	410	\$ 2,160
ALLIED GARDENS	\$ 86,148	\$ 137,870	\$ 224,018	9,190	\$ 24	68	\$ 3,294
KEARNY MESA	\$ 7,725	\$ 114,164	\$ 121,889	11,140	\$ 11	45	\$ 2,709
LINDA VISTA	\$ 21,908	\$ 159,640	\$ 181,549	13,170	\$ 14	44	\$ 4,126
SAN CARLOS	\$ 34,107	\$ 121,025	\$ 155,133	11,880	\$ 13	76	\$ 2,041
SERRA MESA	\$ 5,361	\$ 85,794	\$ 91,156	10,710	\$ 9	52	\$ 1,753
TIERRASANTA	\$ 46,924	\$ 134,117	\$ 181,041	17,640	\$ 10	65	\$ 2,785
COUNCIL DISTRICT 7	\$ 202,173	\$ 752,612	\$ 954,785	73,730	\$ 13	350	\$ 2,728
COMMUNITY PARKS I	\$ 2,082,781	\$ 3,529,115	\$ 5,611,896	326,760	\$ 17.17	1,670	\$ 3,360

Community Parks II

ADAMS	\$ 181	\$ 122,056	\$ 122,237	2,360	\$ 52	22	\$ 5,556
GOLDEN HILL	\$ 13,329	\$ 119,634	\$ 132,963	10,040	\$ 13	16	\$ 8,310
NORTH PARK	\$ 2,475	\$ 149,105	\$ 151,580	11,230	\$ 13	17	\$ 8,916
PRESIDIO	\$ 1,751	\$ 45,890	\$ 47,641	5,300	\$ 9	14	\$ 3,403
COUNCIL DISTRICT 3	\$ 17,736	\$ 436,685	\$ 454,421	28,930	\$ 16	69	\$ 6,586
ENCANTO	\$ 355	\$ 158,434	\$ 158,789	9,890	\$ 16	24	\$ 6,616
MARTIN LUTHER KING JR	\$ 3,048	\$ 105,852	\$ 108,900	17,000	\$ 6	55	\$ 1,980
PARADISE HILLS	\$ 1,504	\$ 146,233	\$ 147,736	10,808	\$ 14	65	\$ 2,273
PENN FIELD	\$ 1,504	\$ 92,932	\$ 94,436	2,880	\$ 33	19	\$ 4,970
SKYLINE HILLS	\$ 73	\$ 128,600	\$ 128,673	10,810	\$ 12	24	\$ 5,361
COUNCIL DISTRICT 4	\$ 6,483	\$ 632,051	\$ 638,534	51,388	\$ 12	187	\$ 3,415
CESAR CHAVEZ	\$ 814	\$ 159,732	\$ 160,547	13,000	\$ 12	19	\$ 8,450
MEMORIAL	\$ 799	\$ 148,336	\$ 149,135	14,140	\$ 11	32	\$ 4,660
MONTGOMERY-WALLER	\$ 11,550	\$ 132,122	\$ 143,672	24,900	\$ 6	28	\$ 5,131
SAN YSIDRO	\$ 1,200	\$ 146,316	\$ 147,516	13,980	\$ 11	32	\$ 4,610
SILVER WING	\$ 872	\$ 130,729	\$ 131,601	2,030	\$ 65	47	\$ 2,800
SOUTH BAY	\$ 2,529	\$ 153,843	\$ 156,372	14,750	\$ 11	18	\$ 8,687
STOCKTON	\$ -	\$ 69,427	\$ 69,427	17,000	\$ 4	5	\$ 13,885
COUNCIL DISTRICT 8	\$ 17,764	\$ 940,505	\$ 958,269	99,800	\$ 10	181	\$ 5,294
AZALEA	\$ -	\$ 69,002	\$ 69,002	1,790	\$ 39	22	\$ 3,136
CITY HEIGHTS	\$ 1,195	\$ 203,173	\$ 204,368	27,360	\$ 7	22	\$ 9,289
COLINA DEL SOL	\$ 1,962	\$ 154,932	\$ 156,894	6,560	\$ 24	30	\$ 5,230
MOUNTAIN VIEW	\$ -	\$ 146,629	\$ 146,629	18,100	\$ 8	15	\$ 9,775
SOUTHCREST	\$ 299	\$ 153,011	\$ 153,310	10,620	\$ 14	25	\$ 6,132
WILLIE HENDERSON	\$ 1,515	\$ 117,259	\$ 118,774	2,390	\$ 50	19	\$ 6,251
COUNCIL DISTRICT 9	\$ 4,972	\$ 844,006	\$ 848,978	66,820	\$ 13	133	\$ 6,383
COMMUNITY PARKS II	\$ 46,955	\$ 2,853,247	\$ 2,900,203	246,938	\$ 11.74	570	\$ 5,088

Note: Total Expenses only reflect General Fund wages and Recreation Center Fund (RCF) contract expenditures. Other expenditure categories were omitted because they were accounted for inconsistently across CPI and CPII funds centers and because the purpose of some RCF expenditures was unclear (e.g., programming vs. maintenance). Figures are rounded.

Note: Eight recreation facilities are excluded from these tables for the following reasons: lack of indoor building space (Chollas Lake); opening after time period captured by the analysis (Pacific Highlands, Bay Terraces, Park de la Cruz); lack of RCF (Mid-City Gymnasium and Black Mountain Multi-Purpose Center); or being managed by the Developed Regional Parks Division (Balboa Park Activity Center and Municipal Gymnasium).

Note: Recreation facility square footage and park acreage may not denote how much of this space is available for recreation programming or permitted events. Not all the square footage in a building or acreage of parkland can be used for programming.

Source: OCA generated based on data from the City's enterprise resource planning system, SAP.

Appendix D: Recreation Programming Expenses and Programmable Space by Council District and Community Parks Division

Geographical Area	2019 RCF Contracts	2019 General Fund Wages	Total Expenses	Sq Ft	Total Expenses per Sq Ft	Managed / Permitted Acres	Total Expenses per Acre
COUNCIL DISTRICT 1	\$ 1,146,664	\$ 797,890	\$ 1,944,554	89,570	\$ 22	330	\$ 5,893
COUNCIL DISTRICT 2	\$ 261,461	\$ 801,485	\$ 1,062,946	49,940	\$ 21	363	\$ 2,928
COUNCIL DISTRICT 5	\$ 211,659	\$ 552,382	\$ 764,040	49,750	\$ 15	217	\$ 3,521
COUNCIL DISTRICT 6	\$ 260,825	\$ 624,747	\$ 885,572	63,770	\$ 14	410	\$ 2,160
COUNCIL DISTRICT 7	\$ 202,173	\$ 752,612	\$ 954,785	73,730	\$ 13	350	\$ 2,728
COMMUNITY PARKS I	\$ 2,082,781	\$ 3,529,115	\$ 5,611,896	326,760	\$ 17	1,670	\$ 3,360
COUNCIL DISTRICT 3	\$ 17,736	\$ 436,685	\$ 454,421	28,930	\$ 16	69	\$ 6,586
COUNCIL DISTRICT 4	\$ 6,483	\$ 632,051	\$ 638,534	51,388	\$ 12	187	\$ 3,415
COUNCIL DISTRICT 8	\$ 17,764	\$ 940,505	\$ 958,269	99,800	\$ 10	181	\$ 5,294
COUNCIL DISTRICT 9	\$ 4,972	\$ 844,006	\$ 848,978	66,820	\$ 13	133	\$ 6,383
COMMUNITY PARKS II	\$ 46,955	\$ 2,853,247	\$ 2,900,203	246,938	\$ 12	570	\$ 5,088

Note: Total Expenses only reflect General Fund wages and Recreation Center Fund (RCF) contract expenditures. Other expenditure categories were omitted because they were accounted for inconsistently across CPI and CPII funds centers and because the purpose of some RCF expenditures was unclear (e.g., programming vs. maintenance). Figures are rounded.

Note: Eight recreation facilities are excluded from these tables for the following reasons: lack of indoor building space (Chollas Lake); opening after time period captured by the analysis (Pacific Highlands, Bay Terraces, Park de la Cruz); lack of RCF (Mid-City Gymnasium and Black Mountain Multi-Purpose Center); or being managed by the Developed Regional Parks Division (Balboa Park Activity Center and Municipal Gymnasium).

Note: Recreation facility square footage and park acreage may not denote how much of this space is available for recreation programming or permitted events. Not all the square footage in a building or acreage of parkland can be used for programming.

Source: OCA generated based on data from the City's enterprise resource planning system, SAP.



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: November 8, 2021
TO: Andy Hanau, City Auditor
FROM: Andy Field, Director, Parks and Recreation Department
SUBJECT: Response to Performance Audit of Equity in Recreation Programming

This memorandum serves as the management response to the Performance Audit of Equity in Recreation Programming. The report has five (5) findings with 16 recommendations. The Parks and Recreation Department (Department) appreciates the report prepared by the Office of the City Auditor and thanks the staff involved in preparing the audit. Please accept this memorandum as our response. Management agrees with the recommendations presented by the Office of the City Auditor in their report, and the management response highlights those recommendations that will need additional resources to implement.

Background

For several decades, the Department operated under a decentralized model of offering recreation programs and services within the City of San Diego (City). Historically, budgeting for the Department focused on a generally equal share of funding and resources between various parks from the City's General Fund. Each recreation center had a companion recreation council that advised the Department on its assigned parks and programs, and the recreation council managed the provision of recreation programs that could be fully cost recovered through user fees. While this model was well-established in the City, benchmarking revealed that the recreation council role was unique to the City and not replicated in other municipalities.

In 2017, the City Council approved changing the model of recreation program provision based on a finding that user fees collected for permits are considered City funds and must be expended in accordance with City policies and procedures. Program fees were placed into the recreation center funds rather than in the recreation councils. This approach to funding and contracting for recreation is more consistent with other municipalities and ensures proper controls are in place for the use of fees collected by the Department.

During the transition, staff compared revenues and expenses associated with each recreation center. That analysis revealed that some centers have significantly more pass-through revenue due to the number of cost-recoverable programs offered at those centers. Other centers relied more heavily on the funding provided by the General Fund and by extension the staff assigned to the site. A key finding was that some centers have more range in programming particularly where patrons can afford to pay for specialty programs, and the

Department needed to find ways to offer similar programs at low or no cost for areas of the City that could not afford to pay for these programs.

The Department hired a Recreation Services Program Manager and began the process to centralize the management of recreation service contracts. However, the Department's Recreation Services Program has not had the opportunity to further centralize recreation services and ensure consistently offered programs with an eye toward equity. In an equitable funding model, park planning and investments would address long-standing inequities in the City's park system, which create a burden to people who live in communities of concern and individuals who lack access to resources. The Department will focus on providing equitable access to ensure that the same benefits to parks and recreational programs is provided across the City's 59 recreation centers and 13 aquatic centers regardless of geographic location that make up the Community Parks I Division (CPI) and Community Parks II Division (CPII). To provide equal access, the Department's goal is to address inequitable distribution of programs to ensure that everyone in San Diego has access to programmatic resources.

Currently, under the leadership of Mayor Todd Gloria and the Performance and Analytics Department, staff are collaboratively developing a new Strategic Plan for the City. The Plan will call for resources to serve marginalized communities and create a more equitable City, including San Diego's park system.

Recreation Equity

Equity is a key component of the Department's plan for providing recreation services. On August 3, 2021, the City Council adopted the Parks Master Plan (PMP).¹ As noted in the audit report, the PMP is among the first documents to describe the inequitable park system that currently exists. As noted in Section 4.2 (Continual Park Acquisition Goal) Table 4 (Investment Prioritization Metrics) on page 75, equity can be evaluated and measured through "socio-economic characteristics of people living in an area as identified in the Sustainability Department's Climate Equity Index (CEI)."² In the Background section on page 8, the CEI was "developed to measure the level of access to opportunity residents have within a census tract, and assess the degree of potential impact from climate change to these areas." Factors incorporated into the calculation of the CEI include:

- Environmental (e.g., flood risk, tree canopy coverage, groundwater threats, etc.)
- Health (e.g., asthma rates, cancer fatalities, healthy food access, low infant birth weight, etc.)
- Housing (e.g., housing cost, overcrowding)
- Mobility (e.g., pedestrian access, street conditions, access to public transit, traffic density, bikeability, etc.)

¹ The 2021 Parks Master Plan is available at <https://www.sandiego.gov/sites/default/files/parks-master-plan-adopted-2021.pdf>.

² The 2019 Climate Equity Index is available at https://www.sandiego.gov/sites/default/files/2019_climate_equity_index_report.pdf.

- Socioeconomic (e.g. unemployment, education attainment, median income, poverty rate, digital access, etc.)

A total of 35 indicators are included within these five factors.³ The CEI is calculated by census tract, and each census tract that scores below average on these indicators is identified as a community of concern.⁴ Together, the PMP and CEI identify the locations of the City's park system that require additional investments, as noted on page 37:

Communities of concern are neighborhoods that have historically experienced lower levels of public and private investment in development and supporting infrastructure, including parks. Cities increasingly apply criteria, including existing park conditions, and neighborhood and demographic characteristics, to identify communities of concern and prioritize future park investments in those places with the biggest economic and social hurdles. Residents in communities of concern often rely more on public or nonprofit recreation facilities. In San Diego, the City's central and southern areas tend to have a greater need for additional recreational opportunities based on historical disinvestments.

Not surprisingly, many of the inequities related to recreational programming listed in the audit report are located within these communities of concern. They tend to have older park infrastructure per the findings of the recently completed Park Amenity Condition Assessment Cumulative Report (PCA),⁵ which staff presented to the Active Transportation and Infrastructure Committee on October 13, 2021. It is important to note that program offerings can only be as good as the suitability and size of the recreation center and athletic fields available to the community based on historical development patterns. In some cases, the quantity and quality of these amenities are lacking.

The PMP acknowledges this in Section 2.3 (page 37), which states:

Patterns and trends in development, community planning, and financing have influenced where parks were built in San Diego for decades. Rapid growth, particularly in an era before park standards, left some communities with fewer, well maintained, high quality recreational facilities and parks. The lack of funding tools and land constraints have widened park shortfalls in these typically older, more densely populated neighborhoods. Effective park planning and financing is essential to address the current realities of development in compact areas and the persistence of systemic gaps between communities in the availability and quality of recreational spaces. In addition, some areas of the City have historically received fewer park infrastructure improvements.

³ See Table 1, Climate Equity Index Indicators, on page 10 of the 2019 Climate Equity Index for a complete list of the 35 indicators (grouped by the five factors) and resources used to evaluate each census tract.

⁴ See Appendix A, City of San Diego's Climate Action Plan Identified Communities of Concern on page 19 of the 2019 Climate Equity Index, for a map of the identified communities that need additional investment.

⁵ The 2021 Park Amenity Condition Assessment is available on the City's webpage at <https://www.sandiego.gov/sites/default/files/pr-fy14-19-park-amenity-assessment-cumulative-report.pdf>.

Given the findings of the CEI and PMP, reinforced by data from the PCA, communities of concern are not receiving the level of investment needed today to increase recreational offerings at the recreation centers, parks, athletic fields, aquatic centers, and open space areas. In acknowledging this, the PMP makes clear that significant steps, including appropriate funding, is necessary to correct this. The PMP provides several recommendations, which appear in Section 4.10 Parks Master Plan Policies, pages 90–125. Some recommendations in the PMP relate to recreation equity and to the findings of this audit, including:

- A1: All residents should have access to a park within a safe and enjoyable 10-minute walk or roll. Investments should not only focus on providing new access, but improvements that increase the overall safety of an area so that the access has true purpose – prioritize these investments in Communities of Concern. Additionally, focus park and mobility investments to ensure 10-20-30-40-minute park access, meaning in addition to a 10-minute walk or stroll, ensure that additional recreational resources can be reached with a 20-minute bike ride and 30-minute transit ride to ensure greater access to a diverse range of recreational opportunities throughout the system. Parks being accessed should have sufficient recreational space and activity to be enjoyed for at least 40 minutes.
- AC2: Expand opportunities for culturally specific experiences to engage existing diverse communities and future recreation needs.
- AC12: Encourage the use of parks, recreation centers, and other Parks and Recreation Department assets for arts and culture public outreach and education.
- AV2: Promote positive activity in population-based parks by increasing recreational amenities, scheduled programming, pop-up and community events, festivals, farmer's markets, interactive features, and space for shared activities.
- CB1: Provide opportunities for community experiences that promote local history, cultural awareness and celebrate diversity.
- E6: Prepare a report to examine equity and access within the City's recreation centers, aquatic complexes, and programs.
- E10: Develop communication and outreach best practices which encourage the participation of marginalized populations and represent the local population.
- OM5: Partner with outside organizations to increase equitable park programming opportunities and result in safe and enjoyable park spaces for residents.
- OM7: Appropriately plan for an increased level of staffing and resources for new parks and expanded recreation facilities.
- OM8: Develop, train, and adequately supervise staff to utilize technology and innovation to provide quality recreational programming, park maintenance, and services throughout the City
- PP5: Promote public awareness and education of the City's parks system and increase participation in program offerings through use of social media, multicultural public outreach, and development of a comprehensive communications plan.

- PP7: Develop a Parks Master Plan monitoring program and provide a report to the appropriate City Council Committee every two years to ensure successful implementation. Make monitoring results available to the public on the City website.

When the City Council approved the PMP in August 2021, the motion to approve the PMP included a request a report to the City Council on future implementation to include projected timelines and prioritized list of actions. The Planning and Parks and Recreation departments anticipate an update to be presented to the City Council or Committee as an informational item prior to the end of 2021.

Following that, the Parks and Recreation Department plans to bring its annual Equity Report along with the annual recreation center fund budgets in March 2022 to the Public Safety and Livable Neighborhoods Committee.

Come Play Outside

This past summer saw the return of recreation to many centers after a closure due to the COVID-19 pandemic. The Come Play Outside (CPO) program focused on expanded programming over the summer at 21 recreation centers and aquatic centers in San Diego’s most underserved communities, which are located in Council Districts 3, 4, 7, 8, and 9. It focused on providing funding for a variety of equitable programs and events connecting youth with the outdoors, promoting mental and physical health and wellness, and culturally relevant programs and activities. CPO included swim and lifeguard classes, recreational classes, adventure camps, teen night, movies in the park, the Fern Street Circus, and various other recreational programs.

Partnerships allowed for these programs to be offered at low or no cost to recreation centers located within the communities of concern. Specific funding allocations and in-kind contributions included:

- New Fiscal Year 2022 budget allocations:
 - \$400,000 for Come Play Outside
 - \$250,000 for Back to Work SD, a youth employment, internship, and mentorship program
- County of San Diego Health and Human Services Agency allocation: \$750,000
- Price Philanthropies Foundation
- San Diego Parks Foundation

Parks and Recreation Department staff intend to seek similar funding in Fiscal Year 2023 to continue these programs, which attracted approximately 16,680 attendees to the combined programs. The hosting recreation centers included:

Site	Council District	Zip Code
Linda Vista Recreation Center	7	92111
Cesar Chavez Community Center	8	92173
City Heights Recreation Center	9	92105

Site	Council District	Zip Code
Colina del Sol Pool	9	92115
Colina del Sol Recreation Center	9	92115
Dolores Magdeleno Memorial Recreation Center	8	92113
Encanto Recreation Center	4	92114
Golden Hill Recreation Center	3	92102
Kearny Mesa Pool	7	92111
Martin Luther King, Jr. Pool	4	92114
Martin Luther King, Jr. Recreation Center	4	92114
Memorial Pool	8	92113
Montgomery-Waller Recreation Center	8	92154
Mountain View Recreation Center	9	92113
Paradise Hill Recreation Center	4	92139
Robert Egger, Sr. – South Bay Recreation Center	8	92154
San Ysidro Colonel Salomon Activity Center	8	92154
Silver Wing Recreation Center	8	92154
Skyline Hills Recreation Center	4	92114
Southcrest Recreation Center	9	92113
Vista Terrace Pool	8	92173

Many of the sites that participated in Come Play Outside are older facilities in need of repair and upgrade. As part of the PCA, a consultant evaluated these sites for deferred capital needs, and the cost to upgrade the recreation centers and pools is incorporated into the annual five-year capital outlook report.⁶ As these facilities are upgraded and improved, the Department anticipates being able to expand recreational offerings at these older facilities.

Short-Term Equity Goals

CPO is one of several steps currently underway to developing a more equitable park system for San Diegans. The Department submits the following goals in the coming year 2022 to further advance equity in San Diego’s Park System:

- Expansion of CPO into a year-round program while seeking resources in partnership with the San Diego Parks Foundation, Price Philanthropies, the County of San Diego

⁶ The 2021 Park Amenity Condition Assessment report contains facility/building deferred needs and is posted at <https://www.sandiego.gov/sites/default/files/pr-fy14-19-park-amenity-assessment-cumulative-report.pdf>. The latest Five-Year Capital Outlook is posted at <https://www.sandiego.gov/cip/reports> and <https://www.sandiego.gov/sites/default/files/fy22-26-five-year-capital-infrastructure-planning-outlook.pdf>.

Health and Human Services, and others to fund additional programs focused on the recreation centers, aquatic complexes, and parks that serve communities of concern

- Creation of robust job opportunities and development of youth workforce, including:
 - LEADER Academy – a 24-hour in-person course that teaches participants the basics of working in public service and developing quality recreational programs
 - Mentorships – a paid opportunity for people interested in a career in parks and recreation to learn about various jobs within the Department focusing on areas such as recreation, aquatics, natural resource management, park ranger activities, maintenance, and horticulture
 - Internships – a paid opportunity for college and graduate students to gain valuable experience in their chosen major or field of interest, focusing on natural resource management, park ranger activities, geographic information systems, therapeutic recreation, and specialized recreation
 - Virtual Hiring Halls – sessions conducted on Zoom or similar video conferencing software that teach youth how to apply for a job, what to expect when working, and what opportunities exist in various job classifications within the Department. Staff conducted a virtual hiring hall on September 9, 2021, focusing on South Bay, and a second virtual hiring hall focusing on Encanto, Chollas Valley, Skyline, Paradise Hills, Southcrest, Logan Heights, Mountain View, Mt. Hope, and other nearby neighborhoods is scheduled on November 17, 2021
 - Publicity to announce job opportunities, including outreach to partner nonprofit organizations and media outlets
 - Analysis of salaries and determination if any should be considered for special salary adjustments, such as pool guard, to bring salaries in line with nearby jurisdictions
- Update of the Department’s Fee Schedule:
 - Currently being reviewed by the Park and Recreation Board, Area Committee, Balboa Park Committee, and Mission Bay Park Committee, the updated fee schedule will reach City Council in early 2022
 - The proposal includes development of an “opportunity fund” intended to help provide for recreational programs and activities in recreation centers that serve communities of concern
- Improvement of the low-income fee waiver process, including new contractual service with a vendor to automate application and approval of the low-income fee waiver so the application process does not occur at the recreation center counter in public view

- Application for grants for capital improvement projects to develop and improve projects, such as development of Beyer Community Park in San Ysidro, renovation of John F. Kennedy Park in Chollas Valley/Lincoln Park, and conversion of the former Copley YMCA into the Park de la Cruz Community Center
- Opening of the Old San Ysidro Library as a new recreation center focusing on teens, therapeutic recreation, and older adults with a target opening date in February 2022
- Consideration of ways to activate under-utilized spaces, such as the Performance Annex in City Heights and Marie Widman Park in Encanto in conjunction with the Commission for Arts and Culture

In summary, the Department hopes to continue its efforts to improve equity and access for all San Diegans to enjoy the City park system and its recreational program offerings. The recreation equity audit offers findings and recommendations that are complementary to those of the PMP and earlier equity reports. The Department looks forward to the opportunity to address these inequities and advance the park system.

Management Responses to Recommendations

Finding 1: Although the Parks and Recreation Department solicits participant feedback, it is likely not aware of broader community recreational needs and lacks a strategic plan to provide recreation programs more equitably.

Recommendation #1

To ensure a formalized approach for obtaining recreation programming feedback from the community at-large to address recreation programming equity, the Parks and Recreation Department should:

- Develop, document, and implement a process for conducting a community needs assessment that includes identifying the types of programs communities need, satisfaction levels, effectiveness, and recreation priorities, and demographic information such as race, income, education level, age, etc.
- Conduct this assessment at least every five years to re-evaluate the data and update strategic plan efforts. (Priority #1)

Management Response: Agree. Obtaining customer input and feedback is very important to the Parks and Recreation Department. Each summer, the Department offers an over-the-counter satisfaction survey at its recreation centers. Staff collects the survey responses and evaluates satisfaction, which is a part of the Department's Key Performance Indicators (KPIs). As part of the Come Play Outside initiative, the Performance and Analytics Department developed and administered a targeted survey to gauge participant feedback and evaluation for the various CPO program offerings.

However, this recommendation identifies a need for an assessment that identifies recreational preferences on a community-by-community basis. This change in approach would require surveying residents in a statistically valid way so as to receive input from all

demographics. The needs assessment and resultant survey would focus first on communities of concern.

As the Department does not have an analytics section, implementation of this recommendation would require additional resources. Currently, the Department is working with the Performance and Analytics Department to implement Get It Done, developing an in-house analytics team that understands how data can be used to maximize recreation programs and improve park maintenance is essential.

This is evidenced in a 2016 National Recreation and Parks Association (NRPA) analysis entitled “Using Data at Park and Recreation Agencies.”⁷ NRPA surveyed 58 park systems to examine data usage. Some of the key findings of the analysis outline how other municipalities with park systems use data:

- Park and recreation agencies are using data to support key areas, including master planning, facility usage, programming decisions, and funding requests
- Park and recreation agencies are using a mix of internally collected data and information from other agencies and other third-party resources
- Much of the data analysis is performed by department and program managers
- Park and recreation agencies lack time, resources, and internal analytical skills to conduct proper analysis

The Department needs to develop specific resources to create the desired data-driven organization. For this and other needs assessments and analytics (see also Management Responses to Recommendations # 4, 5, 6, 7, 8, 11, 12, and 15), the Department will request initial resources of 10.00 full-time equivalent positions, consultant support, and an ongoing allocation to fund recreational programs, to be added to the Recreation Services Program in an upcoming budget cycle. Details of this initial request are itemized below:

- 1.00 Program Coordinator to understand the needs of each community, identify areas of inequity, prioritize areas for the needs assessment, coordinate development and distribution of community surveys as well as the analysis of survey results
- 3.00 Analysts to review and synthesize the data, evaluate program efficacy, interact with survey participants, coordinate social media presence for 59 recreation centers and 13 aquatic complexes, and coordinate with recreation service providers
- 3.00 Recreation Specialists to identify suitable programs, link proposed recreation services with service providers, create marketing materials, and coordinate training to ensure consistency across all recreation centers throughout the City
- 2.00 Information Systems Analysts to manage the current online registration software, determine if a better online registration software should be implemented, and conduct analytics of data from the online registration software to aid with program development, marketing, and community needs; these positions would interact with various social media platforms to address any inaccuracies within those platforms

⁷ See NRPA’s 2016 report “Using Data at Park and Recreation Agencies” at <https://www.nrpa.org/contentassets/f768428a39aa4035ae55b2aaff372617/data-analysis-park-and-recreation.pdf>.

- 1.00 Administrative Aide to manage administrative duties associated with the proposed program
- Contract with an Analytics Consultant to develop the survey questions, identify the appropriate respondents, coordinate mailing and printing, create social media presence, and analyze data trends; Citywide implementation of Medallia could be a tool to assist with this effort as well (in coordination with the Performance and Analytics Department)
- Contract with a Marketing Consultant to develop a marketing program and to train staff on how to provide outreach to the community in coordination with the Communications Department
- Recreational program funding to help maximize program offerings that meet the needs established in the assessment

As the needs assessment will be recurring and likely conducted over the span of several years, these additional resources would be needed on an ongoing basis and could integrate the assessment with other source documentation such as the Park Condition Assessment, Unfunded Park Improvements List, and unfulfilled General Development Plans to identify suitable park projects and programs.⁸

Once these positions are hired, the Department will also enhance inclusive engagement in the following areas:

- Qualitative data collection: Conduct qualitative data collection mechanisms through focus groups and community roundtables to capture the perspectives on parks and recreational programs.
- Department staff inclusive engagement: Conduct focus groups with staff to identify opportunities to enhance parks and recreational programs.
- Leveraging staff talents and skills: Examine the administrative and programmatic distribution of staff time and expertise to ensure that each recreation center and aquatic complex is leveraging the skills of each employee.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #2: Once the Parks and Recreation Department completes a community needs assessment, it should develop a strategic plan for addressing recreational equity that:

- Defines Parks and Recreation Department's vision for equitable recreation programming
- Includes objectives and goals with performance measures to gauge progress
- Identifies resource needs to implement:
 - The goals and objectives of the strategic plan

⁸ The unfunded park improvements list is updated every other year and is available here: <https://www.sandiego.gov/park-and-recreation/general-info/documents> and https://www.sandiego.gov/sites/default/files/2018_unfunded_park_improvements_list.pdf. The General Development Plans are available here: <https://www.sandiego.gov/park-and-recreation/general-info/gdp>.

- The recommendations in this audit report
- Any other strategies Parks and Recreation Department plans to pursue to improve recreation programming equity.
- Requires Parks and Recreation Department to annually update progress on its performance measures
- Requires Parks and Recreation Department to update its objectives, goals, and performance measures every five years and incorporate findings from the community needs assessment

The Parks and Recreation Department should present the strategic plan to the City Council for approval. (Priority #1)

Management Response: Agree. Mayor Todd Gloria is developing a Strategic Plan for the City that incorporates equity as a focal area. Led by the Performance and Analytics Department, the Strategic Plan process is currently under development for all City departments. Given the development of the Strategic Plan may reach completion prior to the needs assessment, the Department can commit to completing this recommendation if it can be done prior to Recommendation #1.

The Department agrees that the City Council will consider the Strategic Plan, with its resultant vision, mission, goals, objectives, and performance measures. Selected measures can be added to the Key Performance Indicators listed in the annual budget document, and these measures can be updated annually as part of the budget development process. The Parks and Recreation Department plans to update its Strategic Plan along with the other City departments, but if there is a need to change it as a result of the needs assessment once completed, the Department can bring the changes forward as part of the annual budget development process.

Target Implementation Date: September 1, 2022

Finding 2: Parks and Recreation Department’s approach to resource allocation and program quality is incomplete and limits its ability to provide equitable recreation programming.

Recommendation #3: To fully recover taxpayer money spent on contracted recreation programs, the Parks and Recreation Department should include contracted recreation programs in its next User Fee Study and increase the program surcharge, if necessary, in order to reach 100 percent cost recovery on these programs. (Priority #1)

Management Response: Agree. In accordance with Council Policy 100-05, the Department plans to present its updated Fee Schedule to the Budget and Government Efficiency Committee in January 2022. In fall 2021, staff presented the draft Fee Schedule and its companion 2020 Cost of Service Study to the Park and Recreation Board, Area Committees, Balboa Park Committee, and Mission Bay Park Committee. This Fee Schedule update is intended to connect with the ongoing budget development process and integrate with the Mayor’s Proposed Fiscal Year 2023 Budget, which is planned for distribution to the City Council on or before April 15, 2022.

As a result of the status of the fee schedule update process for 2022, the Department agrees with evaluating all recreation contract service classes that are funded by user fees to ensure full cost recovery, but recommends this be accomplished through the 2023 Cost of Service Study. The 2023 Cost of Service Study will provide necessary baseline information for development of the next schedule Fee Schedule update, which is scheduled to come to City Council in 2025 in support of the Fiscal Year 2026 budget development process.

Based on generally accepted practices for recreation programs, the Department recommends that fees be set up to ensure paying participants will attend activities and events but not become a barrier to participation. It is notable that NRPA, in its 2018 Urban Agency Performance Review,⁹ noted that park agencies typically recover 20.7% of its operating expenditures through revenue recovery such as fees, and larger cities (serving a population of at least 500,000) have cost recovery of only 17%. The reason for this level of cost recovery is so that participant fees are low enough to ensure anyone interested in participating in an activity or program can do so regardless of income level.

Target Implementation Date: March 2025

Recommendation #4: To identify disparities in equitable funding, the Parks and Recreation Department should develop, document, and implement a resource allocation model that will evaluate resource equity between recreation facilities. The model should be based on:

- Community-specific criteria (e.g., health indicators, poverty, transportation access, etc.)
- Site-specific criteria (e.g., size, frequency of visitors, amenities, etc.) (Priority #1)

Management Response: Agree. For community-specific criteria, the 2019 Climate Equity Index provides much information about each community. To create an equity matrix based on this data, the Department would hire a consultant to develop a tool based on the various criteria with the CEI that can be applied to evaluate and compare parks and programs offered in all communities. Some site-specific criteria are available in park inventory spreadsheets, geographic information systems (such as ArcGIS), and the online registration program. A consultant would analyze these data and identify possible resource shortfalls for any given area within the City. The Department would incorporate these results into the annual Equity Report and budget request process. As this recommendation requires additional resources not currently available to the Department as noted in the response to Recommendation #1, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #5: To monitor the quality of staff-run and contractual programs, the Parks and Recreation Department should develop, document, and implement a comprehensive method for measuring the quality of all recreation programs. This should

⁹ The 2018 NRPA Urban Agency Performance Review is available at <https://www.nrpa.org/siteassets/nrpa-agency-performance-review-urban.pdf>. Specific figures (10.7% and 17%) are cited from pages 2 and 13 of the report.

include training staff to conduct these program quality assessments in a way that is standardized and incorporates notes, observations, and interview data. (Priority #2)

Management Response: Agree. As noted in the response to Recommendation #1, the Department values input and feedback to improve recreation program offerings. Current surveys, such as the summer survey and the Come Play Outside survey, may not get the comprehensive data desired. However, it was evident through the nearly \$1 million in additional program funding provided by the County of San Diego and the City's budget for the Come Play Outside initiative that communities of concern are interested in a broad range of programming. In order to address this question, the Department recommends working with a consultant and the analytical team proposed in Recommendation #1, to create a formal surveying system available for all program participants that attaches to the on-line registration platform, the City's webpage, social media, and pen-and-paper comment cards. As this recommendation requires additional resources not currently available to the Department as noted in the response to Recommendation #1, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #6: To address the resource disparities identified in Recommendation #4 and the disparities in program quality identified in Recommendation #5, the Parks and Recreation Department should develop, document, and implement a plan for directing resources, including any equity-based funding, toward specific steps to eliminate identified disparities. Steps taken to address disparities should:

- Consider using equity-based funding for scholarships that apply to contracted programs
- Incorporate community feedback
- Include measurable metrics
- Report on the effectiveness of the Opportunity Fund in addressing inequities
- Be included in any update to the strategic plan developed in response to Recommendation #2 (Priority #1)

Management Response: Agree. Disparities can be reported in the annual Equity Report, including efforts to promote inclusion for recreational programs and budgetary requests to address these areas to improve access. As this recommendation relies on completion of other recommendations that require additional resources not currently available to the Department as noted in the response to Recommendation #1, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Finding 3: The Parks and Recreation Department's approach to community engagement and marketing is decentralized and inconsistent and results in diminished access to programming

Recommendation 7: In order to increase and standardize marketing efforts, the Parks and Recreation Department should hire a marketing professional to:

- Manage online (e.g., social media, websites) and physical (e.g., flyers, banners) content
- Coordinate marketing efforts across the Parks and Recreation Department
- Lead strategic marketing initiatives for the department (e.g., public relations, educational campaigns, etc.) (Priority #3)

Management Response: Agree. Marketing is an area of development for the Department. However, as this recommendation requires additional resources not currently available to the Department as noted in the response to Recommendation #1, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #8: In order to effectively market recreation programs to all residents, the Parks and Recreation Department should:

- Direct individual recreation centers to collect demographic information on participants and the surrounding community, including age, gender, race, and other demographics
- Use collected information to create a strategic marketing plan that:
 - Sets goals and objectives for marketing efforts
 - Creates steps for Citywide marketing plans
 - Develops policies for individual recreation center marketing plans
- Use demographic information to tailor marketing efforts towards specific segments of the population, with the goal of promoting engagement through awareness, access, and participation (Priority #2)

Management Response: Agree. Marketing is an area of development for the Department, and a strategic marketing plan could help train staff on how to reach out to San Diegans to help them learn about the many recreational opportunities that exist at the local recreation center. Implementing this recommendation includes some steps that Department staff can take prior to the end of the fiscal year, such as connecting with the San Diego Public Library to learn more about its marketing program which includes centralized efforts to deploy programming to all of its sites, but will also require additional resources not currently available to the Department as noted in the response to Recommendation #1. Therefore, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Finding 4: Parks and Recreation Department has made efforts to ensure certain communities can participate in recreation programs, but significant barriers remain that may preclude other groups from participating.

Sub-Finding 4-1: Parks and Recreation Department’s approach to low-income fee waivers is inconsistent and does not maximize their impact.

Recommendation #9: To ensure that eligible program participants can receive the fee waiver, the Parks and Recreation Department should develop, document, and implement procedures that allow residents to:

- Apply fee waivers to all eligible programs on an annual basis
- Register for classes online while using the fee waiver (Priority #3)

Management Response: Agree. The Department has recently issued a memorandum and form for the Low-Income Fee Waiver (LIFW) process and is currently developing a link on the City’s webpage for program participants to learn more about the LIFW. Opportunities for LIFW would include contract service classes. For those classes that are funded by participant fees, the fees charged would be sufficient to cover any funding gap created by a low-income participant not paying a fee. This will also tie into developing a recommendation on how to allocate the opportunity fund, which is proposed as part of the upcoming amendments to the Department’s Fee Schedule. Funding contract services will remain contingent on available grants, donations, and dedicated funding until the opportunity fund is established.

Target Implementation Date: July 1, 2022

Recommendation #10: To ensure recreation programs are accessible to people at all income levels, the Parks and Recreation Department should reevaluate its current practice of only allowing the fee waiver for Civic Dance and Aquatics programs and expand eligibility to other recreation programs. As part of this, the Parks and Recreation Department should:

- Analyze alternative agency fee waiver models—including higher income limits, tiered systems, and membership passes—and recommend adoption of a decided-upon model
- Develop, document, and implement guidelines that specify which programs and costs fee waivers can be applied to and the rationale for leaving other programs and costs ineligible for fee waivers and include them in the Parks and Recreation Department’s fee schedule (Priority #3)

Management Response: Agree. As noted in the Management Response to Recommendation #9, the Recreation Services Program Manager will evaluate opportunities for additional LIFW opportunities, including an analysis of other agencies. The Department can incorporate any new guidelines or other changes to the LIFW process into the LIFW memo, which is currently issued annually.

Target Implementation Date: July 1, 2022

Sub-Finding 4-2: Recreation program information is not equally accessible to people who do not speak English.

Recommendation #11: To gain insight into the languages spoken in each community, the Parks and Recreation Department should develop, document, and implement a plan to

identify recreation center service areas and the languages spoken by individuals or households in those areas. The Parks and Recreation Department should update and review the results of this analysis at least biannually to determine which translation and interpretation languages are necessary in the service areas. (Priority #2)

Management Response: Agree. Multilingual approaches to providing recreation services is an area of development for the Department, and a communication plan based on the various languages spoken in the City's diverse communities could help provide guidance for staff seeking to maximize input to develop responsive recreational programs to meet their needs. This effort should supply crucial insight to community needs and can be reviewed every other year to ensure no major demographic shifts in the City are overlooked. However, as this recommendation requires additional resources not currently available to the Department as noted in the response to Recommendation #1, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #12: To ensure that the Parks and Recreation Department meets community language needs, the Parks and Recreation Department should:

- Develop, document, and implement a department-wide language access plan that includes at least the following elements:
 - Establish a threshold at which languages must be spoken in the service area to be considered a substantial number of customers
 - Policies for recreation center staff that specify which written materials need to be translated into the languages identified in Recommendation #11
 - Procedures for getting documents translated and approved by qualified bilingual staff or professional translators (Priority #2)

Management Response: Agree. As the Department provides inclusive programs, the Department is committed to assessing how to request budget allocations to address identified gaps in translation. This recommendation has the same considerations and process for execution as Recommendation #11, including that this recommendation requires additional resources not currently available to the Department as noted in the response to Recommendation #1, which makes this effort currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #13: To provide high-quality customer service to residents who speak languages other than English, the Parks and Recreation Department should:

- Work with the Communications Department to obtain access to a contract for over-the-phone interpretation services and written materials translation (Priority #2)

Management Response: Agree. The Communications Department is currently working to issue a Request for Proposals (RFP) for a vendor to provide verbal and written translation services. The goal is to have the Contractor in place by the end of Fiscal Year 2022. The Communications Department plans to request 1.00 Program Coordinator to manage this

contract and implement the services while working closely with Parks and Recreation Department staff. The Communications Department envisions this as a system where staff request either translation of materials or verbal interpretation services through a Public Information Officer or directly through the Contractor. The RFP requests a call-in feature that would allow Department staff direct access to live interpretation.

Target Implementation Date: October 1, 2022

Finding 5: Although Parks and Recreation Department tracks certain program information, current practices diminish its ability to implement a data-driven approach for resource allocation, monitoring, evaluation, and reporting.

Recommendation #14: To facilitate data analysis efforts, the Parks and Recreation Department should develop, document, and implement naming conventions for the same or similar recreation programs in its recreation program management software and train staff on these naming conventions as part of Recommendation #16. (Priority #3)

Management Response: Agree. The Department attempted to implement naming conventions at the time the online registration software was first implemented. However, lack of centralized coordination led to site-specific naming. The Department recently formed a super user committee under the guidance of the Recreation Services Program Manager, and naming can be an area of work for this committee.

Notably, centralized naming conventions can work for staff-led programs, but contract service providers often provide the name of their program to the Department and expect that name to be used in the online registration software. The Department can look at categorizing various types of programs and activities so that staff can retain flexibility and creativity when developing names for programs while still creating some level of centralized control over naming.

Target Implementation Date: May 1, 2022

Recommendation #15: To ensure the accuracy of key data fields in the Parks and Recreation Department's recreation program management software, the Parks and Recreation Department should:

- Develop automated controls, where possible, to ensure that recreation staff enter program information in the recreation program management software consistently and accurately
- Develop policies and procedures that require Area Managers to regularly review program information captured in Parks and Recreation Department's recreation program management software—such as dates, season, and class status, among others—for consistency and accuracy. These policies and procedures should specify how Area Managers should select data entries for review, require this review to be documented, and identify corrective actions where necessary. (Priority #2)

Management Response: Agree. The Department currently has procedures in place for Area Managers to regularly review ActiveNet entries, and the Department plans to formalize this into a procedural memorandum or department instruction. This material can be reinforced

through training. The Department also plans to utilize a portion of the positions identified in Recommendation #1 to evaluate ActiveNet and determine if that remains the best online registration program or if another option with additional data analytics tools would be preferable.

The Department also recently developed and implemented the automated Fee Calculator, which staff began using in March 2021. The Fee Calculator retains the factors used by staff in developing fees for various permits and reduces opportunities for fraud and abuse by accidentally miscalculating fees. Training for the online recreation system is offered to all new employees and is updated for existing employees. The recreation specialists and analysts in Recommendation #1 would create standards for data entry into the online registration system.

However, as this recommendation requires additional resources not currently available to the Department as noted in the response to Recommendation #1, this effort is currently unfunded.

Target Implementation Date: To be determined depending upon Fiscal Year 2023 budgeted resource allocations.

Recommendation #16: To ensure that staff are adequately trained on how to enter program information into its recreation program management software, the Parks and Recreation Department should:

- Provide an updated (current) training on its recreation program management software to all users that includes documenting the appropriate program name, primary program instructor, and noting the appropriate activity status
- Annually provide a recreation program management software refresher training to all users (Priority #3)

Management Response: Agree. The Department currently uses ActiveNet as its online registration software. Under the direction of the Recreation Services Program Manager and the Training/Employee Development Program Coordinator, the Department established a committee of proficient ActiveNet users. This committee represents the various areas of the Department currently using ActiveNet and has a goal of creating a comprehensive training program for staff to use ActiveNet. Once created, training offerings and topics are planned to include new user overview, annual refresher training, and trainings to address changes in procedures, policies, and software updates. The Department intends for this committee to continue meeting after the training program is created. It is intended to be a direct resource for Department staff to ask questions, troubleshoot issues, and review data entries related to the online registration program.

Target Implementation Date: April 1, 2022

Conclusion

We thank the Office of the City Auditor and its staff for their insightful look into recreation equity. The recommendations will ensure all San Diegans have access to much needed

recreational opportunities in the City's diverse communities. If you have any questions, please contact me at (619) 235-1110 or afield@sandiego.gov.



Andy Field
Director
Parks and Recreation Department

cc: Paola Avila, Chief of Staff, Office of the Mayor
Jay Goldstone, Chief Operating Officer
Matthew Vespi, Chief Financial Officer
Kristina Peralta, Deputy Chief Operating Officer
Jessica Lawrence, Director of Policy, Office of the Mayor
Matt Yagyagan, Deputy Director of Policy, Office of the Mayor
Andrea Tevlin, Independent Budget Analyst
Jane Boardman, Deputy City Attorney
Karen Li, Deputy City Attorney
Nicole Pedone, Deputy City Attorney
Kirby Brady, Director, Performance and Analytics Department
Rolando Charvel, Director and City Comptroller, Department of Finance
Nicole Darling, Director, Communications Department
Kim Desmond, Chief Officer of Race and Equity
Christiana Gauger, Chief Compliance Officer
Jonathon Glus, Executive Director, Commission for Arts and Culture
Mike Hansen, Director, Planning Department
Alyssa Muto, Director, Sustainability and Mobility Department
Karen Dennison, Assistant Director, Parks and Recreation Department
Tom Tomlinson, Assistant Director, Planning Department
Gina Dulay, Deputy Director, Parks and Recreation Department
Louis Merlin, Deputy Director, Parks and Recreation Department
Shelly Stowell, Deputy Director, Parks and Recreation Department
Michael Tully, Deputy Director, Parks and Recreation Department
Heidi Vonblum, Deputy Director, Planning Department
Sarah Erazo, Program Manager, Parks and Recreation Department
Jon Richards, Program Coordinator, Parks and Recreation Department
Tim Graham, Supervising Public Information Officer, Communications Department