INTERNAL AUDIT DIVISION
CLERK OF THE CIRCUIT COURT

AUDIT OF
ALTERNATE WATER SOURCE REBATE
AND CONSERVATION PROGRAM

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JUNE 25, 2009
REPORT NO. 2009-12

*Regulated by the State of Florida

Internal Audit Division, Clerk of the Circuit Court
June 25, 2009

The Honorable Chairman and Members
of the Board of County Commissioners

We have conducted an audit of the Alternate Water Source Rebate and Conservation Program. Our audit objectives were to determine compliance with the AWS Program eligibility requirements; compliance with the written AWS Program Rebate Policy and Procedures; and if there is potential to maximize the AWS Program membership.

We conclude that the Utilities Department is complying with AWS Program eligibility requirements as well as AWS Program Rebate Policies and Procedures. Except as noted in our report, the AWS Program membership is being maximized. Opportunities for Improvement are presented in this report.

We appreciate the cooperation shown by the staff of the Pinellas County Utilities Department during the course of this review.

Respectfully Submitted,

Robert W. Melton
Chief Deputy Director
Internal Audit Division

Approved:

Ken Burke, CPA*
Clerk of the Circuit Court
Ex Officio County Auditor
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# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Introduction</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opportunities for Improvement</td>
<td></td>
</tr>
<tr>
<td>1. Rebates For Wells Used By Multiple Properties Exceed The Authorized 50% Maximum Rebate.</td>
<td>8</td>
</tr>
<tr>
<td>2. Inadequate Monetary Rebate Incentives Result In Reimbursement Far Less Than The Intended 50% of Well Installation Costs.</td>
<td>10</td>
</tr>
<tr>
<td>3. Program Marketing Needs To Be Enhanced.</td>
<td>13</td>
</tr>
<tr>
<td>4. Reconciliation Between The PCU’s Maximo Work Order System And The Official AWS Program Database Is Not Performed, And Does Not Provide The Required Internal Control Over The Rebate Financial Data.</td>
<td>15</td>
</tr>
<tr>
<td>5. Confusion Surrounding Documentation Requirement Presents Potential AWS Policy Compliance Violations.</td>
<td>16</td>
</tr>
<tr>
<td>6. The AWS Program Web Page Needs Clarification.</td>
<td>18</td>
</tr>
</tbody>
</table>
Synopsis

The long term strategic goal of Pinellas County is to eliminate the use of the County’s highly treated public supplied water for irrigation purposes. Pinellas County Utilities department management and staff show a genuine commitment to water conservation and a desire to continue to develop and improve plans and programs to accomplish this. However, the Alternate Water Source Rebate and Conservation Program is not meeting the maximum potential public supplied water savings under the current rebate guidelines.

Scope and Methodology

We conducted an audit of the Alternate Water Source Rebate and Conservation Program (AWS Program). The objectives of our audit were to:

1. Determine compliance with the AWS Program eligibility requirements.

2. Determine compliance with the written AWS Program Rebate Policy and Procedures.

3. Determine if there is potential to maximize the AWS Program membership.

In order to meet these audit objectives, we interviewed Utilities management and staff to acquire an understanding of the:

- History and goals of the AWS Program.
- The eligibility and reporting requirements.
- The flow and use of the Maximo Work Order System.
- The Program Database and how it is maintained.
- The methods of advertisement.
- Administration of the AWS Program.
We also gained first hand knowledge of the AWS Program by utilizing the Web Site to request additional information. We reviewed the AWS Program Policy and Procedures document as well as the Maximo Users manual, and followed a number of applications through the process of approval to receipt of rebate. Based on our analysis of the available data, we determined the average installation costs and rebate percentages.

Our audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing and the Standards for Offices of Inspector General, and accordingly, included such tests of records and other auditing procedures, as we considered necessary in the circumstances. The audit period was October 1, 2007 through November 30, 2008. However, transactions and processes reviewed were not limited by the audit period.

**Overall Conclusion**

Except as noted in our report, the Utilities Department is complying with AWS Program eligibility requirements, as well as AWS Program Rebate Policies and Procedures. Except as noted in our report, the AWS Program membership is being maximized.

**Background**

Pinellas County Utilities is committed to water conservation and continues to develop and improve its AWS Programs to accomplish this goal. The two key methods used to achieve this goal are continuous improvements in lawn and landscape irrigation efficiency. The full utilization of alternative water resources for the irrigation of lawns and landscapes will reduce the demand on our public supplied resources by as much as 25% on an annual average daily basis. The reduction in irrigation of lawns and landscapes allows Utilities to prioritize its potable water supply for individual customer’s needs such as drinking, cooking, etc., and reduce the need for the development of new and expensive potable water sources. Tampa Bay Water is the regional supplier and is under mandate to reduce groundwater pumping from 121 million gallons per day (mgd) to approximately 90 mgd. Therefore, Pinellas County must continue to promote the efficient and effective use of water resources.
The Board of County Commissioners authorized the Utilities Department to create an Irrigation Well Assistance Program in 1997. The goal of this program was to provide financial incentives to qualified Utilities customers to install non-potable water sources to meet their irrigation needs. The rebate incentive reimburses up to 50% of the cost to install shallow or deep water wells or surface water withdrawal systems. The maximum amount of the reimbursement is $300. In 1998, the pilot program was revived authorizing 100 rebates and was very effective in providing a cost effective option for qualified customers.

On June 8, 1999, the Board of County Commissioners (BCC) authorized the continuation of the original Shallow Well Program Policy and Procedures. Pinellas County Utilities (PCU) in partnership with Southwest Florida Water Management District (SWFWMD) developed “The Alternative Year-Round Irrigation Conservation Program” that encompasses, refines and enhances the County’s Alternative Water Sources Rebate Program and the “Healthy Lawns Programs.” The “Healthy Lawns Programs” focuses on water conservation and results in reduced water use for lawn and landscape irrigation while maintaining healthy vegetation and property value. The Alternative Water Sources Rebate Program provides monetary incentives to discontinue the use of potable public supplies for lawn and landscape irrigation and to replace them with non-public supplies, Alternative Water Sources.

The October 24, 2006 BCC Resolution No. 06-195 adopted establishing the new Alternate Water Source Rebate and Conservation program which
will comply with SWFWMD Order No. 05-09. The new AWS Program provides the same rebate criteria as the original program and also provides additional non-monetary incentives, increased program oversight, and a greater emphasis on smart and efficient irrigation techniques. In recognition of the conservation benefits of the Alternate Water Source Rebate and Conservation Program, SWFWMD agreed to cooperatively fund the Alternate Source Rebate Program. This agreement allows for the installation of 500 alternate water sources and for 100 run-time irrigation meters (which monitor usage) to be installed on randomly selected program participants’ irrigation systems. The agreement is effective October 1, 2006 through December 31, 2009. The total AWS Program cost is $165,000 with SWFWMD agreeing to fund up to $82,500. The PCU source of funding for this project is the Utilities Operating Budgets.

Phase II of the Cooperative Funding Agreement between SWFWMD and PCU for the Alternative Source Rebate Program is effective January 1, 2010 through December 31, 2012. The total cost of Phase II is $150,000 and SWFWMD agrees to reimburse the County up to a maximum of $75,000. If it becomes evident that the total project cost will exceed $150,000, SWFWMD and the County, by mutual written agreement, may provide additional funding or reduce the project scope. The agreement allows for the continuation of the water conservation program and provides for 500 new participants to receive financial incentive for installing non-potable water supply sources to meet their irrigation needs.
Our audit disclosed certain policies, procedures and practices that could be improved. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure or transaction. Accordingly, the Opportunities for Improvement presented in this report may not be all-inclusive of areas where improvement may be needed.

1. Rebates For Wells Used By Multiple Properties Exceed The Authorized 50% Maximum Rebate.

For multiple properties using the same well, the approved amount is divided by the number of eligible properties. Each resident pays the homeowner’s association a portion of the cost for the well and receives a portion of the rebate. The general policy for rebates states that a rebate shall be up to 50% of the well installation cost and shall not exceed $300.

For the audit period, we identified two rebates which involved installed multiple property wells. In one case, the cost of the well installation was $4,877, which served 46 properties. The rebate per individual property was calculated to be $106. Collectively, the rebates amounted to 100% of well installation. This resulted in an overpayment of $2,385 over the 50% cap.

In the second case, the cost of the well was $11,820, and served 16 properties. The rebate per individual property was calculated to be $300. Collectively, the rebates amounted to $4,800 which did not exceed 50% of the well installation. However, had there been 40 properties using the same well and all the property owners received the $300 maximum rebate, the potential exists that the 50% cap would have been exceeded. The table below highlights the cases presented.
Opportunities For Improvement
Alternate Water Source Rebate and Conservation Program

<table>
<thead>
<tr>
<th>Name</th>
<th>No. of Properties</th>
<th>Approved Amount</th>
<th>Approved Rebate Per Property</th>
<th>Total Rebate Amount</th>
<th>Percentage Rebate On Approved Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pinnacle Drive Subdivision - Oldsmar</td>
<td>46</td>
<td>$4,876.78</td>
<td>$106.01</td>
<td>$4,770.45</td>
<td>98%</td>
</tr>
<tr>
<td>Elisabeth Lane Subdivision - Largo</td>
<td>16</td>
<td>$11,820.00</td>
<td>$300.00</td>
<td>$4,800.00</td>
<td>40%</td>
</tr>
<tr>
<td>Single Property User Average**</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15%</td>
</tr>
</tbody>
</table>

* Only 45 property owners collected the $106.01; not the approved 46
** See Opportunity for Improvement No. 2

There is no provision in the AWS policy that specifically addresses multiple property rebates. It appears that the intent of the AWS Program’s policy is to apply the same rebate calculation to both single and multiple properties; there is an inconsistent distribution of rebate monies.

Should more multiple property rebates be applied for, the AWS funds could be exhausted quickly and single property well rebates would be reduced. In the aforementioned example, the overpayment of $2,385.23 would mean that rebates (at $300 each) for eight potential applicants would not be available. If the intent of the AWS Program policy and/or management is to apply a different calculation to multiple property rebates, there is not a procedure to identify such a calculation.

It is important to note that multiple property well(s) provide the AWS Program the most cost effective source of potable water savings (see Opportunity for Improvement No. 3).

We recommend management:

Update the AWS Program Policy and Procedures to include a specific procedure to address the calculation of multiple property rebates.

Management Responses:

We agree with the need to implement a unilateral approach and formula that recognizes the diversity of multiple property funding situations and maximizes the financial incentive to encourage project participation. Once this approach is identified, the Program Policy
and Procedures will be updated to include the calculation of multiple property rebates so that there is a defined methodology for calculating the rebate.

2. Inadequate Monetary Rebate Incentives Result In Reimbursement Far Less Than The Intended 50% Of Well Installation Costs.

Rebate incentives are inadequate to reach and maintain AWS Program and strategic Water Conservation goals. Of the 223 AWS Program members reviewed:

- 92% received less than the intended 50% of the cost to install the alternate water source based on the approved amount for well installation and the authorized rebate amount.
- The average rebate was 15% of the total approved amount.
- 50% of the median cost to install a well is $825.

A goal of Pinellas County is to implement an alternative source irrigation program that will eliminate the use of expensive public supplied potable water for irrigation purposes. The AWS Program allows for reimbursement of up to 50% of the cost to install the alternate water source, with the total rebate amount not to exceed $300. Since the inception of the AWS Program in 1977, the maximum allowable rebate has remained at $300 while the cost to install wells has risen. This is evidenced by the fact that Pilot Program members submitted invoices ranging from $150 to $2,550 while 2007/2008 invoices ranged from $590 to $7,150. The realistic number of Program members is lower than it could be if the amount of the rebate incentive allowed a greater number of applicants to reach the intended 50% of well installation cost. The pictures below show a typical well installation in Pinellas County.
Further, there is no incentive to keep an existing AWS Program well in working order after the initial installation. The incentive to provide maintenance for a well is not in place. The replacement of pumps and other maintainable items have not been authorized for rebate purposes. In order to continue to realize the current/past savings in potable water usage, each existing well must be operational and kept in working order. Therefore, the savings in potable water use realized after the initial installation of a well will diminish over time.

We realize that increasing the incentives would have a dramatic effect on the current $165,000 budget amount; however, in the long term, an increase in the AWS incentives will save PCU monies in the reduction of potable water provided to assist Tampa Bay Water’s mandate to reduce groundwater pumping. As highlighted in the cooperative agreement between the County and SWFWMD, for every 500
wells drilled, PCU reduces and saves 75,000 gallons of potable water per day (150 gallons savings per account per day).

The following tables provide our analysis on the AWS Program.

### Rebate Analysis

<p>| | |</p>
<table>
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</thead>
<tbody>
<tr>
<td>Average Rebate</td>
<td>15%</td>
</tr>
<tr>
<td>Weighted Average Rebate*</td>
<td>20.69%</td>
</tr>
</tbody>
</table>

* The weighted average takes into consideration the number of rebates at each percentage.

### Rebate vs. Approved Cost Analysis

- 92% of rebates are less than 50% of approved cost
- 75% of rebates are less than 40% of approved cost
- 63% of rebates are less than 25% of approved costs

### Well Cost Analysis

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Average Cost Of A Well</td>
<td>$2,033.24</td>
</tr>
<tr>
<td>50% Of Average Well Cost</td>
<td>$1,016.62</td>
</tr>
</tbody>
</table>

We recommend management:

A. Review the feasibility of the $300 limit on the rebate being increased to fall in line with 50% of the cost of installing a well. This adjustment should also consider an appropriate increase in the overall $165,000 AWS Program budget.

B. Review the feasibility of the replacement of well parts, such as pumps, for AWS members with inoperable wells, being included in the allowable items list. This adjustment should also consider an appropriate increase in the overall $165,000 AWS Program budget.

Management Response:

A. Utilities continuously evaluates program participation levels to ensure alignment with established performance goals and objectives. The ability to increase the $300 rebate limit must be balanced with current revenue and expenditure issues. There will be a continuous review of the ability to increase program
opportunities for improvement

alternate water source rebate and conservation program

budgets with the ongoing requirement of maintaining a balanced budget.

B. The core purpose of this program is to provide financial incentives to our qualified customers to install alternate water supply sources to meet their irrigation needs. The immediate program benefits of offsetting potable water usage, and the resultant cost savings, results in an average return of investment of two to five years for the customer. Utilities feels that this provides sufficient incentive for our customers.

3. Program Marketing Needs To Be Enhanced.

Marketing targeted towards Home Owners Associations which would encourage multiple property use of well(s) is inadequate. While multiple property well(s) are the most advantageous, they also take the sponsorship of someone willing to coordinate and work with the Home Owners Association to rally the residents. Without focused marketing and education about the AWS Program benefits, the necessary sponsorship and interest is less likely to develop.

Multiple property wells provide the most cost effective source of potable water savings. When one or more wells provides water for multiple properties, PCU saves staff resources and money because inspections, installation of backflow devices and program administration are required for only a single well while potable water savings are realized from multiple properties. The following table highlights the potential potable water savings for the multiple properties vs. single property potable water savings with a comparable rebate amount.

<table>
<thead>
<tr>
<th>Name</th>
<th>No. of Properties</th>
<th>*Potable Water Saved per Day</th>
<th>*Potable Water Saved per Year (gallons)</th>
<th>Total Rebated Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pinnacle Drive Subdivision</td>
<td>46</td>
<td>6,900</td>
<td>2,518,500</td>
<td>$4,770.45</td>
</tr>
<tr>
<td>16 Single Property Owners</td>
<td>16</td>
<td>2,400</td>
<td>876,000</td>
<td>$4,800.00</td>
</tr>
</tbody>
</table>

* 150 gallons per day per account  
** $300 rebate per property  
*** $106 rebate per property (45 of the 46 properties collected rebate)
Targeting marketing and/or educating this segment would benefit an entire subdivision. The general information provided on the website and by the well contractors does not make it obvious that the AWS Program extends to multiple property wells.

Management stated that program marketing has not been a focal point at this time, in part due to the continued restriction on additional watering days levied by SWFWMD due to the current drought conditions. However, other benefits such as lowered water bills and participation in the environmental plan to save public source potable drinking water should warrant the expense and effort necessary to attract the most beneficial and cost effective potential AWS Program members.

We recommend management:

A. Develop and implement marketing materials targeted to multiple property groups/associations which encourage multiple property use of well(s).

B. Explore the possibility of sending a PCU representative to address the multiple property groups/associations at an upcoming meeting to generate interest and awareness in the need to lessen the use of public source potable water for irrigation purposes.

C. Include a section on the AWS web page that targets multiple property groups/associations of the benefits of the AWS Program.

Management Response:

A. Utilities will evaluate increasing marketing efforts to allow targeting multiple property groups/associations.

B. Utilities Conservation Department Director currently does meet with homeowner associations regarding the utilization of alternate water supply sources to meet their irrigation needs.

C. Utilities will develop a section on the AWS web page that targets multiple property groups/associations.

In the Final Application Process in the Maximo Users Manual, the performance of a count, matching the number of completed wells in Maximo with the number in the official AWS Program Database (Excel Spreadsheet) is required. The Maximo database is primarily a work order system that tracks by unique work order number, all the different types of work performed by the Utilities crews, including the well installations for the AWS Program. There are many queryable fields to run a variety of reports. However, the date a rebate request is sent to Finance is not one of those fields.

AWS Program Management maintains a separate Excel spreadsheet which is the Official AWS Program Database; it is grouped by the date the rebate request was sent to Finance. The spreadsheet also contains a column with the work order number for each request.

It is possible to run a multitude of reports in Maximo by fields, such as:

- Job plan
- Status
- Status date

There is a job step that has a free form text description field that indicates when the rebate check was mailed. This text field is not queryable and the date does not necessarily match the date on the spreadsheet. There is also a count function in Maximo. Since there is no criteria common to both the Maximo database and the Excel spreadsheet group, the count function can not produce a list matching Maximo to Excel. Management stated that Maximo is used to count the numbers of each type of well (shallow, deep or surface water) that have been installed within a given time frame.

We found the Maximo count to be 337 and the AWS spreadsheet count to be 349. Management stated that the instruction in the Maximo Users Manual to match totals for each group of rebate requests sent to Finance is not done. Rather, a periodic count of all completed well
installations is performed. Management also stated that there is no other internal control to reconcile the well numbers. These records should be reconciled to reasonably ensure the number of wells are accounted for properly.

We recommend management update the Maximo instructions for Step Eight of the Final Application Process identifying specific queries to be run and to reflect the expected result as an approximation of the completed well installations as it is utilized in practice. Maximo should be reconciled to the spreadsheet as instructed in the manual.

Management Responses:

The current Official AWS Program Database (Reimbursement Spreadsheet) has been modified to track actual AWS installation data so that accurate data, for any desired timeframe, can be evaluated at any time. The updated version of Maximo will address the issues experienced with the current version of Maximo. Utilities has processed flow mapped the AWS Rebate Program. This information, along with the current procedures manual, will be utilized to create the required programs within the updated version of Maximo.


Differences in wording between the AWS Policy and Procedures Manual and the AWS Program Application create confusion regarding when a Well As Built Report is necessary, thus creating the potential to be out of compliance with Program requirements. Confusion as to what constitutes a Well As Built Report also exists. The Well As Built Report is part of the Well Completion Report which highlights the hydrograph surrounding the drilled well. The report includes, but is not limited to, the following reportable items:

- Static Water Level
- Sand Content
- Casing
- Depth
- Diameter
- Etc.
The AWS Policy and Procedures Manual states that the applicant **must submit**:

- The appropriate signed and dated application.
- A copy of the SWFWMD Well Permit and the Well As Built Report.
- Appropriate multiple property documentation (if required).
- All invoices and/or receipts for the installation of the Alternate Water Source.

Further, The AWS Program Application states if a licensed contractor is hired to install the well or surface water withdrawal system, a SWFWMD Permit and the Well As Built Report **must be provided**. If installed by the homeowner, a SWFWMD Permit and Well As Built Report (if applicable) **must be obtained and provided**.

The review of the files and the respective documentation determined that the Well As Built Reports were often not present. Staff for the AWS Program stated that applications for surface water withdrawal systems do not require the Well As Built Report. The vast majority of the samples reviewed were either shallow or deep wells. In some instances, staff were under the impression that diagrams constituted the report.

Confusion about this document could present several issues, such as:

- The homeowner, who is installing the well himself, spending unnecessary time trying to obtain paperwork that is not necessary. If the homeowner calls in to ask for help and there is confusion as to what the document looks like or how to obtain it, a homeowner may submit the wrong document and be in violation of the policies and procedures of the AWS Program.
- A licensed Well Driller would likely know what this document is and not face the same difficulty as a homeowner, but would also be in violation of AWS Program policies if the document is not provided.

**We recommend** management:

A. Update the Alternative Water Rebate and Water Conservation Policies and Procedure document and the Rebate Application to indicate specifically when it is applicable to submit the Well As Built Report.
B. Provide refresher education for PCU staff to allow easier identification of the document and to better assist AWS Program members.

Management Response:

A. The Alternate Water Rebate and Water Conservation Policies and Procedures document will be modified to state that well as-builds can be provided if available.

B. PCU Staff has received refresher education on program documents.


The AWS Program Web Page advises interested homeowners to enter their property address and phone number as well as their email address in order to receive information about the AWS Program. Responses are sent to the AWS REBATE mailbox (County’s email system) which is monitored and answered by the PCU staff. Staff determines if the property address given is eligible to participate and receive an AWS rebate. A response is then sent via email to the address provided either confirming eligibility and asking if an application packet is desired or informing the homeowner of ineligibility. Should the interested party provide a wrong email address, there is no notice of the undeliverable email sent from this address. A response could be sent to a non-existent email address without the staff realizing it.

Since responses are generally sent from non-County email addresses, it is not feasible to verify the accuracy of the email address at the time of entry. If the property owner decides they do not want additional information or an application packet at this time, and therefore does not reply, or if the property owner never received the email in the first place, the result is the same; therefore, there is no response to potential AWS Program members and potable water savings could be lost.

Another source of potential loss of AWS Program membership is overlooking and/or not answering incoming informational request emails. In the course of our audit, we reviewed the AWS website and completed the online information request form, which automatically sends an email to the AWS Program staff. Our test failed to receive a response from the AWS Program staff. Approximately four weeks...
later, we sent a second email indicating, “This is a second request for information,” in the comment box. Again, we did not receive a response from the AWS Program staff. We then pointed out to the AWS staff about our email test and the lack of a response, at which time they responded to our email request.

The AWS Program Web Page briefly describes the program benefits (see below) listing several bulleted criteria items. It does not state if the homeowner must meet one or all of the bulleted items. This wording could be misleading to the property owner leading to confusion and the possibility of poor word of mouth publicity for the AWS Program. Different people have different levels of patience and may find it annoying to take the time to submit even a simple form only to find out that they misread the criteria and were not eligible in the first place.

You can save money and drinking water if you have an alternate source for irrigation on your property. Our rebate program is green for your lawn and for your pocket!

By installing an alternate source for irrigation (such as a well), customers may be reimbursed up to $300 through the Alternate Water Sources Rebate Program.

Rebates are available for 50% of the cost of the installation—up to a maximum of $300—for a shallow well, deep well, or surface water withdrawal system (such as lake, pond, or canal) for irrigation.

You are eligible for the rebate if you:

- Receive your water from Pinellas County Utilities or the City of Safety Harbor
- Currently are unable to receive reclaimed water
- Are not scheduled to receive reclaimed water within the next five years

For more information, contact:

Alternate Water Sources Rebate Program
Phone: (727) 464-3688
We recommend management:

A. Provide a method by which the AWS email monitor can determine if replies to requests for information have been received. One possible way would be to allow undeliverable notices to be generated to the mailbox as well as turning on a "return receipt" response function.

B. Review the procedures for processing AWS Program information request emails (identify and address unanswered email).

C. Avoid the possibility of confusion as to the eligibility criteria by adding wording to the effect of: “You are eligible for the AWS rebate if you meet ALL of the following criteria” to the Web Page.

Management Response:

A. There currently is an automatic response sent out to individuals once they send in a request. That automatic response only stays on the computer screen of the individual that is sending in the information for approximately 5 seconds. We are working with BTS to create an automatic email receipt response that remains in a sender’s directory until they delete it.

B. We have reviewed the procedures for processing AWS Program information requests. The procedures will be modified pending implementation of BTS automatic email receipt response.

C. The recommended wording will be added.