TO: The Honorable Chairman and Members of the Board of County Commissioners

FROM: Ken Burke
Clerk of the Circuit Court
Ex Officio County Auditor

SUBJECT: Follow-Up Audit of Alternate Water Source Rebate and Conservation Program

DATE: June 30, 2011

For your review and filing in the Official Records, I am enclosing a copy of the follow-up audit dated June 30, 2011 on the above-referenced audit.

I hope you find this report helpful in ensuring Pinellas County government provides the best possible service to our citizens.

cc: Robert S. LaSala, County Administrator
    Jim Bennett, County Attorney
    Kevin Becotte, Interim Director, Utilities
    Claretha N. Harris, Chief Deputy Director, Finance Division
    Ernst & Young
FOLLOW-UP AUDIT OF ALTERNATE WATER SOURCE REBATE AND CONSERVATION PROGRAM

Audit Services
Division of Inspector General

Ken Burke, CPA*
Clerk of the Circuit Court
Ex Officio County Auditor

Hector Collazo, Jr., CFE, CFS, CISA, CIG, CIGI, CRISC
Director/Inspector General/Chief Audit Executive
Division of Inspector General

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Flo Riggie, CIGA, CISA, CRISC, ITIL-F – Inspector General Auditor II
Ken Green, CIGA - Senior Inspector General Auditor

JUNE 30, 2011
REPORT NO. 2011-09

*Regulated by the State of Florida
**Accredited Office of Inspector General
By the Commission of Florida Law Enforcement Accreditation
June 30, 2011

The Honorable Chairman and Members
of the Board of County Commissioners

We have conducted a Follow-Up Audit of Alternate Water Source Rebate and Conservation Program. The objectives of our review were to determine the implementation status of our previous recommendations. Management provided us with the following response: "Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit."

Because of management’s elimination of this program, the 12 recommendations contained in the audit report were determined to be implemented as an acceptable alternative until such time, if and when, the program is reinstated. The status of each recommendation is presented in this follow-up review.

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

Respectfully Submitted,

Hector Collazo, Jr., Director
Audit Services, Division of Inspector General

Approved:

Ken Burke, CPA*
Clerk of the Circuit Court
Ex Officio County Auditor

*Regulated by the State of Florida
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<thead>
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<th>Original Issues and Recommendations</th>
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<td>50% Maximum Rebate.</td>
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INTRODUCTION

Scope and Methodology

We conducted a follow-up audit of the Alternate Water Source (AWS) Rebate and Conservation Program. The purpose of our follow-up review was to determine the status of previous recommendations for improvement.

The purpose of the original audit was 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.

To determine the current status of our previous recommendations, we surveyed and/or interviewed management to determine the actual actions taken to implement recommendations for improvement. We normally would have performed limited testing to verify the process of the recommendations for improvement, but since Management had stopped utilizing this program, we only utilized Management's responses.

Our follow-up 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. Our follow-up testing was performed during the month of June 2011. The original audit period was October 1, 2007 through November 30, 2008. However, transactions and processes reviewed were not limited by the audit period.

Overall Conclusion

Because of management elimination of this program, the 12 recommendations contained in the audit report were determined to be implemented as an acceptable alternative until such time, if and when, the program is reinstated. The status of each recommendation is presented in this follow-up review.
### Status

<table>
<thead>
<tr>
<th>FINDING NO.</th>
<th>PREVIOUS RECOMMENDATION</th>
<th>IMPLEMENTATION STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Rebates For Wells Used By Multiple Properties Exceed The Authorized 50% Maximum Rebate.</strong></td>
<td>Implemented</td>
</tr>
<tr>
<td>1</td>
<td>Update the AWS Program Policy and Procedures to include a specific procedure</td>
<td>Partly Implemented</td>
</tr>
<tr>
<td>2</td>
<td><strong>Inadequate Monetary Rebate Incentives Result In Reimbursement Far Less Than The Intended 50% Of Well Installation Costs.</strong></td>
<td>Implemented</td>
</tr>
<tr>
<td>2</td>
<td>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.</td>
<td>Implemented</td>
</tr>
<tr>
<td>2</td>
<td>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.</td>
<td>Implemented</td>
</tr>
<tr>
<td>3</td>
<td><strong>Program Marketing Needs To Be Enhanced.</strong></td>
<td>Implemented</td>
</tr>
<tr>
<td>3</td>
<td>A. Develop and implement marketing materials targeted to multiple property groups/associations, which encourage multiple property use of well(s).</td>
<td>Implemented</td>
</tr>
<tr>
<td>3</td>
<td>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.</td>
<td>Implemented</td>
</tr>
<tr>
<td>3</td>
<td>C. Include a section on the AWS web page that targets multiple property groups/associations of the benefits of the AWS Program.</td>
<td>Implemented</td>
</tr>
<tr>
<td>4</td>
<td><strong>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.</strong></td>
<td>Implemented</td>
</tr>
<tr>
<td>4</td>
<td>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</td>
<td>Implemented</td>
</tr>
<tr>
<td>FINDING NO.</td>
<td>PREVIOUS RECOMMENDATION</td>
<td>IMPLEMENTATION STATUS</td>
</tr>
<tr>
<td>-------------</td>
<td>-------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>5</td>
<td>Confusion Surrounding Documentation Requirement Presents Potential AWS Policy Compliance Violations.</td>
<td>Implemented: ✓</td>
</tr>
<tr>
<td></td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B. Provide refresher education for PCU staff to allow easier identification of the document and to better assist AWS Program members.</td>
<td>✓</td>
</tr>
<tr>
<td>6</td>
<td>The AWS Program Web Page Needs Clarification.</td>
<td>Implemented: ✓</td>
</tr>
<tr>
<td></td>
<td>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 &quot;return receipt&quot; response function.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>B. Review the procedures for processing AWS Program information request emails (identify and address unanswered email).</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>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.</td>
<td>✓</td>
</tr>
</tbody>
</table>
Background

Pinellas County Utilities is committed to water conservation and had developed the Alternative Water Sources (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 (BCC) 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
Follow-Up Audit of Alternate Water Source Rebate And Conservation Program

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.
STATUS OF RECOMMENDATIONS

This section reports our follow-up on actions taken by management on the Recommendations for Improvement in our original audit of the Alternate Water Source Rebate and Conservation Program. The recommendations contained herein are those of the original audit, followed by the current status of the recommendations.

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.
Status of Recommendations
Follow – Up Audit of 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><strong>$4,770.45</strong></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).

**Recommendation:**

Update the AWS Program Policy and Procedures to include a specific procedure.

**Status:**

Acceptable Alternative.

Management provided us with the following response. “Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit.”
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.

Typical Well Installation

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.

<table>
<thead>
<tr>
<th>REBATE ANALYSIS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AVERAGE REBATE</strong> → 15%</td>
</tr>
<tr>
<td><strong>WEIGHTED AVERAGE REBATE</strong> → 20.69%</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>REBATE VS. APPROVED COST ANALYSIS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>92% OF REBATES ARE LESS THAN 50% OF APPROVED COST</strong></td>
</tr>
<tr>
<td><strong>75% OF REBATES ARE LESS THAN 40% OF APPROVED COST</strong></td>
</tr>
<tr>
<td><strong>63% OF REBATES ARE LESS THAN 25% OF APPROVED COSTS</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>WELL COST ANALYSIS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AVERAGE COST OF A WELL</strong> → $2,033.24</td>
</tr>
<tr>
<td><strong>50% OF AVERAGE WELL COST</strong> → $1,016.62</td>
</tr>
</tbody>
</table>
Recommendation:

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.

Status:

A. Acceptable Alternative.

B. Acceptable Alternative.

Management provided us with the following response. “Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit.”

3. Program Marketing Needs To Be Enhanced.

Marketing targeted towards Home Owners Associations, which would encourage multiple property use of well, 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.

Recommendation:

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.

Status:

A. Acceptable Alternative.

B. Acceptable Alternative.

C. Acceptable Alternative.
Management provided us with the following response. “Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit.”


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 cannot 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 Recommended 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.

Status:

Acceptable Alternative.

Management provided us with the following response. “Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit.”


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.

**Recommendation:**

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.

**Status:**

A. Acceptable Alternative.

B. Acceptable Alternative.

Management provided us with the following response. "Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit."

### 6. The AWS Program Web Page Needs Clarification.

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

Recommendation:

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.

Status:

A. Acceptable Alternative.

B. Acceptable Alternative.

C. Acceptable Alternative

Management provided us with the following response. "Because of budget cuts, we no longer offer the programs identified in the audit. If we reinstate these programs in the future, we will certainly take into consideration the recommendations contained in the audit."
DIVISION OF INSPECTOR GENERAL

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