AUDIT REPORT

NO. 2026-10

A PERFORMANCE AUDIT OF SALT LAKE COUNTY'S OVERSIGHT OF THE DISCOVERY GATEWAY AGREEMENT

SEPTEMBER 2, 2026

SALT LAKE COUNTY

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AUDITOR'S LETTER

September 2, 2026

We have completed a limited scope performance audit of Salt Lake County's ("the County") oversight of the Discovery Gateway Agreement ("the Agreement"). The audit covered the period from January 1, 2023, through December 31, 2024, and examined compliance with the Agreement, maintenance of County-owned building systems, Facilities Management's recording and billing of maintenance work, and required reporting by Discovery Gateway.

This report contains six findings and 17 recommendations. Two of the findings are rated high risk under the classification framework used in this report: preventive maintenance scheduling and documentation, and facility condition reporting and monitoring. We identified no instances of fraud, waste, or abuse. The County and Discovery Gateway have maintained a working relationship for more than 20 years, but the formal processes supporting that relationship have not kept pace with the way the Agreement operates today. The audit identified opportunities to strengthen contract oversight, preventive maintenance, reporting, work order documentation, billing, and conflict-of-interest oversight. Clearer processes and better documentation would help ensure that contract requirements continue to be understood and followed as personnel change, while strengthening the County's ability to demonstrate compliance over time.

What We Found

Preventive maintenance was not consistently scheduled, completed, or documented in accordance with the Agreement. Of the 116 preventive maintenance activities required during the audit period, 42 (36%) were completed as required. Thirty (26%) were not scheduled, 22 (19%) were scheduled but canceled without work being performed, 11 (9%) could not be confirmed because supporting documentation was unclear or missing, 7 (6%) were marked complete despite no associated work or charges, and 4 (3%) were not performed at the required frequency. Of the 30 unscheduled activities, Facilities Management believed 16 were the responsibility of the property management company; however, documentation confirming that arrangement or verifying completion was not retained. Several of the unscheduled activities involved life-safety and compliance-related systems, including fire alarm panels, smoke detectors, fire extinguishers, security panels, and state elevator inspections.

Facility condition reporting and monitoring could be strengthened. Discovery Gateway and the County maintained ongoing communication, and required financial and operational reports were generally submitted, though not always completely or on time. Of the seven quarterly reports available for review, one arrived by the deadline. The other six were between three and 387 days late, and an eighth could not be located or provided. Required employee compensation disclosures were not submitted for either 2023 or 2024, and the 2023 independent audit report arrived 79 days after completion, beyond the 30 days the Agreement allows. The County had not established a formal process for tracking, reviewing, and documenting required reports. In addition, the most recent facility condition assessment had been conducted in 2017, limiting visibility into the current condition of County-owned assets and future capital needs.

Contract management and oversight should be more formalized. The long-standing Agreement has supported a productive relationship between the County and Discovery Gateway, but the audit identified opportunities to refresh awareness of contract requirements among current stakeholders and ensure the formal framework keeps pace with how the relationship operates today.

One issue runs through all six findings in this report. The Agreement says what each party will do. It says almost nothing about what happens if they do not do it. There are no performance measures and no deadlines for fixing a problem once someone notices it. There is no process for raising a concern and getting it resolved. The Agreement also renews on its own, so there is never a point where either party has to stop and look at how the relationship is actually working. This is worth addressing as the Agreement is updated.

Work order oversight and billing practices could be improved. Work orders are the primary tool used to track maintenance activity, but consistently current status records and supporting documentation would provide a more reliable record of work performed and strengthen the billing process. The audit also identified opportunities to improve the consistency and completeness of invoice detail and supporting documentation, as well as compliance with requirements for invoice timing.

Conflict-of-interest oversight should be documented periodically. The audit did not identify conflicts of interest between the County and Discovery Gateway. That testing was limited in scope. Discovery Gateway declined our request for a roster of its employees, citing privacy concerns, so we relied on publicly available information. Existing County board disclosure procedures provide meaningful coverage for board-related relationships but do not extend to all County personnel who interact with Discovery Gateway outside of a board relationship, and the County does not maintain a documented review process specific to this Agreement. Establishing a routine process to document periodic conflict-of-interest reviews would strengthen transparency and provide a clear record as the relationship and personnel involved in the Agreement continue to evolve.

Facilities Management and Community Services agreed with all 17 audit recommendations and outlined corrective actions to strengthen contract administration and oversight.

Facilities Management plans to review the Agreement, establish clear accountability for required preventive maintenance, implement an annual process to verify that preventive maintenance requirements are captured in the work order system. Facilities Management notes that it already has systems in place to review and approve labor and materials for each job, and plans to strengthen work order oversight through standardized status criteria added to its internal policy and procedure manual and through periodic review of work order activity; documentation standards for preventive maintenance will be addressed through that same work rather than as a separate effort. Facilities Management also plans to reinstitute the quarterly maintenance reporting required by the Agreement and complete a current facility condition assessment in 2026, with future assessments targeted every five to seven years, subject to available funding. For billing, Facilities Management plans to establish procedures addressing invoice documentation, timing, staff responsibilities, retention requirements, continuity measures, and supporting documentation.

The Auditor's Office will conduct a follow-up review no earlier than six months after issuance of this report to assess the status and effectiveness of corrective actions.

This audit was authorized under Utah Code Title 17, Chapter 69, "County Auditor", Part 3, "Powers and Duties." 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.

Thank you to Facilities Management and Community Services management and staff for their cooperation and assistance with this audit. Should you have any questions, please contact me at (385) 468-7200.

Chris Harding, CPA, CFE, CIA
Salt Lake County Auditor

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REPORT HIGHLIGHTS

SALT LAKE COUNTY

A PERFORMANCE AUDIT OF SALT LAKE COUNTY'S OVERSIGHT OF THE DISCOVERY GATEWAY AGREEMENT

September 2026

Objectives

The objectives of this audit were to assess Salt Lake County and Discovery Gateway compliance with the Agreement. We also evaluated the efficiency and effectiveness of services provided and the overall effectiveness of the contract.

The scope of this audit was January 1, 2023, to December 31, 2024.

Opportunity to Improve Preventive Maintenance (PM) Scheduling and Documentation

County-owned building systems have remained operational throughout the audit period and maintenance work has continued. However, the audit identified significant gaps in how required PM activities were scheduled, executed, and documented. Of the 116 PMs required during the audit period, only 36% were completed as required, and unscheduled PMs included life-safety systems such as fire alarms, smoke detectors, and elevator inspections. Staffing shortages and limited awareness of specific Agreement requirements at the operational level contributed to these gaps. Strengthening PM governance and documentation would improve the County's ability to manage its maintenance obligations and verify that critical systems receive required attention.

Opportunity to Strengthen Facility Condition Reporting and Monitoring

Discovery Gateway and the County have maintained ongoing communication throughout the relationship. Required financial and operational reporting has been submitted, though not always with the completeness or timeliness the Agreement contemplates — a challenge that has been compounded by turnover in Discovery Gateway's fiscal staff. The County has not established a formal process for tracking, reviewing, and documenting required reports. Additionally, the most recent facility condition assessment was conducted in 2017, limiting the County's visibility into the current condition of County-owned assets and future capital needs.

Chris Harding, CPA, CFE, CIA Salt Lake County Auditor

Finding Risk Classifications

Classification	Description	Action
High Risk	**High Risk Findings indicate significant weaknesses in controls and compliance:** • Essential controls are either missing OR are in place but fail to adequately address critical risks. • Procedures are either not followed consistently OR are completely missing. • Documentation and communication of controls, policies, and procedures are either lacking OR entirely absent. • Controls may not be in operation OR may not have been implemented. • Material non-compliance (or a critical instance of non-compliance) with legislative requirements (both state law and county ordinances), countywide policies, departmental policies, and best practices is common, resulting in inadequate risk management.	Urgent Corrective Actions are Necessary
Medium Risk	**Medium Risk Findings indicate weaknesses in control design and/or implementation, and occasional non-compliance:** • Controls are partially in place but may not fully address all aspects of key risks. • Documentation and/or communication of controls, policies, and procedures may be incomplete, unclear, inconsistent, or outdated. • Controls might not be operating consistently and/or effectively or may not have been fully implemented. • Occasional non-compliance with legislative requirements (both state law and county ordinances), countywide policies, departmental policies, and best practices has occurred. • Risks are not being effectively managed, which could result in failure to meet departmental objectives or could lead to a less effective risk management framework.	Promptly Implement Recommendations
Low Risk	**Low Risk Findings indicate that controls are generally effective, with minor areas for improvement:** • Controls are effectively addressing key risks but may need minor improvements. • Documentation and/or communication of controls, policies, and procedures are generally adequate but might require minor updates. • Controls are generally operating effectively with minor inconsistencies. • Minor deviations from legislative requirements (both state law and county ordinances), countywide policies, departmental policies, and/or best practices may exist. • Risks are generally well-managed, with minimal areas for improvement identified during testing.	Implement Minor Improvements and Proactive Enhancements

BACKGROUND

The Salt Lake County Auditor's Office Audit Services Division completed a limited scope performance audit of the "Build-Out, Operating and Management Agreement," contract NC04003C (Agreement), between Salt Lake County and Discovery Gateway Children's Museum (Discovery Gateway). The audit examined:

- Whether the mechanical, electrical, plumbing, and security systems owned by Salt Lake County were maintained in a state of good repair.
- Whether Salt Lake County Facilities Management (Facilities Management) properly recorded and billed for work performed by their staff, and that invoices were paid timely.
- Whether reporting and annual audit requirements in the contract were met.

The audit scope was from January 1, 2023, to December 31, 2024.

Discovery Gateway

Founded in 1978, Discovery Gateway is a non-profit organization that promotes children's education through interactive exhibits. Discovery Gateway moved into its current location in 2006 and occupies a 60,000 square-foot, four-floor building owned by Salt Lake County that is part of The Gateway, an open-air retail, residential, and office complex centered around the historic Union Pacific Depot in Salt Lake City, UT.

Discovery Gateway strives "to be the most trusted and preferred family discovery center and child-centered educational resource" and seeks "to inspire children of all ages and abilities to imagine, discover, and connect with their world to make a difference."[1]

Build-Out, Operating and Management Agreement

On May 14, 2004, Salt Lake County entered into the Agreement with Discovery Gateway.[2] The Agreement followed County voters' authorization of $15 million in General Obligation Bonds to build and equip a children's museum, with Discovery Gateway committing an additional $7.5 million. Under the Agreement, Salt Lake County built out the facility and turned operations over to Discovery Gateway. The original term of the Agreement was ten years, with two optional ten-year extensions.

The County owns the building and its major systems — mechanical,

1 https://www.discoverygateway.org/about-us/
2 Discovery Gateway was formerly named The Children's Museum of Utah (TCMU). The Agreement was updated to reflect the organization's name change to Discovery Gateway in 2014, in Amendment 3.

electrical, plumbing, and security — while common area maintenance is handled by a property management company as part of the broader Gateway complex. Discovery Gateway operates the museum, bearing all operational costs and retaining all revenues it generates.

Figure 1: Salt Lake County and Discovery Gateway Contract Timeline. *The Agreement with Discovery Gateway included options for two ten-year extensions. Only the first extension, through May 2024, was executed.*

Source: Image created by Internal Audit staff using Claude AI.

The Agreement was amended four times:

- **Amendment 1:** Effective March 3, 2006, added build-out provisions for the Junior Achievement Enterprise Village on the fourth floor.
- **Amendment 2:** Effective February 2007, clarified maintenance responsibilities and established County Facilities Management billing procedures. Under this amendment, Facilities Management agreed to provide maintenance labor and materials for the building's systems, with Discovery Gateway reimbursing the County via monthly invoices. Both parties are required to exchange quarterly reports — Discovery Gateway submitting maintenance requests and County Facilities Management providing a summary of work completed during the quarter.
- **Amendment 3:** Effective May 14, 2014, exercised the first ten-year extension.

- **Amendment 4:** Effective October 12, 2016, clarified that Discovery Gateway would not seek County funds beyond the original $15 million in bond proceeds.

The Agreement includes an automatic renewal provision, and the Senior Civil Attorney at the Salt Lake County District Attorney's Office confirmed that the Agreement remains in effect and continues under its existing terms. The relationship between the County and Discovery Gateway has operated continuously under this Agreement since 2004.

Salt Lake County Community Services

The Salt Lake County Community Services Department (Community Services) serves as the County's primary representative in its contractual relationship with Discovery Gateway. The Community Services Director described the Department's role as steward of the County-owned building and liaison between the County and Discovery Gateway's leadership and board, characterizing the relationship as collaborative rather than operationally directive. The Director does not manage museum operations, which remain the responsibility of Discovery Gateway's management, board, and staff.

The Director attends board meetings when their schedule allows, receives board packets and financial documents, and maintains direct communication with Discovery Gateway's Executive Director on matters related to the Agreement. The Director also coordinates with the property management company on exterior maintenance or security matters and periodically works with County insurance and risk management personnel.

Salt Lake County Facilities Management

Facilities Management is responsible for providing labor and materials for maintenance of the building and major building systems. The Facilities Management Division Director described the division's role as focused and responsive — providing preventive maintenance and addressing requests from Discovery Gateway staff as they arise.

Discovery Gateway submits maintenance requests to Facilities Management by phone, email, or directly through Facilities Management's work order management system, which is used to track maintenance requests and completed work. Requests have historically come from Discovery Gateway's director or members of its facilities team. Facilities Management sets up PM schedules within the work order management system to automatically generate PM work orders for the various systems at required frequencies. For work outside its scope or capacity — such as elevator or generator maintenance — Facilities Management engages and oversees an external vendor and bills Discovery Gateway accordingly.

Table 1: Roles and Responsibilities Overview. *The following table summarizes the roles and responsibilities of Salt Lake County, Discovery Gateway, and Salt Lake County Facilities Management across key functional areas of the operating agreement.*

	Salt Lake County (Owner / Oversight by Community Services)	Discovery Gateway (Operator)	Salt Lake County Facilities Management (Maintenance Service Provider)
Ownership & Oversight	*Owns building and major systems; Provides contract oversight*	*Museum operations, staffing, and programming*	*Supports maintenance under County authority*
Financial Responsibility	*Provided initial capital funding*	*Covers all operating costs; retains revenues, funding ongoing maintenance and capital asset replacement*	*Bills for services provided*
Maintenance & Billing	*Establishes maintenance and cost recovery framework; delegates execution*	*Requests work; responsible for upkeep; reimburses County for services*	*Performs maintenance (preventive, routine, reactive); provides labor/ materials; prepares and submits invoices*
Reporting	*Receives reports for oversight*	*Provides financial and operational reports*	*Provides maintenance activity reports*
Capital Planning	*Responsible for asset stewardship*	*Identifies and communicates needs*	*Executes or coordinates capital maintenance*
Accountability	*Accountable for public asset*	*Accountable for operations and financial transparency. Maintaining the building in good repair*	*Accountable for service delivery and billing accuracy*

Source: Created by Internal Audit based on Agreement Requirements

OBJECTIVES AND SCOPE

The objectives of this audit were to assess Salt Lake County and Discovery Gateway compliance with the Agreement. We also evaluated the efficiency and effectiveness of services provided and the overall effectiveness of the contract, specifically focusing on:

- Whether the mechanical, electrical, plumbing, and security systems owned by Salt Lake County were maintained in a state of good repair.

- Whether Facilities Management properly recorded and billed for work performed by their staff, and that invoices were paid timely.
- Whether reporting and annual audit requirements in the contract were met.

The scope of this audit was January 1, 2023, to December 31, 2024.

AUDIT CRITERIA

Salt Lake County Contract NC04003C "Build-Out, Operating and Management Agreement," Section 4: Operation of the Children's Museum details Discovery Gateway's operational responsibilities, including requirements to:

- Provide an annual Management and Operations Plan to the Salt Lake County Council and Mayor by June 1 of each year (Subsection 4.2).
- Provide an annual itemized report of Discovery Gateway employees whose total compensation exceeds $100,000 (Subsection 4.4) with an increase of 5% in each successive year.
- Provide quarterly reports on the museum's anticipated and previous fiscal quarter operations, capital purchases, activities, and financial condition (Subsection 4.5).
- Accurately identify all costs and revenues associated with operating Discovery Gateway, including for each program and activity (Subsection 4.6.1).
- Undergo an annual financial audit by an independent Certified Public Accountant firm and provide a copy of the report to Salt Lake County within 30 days of the report's completion (Subsection 4.7).

Salt Lake County Contract NC04003C "Build-Out, Operating and Management Agreement," Amendment 2 establishes maintenance responsibilities and billing procedures for the Discovery Gateway building, including:

- Discovery Gateway is required to maintain the building and all associated County-owned systems in good repair (Section 1).
- Salt Lake County Facilities Management is responsible for performing all preventive, routine, and emergency maintenance work – with outside contractors limited to elevator and generator maintenance and inspections (Section 6 and Exhibit 1).
- Discovery Gateway must provide a thorough description of any problem requiring work, which Salt Lake County then uses as the basis for required monthly invoices; payment is due from Discovery

Gateway within 30 days of receipt of the invoice (Sections 3 and 9).

- Salt Lake County Facilities Management is required to provide Discovery Gateway with a quarterly status report of maintenance and services completed during the previous calendar quarter (Section 9).

Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC), Sections 205, 210, 220, and 230 establish requirements for Generally Accepted Accounting Principles (GAAP) compliant financial statements, including statements of financial position, activities, cash flow, and balance sheet classification.

Salt Lake County Mayor's Finance Accounting Procedures Manual, Section 2.1.4 "Timeline of the Monthly Financial Reports" provides a chart of the dates various monthly financial reports are due. Journal vouchers and other accounting information are due to Mayor's Finance by the fourth working day of the month.

Salt Lake Countywide Policy 1220: Management of Accounts Receivable and Bad Debt Collection, Section 4 "Agency/Department Billing and Collection Efforts" establishes required collection actions once accounts receivable become at least ten days past due.

Salt Lake Countywide Policy 1060: Financial Goals and Policies, Section 4 "Revenue Policies" requires all fees and charges to be set at full cost and to receive Council-approval for any revenue planned to exceed expenses.

Salt Lake Countywide Policy 1060 Financial Goals and Policies, Section 8 "Internal Control Policy" requires adequate documents and records be designed and used to ensure the proper recording of events, as well as the use of independent checks on performance and the proper valuation of recorded amounts.

METHODOLOGY

We used several methodologies to gather and analyze information related to our audit objectives. These methodologies included but were not limited to:

Met with the Community Services Director and Facilities Management personnel to understand contract management, maintenance services, billing, and reconciliation processes.

Reviewed maintenance work orders to verify required preventive maintenance was performed and documentation was sufficient to support work completed.

Reviewed financial records (invoices, supporting documentation, and payment records) to verify invoices were timely, accurate, and adequately supported.

Compared average labor rates charged to Discovery Gateway and County agencies for similar work to assess consistency.

Reviewed Discovery Gateway's annual and quarterly reports to verify timeliness, completeness, and compliance with contractual requirements.

Evaluated whether County funding to Discovery Gateway was allowable under the contract.

Assessed County conflict of interest disclosure processes and monitoring procedures for alignment with contractual requirements.

CONCLUSIONS

The audit reviewed Salt Lake County's relationship with Discovery Gateway under an Agreement that has been in place for over 20 years. Throughout that period, the relationship has functioned and County-owned assets have been maintained and operational. The audit identified opportunities to strengthen the formal frameworks supporting contract oversight, reporting, maintenance documentation, and billing — areas where current practices, while functional, could be better aligned with contractual and policy requirements.

The findings reflect six interconnected areas where greater formality and documentation would reduce institutional risk, support continuity as personnel change, and strengthen the County's ability to demonstrate compliance over time.

1. **Preventive maintenance scheduling and documentation** — County-owned systems have remained operational, and maintenance work has continued throughout the Agreement period. Strengthening the alignment between scheduling practices and contractual requirements would provide the County with a more complete record of maintenance activity and better support long-term asset planning.
2. **Facility condition reporting and monitoring** — The County and Discovery Gateway have maintained ongoing communication

throughout the Agreement. Formalizing how required reports are tracked and reviewed would provide both parties with a clearer, documented record of facility condition and compliance over time, and support continuity as personnel change.

3. **Contract management and oversight —** The Agreement has supported a productive relationship between the County and Discovery Gateway for over 20 years. As with many long-standing agreements, an opportunity exists to refresh awareness of contract terms among current stakeholders and to ensure that the formal framework keeps pace with how the relationship operates today.
4. **Work order oversight —** Work orders have served as the primary tool for tracking maintenance activity. Keeping status records and documentation consistently current would strengthen the billing record and give both parties a shared, reliable view of work performed.
5. **Billing practices —** Invoicing between the County and Discovery Gateway has continued throughout the relationship. Opportunities exist to improve consistency with County policy requirements around detail and timing, which would benefit both parties by reducing ambiguity and supporting accurate recordkeeping.
6. **Conflict-of-interest oversight —** No conflicts of interest were identified. Establishing a routine process to periodically document that review would strengthen transparency and provide both parties with a clear record as the relationship and its personnel continue to evolve.

No instances of fraud, waste, or abuse were identified.

FINDING 1 AND RECOMMENDATIONS

Opportunity to Improve Preventive Maintenance Scheduling and Documentation

Risk Rating: High Risk Finding

Required preventive maintenance activities were not always scheduled, completed, or documented in accordance with Agreement requirements, limiting the County's ability to demonstrate that building systems received required maintenance.

Preventive maintenance (PM) consists of routine, planned activities designed to reduce equipment failure, control costs, and extend asset life. Under Amendment 2 of the Agreement, 58 PMs are required each year across 21 of Discovery Gateway's building systems, for a total of 116 expected PMs during the audit period. Facilities Management uses a work order management system to schedule, track, and document these activities.

Maintenance work has continued throughout the audit period and building systems have remained operational. However, the audit identified areas where the PM program's scheduling, execution, and documentation did not fully align with contractual requirements. Contributing factors include staffing shortages, competing emergency maintenance demands, and in some cases, limited awareness of specific Agreement requirements at the operational level. Of the 116 PMs required during the audit period:

- 42 of the 116 (36%) PMs were completed as required,
- 30 of the 116 (26%) PMs were not scheduled,
- 22 of the 116 (19%) PMs were scheduled but canceled without work being performed,
- 11 of the 116 (9%) PMs could not be confirmed as completed due to unclear or missing supporting documentation,
- 7 of the 116 (6%) PMs were marked as complete or closed despite no associated work or charges recorded, and
- 4 of the 116 (3%) PMs were not performed at the required frequency.

Note: Percentages may not total 100% due to rounding.

The sections below describe each category in more detail.

30 PMs Were Not Scheduled

Of the 116 PMs required by the Agreement, 30 (26%) were not entered into the work order management system during the audit period. These unscheduled PMs affected 12 systems. Notably, several involve life-safety and compliance-related systems — including fire alarms, fire extinguishers, smoke detectors, security panels, and state elevator inspections — where the absence of a scheduled maintenance record limits the County's ability to demonstrate that these systems received required attention. See Table 2 for details.

Table 2: 30 Required Preventive Maintenance Activities Were Not Scheduled. *The following 30 preventive maintenance (PM) activities required by the Agreement were not scheduled in Facilities Management's work order system during the audit period. The unscheduled PMs affected 12 building systems, including life-safety systems such as fire alarms, fire extinguishers, smoke detectors, and elevator inspections.*

System	Frequency	Number of Required PMs Not Scheduled
Fire Alarm Panel, Smoke Detectors, Strobes	*Annually*	2
Fire Extinguishers	*Annually*	2
Fire Risers	*Annually*	2
Elevator State Inspection	*Annually*	2
Security Panels	*Annually*	2
Electrical Panels	*Annually*	2
MCC Panels	*Annually*	2
ADA Adjustments	*Bi-annually*	4
Panic Hardware, Closers, Hinge	*Bi-annually*	4
Indirect Cooling System	*Bi-annually*	4
VAV Boxes	*Annually*	2
Plumbing Fixtures	*Not listed*	2*
	Total PMS Not Scheduled	30

** The frequency of plumbing fixtures was not listed on Exhibit 1 of Amendment 2. We determined, based on the minimum frequency of the other PMs included in Exhibit 1, that this PM would be expected at least annually.*

Facilities Management provided context for the 30 unscheduled PMs: 16 were assumed to be the responsibility of The Gateway's property management company, 10 were not scheduled due to limited awareness of the Agreement requirements, and 4 were not scheduled because the related systems were nonfunctional and not funded for repair. For the 16 PMs assumed to be handled by the property manager, documentation confirming that arrangement or verifying completion was not retained, leaving responsibility and completion unverified.

22 PM Work Orders Were Canceled Without Work Being Performed

Twenty-two of the 116 PMs (19%) were scheduled in the work order system but canceled without work being performed, across six systems. Management attributed these to staffing shortages and competing emergency maintenance demands, noting that the system automatically generates recurring PM work orders and that staff may cancel prior cycles when work has not been completed before the next one is generated. See Table 3 for details.

Table 3: Summary of PMs Canceled Without Work Being Performed. *The following PM work orders were canceled without maintenance being performed during the audit period. This list encompasses 22 PMs expected during the audit period across six different systems.*

System	Frequency	PM Work Orders Canceled Without Work Being Performed
Exhaust Fans	*Annually*	2023
A/C Units	*Quarterly*	2023: Q3 & Q4 2024: Q1, Q2, & Q3
Cabinet Heaters	*Quarterly*	2023: Q2 & Q4 2024: Q2
Fan Coils	*Quarterly*	2023: Q2, Q3, & Q4 2024: Q1, Q2, & Q3
Air Handler	*Quarterly*	2023: Q2, Q3, & Q4 2024: Q1 & Q4
DDC Control Systems	*Annually*	2023 & 2024

When PMs are not performed as scheduled, equipment reliability decreases and the risk of failure increases. Missed manufacturer-recommended maintenance may also affect warranty coverage.

11 PMs Could Not Be Confirmed as Completed Due to Insufficient Documentation

For 11 of the 116 PMs (9%), sufficient documentation was not available to confirm completion. Nine of these related to outsourced maintenance for which no invoice was on file and no costs were passed to Discovery Gateway. For the remaining two, management noted limited awareness of the Agreement requirements. Without supporting documentation, the County cannot demonstrate that these maintenance activities were performed or otherwise addressed.

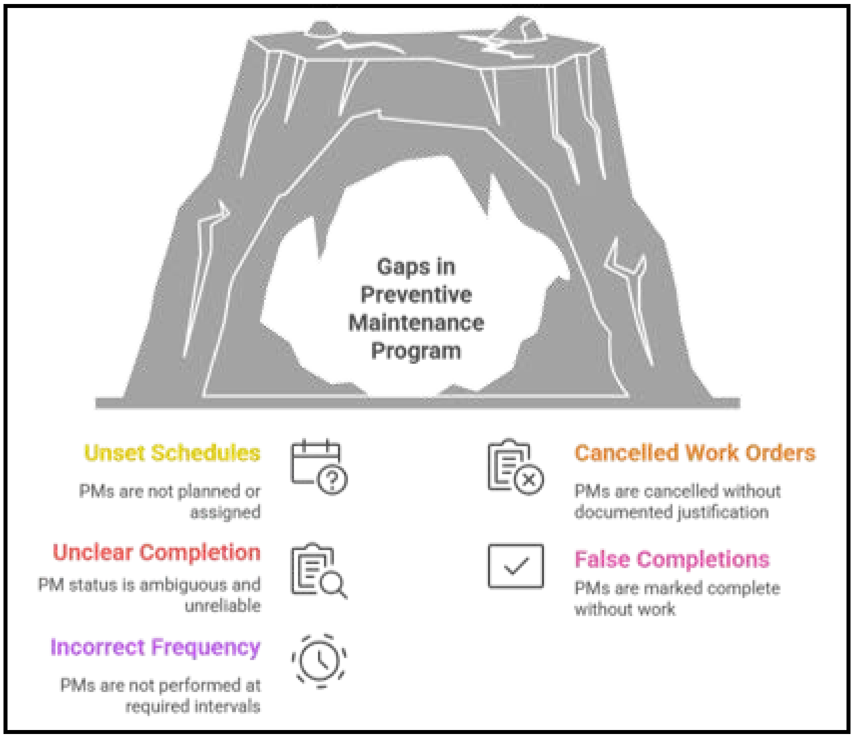
Seven PMs Were Marked Complete or Closed Without Supporting Work

Seven of the 116 PMs (6%) were marked as complete or closed in the work order system but had no associated charges or documentation to support that maintenance had occurred. Management indicated these work orders should have been canceled rather than closed. Without documentation confirming completion, the accuracy of the maintenance record cannot be verified.

Four PMs Were Not Performed at the Required Frequency

Cabinet heaters are required by the Agreement to receive quarterly preventive maintenance. During the audit period, these PMs were performed semi-annually, resulting in four missed PMs (3%). Performing PMs less frequently than required reduces their effectiveness and increases the risk of equipment failure.

Figure 2: Gaps in the Preventive Maintenance Program. *Five gaps were identified in the preventive maintenance program that collectively reduce confidence in whether required maintenance is being planned, performed, and accurately documented.*



Source*: Image created by Internal Audit staff using Napkin.ai.*

Program Governance

Taken together, these observations reflect an opportunity to strengthen the governance framework supporting the PM program. A formal process for ensuring PM schedules align with contractual requirements — and for verifying that all required activities are completed and documented, including those performed by or assumed to be performed by the property management company — was not in place during the audit period. Strengthening this framework would improve the County's ability to manage its maintenance obligations and provide a reliable record of activity over time.

1.1	RECOMMENDATION	Preventive Maintenance Governance and Oversight

We recommend that Facilities Management establish clear accountability for PM completion and oversight under the Agreement, including maintenance activities performed by or assumed to be the responsibility of the property management company, to reduce the risk that required work goes unverified or unrecorded.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 44 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

1.2	RECOMMENDATION	PM Schedule Alignment with Contract Requirements

We recommend that Facilities Management establish a process to periodically verify that PM schedules in the work order management system reflect current contractual requirements, ensuring all required activities are captured, assigned, and tracked.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - DECEMBER 31, 2026

SEE PAGE 44 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

1.3	RECOMMENDATION	Work Order Documentation

We recommend that Facilities Management establish consistent documentation standards for preventive maintenance activities and work order status, supporting the County's ability to verify completion and maintain a reliable maintenance record over time.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - DECEMBER 31, 2026

SEE PAGE 45 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

FINDING 2 AND RECOMMENDATIONS

Opportunity to Strengthen Facility Condition Reporting and Monitoring

Risk Rating: High Risk Finding

The Agreement between Salt Lake County and Discovery Gateway establishes several reporting and communication requirements intended to support the County's oversight of the facility and its operations. These include annual management and operations plans, quarterly reports, financial statements, independent audit reports, and employee compensation disclosures.[3] Together, these mechanisms are designed to provide County stakeholders with the information needed to monitor the condition of the facility, assess Discovery Gateway's financial position, and evaluate compliance with contractual obligations.

Reporting and communication between the County and Discovery Gateway have continued throughout the Agreement; however, required reports were not always complete, timely, or formally monitored, limiting visibility into facility condition, maintenance activities, and future capital needs.

Over the course of the audit period, Discovery Gateway experienced turnover in its fiscal staff, which contributed to delays and gaps in the completeness and timeliness of required reporting. The Community Services Director also noted that certain reporting provisions, such as employee compensation disclosures, may no longer reflect current operational realities and are being considered as part of the broader effort to update the Agreement. These are recognized contributing factors to the observations described below.

Report Completeness and Consistency

The annual management and operations plans submitted for fiscal years 2023 and 2024 did not include comprehensive information on planned capital improvement projects or facility maintenance activities. The practical effect of this gap became apparent during the audit: Facilities Management records suggested Discovery Gateway's roof may have been replaced in 2023, but this activity was not included in the annual plan, and the timing and scope of the work could not be readily confirmed. The Community Services Director later clarified that the replacement was completed in 2023 and 2024 by The Gateway's property management company in coordination with Discovery Gateway. More complete reporting would have provided that clarity without requiring additional follow-up.

Quarterly reports submitted during the audit period similarly did not always include the full range of information the Agreement contemplates. Of the eight quarters reviewed:

3 Salt Lake County Contract NC04003C, "Build-Out, Operating and Management Agreement", Section 4.2 to 4.7.

- The report for one of the eight (13%) quarters could not be located or provided.
- None of the seven remaining quarterly reports included information on capital projects.
- Four of the seven reports (57%) contained no mention of maintenance activities; three (43%) mentioned some maintenance activities.

Financial reporting was also incomplete, with the 2023 financial reports not including a balance sheet or statement of cash flows. All quarterly reports lacked detailed expense information, and employee salary and benefit disclosures were not provided for 2023 or 2024.

Report Submission Timeliness

Of the seven quarterly reports reviewed for the 2023–2024 period, only one (14%) was submitted within the timeframe established by the Agreement. The remaining reports were received between a few days and over one year after the deadline. See Table 4 for details.

Table 4: Quarterly Reports: Delays in Receipt. *Of the eight quarters reviewed, one report was not provided (13%). Of the seven reports reviewed, six (86%) were submitted between three days and more than one year past the required deadline.*

Quarterly Report	Required Submission Deadline (Third Week of Following Month)	Report Received Date	Number of Days Between
2023: Quarter 1	4/22/2023	4/25/2023	3
2023: Quarter 2	7/22/2023	8/22/2023	31
2023: Quarter 3	10/21/2023	10/13/2023	(8)*
2023: Quarter 4	1/20/2024	Not provided**	N/A
2024: Quarter 1	4/20/2024	6/5/2024	46
2024: Quarter 2	7/20/2024	8/11/2025	387
2024: Quarter 3	10/26/2024	8/11/2025	289
2024: Quarter 4	1/25/2025	8/11/2025	198

**A value in parentheses indicates the report was received before the deadline; this report was submitted within the expected timeframe.*

***Documentation verifying receipt of the October–December 2023 quarterly report could not be located or provided, either because the report was never submitted to the County or because supporting documentation was not retained.*

The 2023 independent audit report was provided to the County 79 days after completion, beyond the 30-day period established in the Agreement.

Documented Review and Follow-Up

The Community Services Director maintains an active relationship with Discovery Gateway, participating in board and finance committee meetings and communicating directly with Discovery Gateway's Executive Director when reporting deadlines are missed. This ongoing engagement has been valuable in sustaining the relationship. At the same time, these interactions have not always been formally documented, and the County has not established a structured process for tracking report due dates, recording receipt and review, or following up on incomplete submissions.

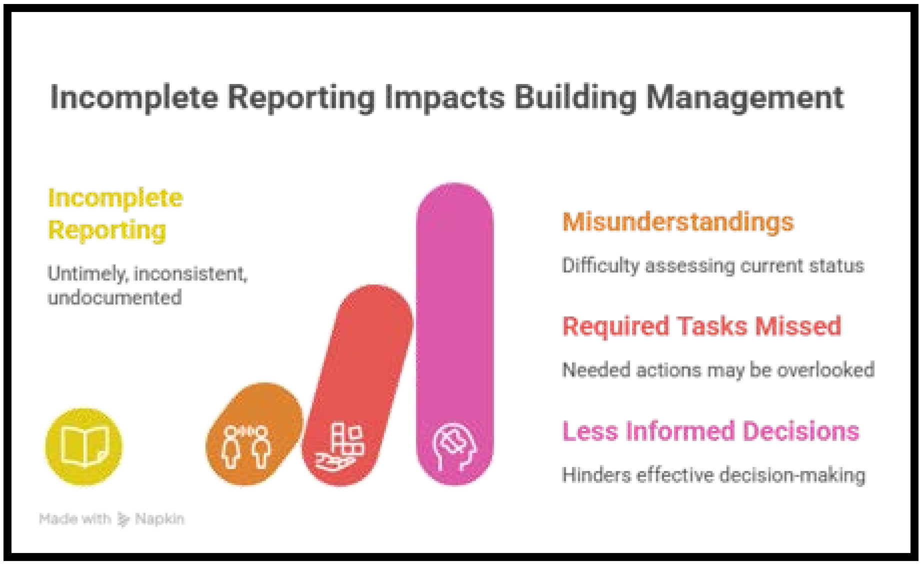
A more formalized approach to documenting these activities would strengthen the County's oversight record and provide continuity as personnel change on both sides of the relationship.

Visibility into Facility Condition and Capital Activity

The reporting considerations above are compounded by the absence of a recent facility condition assessment. The most recent external assessment of the Discovery Gateway building was conducted in 2017 — nearly seven years before the end of the audit period. Given the age of the facility and the County's responsibilities as building owner, periodic assessments are a recognized tool for proactive asset management and capital planning. Facilities Management acknowledged that assessments have been conducted infrequently and that funding constraints have been a limiting factor.

Without a current assessment, County stakeholders have limited visibility into the condition of the building's systems and the timing of potential capital needs. Greater visibility would support more proactive planning and reduce the risk that needed repairs or investments go unrecognized until they become more costly to address.

Figure 3: Impact of Incomplete Reporting on Building Management. *Incomplete, untimely, or undocumented reporting can obscure current conditions, increase the likelihood that needed actions go unaddressed, and limit the information available for effective decision-making.*



Source: *Image created by Internal Audit staff using Napkin.ai.*

2.1	RECOMMENDATION	Report Monitoring and Follow-Up

We recommend that Community Services establish a process to track, review, and document required reports submitted by Discovery Gateway, supporting the County's ability to monitor compliance with the Agreement and identify emerging issues in a timely manner.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 39 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

2.2	RECOMMENDATION	Facility Condition Assessment

We recommend that Facilities Management, in coordination with Community Services, obtain a current facility condition assessment for the Discovery Gateway building and establish a recurring assessment schedule to support long-term asset planning and capital decision-making.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - DECEMBER 31, 2026

SEE PAGE 45 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

FINDING 3 AND RECOMMENDATIONS

Opportunity to Strengthen Contract Management and Oversight

Risk Rating: Medium Risk Finding

Salt Lake County entered into the Agreement with Discovery Gateway on May 14, 2004. The Agreement established an initial ten-year term with two optional ten-year extensions, and has remained in continuous operation since. The Agreement includes an automatic renewal provision, which has allowed the relationship to continue functioning without interruption as the formal extension period concluded in May 2024.

The Agreement has supported a productive relationship between the County and Discovery Gateway for more than 20 years; however, contract administration processes could be strengthened to support renewal documentation, communication of contract requirements, and ongoing oversight responsibilities.

The Agreement has supported a productive and ongoing partnership between the County and Discovery Gateway for over 20 years. As is common with long-standing agreements, the County and Discovery Gateway are already in discussions to update the Agreement to better reflect current operations; an effort the Community Services Director noted is underway collaboratively.

Over the course of a relationship of this length, it is natural for day-to-day practices to evolve beyond what was originally documented. The County has an opportunity to strengthen the formal framework supporting this Agreement, particularly around renewal documentation and the communication of contract requirements across departments. The Senior Civil Attorney at the District Attorney's Office noted that affirmative, documented renewal decisions; even when an automatic provision exists; help ensure that agreement terms remain current and that all parties are operating from a shared understanding of their obligations.

In practice, contract requirements related to Facilities Management's maintenance and reporting responsibilities were not consistently communicated across departments. The Agreement provides for quarterly maintenance status reports to be shared with Discovery Gateway,[4] and while ongoing communication and monthly invoicing have kept the relationship functional, the formal quarterly reporting cadence established in the Agreement was not in place during the audit period. Monthly invoices, while useful, do not capture the full picture of maintenance activity — including service trends, deferred work, or the status of ongoing needs — that quarterly reports are designed to provide.

The opportunity here is primarily one of governance and communication — ensuring that as the Agreement is refreshed,

4 Salt Lake County Contract NC04003C, Amendment 2, Section 9c contract requirements are clearly documented, communicated to all responsible parties, and supported by a consistent oversight process.

3.1	RECOMMENDATION	Contract Renewal and Documentation

We recommend that Community Services, in coordination with Contracts and Procurement, establish a process to identify and document renewal decisions — including any planning delays and the rationale for those delays— before long-standing agreements, such as the Discovery Gateway Agreement, expire or continue without a document decision regarding their terms.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 39 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

3.2	RECOMMENDATION	Contract Administration and Oversight

We recommend that Community Services establish a contract administration process for the Discovery Gateway Agreement that ensures relevant requirements are understood by all responsible parties and that oversight accountability is clearly defined.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 40 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

3.3	RECOMMENDATION	Maintenance Reporting

We recommend that Facilities Management, in coordination with Community Services, reinstitute the quarterly maintenance reporting process established in the Agreement, supporting a shared and documented record of maintenance activity between the County and Discovery Gateway.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 46 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

FINDING 4 AND RECOMMENDATIONS

Opportunity to Strengthen Work Order Review and Oversight

Risk Rating: Medium Risk Finding

Salt Lake Countywide Policy 1060, Financial Goals and Policies, requires adequate documentation and records to enable independent checks on performance.[5]

> Facilities Management has established processes for tracking maintenance activity; however, work order review, status management, and monitoring practices did not always provide a complete and reliable record of work performed.

Facilities Management uses a work order management system to track maintenance activity for the Discovery Gateway building. During the audit, we requested documentation demonstrating supervisory review of work orders prior to closure. Management indicated that supervisors do not review or approve work orders within the work order system directly — technicians are responsible for closing work orders.

Management described compensating controls that provide related oversight: supervisors approve employee time recorded against work orders within the system, and third-party invoices and purchasing card transactions are reviewed through established fiscal approval processes. These controls provide meaningful oversight of labor and expenses and reflect existing investment in accountability. However, because these reviews occur across separate systems and processes, Facilities Management could not demonstrate a single, integrated record linking supervisory review of labor, materials, and completion status to individual work orders prior to closure. This limits the County's ability to demonstrate end-to-end independent verification of completed work.

We also identified inconsistencies in work order statuses and the timing of status updates that reduced the reliability of maintenance records. Overall, 24 work orders were created during the audit period — 16 related to preventive maintenance and 8 related to corrective maintenance. All 8 corrective maintenance work orders were marked as Work Complete. Among the 16 PM work orders, the following was observed:

5 During the audit period, Salt Lake Countywide Policy 1060 "Financial Goals and Policies," Section 8 "Internal Control Policy," Subsection 8.3. For policy updated May 12, 2026, see Subsection section 9.3.

Table 5: Status of Preventive Maintenance Work Orders Reviewed. *The following table summarizes the status of the 16 preventive maintenance work orders reviewed during the audit period.*

Work Order Status	Number of PM Work Orders	Observation
Work Complete	12 of 16 (75%)	Nine had no associated charges or supporting documentation, including six expected PMs discussed in Finding 1 and three additional PMs, limiting the County's ability to verify whether work had been performed.
In Progress	3 of 16 (19%)	Remained open for 347 to 652 days. One had no associated charges or supporting documentation, limiting the County's ability to verify whether work had been completed.
Closed	1 of 16 (6%)	Closure date was approximately 2.7 years after the work order was opened.

Management provided context for each category. Work orders marked as Work Complete with no associated charges should have been canceled rather than closed. For the three work orders still marked In Progress — open between 347 and 652 days — management indicated they were missed during routine housekeeping and were addressed as part of an effort to close outstanding Work Complete work orders in October 2025. The one work order marked Closed nearly three years after opening was part of that same effort.

Without consistently accurate work order records, Facilities Management's ability to readily verify which work has been performed is reduced, and maintenance history may be more difficult to reconstruct for contractual, regulatory, or warranty purposes. Equipment may also appear to be properly maintained when service has been delayed or missed.

4.1	RECOMMENDATION	Work Order Review Controls

We recommend that Facilities Management establish a documented process that links supervisory oversight of labor, materials, and completion status at the work order level, supporting the County's ability to demonstrate end-to-end independent verification prior to closure

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - DECEMBER 31, 2026

SEE PAGE 46 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

4.2	RECOMMENDATION	Work Order Status Standards

We recommend that Facilities Management establish standardized criteria for work order status designations and expectations for timely status updates, to improve the accuracy and reliability of the maintenance record.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 47 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

4.3	RECOMMENDATION	Work Order Monitoring

We recommend that Facilities Management establish a process to periodically review work order activity for anomalies — such as prolonged open durations, status inconsistencies, or work orders with no associated charges — supporting timely identification and resolution of incomplete or inaccurate records.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - DECEMBER 31, 2026

SEE PAGE 47 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

FINDING 5 AND RECOMMENDATIONS

Opportunity to Strengthen Invoicing Practices

Risk Rating: Medium Risk Finding

The County has regularly invoiced Discovery Gateway for maintenance services; however, invoice preparation, transmission, and documentation practices were not always timely or consistently supported, reducing the reliability of billing records.

The Agreement requires the County to bill Discovery Gateway on a monthly basis for work completed during the previous calendar month.[6] To prepare invoices, the Facilities Management Accountant extracts applicable work order charges from the work order management system, enters them into the County's financial system to generate an invoice, and emails the invoice along with supporting documentation to Discovery Gateway. This process has been in place throughout the Agreement and invoices have been regularly submitted and paid.

The audit identified opportunities to strengthen the consistency, timeliness, and documentation practices supporting this billing process. Staffing changes, including the departure of the employee previously responsible for invoicing and a period of short staffing in 2023, contributed to several of the observations below. The sections that follow describe these areas in more detail.

Invoice Preparation and Processing Timeliness

County policy establishes that invoicing and related accounting entries be completed within the first four business days of the month.[7] Of the 25 invoices reviewed:

- 19 of 25 (76%) were dated five to 57 days after the applicable billing cycle ended.
- Six of 25 (24%) were dated within four days of the billing cycle end but were not created in the County's financial system until 10 to 92 days after the invoice date.

6 Salt Lake County Contract NC04003C "Build-Out, Operating and Management Agreement", Amendment 2, Section 3.
7 Salt Lake County Mayor's Financial Administration Accounting Procedures Manual, Section 2 "Policies & Procedures Relating to Accounting and Financial Reporting," Subsection 2.1.4.

Table 6: Delays Between Invoice Dates and Financial System Entry Dates. *The following invoices were entered into the financial system after the invoice date listed on the invoice.*

Invoice Number	Invoice Date	Financial System Creation Date	Days Delayed
FAC0000870	1/1/2023	1/11/2023	10
FAC0000927	6/1/2023	9/1/2023	92
FAC0000932	9/1/2023	9/14/2023	13
FAC0000933	9/1/2023	9/14/2023	13
FAC0000968	12/31/2023	1/16/2024	16
FAC0001052	10/31/2024	11/12/2024	12

Management explained that Discovery Gateway invoices are generally not processed until related County accounting entries are completed, which typically extends beyond the first four days of the month. Additional date alignment inconsistencies were identified when comparing invoice dates to their applicable billing cycles.

Table 7: Invoice Dates Not Aligned with Billing Cycles *The following invoices were not dated consistently with the applicable billing cycle.*

Invoice Number	Invoice Date	Description of Work	Month of Billing Cycle	Days Between Billing Cycle End and Invoice Date
FAC0000888	3/29/2023	Electrician & HVAC – January	January 2023	57
FAC0000891	4/3/2023	Electrician – February	February 2023	34
FAC0000927	6/1/2023	Electrician – June	June 2023	(29)*
FAC0000932	9/1/2023	Electrician – July	July 2023	32
FAC0000962	12/8/2023	Electrician, Lock, Plumbing – October	October 2023	38
FAC0000984	3/14/2024	Electrician & HVAC – January	January 2024	43

* Noted in Table 6, Invoice FAC0000927 was for work done in June but the invoice was dated 6/1/2023. It was not entered into the financial system until 9/1/2023 (63 days after June 30).

Management provided context for these discrepancies, noting that the current work order management system was implemented in January

2023 and billing processes were not fully updated until March 2023. When invoices are not prepared and processed timely, revenue may be recorded in the wrong period and accounts receivable balances may not accurately reflect amounts owed at period end.

Invoice Transmission Timeliness

Salt Lake Countywide Policy 1220 requires agencies to send invoices within ten days of the beginning of the next billing cycle.[8] Of the 25 months reviewed:

- 18 of 25 (72%) emails transmitting invoices were sent 11 to 63 days after the end of the applicable billing cycle.
- Five of 25 (20%) transmittal emails could not be located or provided.
- Two of 25 (8%) were sent within the ten-day requirement.

Management noted that the employee previously responsible for invoice transmission had left and that the division was generally short-staffed for most of 2023. When a replacement was hired, the ten-day deadline was not included in their onboarding. The five emails that could not be located were not retained due to employee turnover.

When invoices are consistently transmitted late, payment is delayed and the County's ability to enforce payment terms may be affected over time. The absence of retained transmittal records also limits the County's ability to demonstrate timely submission if questions arise.

Invoice Detail and Documentation

All 25 invoices reviewed described work only by area and month — for example, "Electrician – February" or "HVAC – January" — without itemized breakdowns of labor, materials, or specific work order references. Supporting documentation with cost detail was emailed to Discovery Gateway alongside invoices but was not uploaded or linked to the invoice record in the County's financial system.

Facilities Management noted that character limitations in the financial system's description fields constrained the level of detail that could be included on invoices. Subsequent follow-up with Mayor's Finance confirmed that multiple line items can be created per invoice, which would allow for additional detail. Regarding the absence of attached supporting documentation in the financial system, management acknowledged there was no specific reason this had not been done and indicated they could explore whether the practice is feasible.

8 Salt Lake Countywide Policy 1220 "Management of Accounts Receivable and Bad Debt Collection," Section 4 "Agency/Department Billing and Collection Efforts," Subsection 4.6.1.

Because neither the invoice nor the supporting documentation referenced the other, their connection relied on proximity and matching totals rather than a documented link. Additionally, with supporting documentation maintained in individual email inboxes, institutional knowledge and billing records are at risk of being lost when personnel transition. This reduces the reliability of the billing record and the County's ability to verify prior transactions.

5.1	RECOMMENDATION	Billing Documentation and Record Retention

We recommend that Facilities Management establish standardized billing documentation requirements that provide sufficient invoice detail and ensure supporting documentation is retained in a centralized, accessible location linked to the corresponding invoice record in the financial system.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 48 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

5.2	RECOMMENDATION	Timely Billing

We recommend that Facilities Management establish a process to ensure Discovery Gateway invoices are prepared, entered into the financial system, and transmitted within required timeframes, supporting accurate financial reporting and timely revenue collection.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 48 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

5.3	RECOMMENDATION	Billing Roles, Responsibilities, and Continuity

We recommend that Facilities Management formalize written billing procedures that define staff responsibilities, retention requirements, and continuity measures — including training for backup personnel — to reduce the risk of process gaps during staffing transitions.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31 ,2026

SEE PAGE 49 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

FINDING 6 AND RECOMMENDATIONS

Opportunity to Improve Oversight of Potential Conflicts of Interest

Risk Rating: Low Risk Finding

The Agreement between Salt Lake County and Discovery Gateway includes provisions intended to maintain independence between the two organizations. These include restrictions on County employees or their family members holding a financial interest in the Agreement, and limitations on Discovery Gateway employees and board members serving on County boards that oversee or fund Discovery Gateway.[9]

> No conflicts of interest were identified; however, the County has not established a documented process to periodically review and retain evidence of conflict-of-interest monitoring related to the Agreement.

No actual conflicts of interest were identified during the audit. Existing County board disclosure procedures also provide meaningful coverage: nominees to boards with the ability to influence Discovery Gateway funding — including the Zoo, Arts, and Parks (ZAP) board and the Tourism, Recreation, Cultural, and Convention (TRCC) board — are required to submit resumes and disclosure statements, and current members complete annual disclosures. These procedures represent a functioning framework for a significant portion of the relevant oversight landscape.

To further assess potential conflicts, we requested a roster of Discovery Gateway employees during the audit period. Discovery Gateway declined to provide the information, citing privacy concerns. Working with publicly available information, we compared current County ZAP and TRCC board members against publicly available Discovery Gateway staff and board member information and found no overlapping names or apparent conflicts of interest.

The existing board disclosure procedures do not extend to all County personnel who interact with Discovery Gateway outside of a board relationship, and the County does not currently maintain a documented process specific to this Agreement for periodically reviewing and recording the absence of conflicts. As personnel change on both sides of a relationship of this length, a routine and documented review process would provide the County with a clear record of ongoing due diligence and strengthen transparency over time.

9 Salt Lake County Contract NC04003C, “Build-Out, Operating and Management Agreement”, Section 19

6.1	RECOMMENDATION	Conflict of Interest Disclosure and Review

We recommend that Community Services, in coordination with the District Attorney's Office as needed, establish a documented process to periodically identify and review potential conflicts of interest related to the Agreement, supporting the County's ability to demonstrate transparency and independence as the relationship and its personnel continue to evolve.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 40 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

6.2	RECOMMENDATION	Agreement Provisions and Documentation

We recommend that Community Services, in coordination with the District Attorney's Office, evaluate whether the Agreement's conflict of interest provisions reflect current oversight practices and establish a centralized location for retaining related disclosures and review documentation.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 41 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

6.3	RECOMMENDATION	Discovery Gateway Acknowledgment

We recommend that Community Services establish a practice of requesting periodic written acknowledgment from Discovery Gateway regarding potential conflicts of interest related to the Agreement, to complement the County's own review process.

AGENCY RESPONSE: AGREE

IMPLEMENTATION DATE - OCTOBER 31, 2026

SEE PAGE 41 FOR THE AGENCY'S FULL RESPONSE TO OUR RECOMMENDATION

COMPLETE LIST OF AUDIT RECOMMENDATIONS

This report made the following 17 recommendations

Recommendation 1.1 – Preventive Maintenance Governance and Oversight

We recommend that Facilities Management establish clear accountability for PM completion and oversight under the Agreement, including maintenance activities performed by or assumed to be the responsibility of the property management company, to reduce the risk that required work goes unverified or unrecorded.

Recommendation 1.2 – PM Schedule Alignment with Contract Requirements

We recommend that Facilities Management establish a process to periodically verify that PM schedules in the work order management system reflect current contractual requirements, ensuring all required activities are captured, assigned, and tracked.

Recommendation 1.3 – Work Order Documentation

We recommend that Facilities Management establish consistent documentation standards for preventive maintenance activities and work order status, supporting the County's ability to verify completion and maintain a reliable maintenance record over time.

Recommendation 2.1 – Report Monitoring and Follow-Up

We recommend that Community Services establish a process to track, review, and document required reports submitted by Discovery Gateway, supporting the County's ability to monitor compliance with the Agreement and identify emerging issues in a timely manner.

Recommendation 2.2 – Facility Condition Assessment

We recommend that Facilities Management, in coordination with Community Services, obtain a current facility condition assessment for the Discovery Gateway building and establish a recurring assessment schedule to support long-term asset planning and capital decision-making.

Recommendation 3.1 – Contract Renewal and Documentation

We recommend that Community Services, in coordination with

Contracts and Procurement, establish a process to identify and document renewal decisions —including any planning delays and the rationale for those delays— before long-standing agreements, such as the Discovery Gateway Agreement, expire or continue without a document decision regarding their terms.

Recommendation 3.2 – Contract Administration and Oversight

We recommend that Community Services establish a contract administration process for the Discovery Gateway Agreement that ensures relevant requirements are understood by all responsible parties and that oversight accountability is clearly defined.

Recommendation 3.3 – Maintenance Reporting

We recommend that Facilities Management, in coordination with Community Services, reinstitute the quarterly maintenance reporting process established in the Agreement, supporting a shared and documented record of maintenance activity between the County and Discovery Gateway.

Recommendation 4.1 – Work Order Review Controls

We recommend that Facilities Management establish a documented process that links supervisory oversight of labor, materials, and completion status at the work order level, supporting the County's ability to demonstrate end-to-end independent verification prior to closure.

Recommendation 4.2 – Work Order Status Standards

We recommend that Facilities Management establish standardized criteria for work order status designations and expectations for timely status updates, to improve the accuracy and reliability of the maintenance record.

Recommendation 4.3 – Work Order Monitoring

We recommend that Facilities Management establish a process to periodically review work order activity for anomalies — such as prolonged open durations, status inconsistencies, or work orders with no associated charges — supporting timely identification and resolution of incomplete or inaccurate records.

Recommendation 5.1 – Billing Documentation and Record Retention

We recommend that Facilities Management establish standardized billing documentation requirements that provide sufficient invoice detail and ensure supporting documentation is retained in a centralized, accessible location linked to the corresponding invoice record in the financial system.

Recommendation 5.2 – Timely Billing

We recommend that Facilities Management establish a process to ensure Discovery Gateway invoices are prepared, entered into the financial system, and transmitted within required timeframes, supporting accurate financial reporting and timely revenue collection.

Recommendation 5.3 – Billing Roles, Responsibilities, and Continuity

We recommend that Facilities Management formalize written billing procedures that define staff responsibilities, retention requirements, and continuity measures — including training for backup personnel — to reduce the risk of process gaps during staffing transitions.

Recommendation 6.1 – Conflict of Interest Disclosure and Review

We recommend that Community Services, in coordination with the District Attorney's Office as needed, establish a documented process to periodically identify and review potential conflicts of interest related to the Agreement, supporting the County's ability to demonstrate transparency and independence as the relationship and its personnel continue to evolve.

Recommendation 6.2 – Agreement Provisions and Documentation

We recommend that Community Services, in coordination with the District Attorney's Office, evaluate whether the Agreement's conflict of interest provisions reflect current oversight practices and establish a centralized location for retaining related disclosures and review documentation.

Recommendation 6.3 – Discovery Gateway Acknowledgment

We recommend that Community Services establish a practice of requesting periodic written acknowledgment from Discovery Gateway regarding potential conflicts of interest related to the Agreement, to complement the County's own review process.

Appendix A

NC04003C Second Amendment to Build-Out, Operating and Management Agreement, Exhibit 1

EXHIBIT 1
Facility Maintenance Agreement for the Discovery Gateway between
The Children's Museum of Utah and Salt Lake County Facility Management
October 2006

The majority of service the Discovery Gateway requires will be on an "as needed or on call basis"; however it is understood that County Facility Management has certain tasks requiring additional expertise for building systems for which the County will perform the work as Scheduled Preventative Maintenance (PM) and the Discovery Gateway will fund as outlined in the table below.

HVAC System PM - Estimated Annual Cost: $5,000	**Plumbing System PM – Estimated Annual Cost: $2,000**
Scheduled Preventative Maintenance	**Scheduled Preventative Maintenance**
(7) Exhaust Fans .5 hr each (annual)	Plumbing Fixtures (urinals, toilets, sinks, faucets, drinking fountains, water heaters)
(2) A/C units 1 hr each (quarterly)	**As needed by additional work order:**
(6) Cabinet Heaters .5 hr ea (quarterly)	Drain Traps (as needed)
(9) Fan Coils 1 hr each (quarterly)	Roof Drains (as needed)
(1) Air Handler 8 hr each (quarterly)	
DDC Control Systems (annual)	**Hardware System PM – Estimated Annual Cost: $500**
(1) indirect cooling system 4 hr each (bi-annual)	ADA Adjustments (bi-annual)
VAV Boxes (annual)	Fire Safety Adjustments - Panic Hardware, Closers & Hinges (bi-annual)
Electrical & Security System PM – Estimated Annual Cost: $5,000	**County can provide bids for the following:**
Scheduled Preventative Maintenance:	Carpet Cleaning
Electrical Panels (annual)	General Cleaning
MCC Panels (annual)	Duplicate or Re-Key Existing System
Fire Alarms Panel, Smoke Detectors & Strobes (annual)	Safe, Desk & File Re-Key
Fire Extinguishers (annual)	
Fire Risers (annual)	
Security Panels (annual)	
Surveillance Equipment (annual)	
As needed by additional work order:	
Lighting	
Card Reader System/Access Cards	
Security Gates	
New wiring & circuits	
Sound System	
Sound System	
Additional Service Agreement Fees:	
Elevator State Inspection (annual)	
Elevator Maintenance (monthly)	
Generator (monthly)	

Agency Response

SALT LAKE COUNTY
COMMUNITY SERVICES

Jennifer Wilson
Salt Lake County Mayor

DEPARTMENT OF
COMMUNITY SERVICES

ROBIN B CHALHOUB
Director

ROBERT SAMPSON
Associate Director

DIVISIONS

ARTS & CULTURE

CLARK PLANETARIUM

COUNTY LIBRARY

DISCOVERY GATEWAY

PARKS, RECREATION & GOLF

ZOO, ARTS & PARKS

August 18, 2026

Auditor Chris Harding, CPA
Office of the Auditor
Salt Lake County
2001 S State Street
Salt Lake City, UT 84190

Auditor Harding,

Thank you to you and the audit team for the time and effort dedicated to auditing the Discovery Gateway Agreement. This audit provides the department with a valuable opportunity to evaluate and strengthen our administrative and contracting processes to promote accountability, effectiveness, and continuous improvement. We have carefully reviewed the findings and are committed to implementing the recommended process improvements within the timelines outlined in our response below.

Effective contract management requires an integrated system of policies, people, processes, and tools, all of which require ongoing evaluation and improvement to ensure contractual obligations and deliverables are met. The audit has provided valuable insights into opportunities to strengthen each component of this system. Community Services is actively implementing improved tools and processes while evaluating and refining policies to ensure contracts are managed consistently, effectively, and in accordance with applicable requirements.

Community Services is also currently working with Discovery Gateway to develop an updated agreement that more accurately reflects current operations, responsibilities, and expectations. I appreciate the audit team's thoughtful analysis and recommendations, which will help inform the development of this new agreement. The discussions with the audit team were both beneficial and timely, and we value the opportunity to use this process to strengthen our contract management practices.

Please find below our response to each of the recommendations in the audit report relating to Community Services.

Sincerely,

Robin B. Chalhoub

Robin B. Chalhoub
Department Director

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www.slco.org

AUDIT FINDING 2: OPPORTUNITY TO STRENGTHEN FACILITY CONDITION REPORTING AND MONITORING

RECOMMENDATION 2.1: We recommend that Community Services establish a process to track, review, and document required reports submitted by Discovery Gateway, supporting the County's ability to monitor compliance with the Agreement and identify emerging issues in a timely manner.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Robin B. Chalhoub, Department Director

Narrative for Recommendation 2.1 including action plan.

The Department will establish a contract management process that will enhance oversight in monitoring compliance with agreements. The Department will implement an online system that will track and retain required reports submitted by Discovery Gateway and other contract partners. With automated notifications, timely review for contract compliance will occur.

AUDIT FINDING 3: OPPORTUNITY TO STRENGTHEN CONTRACT MANAGEMENT AND OVERSIGHT

RECOMMENDATION 3.1: We recommend that Community Services, in coordination with Contracts and Procurement, establish a process to identify and document renewal decisions —including any planning delays and the rationale for those delays— before long-standing agreements, such as the Discovery Gateway Agreement, expire or continue without a document decision regarding their terms.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Robin B. Chalhoub, Department Director

Narrative for Recommendation 3.1 including action plan.

Contracts and Procurement provides a monthly notification to the department of contracts due to expire in six months. The Department will ensure that its contract management process includes documentation for contract renewals and for planning delays, even when an automatic provision in the contract exists.

RECOMMENDATION 3.2: We recommend that Community Services establish a contract administration process for the Discovery Gateway Agreement that ensures relevant requirements are understood by all responsible parties and that oversight accountability is clearly defined.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Robin B. Chalhoub, Department Director

Narrative for Recommendation 3.2 including action plan.

Community Services will provide Discovery Gateway with a document that itemizes the agreement requirements. Community Services and Facility Management will meet with Discovery Gateway Executive Director to ensure alignment and clarify expectations.

AUDIT FINDING 6: OPPORTUNITY TO IMPROVE OVERSIGHT OF POTENTIAL CONFLICTS OF INTEREST

RECOMMENDATION 6.1: We recommend that Community Services, in coordination with the District Attorney's Office as needed, establish a documented process to periodically identify and review potential conflicts of interest related to the Agreement, supporting the County's ability to demonstrate transparency and independence as the relationship and its personnel continue to evolve.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Robin B. Chalhoub, Department Director

Narrative for Recommendation 6.1 including action plan.

The current agreement has no stipulated compliance mechanism for the review and recording of interest of either entity. Community Services is currently working with Discovery Gateway to update the Agreement. A mechanism for periodically reviewing and recording the absence of conflict will be addressed in the new agreement in alignment with current County oversight practices.

RECOMMENDATION 6.2: We recommend that Community Services, in coordination with the District Attorney's Office, evaluate whether the Agreement's conflict of interest provisions reflect current oversight practices and establish a centralized location for retaining related disclosures and reviewing documentation.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Robin B. Chalhoub, Department Director

Narrative for Recommendation 6.2 including action plan.

Community Services will work with the District Attorney's Office to ensure the updated contract includes the County's current conflict of Interest provisions. A retention and review process will be established as required by these provisions.

RECOMMENDATION 6.3: We recommend that Community Services establish a practice of requesting periodic written acknowledgment from Discovery Gateway regarding potential conflicts of interest related to the Agreement, to complement the County's own review process.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Robin B. Chalhoub, Department Director

Narrative for Recommendation 6.3 including action plan.

Community Services will request Discovery Gateway submit an annual declaration regarding potential conflicts of interest related to the Agreement in conjunction with their required Annual Report and Budget submission.

SALT LAKE COUNTY

JENNIFER WILSON
Salt Lake County Mayor

Megan Hillyard
Administrative Services Department Director

Tyson Kyhl
Facilities Management Division Director

Salt Lake County Government Center

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August 6, 2026
Auditor Chris Harding, CPA
Office of the Auditor
Salt Lake County
2001 S State Street
Salt Lake City, UT 84190

Auditor Harding-

Thank you to you and your team for the time and effort invested in auditing the Discovery Gateway Agreement. Your thorough review provided valuable insights into opportunities to strengthen our performance under the agreement and enhance our contract administration practices. We appreciate the comprehensive report and thoughtful recommendations, which will support our ongoing commitment to accountability, continuous improvement, and effective contract management.

We have carefully reviewed each of the findings and recommendations and are committed to implementing the recommended corrective actions within the timelines identified below. We appreciate the opportunity to use the audit results to further improve our processes and ensure continued compliance with the terms and objectives of the agreement.

Please find our response below to each of the recommendations made in your report relating to Facilities Management.

Sincerely-

Tyson Kyhl Digitally signed by Tyson Kyhl Date: 2026.08.06 10:33:02 -06'00'

Tyson Kyhl
Director
Facilities Management

AUDIT FINDING 1: OPPORTUNITY TO IMPROVE PREVENTIVE MAINTENANCE SCHEDULING AND DOCUMENTATION

RECOMMENDATION 1.1: We recommend that Facilities Management establish clear accountability for PM completion and oversight under the Agreement, including maintenance activities performed by or assumed to be the responsibility of the property management company, to reduce the risk that required work goes unverified or unrecorded.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	Oct 31, 2026	Jon Lee – Strategic & Special Projects Manager

Narrative for Recommendation 1.1 including action plan.

We will review the County's contract with Discovery Gateway and ensure we have full understanding of what maintenance is required by us. Where needed we will add recurring preventative maintenance work orders in our system.

RECOMMENDATION 1.2: We recommend that Facilities Management establish a process to periodically verify that PM schedules in the work order management system reflect current contractual requirements, ensuring all required activities are captured, assigned, and tracked.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	Dec 31, 2026	Jon Lee – Strategic & Special Projects Manager

Narrative for Recommendation 1.2 including action plan.

We will create an annual process to review current contracts and ensure required activities are captured.

RECOMMENDATION 1.3: We recommend that Facilities Management establish consistent documentation standards for preventive maintenance activities and work order status, supporting the County's ability to verify completion and maintain a reliable maintenance record over time.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	Dec 31, 2026	Jon Lee – Strategic & Special Projects Manager

Narrative for Recommendation 1.3 including action plan.

This will be included in the work done for Recommendations 4.2 and 4.3 covering all work order oversite, nothing will be specific for preventative maintenance.

AUDIT FINDING 2: OPPORTUNITY TO STRENGTHEN FACILITY CONDITION REPORTING AND MONITORING

RECOMMENDATION 2.2: We recommend that Facilities Management, in coordination with Community Services, obtain a current facility condition assessment for the Discovery Gateway building and establish a recurring assessment schedule to support long-term asset planning and capital decision-making.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	Dec 31, 2026	Ryan Henrie – Associate Division Director

Narrative for Recommendation 2.2 including action plan.

The current FCA is already scheduled and will be completed this year. Future FCAs will be budget dependent with a goal to complete them every 5 – 7 years.

AUDIT FINDING 3: OPPORTUNITY TO STRENGTHEN CONTRACT MANAGEMENT AND OVERSIGHT

RECOMMENDATION 3.3: We recommend that Facilities Management, in coordination with Community Services, reinstitute the quarterly maintenance reporting process established in the Agreement, supporting a shared and documented record of maintenance activity between the County and Discovery Gateway.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Jon Lee – Strategic & Special Projects Manager

Narrative for Recommendation 3.3 including action plan.

We will coordinate with Community Services and reinstitute the quarterly maintenance reporting process established in the agreement.

AUDIT FINDING 4: OPPORTUNITY TO STRENGTHEN WORK ORDER REVIEW AND OVERSIGHT

RECOMMENDATION 4.1: We recommend that Facilities Management establish a documented process that links supervisory oversight of labor, materials, and completion status at the work order level, supporting the County's ability to demonstrate end-to-end independent verification prior to closure.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**

Agree	December 31, 2026	Jerusha Harding – Fiscal & Admin Manager II

Narrative for Recommendation 4.1 including action plan.

We already have systems in place to review and approval labor and materials for each job. We do agree our policy around work order status could use some improvement and we will create an internal policy and implement it this year. We believe with these improvements as well as those noted in Recommendations 4.2 and 4.3 our work order oversite will be sufficient.

RECOMMENDATION 4.2: We recommend that Facilities Management establish standardized criteria for work order status designations and expectations for timely status updates, to improve the accuracy and reliability of the maintenance record.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	October 31, 2026	Jon Lee – Strategic & Special Projects Manager

Narrative for Recommendation 4.2 including action plan.

We will create these criteria and processes around updating work order status and add them to our Internal Policy and Procedure Manual.

RECOMMENDATION 4.3: We recommend that Facilities Management establish a process to periodically review work order activity for anomalies — such as prolonged open durations, status inconsistencies, or work orders with no associated charges — supporting timely identification and resolution of incomplete or inaccurate records.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agree	December 31, 2026	Jerusha Harding – Fiscal & Admin Manager II

Narrative for Recommendation 4.3 including action plan.

We currently hold monthly meetings with our trade managers, and part of the agenda is to review work order status. We also have creating reports to assist with this type of review on our to-do list, we will make efforts to get the report created before the end of the year but given all the current changes happening in Facilities, we may need more time to get this fully resolved.

AUDIT FINDING 5: OPPORTUNITY TO STRENGTHEN INVOICING PRACTICES

RECOMMENDATION 5.1: We recommend that Facilities Management establish standardized billing documentation requirements that provide sufficient invoice detail and ensure supporting documentation is retained in a centralized, accessible location linked to the corresponding invoice record in the financial system.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agreed	October 31, 2026	Jerusha Harding – Fiscal & Admin Manager II

Narrative for Recommendation 5.1 including action plan.

We will find a reporting solution that can be loaded into Myfin with the invoices we send to our out-of-county customers.

RECOMMENDATION 5.2: We recommend that Facilities Management establish a process to ensure Discovery Gateway invoices are prepared, entered into the financial system, and transmitted within required timeframes, supporting accurate financial reporting and timely revenue collection.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agreed	October 31, 2026	Jerusha Harding – Fiscal & Admin Manager II

Narrative for Recommendation 5.2 including action plan.

We will ensure our procedures for out-of-county billing include the timeframes for sending customer invoices.

RECOMMENDATION 5.3: We recommend that Facilities Management formalize written billing procedures that define staff responsibilities, retention requirements, and continuity measures — including training for backup personnel — to reduce the risk of process gaps during staffing transitions.		
Agree or Disagree with Recommendation	**Target date to complete implementation activities (Generally expected within 60 to 90 days)**	**Name and Title of specific point of contact for implementation**
Agreed	October 31, 2026	Jerusha Harding – Fiscal & Admin Manager II

Narrative for Recommendation 5.3 including action plan.

We will create out-of-county billing procedures and ensure they define staff responsibilities, retention requirements, continuity measures, timeframe for sending invoices and report to attach in the billing system.