Division of Parks and Recreation, Department of Resources and Economic Development Cannon Mountain Audit Findings Corrective Action Plan

Status as of July 26th, 2015

Completion Status:

Open •

Partial ••

Substantial •••

#	Observation Title	Recommendation	Action Item	Due date	Completion Status	Comments
1	Establish a Risk Assessment Process	 Establish a formal risk assessment process supported by policies and procedures for recognizing, evaluating, and responding to risks that could affect Cannon Mountain's ability to reach its objectives. Regularly review financial and operational activities for indicators of risk exposure. Establish and monitor controls 	Mountain Operations and review annually for accuracy and updates as needed. Establish a risk assessment review team that includes members with proper areas of expertise to be sure all details of operations are being appropriately considered.	11/1/2015	-	
		that appropriately address those risks. Cannon Mountain and Department employees with particular areas of expertise and knowledge of Cannon Mountain operations should participate in the review to ensure that details of operations that may not be obvious to management are appropriately considered.				

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2	Establish Policies and Procedures for all Significant Financial Activities	 Establish policies and procedures to support its employees in performing significant financial accounting and reporting activities, including performing and reviewing the collection, recording, and reporting of revenue and compile in a generally accessible and indexed manual or form Employees should be trained in the application of the policies and procedures, and management should monitor to ensure that the controls provided by the policies and procedures are consistently applied and remain effective. 	 Extend existing supervision of centralized financial accounting and reporting activities to exercise direct oversight of the Cannon financial accounting and reporting performance. Enhance currently documented practices by adding updates, review and approval from department business administrator to ensure accuracy of proper procedures and adherence to established policies where applicable. Create a repository of all policies and procedures to be accessible by all business staff both centrally and locally and provide training where necessary. 	11/1/2015 Ongoing	• •	
				Ongoing	••	
3	Reconcile 3 Primary Accounting Systems	Prepare periodic reconciliations of the financial information recorded in its three primary accounting systems.	Creation of Quickbooks reconciliation under review pending determination of need for use.	12/1/2015	•	
		Review and approve reconciliations to ensure they	Review and approval of revenue collection			

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		are timely, complete, and accurate with any identified differences appropriately resolved.	reconciliations will be performed centrally by the department business office on a monthly basis.	11/1/2015	•	
4	Establish Controls Over Internet Sales Process	Immediately establish controls over the internet payment processing account commensurate with the activity in the account.	A reconciliation procedure will be documented for the internet sales account.	11/1/2015	•	
		Policies and procedures should be established for a regular reconciliation of the activity in the account. The reconciliation should be performed independently of any other responsibility for the account or	A monthly reconciliation will be performed by the Cannon business office and will be reviewed and approved by the department business office centrally each month.	12/1/2015	•	
		the activity in the account. The reconciliation should be reviewed and approved by a responsible member of management.	Account access has been established properly and will be maintained as such going forward.	1/1/2015	••••	
		Department ownership should be exercised over the account. The Department should be identified as the owner of the account and prior employee's names should be removed from the account.				

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		Separate user names, passwords, and access authorities should be established for the account to ensure that accountability is established and access is appropriately limited to the users' roles and responsibilities.				
5	Perform Regular and Complete Reconciliations of Clearing Account	 Perform a regular and complete reconciliation of its clearing account. All differences identified in the reconciliations should be resolved in a timely manner. The results of the reconciliations should be reviewed and approved by Department financial management to ensure the accuracy and completeness of the credit card revenues included in the reconciliations. Establish policies and procedures relative to the proper accounting and reporting of credit card revenues and fees. The policies and procedures should address all of the Department's credit card vendors. 	 Establish and maintain a reconciliation that identifies all revenue being transferred from the clearing account for collection less the correctly assessed fee amount. Establish and maintain as needed, all policies and procedures relative to proper accounting and reporting of credit card revenues and fees. 	1/1/2016		

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6	Establish Policies and Procedures for Adjusting Financial	 Establish policies and procedures for proposing and recording financial transactions 	The Department Business Administrator will extend to the Cannon Business office the	12/1/2015	•••	Add the step of sending JE approvals to the Department business office via including as
	Accounts	intended to correct or adjust financial accounts.Any financial transactions	current practice of standard review of all journal entries submitted by accounting staff prior to input and submission			an added step in the process flow approval system in NHFIRST
		intended to correct a previously recorded account transaction or balance should be subject to	for approval by the Bureau of Accounting.			
		appropriate controls, including policies and procedures requiring an effective review and approval control.	 Avoid subsequent adjustment needs by implementing the practice of allocating charges for fees based on actual 			
			location rather than an estimated percentage allocation.	11/1/2015	••	
7	Monitor Employee Access to Information Systems	Monitor employee access to information systems.	 Information systems access department policy has been updated to include a policy 	1/1/2015	••••	
		Ensure that all employees are knowledgeable of, and trained in, the application of	specific to the Cannon Location and systems used on site.			
		Department policies relevant to their job responsibilities, including employees involved in controls addressed in Department Policy #51, Initial System Access.	Include a sign-off form for each employee confirming that they have been trained and are in compliance with the policy to be maintained by the department Internal Auditor.			
		All standard roles in the automated control system should be regularly reviewed to ensure they remain appropriate				

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		for the state of fire of			Status	
		for the jobs defined.				
		All changes to system access,				
		including authorization for the				
		changes, should be				
		documented.				
#	Observation Title	Recommendation		Due date	Completion	
					Status	
8	Improve	Improve controls to ensure	Cannon Mountain Business	12/1/2015	••	
	Communication of	there is a system for, and	office personnel to start			
	Financial Information	expectation of, communication	participating directly in weekly			
		of financial information,	department business office			
		especially information that may	staff meetings.			
		require management's				
		involvement.	➤ All documented business			
		Review the cause of the credit	communications via memo or email between the Cannon			
		card processing issue that	location and the department			
		resulted in the loss of the credit	business office will include at a			
		card sales data and revenue and	minimum the Mountain			
		ensure there are policies and	Manager and the Cannon office			
		procedures in place to timely	manager.			
		mitigate any losses should it				
		happen again.	Each department and cannon			
			business office staff member			
		Review the circumstances that	will be required to submit to			
		caused a significant revenue	the agency business			
		control to be unperformed	administrator a listing of all			
		without its notice for half of	duties and responsibilities and			
		fiscal year 2014.	normal due dates for			
			deliverables for each where			
		> Improve its control monitoring	applicable. Back-up support			
		to ensure that the controls it	will be delegated among the			

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		intends to have in place are operating as designed.	office staff to ensure coverage in the event of employee absence. Business administrator will maintain a checklist of business office duties and review with staff regularly to ensure compliance with deadlines and completion of required duties in a timely fashion.			
9	Take Advantage of Available Discounts	those invoices offering discounts. Where efficient, Cannon Mountain and the Department should take advantage of available discounts to lessen cost of operations.	Provide training where necessary and conduct a periodic audit of invoicing activity.	Ongoing	••••	
10	Record All Financial Activity in the Financial Statements	Generally, all financial activity should be recorded in accounting systems and reported on financial statements, including bartered activity. Participating in unrecorded bartered financial activity increases the risk that the extent of financial activity is not understood, properly controlled, and where required, in compliance with laws and rules, including tax reporting requirements.	 Develop a documented notification and concurrence procedure to confirm the proper effort has been made to make Department management aware and confirm that partnerships have been formally approved. Ensure that reporting of financial and accounting data from contracted agency will be sent to the Department Business Office for monthly review. 	12/1/2015	•	

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					Status	
		 Consider the appropriateness of the current accounting and financial reporting (including tax reporting) procedures for the external partner and sponsor marketing relationships including the vehicle lease, Lodging Partnership Program, and any other bartered transactions which result in certain Cannon Mountain financial activity to be "offbook". Establish policies and procedures that ensure that Department management is aware of, and approves, the external partner and sponsor and other relationships that are not currently recorded in Cannon Mountain's financial activity. 	The Department Business Administrator will seek guidance from the Director of Finance, Department of Administrative Services as to the appropriateness and accuracy of recording non- monetary bartered transactions under these circumstances to determine if it is required and, if so, how it should be recorded as such.			
11	Establish Controls to Mitigate Payroll Risks	Cannon Mountain should establish controls to mitigate risks in its payroll process including establishing controls for: A supervisory review of employee hours worked. Each Cannon Mountain department	To mitigate risk, ensure through written concurrence that every Cannon department manager is viewing payroll, approves prior to final submission, and that discrepancies are discussed with the employee(s) in	12/1/2015	•	

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		manager should review reported work hours for their employees to ensure employees comply with payroll policies and the payroll appears reasonable. The mitigation of the risk resulting from the broad access provided to the Cannon Mountain payroll officer to make changes to the payroll without any review and approval control. Providing payroll information reports to Cannon Mountain that could be used to review payroll charged to its accounts. Proactively monitoring hours worked by seasonal employees to ensure those employees are provided all benefits that they earn, as further discussed in Observation No. N-16.	question prior to final submission Seek to attain additional payroll reporting out of the NHFIRST payroll system from the Department's Payroll Officer to tighten up all other aspects of payroll reporting			
12	Mitigate State Payroll System Weakness	 Work with DAS to determine whether there is an available control within the State's payroll system that would allow for a review and approval control for payroll changes made by the Department's payroll officer. Establish formal policies and procedures for an effective 	Enhancement to current department payroll reconciliation procedure relative to the adding and deleting of new employees in the payroll system centrally at the Department.	12/1/2015	••	

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		review, analysis, and approval of the Department's bi-weekly payroll that would mitigate the weakness caused by the payroll officer's current access authorities and increase the likelihood that payroll errors or frauds would be prevented or detected in a timely manner.				
1	Monitor Benefits Provided to Seasonal Employees	 Work with the State's Division of Personnel to determine the appropriate criteria for identifying seasonal employees who become eligible for benefits, by position or by time worked, and determine the appropriate process for notifying and awarding benefits to those employees. Establish policies and procedures to effectively manage its seasonal employees' work time; to ensure that employees become eligible for benefits as part of a managed work schedule and not through lack of management's oversight of employees' work schedules and hours. Consult with appropriate parties to determine whether any 	Develop an internal review process that the payroll manager at Cannon Mountain can use for the purpose of providing better oversight of hours worked by individuals and which can be provided to managers for the purpose of exercising better control and oversight of work schedules for seasonal employees.	12/1/2015		

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		liability exists for past benefit determinations and whether action is required at this time relative to benefits not having been provided during fiscal year 2014 and prior.				
14	Review the Awarding and Reporting of Fringe Benefits	 Review with appropriate subject experts whether federal tax regulations require Cannon Mountain to report the monetary value of certain benefits provided to employees, volunteers, and affiliates. Evaluate its criteria for awarding these benefits to ensure that that the benefits provided to employees, volunteers, and affiliates remain economical. 	➤ Obtain professional tax-law guidance to determine impact if any, of IRS regulations.	12/1/2015	•	
15	Improve Accountability and Transparency Over No-Cost Passes	 Improve the accountability and transparency over its issuance of no-cost passes. Information on the use of no-cost passes should be accumulated, analyzed, and reported for management's review and approval. 	➤ The Business Office at Cannon will provide an accounting of the number and type of passes made available for distribution and will update and report monthly to the Commissioner, Director of Parks and Recreation, and the Department Business	12/1/2015	•	

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		 Management should ensure the analysis demonstrates their delegation of authority has been properly administered and the program is providing the intended results. Consider whether the financial activity resulting from bartered services should be reported for Federal income tax purposes and considered for inclusion in Cannon Mountain's financial statements. 	Department management will consult annually with Cannon management regarding the effectiveness of such issuances. The Department Business Administrator will seek professional tax-law guidance regarding the consideration of Federal Internal Revenue Service regulations should they be applicable.		Status	
16	Improve Accountability of Discounted Season Passes	 Improve accountability over discounted season passes. Consider modifying its policies and procedures for recording season pass transactions in its point of sale system to capture additional information and provide additional accountability over its issued season passes. 	Statistical and demographical information relative to season pass distribution adds value to seeking new marketing and sales opportunities. To that end, effective November 1, 2014, we now specifically track all season pass types.	12/1/2015	••••	
17	Increase Use of Vouchers to Support Complimentary Tickets	Cannon Mountain should limit the instances where complementary tickets are issued without the support of a complementary ticket voucher.	Only the General Manager and Guest Services Manager at Cannon authorize the use of complimentary tickets in resolving issues at the Guest Services counter.	12/1/2015	•••	

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		Once limited, instances where free tickets are issued without the support of a voucher should be reviewed with the ticket seller and the supervisor who authorized the free ticket.	Tickets are to be held in a secure location and accessed only by or with the permission of either authorized issuing agent.			
		Confirmation of the circumstances surrounding the issuance of a free ticket without a voucher should be documented by the reviewer of	 All complimentary tickets will be pre-issued for use and recorded as such, prior to being issued as complementary. Any unused tickets will be 			
		the transaction.	returned and an adjustment will be recorded to account for a final count of all tickets issued.			
18	Improve Control Over Retail Operations	Improve the controls over its retail operations. > Implement appropriate control activities for the retail operations, including review and approval controls and	Clearly define segregation of duties and establish roles and responsibilities with emphasis on the procurement and control of accountability of all inventory	12/1/2015	••	
		segregation of duties controls. > Implement monitoring controls to reasonably ensure that the	Prepare Monthly reconciliation and reporting of all inventory on hand.			
		implemented control activities are consistently performed and remain responsive to the risks they are intended to address. Management information	 Employ independent assistance from the division retail manager of concession to participate in oversight of the Cannon retail operations unit 			

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		reporting of the retail activity should be prepared and reviewed by Cannon Mountain management to ensure management remains aware of the profitability and the efficiency and effectiveness of the retail operations. Periodic reporting and analyses of cost of goods sold, inventory levels, turnover, shrinkage adjustments, and other performance data should be provided to, and used by, Cannon Mountain and Department management to establish and monitor expected and actual performance of the retail operations. Adjustments to inventory records based on periodic inventory control counts should be reported to, and reviewed by, a level of management independent of retail operations to ensure that Cannon Mountain's retail operations are	 Establish regular intervals of audit control from internal auditor to ensure compliance and proper procurement and inventory control procedures. Department business administrator to establish formal reporting requirements from all concession operations 			
		operating as intended.				
19	Monitor and Enforce Contract Provisions	Ensure contract provisions are effectively monitored and enforced.	 Department business administrator to establish contract compliance 	12/1/2015	••	

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		 Ensure that any delegation of contract monitoring responsibilities are understood and supported by appropriate policies and procedures to ensure the Department's interests are protected. Require food services concessionaire to adhere to all contract provisions intended to protect the Department's interests. Information received from its contractor should be reviewed for accuracy and compliance. Instances of noncompliance with contract provisions should be aggressively pursued and resolved. 	quarterly with Cannon Mountain Manager. Department internal auditor will conduct seasonal audits and determine delegation of on-site responsibilities to ensure compliance with provisions of all contracts. Department Business administrator will review all financial information sent for review to the Cannon mountain business office.		Status	
20	Safeguard and Report State Assets	Ensure that Cannon Mountain is complying with all State policies and procedures for the safeguarding and reporting of State assets.	Office will require monthly reporting of all assets from the Cannon Mountain Business Office.	12/1/2015	••	
		Improve their communication of information related to the performance, results, and review of the related control activities.				

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		As part of its monitoring activities, the Department should ensure that information related to the real property improvements at Cannon Mountain is communicated to the Department's Design, Development and Maintenance section for its review and consideration, and for Department recordkeeping purposes.	assets received are tagged and recorded per State policy and inventory tag procedures. The Department Internal Auditor will also be engaged to proactively ensure proper accountability of all assets at Cannon Mountain via semiannual audits.			
21	Establish Controls Over Equipment Rental Inventory	 Establish controls over its equipment rental inventory to lessen the risk that inventory is not properly controlled and accounted for. Review and approve purchases 	Clearly define segregation of duties and establish roles and responsibilities with emphasis on the procurement and control of accountability of all inventory	12/1/2015	•	
		of rental shop equipment. Prepare reconciliations to	Prepare Monthly reconciliation and reporting of all inventory			
		ensure purchased inventory is received and included in inventory records. Implement reviews, including	 Employ independent assistance from the division retail manager of concession to participate in oversight of the Cannon retail operations unit 			
		the results of comparisons of physical inventory counts to inventory records.	Establish regular intervals of audit control from internal auditor to ensure compliance and proper procurement and inventory control procedures.			

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Establish Policies and Procedures to Review Filings of Statements of Financial Interests	procedures to review the filing status of employees, and others associated with the Department, who are required to file Statements of Financial Interests.	Department Business Office maintains a schedule of all reporting requirements for the agency and will continue to review regularly to ensure that filing deadlines for all reports are met.	12/1/2015	•••	
	to file timely Statements of Financial interests, including advising those individuals of statutory consequences if timely filings are not made.				
Establish Policies and Procedures for Monitoring Mittersill Project	Establish policies and procedures for monitoring its contract with the FSC and for ensuring that the Mittersill Project proceeds as intended.	Cannon Business office will record the acquisition of any new assets per State asset reporting.	12/1/2015	•	
	 Receive and closely review FSC audited financial statements. Determine the appropriate accounting and reporting of the Mittersill Project, including the assets purchased and built by the Project. Maintain oversight for all construction activity at 	Department business administrator will seek guidance from the Director of Accounting, Department of Administrative Services and our Department's legal counsel to determine how the Department should record the benefit we have been given from this contract with particular focus on how and when assets of the project are			
	Establish Policies and Procedures to Review Filings of Statements of Financial Interests Establish Policies and Procedures for Monitoring Mittersill	Establish Policies and Procedures to Review Filings of Statements of Financial Interests Establish Policies and Procedures to review the filing status of employees, and others associated with the Department, who are required to file Statements of Financial Interests. Encourage required individuals to file timely Statements of Financial interests, including advising those individuals of statutory consequences if timely filings are not made. Establish Policies and Procedures for Monitoring Mittersill Project Project Project Project proceeds as intended. Receive and closely review FSC audited financial statements. Determine the appropriate accounting and reporting of the Mittersill Project, including the assets purchased and built by the Project. Maintain oversight for all	Establish Policies and Procedures to Review Filings of Statements of Financial Interests Financial Interests Percent Policies Procedures to review the filing status of employees, and others associated with the Department, who are required to file Statements of Financial Interests.	Establish Policies and Procedures to Review Filings of Statements of Financial Interests Encourage required individuals to file timely filings are not made.	Establish Policies and Procedures to review the filing status of employees, and others associated with the Department, who are required to file Statements of Financial Interests. Pencurage required individuals to file timely Statements of Financial interests. Pencurage required individuals to file timely Statements of Financial interests. Pencurage required individuals to file timely Statements of Financial interests. Pencurage required individuals to file timely Statements of Financial interests. Pencurage required individuals to file timely filings are not made. Procedures for Monitoring Mittersill Project or ensuring that the Mittersill Project proceeds as intended. PReceive and closely review FSC audited financial statements. Petermine the appropriate accounting and reporting of the Mittersill Project, including the assets purchased and built by the Project. PMaintain oversight for all construction activity at the set of the project are when a section for the project are the filing maintains a schedule of all reporting requirements for the agency and will continue to review regularly to ensure that filling deadlines for all reports are met. Pagency and will continue to reporting requirements for the agency and will continue to review regularly to ensure that filling deadlines for all reports are met. Pagency and will continue to reporting requirements for the agency and will continue to review regularly to ensure that filling deadlines for all reports are met. Pagency and will continue to reporting requirements for the agency and will continue to review regularly to ensure that filling deadlines for all reports are met. Pagency and will continue to review regularly to ensure that filling deadlines for all reports are met. Pagency and will continue to review regularly to ensure that filling deadlines for all reports agency and will continue to review required individuals to file agency and will continue to review regularly to ensure that filling deadlines for all reports are met. Pagency and w

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		that all construction activity meets the Department's standards and is suitably documented to allow for future operation and maintenance, and to properly account for and report those improvements.	Cannon Business Office will ensure that FSC provides its financial reports annually which will be reviewed by the Department Business Administrator and Cannon General Manager with consideration of where and how the funds for our benefit are being held and managed.		Status	
24	Determine Budgetary Status of Ski School and Concession Operations	 Consider the continued requirement and appropriateness of excluding its school and concession operations from the State's budget process. To increase transparency, accountability, and controls, Cannon Mountain should include its school and concession operations in its budget submissions. 	The Cannon Mountain and Cannon Ski School/concession units will be included in the agency operation budget development phase for the FY18-19 Biennium	6/1/2015	••••	
25	Comply with Statutory Requirements	The Department should comply with statutory requirements. Review and assess the statutes affecting the Department's operations. If the Department determines that certain statutes	Conduct thorough review with department business administrator, division director and Cannon Mountain Manager to determine if there should be any request for statutory changes.	12/1/2015	•	

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		no longer have relevancy, the Department should request the statutes be appropriately amended. > Seek legislative clarification for statutes in which the				
		Department is unsure of the statutory requirements.				
26	Submit Quarterly Reports on Seasonal Passes Sold at Reduced Rates	 Include information regarding season passes sold at reduced rates to New Hampshire residents in its quarterly reporting to comply with RSA 227:14. The reports should be reviewed for accuracy and submitted timely. If the Department determines that the reporting requirement no longer serves the purpose of the State and Department, the Department should request that the statute be appropriately amended. 	Enhance reporting to include season pass sales data for reduced rate sales.	12/1/2015	•	