



Joseph M. Centorino, Inspector General

TO: Honorable Mayor and Members of the City Commission
FROM: Joseph Centorino, Inspector General

DATE: August 31, 2022
AUDIT: Trash Be Gone, Inc. Roll-off Fee Revenues Audit
OIG No. 22-12
PERIOD: June 1, 2017 through August 31, 2021

This report stems from an audit performed of the roll-off permit fees charged, collected, and remitted by Trash Be Gone, Inc. during the June 1, 2017 through August 31, 2021 audit period. The City of Miami Beach Office of the Inspector General (OIG) Sanitation Tax Auditor examined the roll-off contractor's compliance with selected provisions in the City Code, including obtaining annual business tax receipts (BTRs), filing required reports, and maintaining sufficient insurance coverage. The performance of City staff responsible for monitoring Trash Be Gone, Inc. and processing all received payments was also reviewed.

INTRODUCTION

A roll-off is defined as a container with a minimum capacity of ten cubic yards designed to be transported by a motorized vehicle. Contractors use these containers to collect and dispose of construction and demolition debris and/or large quantities of trash and/or bulky waste, but not garbage or commercial refuse. Bulky waste represents large items of household refuse, such as appliances, furniture, accumulations from major tree cutbacks, large crates and like articles, while commercial refuse consists of all solid waste produced by commercial establishments.

The City's licensing and permitting system, EnerGov, reported nineteen roll-off contractors on May 9, 2022 with 2021/22 fiscal year BTRs in "active" status, one roll-off contractor in "pending" status, one contractor in "temporary" status, and one contractor in "revoke" status. The number of roll-off contractors frequently changes, either upward as new contractors abide by the City's guidelines and obtain BTRs, or downward as contractors merge or stop conducting business in Miami Beach and do not renew their BTRs.

"Pending" status means that the BTR is not yet valid or active and missing needed documentation and/or payment. "Temporary" status means that the BTR will remain active if the contractor remains compliant with agreed upon terms. "Revoke" status means that the BTR previously issued by the City was rescinded for stated reasons.

Roll-off contractors operating in Miami Beach are required to follow the terms outlined in the City Code, which include the monthly remittance of roll-off fees equal to the City Commission approved rate (18% from the beginning of the audit period through September 30, 2019 and 20% for the remainder of the audit period) multiplied by the total gross receipts for each contractor's City operations. City Code Section 90-221 defines gross receipts as the entire amount of fees collected by the contractor (whether wholly or partially collected) for solid waste collection and disposal within the City, excluding any taxes, and gross receipts from servicing roll-off and portable containers.

City Code Section 90-278(4) requires that monthly reports, accompanied by payment of any owed fees, to be submitted to the City's Finance Department by all authorized contractors at the end of the month after the month in which the gross receipts were generated. For example, the monthly report and any associated roll-off fees owed for February 2022 are due by March 31, 2022. Any unpaid fees that are not timely received are subject to penalties of 10% per month up to a maximum of 50%, plus interest of 1% per month.

City Code Section 90-278(3) requires that each roll-off contractor provide the City Manager with a current list of the names and addresses of each account upon its initial application. Upon any application for renewal of its permit, each contractor must provide the frequency of service, the permit number and capacity of each roll-off container or dumpster for each account, and the address serviced by each roll-off container or dumpster. This list of accounts is typically furnished concurrently with the monthly report to the Finance Department. It is an essential document to verify the accuracy of the roll-off contractor's filings during the audit process.

When the roll-off contractor has annual gross receipts reported to the City over \$200,000.00, it shall deliver to the City's Finance Department a statement of annual gross receipts generated from accounts within the City for the preceding fiscal year, prepared by an independent Certified Public Accountant (C.P.A.). These statements of annual gross receipts are to be furnished within sixty days following the close of the roll-off contractor's fiscal year pursuant to City Code Section 90-278(4). Trash Be Gone, Inc. did not exceed this annual threshold during the audit period, and, therefore, did not have to submit this statement.

Lastly, City Code Section 90-196 details the required insurance coverage to be maintained by qualified licensed roll-off contractors and Section 90-193 addresses the need to obtain permits for all accounts serviced in the City.

OVERALL OPINION

Due to other commitments and the volume of records requested, the contractor was granted several time extensions during the audit process. Trash Be Gone, Inc. was cooperative and provided the documentation needed to perform this audit.

The contractor filed few Roll-Off Permit Fee returns and remitted little monies to the City's Finance Department during the June 1, 2017 through August 31, 2021 audit period. As this audit was concluding, the contractor filed Roll-Off Permit Fee Returns and remitted \$4,560.88 in monies due to the City on May 28, 2022, related to the months of September 2021 through March 2022. This remittance by the contractor was acknowledged, and, although occurring outside the designated audit period, the OIG Sanitation Tax Auditor performed additional analysis on these filings, which are included in this audit report.

The following deficiencies, separated by the deficient party(ies), were identified during the audit process:

A. Findings pertaining solely to Trash Be Gone, Inc.

1. Trash Be Gone, Inc. did not report gross receipts totaling \$175,459.80 to the City during the audit period, which resulted in unpaid roll-off permit fees due of \$57,612.24 (including penalties and interest). In addition, \$2,992.11 in associated audit costs is due to the City pursuant to City Code Section 90-278(6).
2. Trash Be Gone, Inc. furnished records confirming the performance roll-off services at 23 Miami Beach locations during the audit period without the required BTR for the 2018/19 fiscal year and without obtaining the permits required by City Code Sections 90-193, 90-276 and 90-278(6)(a-c). The Code Compliance Department did not issue any Notices of Violation to the contractors for these incidents.

B. Findings pertaining solely to the City

3. Trash Be Gone, Inc. was assigned four different contact numbers in the City's EnerGov system, thereby complicating the search process to determine whether any outstanding balances exist.

C. Findings pertaining to both Trash Be Gone, Inc. and the City

4. Trash Be Gone, Inc. did not timely remit its monthly roll-off permit fees and prior audit assessment due, but the Finance Department did not charge the contractor \$247.50 due in penalties and interest during the audit period pursuant to City Code Sections 90-278(6)(a-c). Similarly, the OIG Sanitation Tax Auditor calculated that an additional \$1,926.82 in late filing fees, penalties and interest is due to the City for the contractor's late submittal of roll-off permit fees for the months of September 2021 through April 2022 (outside the designated audit period).
5. The roll-off contractor did not timely submit its lists of accounts to the City Manager pursuant to City Code Section 90-278(3), and no evidence was provided by City staff indicating that any were requested.

PURPOSE

The purpose of this audit was to determine whether tested roll-off contractor filings were complete and accurate; whether corresponding remittances were correctly calculated using the City Commission approved roll-off permit fee rate; whether filings and monies were timely received and correctly recorded by the City; and whether the contractor was compliant with other designated City Code sections.

SCOPE

1. Determine whether the roll-off contractor maintained sufficient records to verify whether its tested permit fee billings were correct; and whether its corresponding Miami Beach gross receipts were accurately computed based on the monthly fees submitted to the City.
2. Determine whether the roll-off contractor timely submitted its tested monthly reports of gross receipts and remitted full payment of fees due to the City; if not, determine whether the appropriate penalties and interest charges assessed pursuant to City Code Section 90-278(6)(a-c).

3. Determine whether the roll-off contractor timely obtained its required annual BTRs.
4. Determine whether the roll-off contractor complied with reporting requirements listed in City Code Section 90-278.
5. Determine whether the roll-off contractor maintained the required insurance coverage pursuant to City Code Sections 90-191 and 90-196.
6. Determine whether tested monthly roll-off fee payments remitted were accurately recorded in the City's Financial System.

FINDINGS AND RESULTS/RECOMMENDATIONS

The findings below are separated by those pertaining solely to the roll-off contractor, those pertaining solely to the City, and any pertaining to both the roll-off contractor and the City.

A. Findings Pertaining Solely to Trash Be Gone, Inc.

1. ***Unreported Roll-off Permit Fees Totaling \$57,612.24 (Including Penalties and Interest) And \$2,992.11 In Audit Costs Are Due To The City.***

Trash Be Gone, Inc. filed the following six-monthly Roll-Off Permit Fee Returns and remitted the associated payments to the City during the June 1, 2017 through August 31, 2021 audit period:

Month	Roll-Off Permit Fees Paid
July 2017	\$396.00
August 2017	\$252.00
September 2017	\$189.00
October 2017	\$63.00
November 2017	\$378.00
December 2017	\$216.00
Total	\$1,494.00

Source: Munis system database

Contractors were not required by the City Code during the audit period to file monthly Roll-Off Fee Returns when no monies were due to the City. Therefore, the Finance Department would not have been aware that any monthly returns/payments due were not filed, as City staff may have assumed that the contractor did not perform any related Miami Beach roll-off transactions for the unreported months of January 2018 through the end of the audit period, August 31, 2021. This shortcoming was recently resolved through the passage of City Ordinance No. 2021-4456, effective December 18, 2021, which among other provisions, requires roll-off contractors to file monthly returns regardless of whether any work was performed within the City and it levies a \$50 late filing fee for each month that the return is delinquent.

City Code Section 90-221 defines gross receipts as "*the entire amount of the fees collected by the contractor (whether wholly or partially collected) for solid waste collection and disposal within the city and including, without limitation, but excluding any taxes, and gross receipts from servicing roll-off and portable containers.*" The OIG Sanitation Tax Auditor reviewed all contractor furnished documentation to determine the amount of monthly roll-off gross receipts occurring within the City during the June 1, 2017 through August 31, 2021 audit period. These calculated amounts were then compared to the remitted roll-off fee payments, with any identified differences sent to the contractor. Any differences sufficiently explained were removed from the corresponding assessment calculations.

On March 14, 2022, the contractor finally provided all the records requested to satisfy the OIG audit's records requirements. Examination of these furnished records concluded that there were 452 unreported taxable Miami Beach roll-off transactions. As a result, it was calculated that \$57,612.24 in roll-off permit fees are due to the City (including penalties and interest), as shown by period in the table below. Trash Be Gone, Inc. did not charge and collect roll-off permit fees from its customers for many of these transactions, but it was determined that \$162.00 in fees were collected and not remitted to the City.

<i>Period</i>	<i>Unreported Gross Receipts</i>	<i>Roll- Off Fee Rate *</i>	<i>Roll-Off Fees Due</i>	<i>Penalties **</i>	<i>Interest **</i>	<i>Total Amount Due</i>
<i>Jun. 2017 – Dec. 2017</i>	\$46,240.80	18%	\$8,323.34	\$4,161.71	\$4,573.58	\$17,058.63
<i>Jan. 2018 – Dec. 2018</i>	\$39,117.80	18%	\$7,041.20	\$3,520.66	\$3,225.50	\$13,787.36
<i>Jan. 2019 – Sept. 2019</i>	\$32,151.80	18%	\$5,787.33	\$2,893.69	\$1,987.13	\$10,668.15
<i>Oct. 2019 – Dec. 2019</i>	\$9,645.60	20%	\$1,929.12	\$964.56	\$543.87	\$3,437.55
<i>Jan. 2020 – Dec. 2020</i>	\$29,218.80	20%	\$5,843.76	\$473.00	\$209.74	\$6,526.50
<i>Jan. 2021 – Aug. 2021</i>	\$19,085.00	20%	\$3,817.00	\$1,908.50	\$408.55	\$6,134.05
<i>Totals</i>	\$175,459.80		\$32,741.75	\$13,922.12	\$10,948.37	\$57,612.24

* City Commission approved roll-off permit fees equaled 18% from the beginning of the audit period, June 1, 2017, through September 2019, and 20% from October 1, 2019 through the end of the audit period, August 31, 2021.

** Penalties and interest were waived and not charged for late payments received during the period of March 1, 2020 through November 30, 2020, pursuant to City Resolution Nos. 2020-31237 and 2020-31390.

In addition, City Code Section 90-278(6) states, "If the contractor fails to timely pay the full permit fee as set forth in subsections (1) and (2) of this section, the contractor shall pay any and all of the city's expenses for collection of such fees, including, but not limited to, court costs, audit costs and reasonable attorney fees." As a result, it was calculated that the City is due \$2,992.11 in audit costs through May 25, 2022 related to the completion of this audit by the OIG Sanitation Tax Auditor.

As the audit was being finalized, Trash Be Gone, Inc. filed the following monthly roll-off fee returns on May 18, 2022 for September 2021 through March 2022, which were outside the designated audit period. The accuracy and completeness of these reported figures was not determined, as each month will be included in the next audit performed of the roll-off contractor.

Month	Roll-Off Permit Fees Paid
September 2021	\$651.04
October 2021	\$304.08
November 2021	\$95.00
December 2021	\$509.08
January 2022	\$812.40
February 2022	\$911.80
March 2022	\$1,277.48
Total	\$4,560.88

Source: Munis Database

Results/Recommendations:

The City's Finance Department should invoice Trash Be Gone, Inc. \$57,612.24 for unreported roll-off fees, including penalties and interest, due to identified unreported taxable Miami Beach transactions. In addition, the Finance Department should also invoice the contractor \$2,992.11 in audit costs through May 25, 2022 pursuant to City Code Section 90-278(6). Once these invoices are received, the roll-off contractor should timely remit full payment to avoid additional disciplinary actions under the City Code. Lastly, Trash Be Gone, Inc. should consistently and accurately file its future monthly roll-off fee returns to the City.

Finance Department Response:

The Finance – Revenue Division issued invoice # 37972 for \$60,604.35 for both the fees and audit costs on July 12, 2022.

2. ***Trash Be Gone, Inc. Furnished Records Confirming That It Performed Roll-Off Services At 23 Miami Beach Locations During The Audit Period Without Obtaining The Required Permits Contrary To City Code And No Notices Of Violation Were Issued.***

City Code Section 90-193 states, *“The city manager shall require, and will issue, a permit for each garbage facility, recycling, hazardous and biohazardous waste, rolloff and portable container, for all solid waste accounts in the city serviced by a private waste contractor. The permit for solid waste collection and disposal shall be issued by the city manager after the contractor has complied with all requirements for obtaining a business tax receipt; any and all other requirements prescribed by this chapter; and has been cleared by the city’s finance department. Rolloffs, portable containers and containers for recycling or hazardous and biohazardous wastes shall be included, except that all recycling containers situated in a single location on a property shall require only one permit.”* Roll-off permits are issued to contractors by the Sanitation Division upon satisfying all the designated requirements. If contractors perform roll-off services without timely obtaining the required permit, then each address is subject to the issuance of a Notice of Violation or NOV by the Code Compliance Department.

Upon reviewing all the documentation furnished by Trash Be Gone, Inc., the OIG Sanitation Tax Auditor determined that the contractor performed roll-off services at the following 23 Miami Beach addresses without obtaining the required permits from the Sanitation Division:

- | | |
|---------------------------------|--------------------------------|
| 1) 1237 Lincoln Road | 13) 550 9th Street |
| 2) 1248 Marseilles Drive | 14) 5646 N. Bay Road |
| 3) 1330 15 th Street | 15) 5650 Alton Road |
| 4) 1424 Ocean Drive | 16) 5848 N. Bay Road |
| 5) 1430 Ocean Drive | 17) 6380 N. Bay Road |
| 6) 1800 Bay Road | 18) 6420 Allison Road |
| 7) 234 Washington Avenue | 19) 701 4 th Street |
| 8) 2555 Collins Avenue | 20) 727 4 th Street |
| 9) 419 Michigan Avenue | 21) 747 4 th Street |
| 10) 430 W. Dilido Drive | 22) 815 Alton Road |
| 11) 508 Dilido Drive | 23) 100 South Pointe Drive |
| 12) 5620 Pine Tree Drive | |

City Code Section 90-192(a) states, "...*The business tax receipt will be issued once an applicant has met all requirements*". It was noted that Trash Be Gone, Inc. received its 2018/19 fiscal year (October 1, 2018 through September 30, 2019) on October 8, 2019, which is 372 days after its October 1, 2018 due date. Despite not having a valid 2018/19 fiscal year BTR, the roll-off contractor's furnished records verify that it still performed roll-off services within the City during that period. The City Attorney's Office confirmed on May 25, 2022, via email, that if a roll-off contractor performed services without a BTR in a specific fiscal year, a NOV for operating in the City without a valid BTR can be issued retroactively by the Code Compliance Department.

As the Code Compliance Department is primarily complaint driven, no evidence was found indicating that it was notified of the unpermitted job sites. The City Attorney's Office confirmed during May 2022 phone conversations with the OIG that NOV's can be issued retroactively by the Code Compliance Department to the contractor related to these 23 addresses and for operating during the 2018/19 fiscal year without a valid BTR.

Results/Recommendations:

The Code Compliance Department should issue 23 NOV's for \$100 each to Trash Be Gone, Inc. for the listed non-compliant addresses and a separate NOV for \$1,000 related to its failure to timely obtain the required BTR during the 2018/19 fiscal year. Once received, the roll-off contractor should promptly remit the corresponding monies due to avoid possible additional disciplinary actions. In addition, Trash Be Gone, Inc. should comply with the City Code and timely obtain the required BTR's and roll-off permits for future Miami Beach addresses serviced or be subject to receiving NOV's from the Code Compliance Department.

Update:

The Notices of Violations were issued by Code Compliance Department.

Findings Pertaining Solely to the City

3. *Multiple Contact Numbers Were Issued To Trash Be Gone, Inc. In The City's EnerGov System.*

The Tyler Technologies EnerGov system Customer Service System (CSS) portal is the web-based interface that customers use to engage with related City needs. Customers, such as Trash Be Gone, Inc., create password-protected contact numbers through the CSS portal containing all its relevant information. The EnerGov system is the City's licensing and permitting system.

Individuals and businesses with email accounts can, and often do, create numerous contact numbers as there are insufficient internal controls to limit the number of contact numbers in the EnerGov system. Although there may be many reasons why multiple contact numbers were issued to the same individual or corporation, any obsolete or outdated numbers are not inactivated. Some examples are as follows: several individuals interacting separately with the City but working at the same property address; failure of a customer to remember a selected password; and a customer acquiring a new email account. Regardless of the reason, the number of contact numbers has grown exponentially over time, significantly complicating the search process, and the determination of outstanding balances.

When more than one contact number is created in the EnerGov system, it can create confusion as roll-off permits, Code Compliance violations, outstanding balances, etc., may be entered under any of the issued contact numbers. Consequently, the reviewer must be aware of all contact numbers and review them in their totality to accurately represent the individual or company's status.

The OIG Sanitation Tax Auditor's review of the EnerGov system determined that Trash Be Gone, Inc. was issued four contact numbers during the period of August 8, 2016 through August 20, 2021. The table below shows the disbursement of the 11 issued roll-off permits among the four contact numbers. Although all four contact numbers are to be linked to the contractor's annual BTR, it was determined that only 475536 and ID-000005209 were linked.

<i>Contact Numbers</i>	<i># Roll-Off Permits</i>
475536	8
ID-000005209	3
ID-000124597	0
ID-000128275	0
Total	11

Source: EnerGov system database

Results/Recommendation(s):

Only one active contact number is recommended to be assigned to each address, whenever possible, to facilitate effective and accurate searches. It is also recommended that the City's Information Technology Department begin a database debug by deleting these multiple contact numbers and transferring any corresponding transactions to a contact number under the control of the property or business owner. The OIG understands that this is a time-consuming and labor-intensive task but believes that this issue should be addressed. The Information Technology Department should also contact Tyler Technologies Inc. to determine whether sub-contact numbers could be linked to the main contact number issued to the property or business owner. Finally, Code Compliance Department information related to violations should include a contact number linked to the customer's BTR and any pertinent permits.

Information Technology (IT) Department Response:

CSS allows for anyone to create a contact record and there are no systematic controls to prevent this. Tyler designed this for customer convenience. We feel that the City should ask Tyler to consider that when registering, the customer has an "Open Text" field as a

login name followed by an associated email. IT would prefer to see that the email is the official login name so that there are not multiple email contacts associated with any number of business names which is an issue today. IT is open to working with departments to create this city wide standard. This would begin with a defined standard for a "Contact" as well as assigning the appropriate "Contact Type" to create continuity across all systems. This will be a laborious task requiring input, contributions, and coordination across many departments. Staff would subsequently verify information on every contact within a Permit Application and assure that there are no duplicates within the system. This in combination with the existing contact "Merge" feature in EnerGov would help rectify this finding. After a purge of unlinked contacts, the City would still have 180,084 records to address. The City would need to develop and implement standards for Munis CSS, VSS, Eden and other enterprise tools before a CRM system could be properly implemented. This will all require substantial time and resources which would require appropriate prioritization.

Findings Pertaining to Both Trash Be Gone, Inc. and the City

4. ***Trash Be Gone, Inc. Did Not Timely Remit Its Monthly Roll-Off Permit Fees, And The Finance Department Did Not Charge The Contractor \$247.50 During The Audit Period and \$1,926.82 Outside Of The Audit Period Due In Late Filing Fees, Penalties And Interest Pursuant To City Code Sections 90-278(6)(a-c).***

City Code Section 90-278(4) states, "Each contractor shall deliver to the city's finance department a true and correct monthly report of gross receipts generated during the previous month (from accounts within the city) on or before the last day of each month. This monthly report shall include the customer names, service addresses, account numbers, and the actual amount collected from each customer. Payments of any fees required in this section shall be made monthly to the finance department, on or before the last day of each month, for gross receipts of the previous month." In addition, City Code Section 90-278(6)(a-c) requires that late contractor remittances are subject to penalties of ten percent per month with a maximum of fifty percent and interest at the highest legal rate of interest permitted by law (12% per annum was charged).

Testing determined that all six roll-off permit fee payments (100%) received by the City during the audit period were received after the due date specified in City Code Section 90-278(4). The roll-off permit fee payments for the following six months were submitted after the due date ranging from a low of 15 days for July 2017 and September 2017 to a high of 85 days for October 2017.

Month	Due Date	Date Paid	# of Days Late
July 2017	08/31/17	09/15/17	15
August 2017	09/30/17	11/15/17	46
September 2017	10/31/17	11/15/17	15
October 2017	11/30/17	02/23/18	85
November 2017	12/31/17	02/23/18	54
December 2017	01/31/18	02/23/18	23

Source: Munis system database

Despite the tardiness of these payments, the roll-off contractor was not charged any related late charges during the audit period. As a result, the OIG Sanitation Tax Auditor calculated that the contractor owes a total of \$247.50 in late charges as shown in the following table.

Month	Amount Paid	Penalties	Interest	Amount Due
July 2017	\$396.00	\$39.60	\$3.96	\$43.56
August 2017	\$252.00	\$50.40	\$5.04	\$55.44
September 2017	\$189.00	\$18.90	\$1.89	\$20.79
October 2017	\$63.00	\$18.90	\$1.89	\$20.79
November 2017	\$378.00	\$75.60	\$7.56	\$83.16
December 2017	\$216.00	\$21.60	\$2.16	\$23.76
Total	\$1,494.00	\$225.00	\$22.50	\$247.50

Furthermore, it was noted that the recent monthly filings of Trash Be Gone, Inc. for September 2021 through March 2022 were also filed late, ranging from a low of 18 days for March 2022 to a high of 199 days for September 2021. Also, City Resolution No. 2021-4456, effective December 18, 2021, should be followed, which levies a \$50 late filing fee for each month that the return is delinquent.

Month	Due Date	Date Paid	# of Days Late
September 2021	10/31/2021	05/18/22	199
October 2021	11/30/2021	05/18/22	169
November 2021	12/31/2021	05/18/22	138
December 2021	1/31/2022	05/18/22	110
January 2022	2/28/2022	05/18/22	79
February 2022	3/31/2022	05/18/22	48
March 2022	4/30/2022	05/18/22	18

Source: Munis system database

The roll-off contractor was not charged any related late charges for any of these May 18, 2022 submitted late filings. As a result, the OIG Sanitation Tax Auditor calculated that the contractor owes a total of \$1,926.82 in late charges as shown in the following table.

Month	Amount Paid	Penalties	Interest	Late Filing Fees	Amount Due
September 2021	\$651.04	\$325.52	\$45.57	N/A	\$371.09
October 2021	\$304.08	\$152.04	\$18.24	N/A	\$170.28
November 2021	\$95.00	\$47.50	\$4.75	N/A	\$52.25
December 2021	\$509.08	\$203.63	\$20.36	\$200.00	\$423.99
January 2022	\$812.40	\$243.72	\$24.37	\$150.00	\$418.09
February 2022	\$911.80	\$182.36	\$18.24	\$100.00	\$300.60
March 2022	\$1,277.48	\$127.75	\$12.77	\$50.00	\$190.52
Total	\$4,560.88	\$1,282.52	\$144.30	\$500.00	\$1,926.82

Results/Recommendation(s):

The City's Finance Department should create an invoice for \$247.50 (during the audit period) and \$1,926.82 (outside the audit period) charging Trash Be Gone, Inc. for late filing fees, penalties and interest associated with its late payments. Meanwhile, Trash Be Gone, Inc. should timely remit its future roll-off fee payments to the City prior to the stated due dates to avoid having late charges levied. If not, the contractor should be invoiced accordingly by the Finance Department pursuant to the City Code. It would be beneficial if the late charge calculations could be programmed into the City's enterprise resource planning system, so that the invoices could be automatically generated.

Finance Department Response:

The Finance – Revenue Division issued Invoice # 37973 for \$247.50 and invoice # 37974 for \$1,926.82 on July 12, 2022. The Finance Department will check with the Information Technology Department if it is possible to program the late charge calculations into the

City's enterprise resource planning system.

5. *Trash Be Gone, Inc. Did Not Timely Submit Its Lists Of Accounts To The City Manager Pursuant To City Code Section 90-278(3) And No Evidence Was Provided From City Staff Indicating Any Were Requested.*

City Code Section 90-278(3) states, "Each contractor shall provide the city manager with a current list of the names and addresses of each account, upon initial application, and upon any application for renewal, of its permit, the frequency of service, and the permit number and capacity of each roll-off container or dumpster as per account and the address serviced by each roll-off container or dumpster. No property owner may share an account with another property owner."

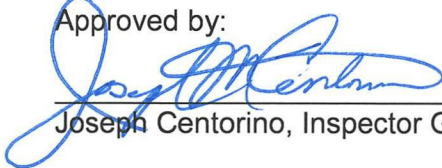
Trash Be Gone, Inc. did not provide the City Manager with its lists of accounts during the audit period, nor was evidence provided indicating that any were requested by the City. Upon request, the roll-off contractor provided the lists of accounts to the OIG Sanitation Tax Auditor. These listings are essential in verifying the accuracy of the roll-off contractor's filings during the audit process, as its customer data is subsequently reconciled with the supporting documentation provided.

Furthermore, the list of accounts furnished was used to prepare and mail positive confirmation letters to identified Trash Be Gone, Inc. customers, requesting a listing of all Miami Beach roll-off transactions with the roll-off contractor during the specified period. The OIG Sanitation Tax Auditor's corresponding reconciliation of all completed and returned confirmation letters with the furnished list of accounts did not reveal any material differences.

Results/Recommendation(s):


Trash Be Gone, Inc. should comply in the future with City Code Section 90-278(3) by timely submitting its lists of accounts to the City Manager. The OIG recommends that the City Code be revised to establish a due date for the submittal of these lists of accounts and to allow the charging of interest and/or penalties to non-compliant contractors.

Approved by:

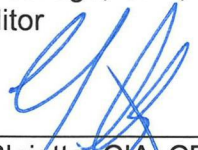

Joseph Centorino, Inspector General

08/31/2022
Date

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