Board of County Commissioners
County Internal Auditor's Office

Mobility Fee Program
Report #2026-07
June 17, 2026

County Internal Auditor
Melinda Jenzarli, CIA, CISA, CFE, CPA, MBA
601 E. Kennedy Blvd., 16th Floor
P O Box 1110 Tampa, FL 33601-1110
(813)274-6796

TO: Board of County Commissioners

FROM: Melinda Jenzarli, County Internal Auditor

DATE: June 17, 2026

SUBJECT: Mobility Fee Program, Report #2026-07

Pursuant to the 2025 Annual Audit Plan, the County Internal Auditor's Office conducted an audit engagement of the mobility fee program. The Audit Team's objective was to determine the maturity of the mobility fee program activities.

The purpose of this Report is to provide management with independent, objective analysis, recommendations, counsel, and information concerning the activities reviewed. As such, this Report is not an appraisal or rating of management.

Although the Audit Team exercised due professional care in the performance of this engagement, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud and/or employee abuse is the responsibility of management. Audit procedures alone, even when carried out with professional care, do not guarantee that fraud or abuse will be detected.

I appreciate the cooperation and professional courtesies extended to the Audit Team. The County Administrator gave the Audit Team full, free, and unrestricted access to all applicable activities, records, property, and personnel necessary to accomplish the stated objective of this engagement. Personnel also provided necessary assistance for the Audit Team to effectively perform the engagement in an efficient manner.

Sincerely,

Melinda Jenzarli, CIA, CISA, CFE, CPA, MBA
County Internal Auditor

Copy: Tom Fesler, Chief Financial Administrator, County Administration
Adam Gormly, Director, Development Services
Greg Horwedel, Deputy County Administrator
Julia Mandell, County Attorney
Bonnie M. Wise, County Administrator

TABLE OF CONTENTS

EXECUTIVE SUMMARY

Pursuant to the 2025 Annual Audit Plan, the County Internal Auditor's Office conducted an audit engagement of the mobility fee program. To achieve the audit's objective, the Audit Team assessed whether the standard operating procedures (SOPs), control designs, and activities performed collectively provide a reasonable level of assurance that Development Services, in collaboration with Public Works, Management & Budget, and Community & Infrastructure Planning, can efficiently and effectively achieve the four (4) principal business objectives while mitigating associated risks. The table below outlines the principal business objectives, associated risks, and the Audit Team's overall results and recommendations.

Principal Business Objective and Risk	Overall Results and Recommendations
Objective 1 – Mobility Fee Rates: The mobility fee rate schedule adequately funds necessary capital improvements within the mobility network due to increased travel demands from new developments. **Improper or Incorrect Valuation Risk**: Mobility fee rates are not periodically reviewed and updated, potentially leading to inadequate funding for necessary capital improvements that may jeopardize the safety and efficiency of the mobility network.	The improper or incorrect valuation risk is reasonably mitigated during the following activities: **1.1** BOCC Mobility Report Review **1.2** Mobility Fee Study **1.3** BOCC Ordinance Adoption Mitigation of this risk enables Development Services to efficiently and effectively achieve the mobility fee rates principal business objective. To further enhance the existing control environment, recommendations were made to: **1.2.1** Implement a formal SOP for the mobility fee study, defining timelines, responsibilities, a formal definition of "study initiation" with supporting documentation, and key steps to ensure updates are initiated within the four (4) year cycle and adopted within 12 months of initiation. **1.2.2** Implement a documented scheduling and monitoring process for the mobility fee study that includes defined timelines, requirements for documentation of initiation activities, periodic status checks, and escalation protocols. Detailed assessment results are on pages 10 – 19.

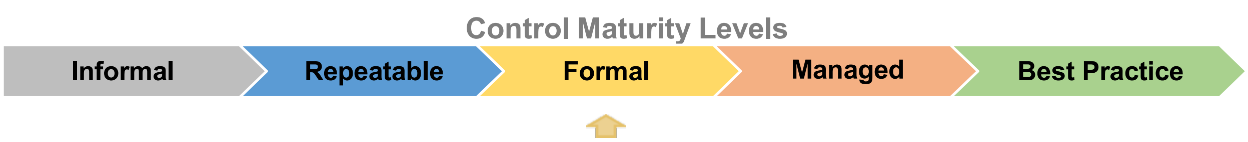
Objective 2 – Mobility Fee Assessment: Mobility fees are calculated and assessed per the Hillsborough County Mobility Fee Program Ordinance and effective mobility fee rate schedule. **Transaction Processing – Data Entry Risk**: Mobility fees are calculated and assessed incorrectly, resulting in applicants being overcharged, undercharged, or not charged at all, and the County receiving incorrect mobility fee amounts.	The transaction processing – data entry risk is partially mitigated during the following activities: **2.1** Mobility Fee Calculation and Assessment Review **2.2** Mobility Fee Assessment Validation The partial mitigation of this risk may hinder Development Services' ability to efficiently and effectively achieve the mobility fee assessment principal business objective. To strengthen the existing control environment, recommendations were made to: **2.1.1** Enhance the Mobility Fee SOP to include clear mobility fee calculations steps for both automated and manual methods, instructions for using the manual calculator, guidance on applying adjustments, and examples of common scenarios. **2.2.1** Enhance the Mobility Fee SOP to include detailed procedures for running and reviewing daily reports, defining review criteria, documenting exceptions, establishing timeliness standards, and examples of common scenarios. **2.2.2** Work with the Accela Team to explore possible configuration enhancements to automatically route projects that should require mobility fee review in coordination with Building & Construction Services staff. Detailed assessment results are on pages 20 – 28.
Objective 3 – Mobility Fee Revenue: Mobility fees collected are deposited and posted to the seven (7) designated mobility trust funds according to the mobility fee assessment district from which they were collected per the Hillsborough County Mobility Fee Program Ordinance. **Transaction Processing – Misallocation Risk**:	The transaction processing – misallocation risk is reasonably mitigated during the following activity: **3.1** Mobility Fee Collections Reconciliation Mitigation of this risk enables Development Services to efficiently and effectively achieve the mobility fee revenue principal business objective.

Mobility fees collected are not deposited or posted to the correct mobility fee benefit district fund, resulting in inaccurate financial reporting and insufficient funds for necessary capital improvements.	To further enhance the existing control environment, a recommendation was made to: **3.1.1** Enhance the Mobility Fee SOP to include detailed procedures for daily reconciliation of Accela and Oracle Cloud records, requirements for retaining supporting documentation, and clear protocols for resolving discrepancies. Detailed assessment results are on pages 29 – 32.
Objective 4 – Mobility Fee Expenditure: Mobility fees are used to fund new mobility facility capital improvements necessitated by new development in designated mobility fee benefit districts per the Hillsborough County Mobility Fee Program Ordinance. **Fiduciary – Guideline Violations Risk**: Mobility fees are used to fund disallowed activities, not appropriately deployed to fund needed capital improvements (persistent trust fund increase), or used to fund activities in an incorrect mobility fee benefit district, resulting in violations of the Hillsborough County Mobility Fee Program Ordinance or applicable law.	The fiduciary – guideline violations risk is reasonably mitigated during the following control activities: **4.1** Mobility Funds Usage Monitoring **4.2** Mobility Projects Eligibility & Expenditures Review Mitigation of this risk enables Development Services to efficiently and effectively achieve the mobility fee expenditure principal business objective. Detailed assessment results are on pages 33 – 39.

Minor concerns that may have been identified and not included in this Report were communicated to management and/or corrected during fieldwork.

The exit conference was held on May 8, 2026.

OVERALL OPINION



It is the County Internal Auditor's overall opinion that mobility fee program activities are at the Formal control maturity level. Controls are overall well-defined and documented. Standard operating procedures generally provide detailed guidance. Control gaps are generally detected and remediated in a timely manner. There is clarity on roles, responsibilities, authorities, and accountability.

AUDITED BY

Melinda Jenzarli, CPA, CIA, CISA, CFE, MBA, County Internal Auditor

Abram Gablla, CIA, CGAP, Internal Auditor III
Jeremy Miller, CIA, MBA, Lead Internal Auditor
Blake Withee, CFE, CIGI, Internal Auditor I

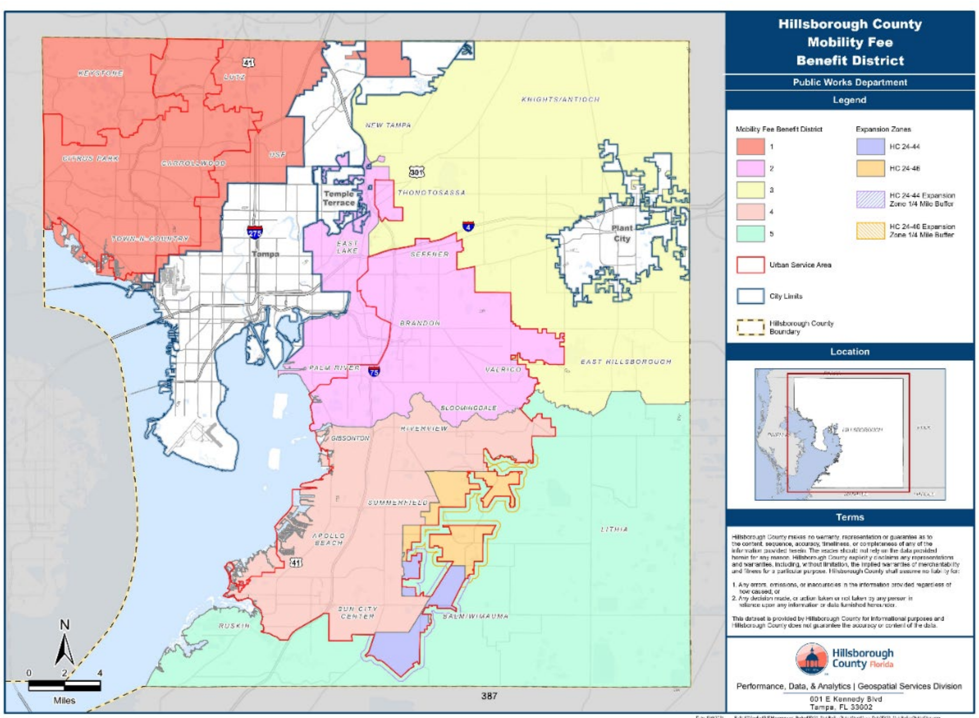
BACKGROUND INFORMATION

Development Services' primary business objective is to administer the Hillsborough County Land Development Code and to provide planning, zoning, development review, permitting, and building inspection services for unincorporated Hillsborough County. The mobility fee program supports this objective by ensuring that new development contributes proportionally to the transportation infrastructure needed to accommodate increased travel demand. This helps the department manage growth, maintain service levels, and align infrastructure expansion with development activity.

Mobility fees are a one-time assessment on development activity to help fund transportation improvements needed to accommodate the increased travel demand generated by new projects or remodels of vacant property or existing structures with an increase in usable area. These fees are collected before building permits are issued and are processed through Accela, the County's permitting and land management system. Accela manages the full permitting workflow, including issuing permits, invoicing fees, and recording fee activity within associated permits.

Mobility fees generate about $50 million in annual revenue for transportation improvements in unincorporated Hillsborough County. The program serves as a dedicated funding source for capital projects identified in the Hillsborough County Comprehensive Plan. These projects include roadway capacity improvements, multimodal connections, and infrastructure that support compact and efficient development patterns. Revenue is allocated within seven (7) mobility fee benefit districts in unincorporated areas of the County.

The map below shows the seven (7) mobility fee benefit districts in unincorporated Hillsborough County, excluding Tampa, Temple Terrace, and Plant City.



The mobility fee program process is shown in Figure 1 below:

Figure 1 – Mobility Fee Program Process

ENGAGEMENT OBJECTIVE

The Audit Team's objective was to determine the maturity of mobility fee program activities.

APPROACH

The audit was conducted in conformance with the *Institute of Internal Auditors Global Internal Audit Standards™*. These Standards require that the County Internal Auditor's Office plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the audit comments and conclusions based on the audit objectives. The County Internal Auditor believes that the evidence obtained provides this reasonable basis.

To assist in evaluating the control environment, the County Internal Auditor's Office follows the Committee of Sponsoring Organizations of the Treadway Commission framework (COSO). This standardized system assesses and enhances internal controls, risk management, and business processes to help organizations maintain accountability and achieve goals and objectives.

SCOPE

The Audit Team determined whether the following principal business objectives support the achievement of the primary business objective to administer the Hillsborough County Land Development Code and provide planning, zoning, development review, permitting, and building inspection services for unincorporated areas of Hillsborough County.

- <u>Mobility Fee Rates</u>: The mobility fee rate schedule adequately funds necessary capital improvements within the mobility network due to increased travel demands from new developments.
- <u>Mobility Fee Assessment</u>: Mobility fees are calculated and assessed per the Hillsborough County Mobility Fee Program Ordinance and effective mobility fee rate schedule.
- <u>Mobility Fee Revenue</u>: Mobility fees collected are deposited and posted to the seven (7) designated mobility fee trust funds according to the mobility fee assessment districts from which they were collected per the Hillsborough County Mobility Fee Program Ordinance.
- <u>Mobility Fee Expenditure</u>: Mobility fees are used to fund new mobility facility capital improvements necessitated by new development in designated mobility fee benefit districts per the Hillsborough County Mobility Fee Program Ordinance and applicable law.

The Audit Team conducted interviews, observations, and testing on the control environment and activities performed from October 1, 2024, through September 30, 2025, as follows.

- **Data Reliability:** A data reliability analysis was conducted to confirm that the data used for the engagement was complete and accurate. The full population of 77,932 permit records was obtained from Accela, GIS, Hillsborough County Property Appraiser, and Oracle Cloud. Records were traced and reconciled to verify key fields and identify discrepancies, ensuring the reliability of data supporting the engagement's conclusions.
- **Walkthrough:** A walkthrough of control activities was conducted for the FY2025 population segments, including issued permits, permits with mobility fees paid, monthly mobility fee collections by district, and permits with issued Certificates of Occupancy (COs). Walkthrough procedures included reviewing selected permits with and without mobility fees to verify the accuracy of permit data and fee calculations, reconciling monthly district mobility fee collections to deposits recorded in Oracle Cloud, and reviewing

selected permits with issued COs to determine whether one was required, verify issuance, and ensure the approved plans matched permit data in Accela.

- **Testing Approach:** Based on the data reliability and the walkthrough results, testing was conducted on the different population segments as described in Figure 2 below.

Figure 2 – Testing Approach

Segment	Segment Population	Records Tested	Testing Methodology	Control Activity Reference
County Administrator's Recommended Budget	1	1	Validate mobility report presented to BOCC.	**Objective 1** BOCC Mobility Report Review
Mobility Fee Update Study dated April 20, 2020, and study currently in progress	2	2	Validate the 2020 mobility fee study to confirm it incorporated localized data and maintained a rational nexus with growth needs. Confirm progress on the update to the mobility fee study.	**Objective 1** Mobility Fee Study
Hillsborough County Mobility Fee Ordinance 20-10	1	1	Validate BOCC ordinance adoption.	**Objective 1** BOCC Ordinance Adoption
Permits with Issued Certificates of Occupancy	3,192	24	Judgmental sample of 24 permits with issued COs to validate mobility fee assessments: 14 with fees calculated manually or using hybrid methods, 7 with fees automatically assessed per the adopted fee schedule, and 3 with no mobility fees paid.	**Objective 2** Mobility Fee Calculation and Assessment Review
Accela Review Reports	365 daily review reports, 12 monthly review reports	4	Judgmental sample of 2 weeks of daily review reports and 2 monthly review reports used to validate mobility fee assessments.	**Objective 2** Mobility Fee Assessment Validation
Accela and Oracle Financial Records	365 daily financial records, 2,836 permits with mobility fees	10	Random sample of 5 daily financial records reviewed to confirm Accela totals match deposits. Random sample of 5 permits with paid mobility fees to confirm that the fee code assignment corresponds to the appropriate mobility fee assessment district.	**Objective 3** Mobility Fee Collections Reconciliation
Impact/Mobility Fee Threshold Report dated March 31, 2025	1	1	Verify revenue tracking mechanisms and confirm annual threshold reporting guides expenditure planning.	**Objective 4** Mobility Fund Usage Monitoring

10 Year Horizon – Cumulative Detail Report (Mobility Fees)	62 months (January 31, 2020, through March 31, 2025)	3	Judgmental sample of FY2022 threshold data with a random sample of 3 months from 3 different mobility fee benefit districts reviewed to confirm the cumulative threshold amounts entering the 10-year window matched the corresponding ten-years-prior revenue and followed the first-in, first-out requirement.	**Objective 4** Mobility Fund Usage Monitoring
Mobility Fee Funded Projects	115	10	Judgmental sample of 10 mobility projects to validate eligibility. The sample included projects from 5 mobility fee districts.	**Objective 4** Mobility Projects Eligibility & Expenditures Review

POSITIVE ATTRIBUTES

Development Services supports the County's transportation network by reviewing and processing thousands of permits related to development activity each year. In FY2025, this included issuing more than 11,000 residential and commercial related permits and over 3,000 certificates of occupancy. This review process helps ensure that mobility fees are assessed in a manner that is consistent, fair, and transparent for both payors and taxpayers.

Hillsborough County's population increased by 8.3 percent from 2020 to 2024, which has contributed to increased permitting activity and highlights the sustained effort required of Development Services to support transportation needs tied to continued development. Mobility fees assessed and collected contribute essential funding for transportation improvements throughout the County.

AUDIT RESULTS & RECOMMENDATIONS

PRINCIPAL BUSINESS OBJECTIVE 1
MOBILITY FEE RATES

The mobility fee rate schedule adequately funds necessary capital improvements within the mobility network due to increased travel demands from new developments.

IMPROPER OR INCORRECT VALUATION RISK

Mobility fee rates are not periodically reviewed and updated, potentially leading to inadequate funding for necessary capital improvements that may jeopardize the safety and efficiency of the mobility network.

OVERALL RESULTS

The improper or incorrect valuation risk is reasonably mitigated during the following activities:

1.1 BOCC Mobility Report Review

1.2 Mobility Fee Study

1.3 BOCC Ordinance Adoption

Mitigation of this risk enables Development Services to efficiently and effectively achieve the mobility fee rates principal business objective.

To further enhance the existing control environment, recommendations were made to:

1.2.1 Implement a formal SOP for the mobility fee study, defining timelines, responsibilities, a formal definition of "study initiation" with supporting documentation, and key steps to ensure updates are initiated within the four (4) year cycle and adopted within 12 months of initiation.

1.2.2 Implement a documented scheduling and monitoring process for the mobility fee study that includes defined timelines, requirements for documentation of initiation activities, periodic status checks, and escalation protocols.

1.1 BOCC MOBILITY REPORT REVIEW

ACTIVITY OVERVIEW

Per the Hillsborough County Mobility Fee Program Ordinance (Mobility Fee Ordinance), §40-88(a) – Annual review and audit requirements, the County Administrator, with support from Development Services, is tasked with preparing an annual mobility fee report for the Board of County Commissioners (BOCC) as part of the County's normal budget cycle. This report is intended to provide the BOCC with a clear and thorough account of mobility fee activity. The report may include details on total fees collected and spent, updates on mobility-related capital projects initiated or completed, and a projected schedule for capital improvements over the next six years. It may also provide information about building permits and certificates of occupancy issued, as well as any recommendations for changes to the mobility fee program that the County Administrator deems appropriate for BOCC consideration. By compiling this information, the process supports transparency, informed decision-making, and ongoing alignment with actions the County will take under the Mobility Fee Ordinance and the County's transportation planning goals.

AUDIT PROCEDURES

The Audit Team determined if standard operating procedures (SOPs) provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the BOCC mobility report review activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team:

- Reviewed the annual mobility fee report included in the FY2026–2027 recommended budget.
- Evaluated whether optional elements from the Mobility Fee Ordinance were addressed in the report, such as summaries of mobility fees collected and spent, mobility projects initiated and completed, building permits and certificates of occupancy issued, and the forward-looking six-year capital improvement schedule.
- Determined if the report identified any recommended changes to the mobility fee program for BOCC consideration.
- Reviewed whether Development Services worked with the County Administrator to prepare and present the report during the normal County budget cycle.

Figure 3 – BOCC Mobility Report Review

CONTROL OBJECTIVE: To ensure that the annual mobility fee report provides the BOCC with the information necessary for annual review, reporting, and program evaluation, per Mobility Fee Ordinance §40-88(a).

COSO CONTROL: Officer/Board Level Review – Senior management and/or the board of directors ask for information and reports on specific business/quality objectives and/or the adequacy of the systems and processes that support the achievement of those objectives.

Written Guiding Principle	Activities Performed Comply with Written Guiding Principle
Hillsborough County Mobility Fee Program Ordinance, §40-88(a) –	Yes

<table>
<tr><td colspan="2">Annual review and audit requirements[1], establishes the requirements for the annual review, reporting, and potential amendment of the mobility fee program.</td><td colspan="2"></td></tr>
<tr><th colspan="2">Standard Operating Procedures (SOPs)</th><th colspan="2">SOPs Provide Adequate Guidance and Align with Written Guiding Principle</th></tr>
<tr><td colspan="2">There are no SOPs for the BOCC mobility report review activity.</td><td colspan="2">N/A</td></tr>
<tr><th colspan="2">Control Design Evaluated and Tested</th><th>Control Design is Efficient and Effective</th><th>Activities Performed Conform with Control Design</th></tr>
<tr><td colspan="2">The County Administrator, with support from Development Services, prepares and presents the annual mobility fee report to the BOCC as part of the normal budget cycle. This control includes collecting and verifying data on mobility fee revenues, expenditures, and project activity, assembling supporting schedules, and preparing a summary for BOCC review.</td><td>Yes</td><td>Yes</td></tr>
</table>

RESULTS

The test results below indicate that the annual mobility fee report activity enables the County Administrator, with support from Development Services, to ensure compliance with the provisions of Mobility Fee Ordinance §40-88(a), by providing the BOCC with relevant mobility fee program information.

Compliance With Written Guiding Principle

The Audit Team determined that the activities performed comply with Mobility Fee Ordinance §40-88(a). For the FY2026–2027 recommended budget, the County Administrator, with support from Development Services, prepared and presented an annual mobility fee report to the BOCC that addressed key elements of the Mobility Fee Ordinance, demonstrating compliance with provisions for the annual review, reporting, and program evaluation.

SOPs Provide Adequate Guidance and Align With Written Guiding Principle

There are no SOPs for the BOCC mobility report review activity. However, Mobility Fee Ordinance §40-88(a) provides sufficient written guidance to ensure that Development Services compiles mobility fee program information and coordinates with the County Administrator on the annual mobility fee report to the BOCC.

---

[1] **Hillsborough County Mobility Fee Program Ordinance §40-88(a)**, states, "(1) Each year during the normal County budget cycle, the Administrator will prepare a report to the Board on the subject of mobility fees, which report may include, as needed:
a. A summary of mobility fees collected and spent during the preceding fiscal year;
b. A summary of mobility facilities initiated and completed during the preceding fiscal year by the County or a cooperating agency;
c. The building permits and certificates of occupancy issued, by land use type as set forth in the mobility fee rate schedule; and
d. The schedule of mobility facility capital improvements included in the subsequent six-year period of the mobility plan.
(2) Based on the review of said information, the Administrator will, as needed, identify any changes to the mobility fee program recommended for consideration by the Board.
(3) Based on the Administrator's report and such other factors as the Board deems relevant and appropriate, the Board may amend this article, the mobility plan, or the mobility fee study as needed to maintain legal compliance. Nothing herein precludes the Board or limits its discretion to amend this article or the mobility fee program at such other times as may be deemed necessary."

Control Design Efficiency and Effectiveness

The control design is efficient and effective. Annual reports on mobility fee activities enable Development Services to clearly communicate information on actual and planned expenditures, including the specific capital projects funded by mobility fees. These reports are issued along with the County Administrator’s recommended budget. This process provides accurate and reliable data for oversight and ensures that any proposed changes to the mobility fee program can be formally presented to the BOCC for consideration.

Conformance with Control Design

The Audit Team determined that the activities performed conform with the control design. Per the Mobility Fee Ordinance §40-88(a), for the FY2026–2027 recommended budget, Development Services worked with the County Administrator to prepare and present the annual mobility fee report during the County’s normal budget cycle, consistent with the documented control design.

1.2 MOBILITY FEE STUDY

ACTIVITY OVERVIEW

The Community & Infrastructure Planning Department initiated the most recent mobility fee study, which Development Services is now managing. Due to the study's technical and legal complexity, the County engaged Benesch, a qualified external consultant, to complete the study and develop the recommended mobility fee rate schedule. The study is anticipated to be finalized by mid-2026.

After the BOCC adopts the Mobility Fee Ordinance, including the study's recommended mobility fee rates, multiple departments, including Public Works, Management & Budget, and Development Services, collaborate to implement the new rate schedule.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the mobility fee study activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team:

- Reviewed the 2020 mobility fee study to evaluate if it included the use of recent localized data, proportionality, and rational nexus requirements.
- Reviewed information provided by Development Services regarding the most recent mobility fee study update and assessed whether the timing aligned with the four (4) year cycle for initiating updates and the 12-month adoption timeline from initiation.
- Verified the qualifications of the consultant used for the mobility fee studies.

Figure 4 – Mobility Fee Study

CONTROL OBJECTIVE: To ensure mobility fee studies meet the data, methodology, and proportional and rational nexus requirements per Florida Statute §163.31801(4)(a) and are updated every four years per Mobility Fee Ordinance §40-89.

COSO CONTROL: SPECIALIZED REVIEWS & AUDITS - The organization engages specialists from time to time to examine and report on the way the organization is managing specific issues or areas of business activity.

Written Guiding Principles	Activities Performed Comply with Written Guiding Principles
Hillsborough County Mobility Fee Program Ordinance §40-89 – Periodic update to mobility fee study[2], establishes the requirements for periodically updating the mobility fee study and rate schedule. **Florida Statutes §163.31801(4)(a) – Impact Fees**[3], establishes the requirement that impact fees be calculated using recent, localized data and maintain a rational nexus to new development.	Partial

[2] **Hillsborough County Mobility Fee Program Ordinance §40-89,** states, "The Administrator will initiate an update to the mobility fee study and the mobility fee rate schedule every four years and bring the updated mobility fee study and mobility fee rate schedule to the Board for adoption. If a data source or factor that is included in either the demand or credit component of the mobility fee study is updated in a way that would materially affect the mobility fee rate schedule, the Administrator shall bring an item to the Board advising of the change and recommending a study update in order to incorporate said new data or factor."

[3] **Florida Statutes §163.31801(4)(a**), states, "(4) At a minimum, each local government that adopts and collects an impact fee by ordinance and each special district that adopts, collects, and administers an impact fee by resolution must:

(a) Ensure that the calculation of the impact fee is based on a study using the most recent and localized data available within 4 years of the current impact fee update. T of the initiationhe new study must be adopted by the local government within 12 months of the initiation of the new impact fee study if the local government increases the impact fee."

Standard Operating Procedures (SOPs)	SOPs Provide Adequate Guidance and Align with Written Guiding Principles
There are no SOPs for the mobility fee study activity.	N/A

Control Design Evaluated and Tested	Control Design is Efficient and Effective	Activities Performed Conform with Control Design
To ensure compliance with Mobility Fee Ordinance §40-89 and Florida Statutes §163.31801(4)(a), the County engages a qualified external consultant to update the mobility fee study and rate schedule.	Partial	Yes

RESULTS

The test results below indicate that the mobility fee study activity overall enables the performance of mobility fee studies to meet the data, methodology, and proportional and rational nexus requirements per Florida Statute §163.31801(4)(a) and be initiated in alignment with the intended update cycle outlined in Mobility Fee Ordinance §40-89. Recommended enhancements to the Mobility Fee SOP and control design will help ensure that mobility fee studies are initiated within the intended four (4) year update cycle, that studies comply with the 12-month adoption timeline from initiation, and will assist in managing potential delays caused by external factors.

Compliance With Written Guiding Principles

The Audit Team determined that the activities performed comply with written guiding principles for the 2020 mobility fee study, as it met statutory requirements for data, methodology, and a proportional and rational nexus.

For the most recent mobility fee study, while the Mobility Fee Ordinance provides for initiation every four (4) years, the purchase order for the fee study update was issued on May 1, 2025, within five (5) years of the previous study’s completion on April 20, 2020, thereby deviating from the prescribed timeframe.

Although planning activities may have occurred earlier, the Audit Team could not determine whether such activities met the threshold for “initiation,” as the Mobility Fee Ordinance does not define when initiation begins.

In addition, factors such as the passage of Florida Senate Bill 180, which affected land development regulations, have contributed to the timing of the study’s completion and presentation to the BOCC for approval.

Management indicated that the localized data for the ongoing fee study is being updated to comply with the Florida Impact Fee Act’s 12-month adoption requirement. The update will be completed before any proposed mobility fee adjustments are presented to the BOCC.

SOPs Provide Adequate Guidance and Align With Written Guiding Principles

There are no SOPs for the mobility fee study activity.

Control Design Efficiency and Effectiveness

The control design is efficient but is only partially effective. Engaging a qualified external consultant helps ensure the mobility fee study is completed with specialized, defensible expertise and current best-practice methodologies that meet statutory requirements. Using an independent consultant also provides objective analysis and access to technical tools and resources that are more efficient and reliable than conducting the study in-house. The effectiveness of this design could be further enhanced by implementing a monitoring process to ensure fee study updates are initiated within the intended four (4) year cycle and 12-month adoption timeline from initiation, and to help manage potential timing impacts from external factors.

Conformance with Control Design

The Audit Team determined that the activities performed conform with the control design. The County engaged a qualified external consultant to update the mobility fee study and rate schedule for both the 2020 study and the most recent study in progress.

RECOMMENDATION 1.2.1

SOPs are essential as they provide a roadmap for daily operations, ensure compliance with written guiding principles, guide decision-making, and streamline processes. Therefore, consideration should be given to building upon the foundation already in place by creating a formal SOP for the mobility fee study activity. The SOP should define the timelines for study updates, establish a formal definition of "study initiation," and require documentation of initiation activities (e.g., procurement request, approved scope of services, purchase order issuance). Clearly outlining responsibilities, key steps, and required evidence of initiation will help ensure mobility fee studies are initiated within the intended four (4) year cycle and adopted within the 12-month timeline from initiation, and that processes are consistently followed in compliance with written guiding principles.

MANAGEMENT RESPONSE: CONCUR

Development Services, in coordination with other Mobility Fee Program co-administrators, will develop and implement standardized operating procedures (SOPs) that outline the process, timelines, required documentation, defined roles and responsibilities, and mitigation alternatives to complete mobility fee studies within the intended four-year cycle.

TARGET COMPLETION DATE: JUNE 2026

RECOMMENDATION 1.2.2

To strengthen the effectiveness of the mobility fee study control design, consideration should be given to implementing a monitoring process with defined timelines, requirements for documentation of initiation activities (e.g., procurement request, approved scope of services, purchase order issuance), periodic status checks, and clear escalation and response steps for delays or other external factors. This would help ensure mobility fee studies are initiated and within the intended four (4) year cycle and adopted within the 12-month timeline from initiation.

MANAGEMENT RESPONSE: CONCUR

Development Services, in coordination with other Mobility Fee Program co-administrators, will develop and implement standardized operating procedures (SOPs) that outline the process, timelines, required documentation, defined roles and responsibilities, and mitigation alternatives to complete mobility fee studies within the intended four-year cycle.

TARGET COMPLETION DATE: JUNE 2026

1.3 BOCC ORDINANCE ADOPTION

ACTIVITY OVERVIEW

The BOCC adopts an ordinance to establish or amend mobility fees and the associated rate schedule, ensuring conformance with Florida Impact Fee Act, §163.31801(3)(d), (f), (g), (h), and Mobility Fee Ordinance, §40-71 – Adoption of mobility fee study. The ordinance incorporates the most recent mobility fee study as the technical basis for fee rate-setting, earmarks collected revenues for new capital improvements benefiting new development, and affirms proportionality through mobility fee benefit district structures. The ordinance also requires at least 90 days' notice before any new or increased fee becomes effective. This process provides legal authority, transparency, and fiscal accountability for the mobility fee program.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the BOCC ordinance adoption activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team reviewed Mobility Fee Ordinance 20-10 and 21-21 and evaluated whether they incorporated the requirements set forth in the Florida Impact Fee Act. This included assessing whether the ordinances provided at least 90 days' notice before new or increased mobility fees become effective, incorporated proportionality and rational nexus standards, and specified that mobility fee revenues be earmarked for capital facilities benefiting new development.

Figure 5 – BOCC Ordinance Adoption

CONTROL OBJECTIVE: To ensure mobility fees are adopted and administered per the Florida Impact Fee Act §163.31801(3)(d), (f), (g), (h), including, alignment of collected revenue benefiting new capital improvements, proportionality and rational nexus, and required notice of new or increased fees.

COSO CONTROL: Officer/Board Level Review – Senior management and/or the board of directors ask for information and reports on specific business/quality objectives and/or the adequacy of the systems and processes that support the achievement of those objectives.

Written Guiding Principles	Activities Performed Comply with Written Guiding Principles
Hillsborough County Mobility Fee Program Ordinance, §40-71 – Adoption of mobility fee study, states, "The Board hereby adopts and incorporates into this article by reference the mobility fee study entitled the "Hillsborough County Mobility Fee Study." **Florida Statutes, §163.31801(4)(d), (f), (g), (h) — Impact Fee Act[4]**, establishes the conditions that an impact fee must meet, including notice requirements, proportionality, rational nexus, and proper use of collected funds.	Yes

[4] **Florida Statutes §163.31801(4)(d), (f), (g), (h)**, states, "(4) At a minimum, each local government that adopts and collects an impact fee by ordinance and each special district that adopts, collects, and administers an impact fee by resolution must:
(d) Provide notice at least 90 days before the effective date of an ordinance or resolution imposing a new or increased impact fee. A local government is not required to wait 90 days to decrease, suspend, or eliminate an impact fee…
(f) Ensure that the impact fee is proportional and reasonably connected to, or has a rational nexus with, the need for additional capital facilities and the increased impact generated by the new residential or commercial construction.
(g) Ensure that the impact fee is proportional and reasonably connected to, or has a rational nexus with, the expenditures of the funds collected and the benefits accruing to the new residential or nonresidential construction."
(h) Specifically earmark funds collected under the impact fee for use in acquiring, constructing, or improving capital facilities to benefit new users."

Standard Operating Procedures (SOPs)	SOPs Provide Adequate Guidance and Align with Written Guiding Principles
There are no SOPs for the BOCC ordinance adoption activity.	N/A

Control Design Evaluated and Tested	Control Design is Efficient and Effective	Activities Performed Conform with Control Design
Updates to the Mobility Fee Ordinance are presented to the BOCC during a public hearing for review and discussion. The BOCC evaluates the proposed ordinance, which incorporates the most recent mobility fee study as the technical basis for fee rate-setting, and considers input from the public before formal adoption. Once adopted, the ordinance establishes how mobility fees are calculated, collected, and applied, directing revenues to capital improvements that serve new development. The ordinance defines mobility fee benefit districts to maintain proportionality and includes a requirement of at least 90 days' notice before any new or increased mobility fee becomes effective.	Yes	Yes

RESULTS

The test results below indicate that the BOCC ordinance adoption activity enables Development Services to ensure adoption and administration of mobility fees in compliance with Florida Impact Fee Act §163.31801(3)(d), (f), (g), (h), including current mobility fee rate-setting grounded in the adopted mobility fee study, earmarking collected revenues for new capital improvements benefiting new development, affirmation of proportionality through mobility fee benefit district structures, and at least 90 days' notice before any new or increased mobility fee becomes effective.

<u>Compliance With Written Guiding Principles</u>

The Audit Team determined that the activities performed comply with written guiding principles. Per Mobility Fee Ordinance §40-71 and Florida Impact Fee Act §163.31801(3)(d), (f), (g), (h), the ordinances adopted during the audit period met all requirements for legal authority, proportionality, and at least 90 days' notice before any new or increased mobility fee becomes effective.

<u>SOPs Provide Adequate Guidance and Align With Written Guiding Principles</u>

There are no SOPs for the BOCC ordinance adoption activity. However, Mobility Fee Ordinance §40-71 and Florida Impact Fee Act §163.31801(3)(d),(f), provide sufficient written guidance to ensure that the BOCC adopts ordinances establishing or amending mobility fees and rate schedules, incorporates the most recent mobility fee study, earmarks collected revenues for capital improvements, affirms proportionality through benefit district structures, and helps ensure transparency with at least 90 days' notice before any new or increased fee becomes effective.

<u>Control Design Efficiency and Effectiveness</u>

The control design is efficient and effective. It provides a formal, legally grounded process that supports adequate funding for mobility-related capital improvements. The BOCC's public hearing and formal adoption of mobility fee ordinances ensure that the requirements of the Florida Impact

Fee Act, including statutory provisions for proportionality, use of the most recent mobility fee study, and at least 90 days' notice, are met before new or amended mobility fees take effect.

Conformance with Control Design

The Audit Team determined that the activities performed conform with the control design. The BOCC implemented the mobility fee rate schedule based on the most recent mobility fee study, earmarked collected revenues for new capital improvements benefiting new development, affirmed proportionality through findings and benefit district structures, and provided at least 90 days' notice before any new or increased mobility fee became effective.

PRINCIPAL BUSINESS OBJECTIVE 2
MOBILITY FEE ASSESSMENT

Mobility fees are calculated and assessed per the Hillsborough County Mobility Fee Program Ordinance and effective mobility fee rate schedule.

TRANSACTION PROCESSING – DATA ENTRY RISK

Mobility fees are calculated and assessed incorrectly, resulting in applicants being overcharged, undercharged, or not charged at all, and the County receiving incorrect mobility fee amounts.

OVERALL RESULTS

The transaction processing – data entry risk is partially mitigated during the following activities:

2.1 Mobility Fee Calculation and Assessment Review

2.2 Mobility Fee Assessment Validation

The partial mitigation of this risk may hinder Development Services' ability to efficiently and effectively achieve the mobility fee assessment principal business objective.

To strengthen the existing control environment, recommendations were made to:

2.1.1 Enhance the Mobility Fee SOP to include clear mobility fee calculation steps for both automated and manual methods, instructions for using the manual calculator, guidance on applying adjustments, and examples of common scenarios.

2.2.1 Enhance the Mobility Fee SOP to include detailed procedures for running and reviewing daily reports, defining review criteria, documenting exceptions, establishing timeliness standards, and examples of common scenarios.

2.2.2 Work with the Accela team to explore possible configuration enhancements to automatically route projects that should require mobility fee review and, in the interim, coordinate with Building & Construction Services staff to explore ways to ensure that all projects requiring a mobility fee review are manually routed to the mobility fee team.

2.1 MOBILITY FEE CALCULATION AND ASSESSMENT REVIEW

ACTIVITY OVERVIEW

Per Mobility Fee Ordinance §40-78(a)(1), (c)(1), (c)(2)(a) and §40-79(a), mobility fees are assessed per the adopted mobility fee rate schedule or an accepted independent calculation and paid prior to issuance of a CO or alternative approval. Mobility fee staff calculate and assess mobility fees using automated, manual, or hybrid methods based on project complexity.

- For projects without complicating factors, staff utilize an embedded calculator within the Accela permitting system to apply the mobility fee rate schedule using key variables such as use type, square footage, and mobility zone.
- For projects requiring adjustments, staff perform manual calculations outside the Accela permitting system using a Microsoft Excel workpaper using the formula [Demand × Cost] – Credit = Fee, incorporate localized trip generation data, and apply equivalency procedures for unlisted land uses.

Staff review the calculated results, complete workflow tasks, and issue invoices to ensure mobility fees are assessed accurately.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the mobility fee calculation and assessment activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team judgmentally selected a sample of 24 permits with issued COs during FY2025 from a population of 3,192 permits. The sample included 14 permits with manual or hybrid calculations, seven (7) permits with automatically calculated fees per the adopted mobility fee schedule, and three (3) permits with no mobility fee paid. For each of the 24 permits tested, the Audit Team:

- Determined whether mobility fees were assessed per Mobility Fee Ordinance, including verifying that no CO was issued before payment of the required mobility fee or confirmation of a valid exemption.
- Reviewed Accela records to evaluate whether staff followed Mobility Fee SOP §2 by selecting the appropriate calculation method, validating the mobility zone, square footage, and land use type, and reviewing calculated fee amounts before invoicing.
- Evaluated whether the Microsoft Excel workpaper used internally by mobility fee staff for manual fee calculations was applied appropriately and whether the permit file date was considered during phase-in periods (mobility fee increases may be phased in over specific time periods).

<table>
<tr><td colspan="3">Figure 6 – Mobility Fee Calculation and Assessment Review
CONTROL OBJECTIVE: To ensure mobility fees are calculated, assessed, and collected per Mobility Fee Ordinance §40-78(a)(1), (c)(1), (c)(2)(a), and §40-79(a), including application of the adopted mobility fee rate schedule, proper use of exceptions and credits, and verification of payment or exemption before issuing Certificates of Occupancy.
COSO CONTROL: Direct Control Methods Related to Business Systems – There are specific direct controls built into business systems to ensure the desired results are achieved.</td></tr>
<tr><td>Written Guiding Principle</td><td colspan="2">Activities Performed Comply with Written Guiding Principle</td></tr>
<tr><td>Hillsborough County Mobility Fee Program Ordinance §40-78(a)(1), (c)(1), (c)(2)(a) – Mobility fees assessed and collected; effect on other regulations and approvals[5], establishes the requirements for assessing and collecting mobility fees, including timing of payment based on the type of development.
§40-79(a), Amount of mobility fees[6], establishes how mobility fee amounts are determined and the methods by which applicants may satisfy payment requirements.</td><td colspan="2">Yes</td></tr>
<tr><td>Standard Operating Procedure (SOP)</td><td colspan="2">SOP Provides Adequate Guidance and Aligns with Written Guiding Principle</td></tr>
<tr><td>Mobility and Impact Fee Assessments SOP, §2.2, states, "Projects are reviewed for Zone information, square footage, and use type in order to assess Impact and Mobility fees. Basic projects in Accela with no extenuating circumstances (prior structures, change in use, exemptions, etc.) can be assessed using the Impact Fee Calculator. If the project requires a more advanced calculation, it is done manually using the impact fee schedule for relevant fee type as directed by the relevant Ordinance. Once fees are assessed, any associated Workflow Tasks are completed in Accela."</td><td colspan="2">Partial</td></tr>
<tr><td>Control Design Evaluated and Tested</td><td>Control Design is Efficient and Effective</td><td>Activities Performed Conform with Control Design</td></tr>
<tr><td>Mobility fee staff use defined calculation tools and verification steps to ensure consistent mobility fee assessments. The embedded calculator within the Accela permitting system handles standard cases. For exceptions, such as phase-in</td><td>Partial</td><td>Yes</td></tr>
</table>

[5] **Hillsborough County Mobility Fee Program Ordinance §40-78(a)(1), (c)(1), (c)(2)(a),** states,
"(a) Satisfaction of mobility fee obligations. (1) Payment of fees. Impact-generating development shall be required to pay mobility fees in the amounts set forth in the mobility fee rate schedule unless otherwise exempted by this article.
(c) Collection of mobility fees. (1) At certificate of occupancy. Except as provided by Subsection (c)(2), mobility fees are due and payable at the time of issuance of the certificate of occupancy for impact-generating development. No certificate of occupancy for any impact-generating development requiring the payment of a mobility fee pursuant to this article shall be issued until payment or verification of an applicable exemption or waiver under this article has been made.
(2) At time other than certificate of occupancy. Mobility fees shall be due and payable as follows:
a. Development not requiring certificate of occupancy. Impact-generating development that does not require a certificate of occupancy shall pay the mobility fee prior to the issuance of an alternative approval from the County, as determined by the Administrator"

[6] **§40-79(a),** states, "Mobility fee applicants required to pay mobility fees pursuant to section 40-78 may satisfy the requirement to pay mobility fees by paying in full the amounts set forth the mobility fee rate schedule or by paying in full amounts determined by an independent mobility fee calculation accepted by the County pursuant to section 40-81. Mobility fees are assessed according to the listed land use in the mobility fee rate schedule."

considerations, prior credits, or when staff perform manual calculations when direct application of the adopted rate schedule within Accela is not appropriate because of project specific factors, staff perform manual mobility fee calculations using a Microsoft Excel workpaper, referencing permit attributes to determine the appropriate mobility fee amount. Staff then validate mobility zone, square footage, and use type, review calculated amounts, and complete required workflow tasks prior to invoicing to maintain uniformity in mobility fee assessment and review.		

RESULTS
The test results below indicate that the mobility fee calculation and assessment review activity enables Development Services to ensure compliance with Mobility Fee Ordinance §40-78(a)(1), (c)(1), (c)(2)(a) and §40-79(a). Impact-generating development either paid mobility fees per the adopted mobility fee rate schedule or, when exceptions applied (such as prior-use credits or change in use), mobility fees were calculated manually or through hybrid methods. COs were not issued prior to payment or verification of exemption. Enhancements recommended to the Mobility Fee SOP §2 will provide more detailed guidance on automated and manual mobility fee calculations.

<u>Compliance With Written Guiding Principle</u>
The Audit Team determined that the activities performed comply with the written guiding principle. Per Mobility Fee Ordinance §40-78(a)(1), (c)(1), (c)(2)(a) and §40-79(a), for the FY2025 sample of 24 permits, mobility fees were either correctly assessed using the adopted mobility fee rate schedule or calculated manually when exceptions applied, and no COs were issued prior to payment or verification of exemption.

<u>SOP Provides Adequate Guidance and Aligns With Written Guiding Principle</u>
The Mobility Fee SOP does not provide adequate detailed written guidance but does align with Mobility Fee Ordinance §40-78(a)(1), (c)(1), (c)(2)(a) and §40-79(a). The Mobility Fee SOP provides high-level direction and does not offer the level of detail needed for consistent application of mobility fee assessments. It lacks a reference to the manual calculation process performed outside of Accela using a Microsoft Excel workpaper, which is a key tool for mobility fee adjustments. While it notes that manual calculations may be required for projects with prior structures, change in use, or exemptions, it does not explain how to apply these factors. The Mobility Fee SOP also lacks specific calculation methodology and examples, making it insufficient for training or ensuring consistency.

<u>Control Design Efficiency and Effectiveness</u>
The control design is efficient but only partially effective. The design supports management in achieving the objective and mitigating the risk by using automated tools for standard assessments and manual methods for exceptions, combined with verification steps prior to invoicing. However, the absence of documented mobility fee calculation steps and examples in the SOP limits consistency and training value. The recommendation to enhance the Mobility Fee SOP should sufficiently increase the effectiveness of the mobility fee calculation and assessment activity's control design.

<u>Conformance with Control Design</u>
The Audit Team determined that the activities performed conform with the control design. For the FY2025 sample of 24 permits, staff selected the appropriate calculation method (automated, manual, or hybrid), validated mobility zone, square footage, and use type, and, for phase-in situations, mobility fee staff considered the permit file while performing manual calculations

outside of Accela using the Microsoft Excel workpaper. Required workflow tasks in Accela were completed prior to invoicing, demonstrating adherence to the documented process.

RECOMMENDATION 2.1.1

SOPs are essential as they provide a roadmap for daily operations, ensure compliance with written guiding principles, guide decision-making, and streamline processes. Therefore, consideration should be given to building upon the foundation already in place by enhancing the Mobility Fee SOP to include clear mobility fee calculation steps for both automated and manual methods, instructions for using the manual calculator when applicable, and guidance on applying adjustments for prior structures, change in use, and exemptions, supported by examples of common scenarios to promote consistency.

MANAGEMENT RESPONSE: CONCUR

Development Services will enhance existing SOPs outlining standard practices for mobility fee calculations and adjustments for prior structures, changes in use, and exemptions. The SOPs will include a reference to a step-by-step process guide to show examples to strengthen consistent application and support staff training.

TARGET COMPLETION DATE: JUNE 2026

2.2 MOBILITY FEE ASSESSMENT VALIDATION

ACTIVITY OVERVIEW

Permit types related to new commercial construction and commercial building alterations are routed to the mobility fee staff for review and mobility fee assessment in Accela by Development Services Facilitators after permit intake. Permit types related to commercial miscellaneous permits, plan revisions, residential miscellaneous permits, and residential new construction and additions are routed to the mobility fee staff by Building & Construction Services staff through ad hoc tasks created after plan review on an as-needed basis because not all permits in these categories require mobility fee review.

After completing mobility fee review and assessments, mobility fee staff perform several reviews per Mobility Fee SOP §4 to help ensure mobility fee assessments are accurate and complete. These reviews include:

- Reviewing daily reports to verify that prior day mobility fee assessments were invoiced correctly.
- Conducting consistent monthly reviews of mobile home permits to identify any permits that may have been issued without appropriate mobility fee review and assessment.
- Using a newly implemented Accela report that provides a comprehensive list of all permits issued the prior day and identifies any that may require mobility fee assessment but were not routed to the mobility fee staff. By covering all permit types, this report replaces the former monthly mobile home review and strengthens oversight through daily monitoring.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and if the control design is efficient and effective to support management in achieving the mobility fee assessment validation activity.

To determine if the activities performed conform with the control design, the Audit Team judgmentally and randomly selected samples of permits from April and August 2025, covering daily mobility fee assessment reviews, monthly mobile home permit reviews, and the new daily Accela report. The Audit Team tested the following:

- For daily reviews, the population included 43 permits from April and 73 from August; 12 were tested to confirm invoicing accuracy, verify permit attributes used for mobility fee determination, and confirm completion of required workflow tasks in Accela.
- For mobile home permits, the population included one (1) permit from April and 15 from August; six (6) were tested to verify the mobility fee review task was completed prior to issuance.
- For the new daily Accela report, nine (9) permits were selected from issued permit listings from April and August 2025, and six (6) were tested to confirm they required a mobility fee and that the determination was accurate.

<table>
<tr><td colspan="3">Figure 7 – Mobility Fee Assessment Validation
CONTROL OBJECTIVE: To ensure all permits requiring a mobility fee are accurately identified, assessed, and calculated through review processes that confirm assessments are complete and accurate.
COSO CONTROL: Results & Status Reports/Reviews – There are processes or other mechanisms in use or in place which report on or examine the achievement status of a particular objective or objectives.</td></tr>
<tr><th>Written Guiding Principles</th><th colspan="2">Activities Performed Conform with Written Guiding Principles</th></tr>
<tr><td>There are no written guiding principles that require Development Services to perform daily or monthly reviews of mobility fees.</td><td colspan="2">N/A</td></tr>
<tr><th>Standard Operating Procedure (SOP)</th><th colspan="2">SOP Provides Adequate Guidance</th></tr>
<tr><td>Mobility and Impact Fee Assessments SOP, §4, states,
"§4.1.1. Daily reports are run to show the previous day's assessments to verify accuracy and any fees that have not been invoiced. (We are working with the Accela team to provide a report that will show permits that were issued the day before so that if any projects that were not assessed will be able to be reviewed and assessed accordingly in a prompt manner.)
§4.1.2. A weekly report is run for Mobile Home permits to monitor any projects that may have been issued without being sent to impact fee staff for review."</td><td colspan="2">No</td></tr>
<tr><th>Control Design Evaluated and Tested</th><th>Control Design is Efficient and Effective</th><th>Activities Performed Conform with Control Design</th></tr>
<tr><td>Mobility fee staff receive permits for review and mobility fee assessment either through workflow initiation by Development Services Facilitators for new commercial construction and commercial building alterations, or through ad hoc tasks created by Building & Construction Services staff for commercial miscellaneous permits, plan revisions, residential miscellaneous permits, and residential new construction and additions.
After completing these mobility fee assessments, mobility fee staff perform daily reviews using system-generated reports to verify that assessments completed the prior day are accurate, invoiced correctly, and supported by required workflow tasks in Accela.
Historically, a separate review was performed on mobile home permits to identify any that may have been issued without routing for mobility review. This review is now incorporated into a daily report implemented in November 2025 that lists all permits issued the previous day and identifies any that may require mobility fee assessment.</td><td>Yes</td><td>Yes</td></tr>
</table>

RESULTS

The test results below indicate that the mobility fee assessment validation activity overall enables Development Services to ensure that all permits requiring a mobility fee are properly identified, assessed, and calculated accurately. The new daily Accela report strengthens the identification of permits that require review by the mobility fee team. Recommended enhancements to the Mobility Fee SOP §4 will support consistent control execution. Additionally, potential Accela configuration improvements could automatically route projects requiring mobility fee reviews, reducing manual effort and improving overall efficiency.

<u>Compliance With Written Guiding Principles</u>
The Audit Team did not perform this testing as there are no written guiding principles for the mobility fee assessment validation activity.

<u>SOP Provides Adequate Guidance</u>
Mobility Fee SOP §4 does not provide adequate detailed written guidance. While the Mobility Fee SOP outlines that reviews should be performed, its content is high-level and lacks step-by-step instructions, criteria for identifying exceptions, and expectations for documentation or timeliness. The absence of these details limits consistency and training value, particularly as the process transitioned to a new report.

<u>Control Design Efficiency and Effectiveness</u>
The control design is partially efficient but is effective. The daily Accela report provides a complete population of all issued permits issued the prior day in one place, streamlining staff review and reducing reliance on manual routing or ad hoc task creation. The report includes permit type, descriptions, and other identifying attributes, allowing staff to quickly filter and identify permits that may require mobility fee assessment. By serving as a secondary check on top of the standard workflow process, the report increases the likelihood that routing exceptions are detected promptly and corrected before a permit's certificate of occupancy is issued. This consolidated daily review also replaces the prior monthly mobile-home-specific process, reducing duplicative effort while strengthening overall monitoring. However, because the control still depends on manual identification of permits needing review, opportunities remain to further automate routing to reduce reliance on staff oversight.

<u>Conformance with Control Design</u>
The Audit Team determined that the activities performed conform with the control design. For the populations tested (daily mobility fee assessment reviews, mobile home permit reviews, and new daily report review), mobility fee staff performed daily reviews to validate invoicing accuracy, verify permit attributes for mobility fee determination, and confirm completion of required workflow tasks in Accela.

For the monthly mobile home permits review, staff ensured the mobility fee review task was completed prior to issuance.

For the new daily report, sampled permits appeared on the report and reflected accurate mobility fee determinations, except for one routing exception where a permit was issued without paying the required mobility fee. The CO had not yet been issued, and the exception likely would have been caught before finalization; therefore, it was not determined to be material. Once the mobility fee team was notified of the exception, the permit was immediately invoiced.

RECOMMENDATION 2.2.1
SOPs are essential as they provide a roadmap for daily operations, ensure compliance with written guiding principles, guide decision-making, and streamline processes. Therefore, consideration should be given to building upon the foundation already in place by enhancing the Mobility Fee SOP to include detailed procedures for running and reviewing daily reports, defining review criteria, documenting exceptions, and establishing timeliness standards. Including examples of common scenarios should promote uniform application.

MANAGEMENT RESPONSE: CONCUR
Development Services will enhance existing Standard Operating Procedures (SOPs) to strengthen the current fiscal control framework of the mobility fee program. These SOPs will include a reference to a detailed process guide for generating and reviewing daily reports, defining specific review criteria, documenting exceptions, and establishing clear timeliness expectations. This action will strengthen consistent application and support staff training.

TARGET COMPLETION DATE: JUNE 2026

RECOMMENDATION 2.2.2
To strengthen the efficiency of the control design, consideration should be given to working with the Accela team to explore possible configuration enhancements to automatically route projects that should require mobility fee reviews and limit the number of projects that require manual intervention. Coordination with Building & Construction Services should provide additional assurance that the mobility fee review task is triggered upon completion of their final steps.

MANAGEMENT RESPONSE: CONCUR
Development Services will collaborate with the County's Enterprise Project Management Office (EPMO) to evaluate and implement feasible configuration enhancements to Accela (HillsGovHub) for applicable permit types. These enhancements should ensure that qualifying projects requiring mobility fee reviews are automatically routed to the Fiscal Group for timely and consistent processing.

TARGET COMPLETION DATE: JUNE 2027

PRINCIPAL BUSINESS OBJECTIVE 3
MOBILITY FEE REVENUE

Mobility fees collected are deposited and posted to the seven designated mobility fee trust funds according to the mobility fee assessment district from which they were collected per the Hillsborough County Mobility Fee Program Ordinance.

TRANSACTION PROCESSING – MISALLOCATION RISK

Mobility fees collected are not deposited or posted to the correct mobility fee benefit district fund, resulting in inaccurate financial reporting and insufficient funds for necessary capital improvements.

OVERALL RESULTS

The transaction processing – misallocation risk is reasonably mitigated during the following activity:

3.1 Mobility Fee Collections Reconciliation

Mitigation of this risk enables Development Services to efficiently and effectively achieve the mobility fee revenue principal business objective.

To strengthen the existing control environment, a recommendation was made to:

3.1.1 Enhance the Mobility Fee SOP to include detailed procedures for daily reconciliation of Accela and Oracle Cloud records, requirements for retaining supporting documentation, and clear protocols for resolving discrepancies.

3.1 MOBILITY FEE COLLECTIONS RECONCILIATION

ACTIVITY OVERVIEW

Per Mobility Fee Ordinance §40-84(b)(2)(a), seven (7) mobility fee trust funds correspond to five (5) geographic benefit districts supporting transportation improvements in the development area. The two (2) additional mobility fee trust funds were established in June 2025 for an urban service area expansion in district 5. District boundaries are maintained in the County's GIS system.

Mobility fee payments are processed through the Accela permitting system or manually at the County Center and recorded in Accela against the related permit. Each payment is assigned a fee code and accounting string based on the permit's mobility fee benefit district to help ensure funds are directed to the correct mobility fee trust fund.

Per Mobility Fee SOP §3, at the close of each business day, Customer Account Specialists reconcile mobility fee transactions by comparing Accela payment totals with Oracle Cloud deposit records and scanned bank slips and manifests, which are then reviewed by the Customer Accounts & Fiscal Support Manager. Any discrepancies are reviewed before revenue is posted to Oracle Cloud via a deposit journal entry. Supporting documentation is retained in OnBase and Oracle Cloud.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the mobility fee collections reconciliation activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team selected a random sample of five (5) permits with mobility fees paid during FY2025 from a population of 2,836 permits, and a random sample of four (4) daily financial reconciliation records from FY2025 and one (1) from FY2026. Using these samples, the Audit Team:

- Reviewed the assigned mobility fee code in Accela, verified the parcel location in the County's GIS system, and validated that the mobility fee revenue was posted to the correct mobility fee trust fund in Oracle Cloud.
- Compared daily payment totals recorded in Accela to related records in Oracle Cloud to determine whether the reconciliation process operated as designed.
- Confirmed that Oracle Cloud maintained appropriate supporting documentation for daily payments from Accela, including scanned bank slips and manifests, when applicable.
- Verified that any discrepancies identified during reconciliation were resolved prior to finalizing the deposit journal entry in Oracle Cloud.

<table>
<tr><td colspan="3">Figure 8 – Mobility Fee Collection Reconciliation
CONTROL OBJECTIVE: To ensure mobility fee revenues are accurately recorded and deposited into the correct mobility fee trust fund based on the permit's mobility fee benefit district, per Mobility Fee Ordinance §40-84(b)(2)(a).
COSO CONTROL: Reconciliations/Comparisons/Edits – There are traditional control techniques such as reconciling bank accounts, comparisons of sub ledger totals to control accounts, system edits, etc. that are relevant to the achievement of the objective.</td></tr>
<tr><th>Written Guiding Principle</th><th colspan="2">Activities Performed Conform with Written Guiding Principle</th></tr>
<tr><td>Hillsborough County Mobility Fee Program Ordinance, §40-84(b)(2)(a) – Mobility fee trust funds, states, "Upon collection of mobility fees, as provided in Section 40-78, revenues received by the County shall be deposited into the mobility fee trust fund according to the mobility fee benefit district from which it is collected."</td><td colspan="2">Yes</td></tr>
<tr><th>Standard Operating Procedure (SOP)</th><th colspan="2">SOP Provides Adequate Guidance and Aligns with Written Guiding Principle</th></tr>
<tr><td>Mobility and Impact Fee Assessments SOP, §3.1 – §3.2[7], establishes the requirements for processing mobility and impact fee payments and recording associated revenues.</td><td colspan="2">Partial</td></tr>
<tr><th>Control Design Evaluated and Tested</th><th>Control Design is Efficient and Effective</th><th>Activities Performed Conform with Control Design</th></tr>
<tr><td>Mobility fee payments are recorded in Accela with an accounting string based on the permit's mobility fee benefit district to ensure funds are directed to the correct mobility fee trust fund. Customer Account Specialists reconcile payment totals using daily deposit journals in Oracle Cloud, comparing them to bank deposits and scanned slips and manifests. Journals are reviewed and approved by the Customer Accounts & Fiscal Support Manager before submission to County Finance, and supporting documentation is retained in Oracle Cloud and OnBase.</td><td>Yes</td><td>Yes</td></tr>
</table>

RESULTS

The test results below indicate that the mobility fee collections reconciliation activity enables Development Services to ensure that mobility fee revenues are recorded and deposited into the correct mobility fee trust fund based on the permit's benefit district, in compliance with Mobility Fee Ordinance §40-84(b)(2)(a). A recommendation was made to enhance Mobility Fee SOP §3 to provide more detailed guidance on performing reconciliations, requirements for retaining documentation, and protocols for resolving discrepancies.

---

[7] **The Mobility and Impact Fee Assessments SOP §§3.1–3.2**, states,
"3.1. Fees are paid online via the HillsGovHub website (https://hcfl.gov/businesses/hillsgovhub) or via check or offset account submitted to Customer Account Specialists. Any payment issues are assisted by divisional staff via our Customer Service Portal or email/calls to Customer Account Specialists.
3.2. Revenues are recorded daily via Deposit Journals by Customer Account Specialists and are submitted for review in the Oracle accounting system to the Customer Accounts & Fiscal Support Manager. Upon review the records are submitted to County Finance via the Oracle accounting system and OnBase, as required by the Clerk of Court."

<u>Compliance With Written Guiding Principle</u>
The Audit Team determined that the activities performed comply with Mobility Fee Ordinance §40-84(b)(2)(a). For the five (5) permits tested with mobility fees paid, staff recorded revenues into the correct mobility fee trust fund based on the permit's mobility fee benefit district by assigning the appropriate fee code in Accela and posting the transaction in Oracle Cloud.

<u>SOP Provides Adequate Guidance and Aligns With Written Guiding Principle</u>
While Mobility Fee SOP §3.1–§3.2 does not provide adequate detailed written guidance, it aligns with Mobility Fee Ordinance §40-84(b)(2)(a). The Mobility Fee SOP outlines the general process for mobility fee payment and revenue recording, but it lacks specific instructions for daily reconciliation, documentation retention, and exception handling.

<u>Control Design Efficiency and Effectiveness</u>
The control design is efficient and effective. The design ensures mobility fee payments are accurately recorded with district-based accounting strings, reconciled daily, posted via deposit journal entry in Oracle Cloud, and reviewed before submission to County Finance. The recommended enhancements to Mobility Fee SOP §3.1–§3.2 will help promote consistent and reliable performance of the control design.

<u>Conformance with Control Design</u>
The Audit Team determined that the activities performed conform with the control design. Per Mobility Fee SOP §3.1–§3.2 and departmental practices for the tested five (5) daily financial reconciliation records and the five (5) permits with mobility fees paid, management completed daily reconciliations, resolved discrepancies before posting, retained documentation in Oracle Cloud, and deposited revenues into the correct mobility fee trust fund based on the mobility fee benefit district with the appropriate fee code in Accela.

RECOMMENDATION 3.1.1
SOPs are essential as they provide a roadmap for daily operations, ensure compliance with written guiding principles, guide decision-making, and streamline processes. Therefore, consideration should be given to building upon the foundation already in place by enhancing the Mobility Fee SOP to include detailed, step-by-step procedures for daily reconciliation of Accela and Oracle Cloud records, requirements for retaining supporting documentation such as scanned bank slips and manifests, and clear protocols for resolving discrepancies to ensure that mobility fee revenues are deposited into the correct mobility fee trust fund per Mobility Fee Ordinance §40-84(b)(2)(a).

MANAGEMENT RESPONSE: CONCUR
Development Services will enhance current standard operating procedures (SOPs) to strengthen fiscal controls for mobility fees, including daily reconciliation procedures, documentation retention requirements, and clear steps for resolving discrepancies to ensure revenues are deposited into the correct trust fund in compliance with the ordinance. These SOPs will reference detailed step -by -step guide to provide a consistent application and support staff training.

TARGET COMPLETION DATE: JUNE 2026

PRINCIPAL BUSINESS OBJECTIVE 4
MOBILITY FEE EXPENDITURE

Mobility Fees are used to fund new mobility facility capital improvements necessitated by new development in designated mobility fee benefit districts per the Hillsborough County Mobility Fee Program Ordinance and applicable law.

FIDUCIARY – GUIDELINE VIOLATIONS RISK

Mobility fees are used to fund disallowed activities, not appropriately deployed to fund needed capital improvements (persistent trust fund increase), or used to fund activities in an incorrect mobility fee benefit district, resulting in violations of the Hillsborough County Mobility Fee Program Ordinance or applicable law.

OVERALL RESULTS

The fiduciary – guideline violations risk is reasonably mitigated during the following control activities:

4.1 Mobility Funds Usage Monitoring

4.2 Mobility Projects Eligibility & Expenditures Review

Mitigation of this risk enables Development Services to efficiently and effectively achieve the mobility fee expenditure principal business objective.

4.1 MOBILITY FUNDS USAGE MONITORING

ACTIVITY OVERVIEW

Per Mobility Fee Ordinance §40-85(b)(4)(a), (b) – Expenditures from trust funds, mobility fee revenues must be spent within ten (10) years of collection, with the earliest deposits in a mobility fee trust fund spent first (first-in, first out).

To support compliance with these requirements, the Customer Accounts & Fiscal Support Manager within Development Services generates the Impact/Mobility Fee Threshold Report annually from Oracle Cloud. The report identifies the required expenditures for each of the five (5) districts based on their ten (10) year threshold dates (ten (10) years from the date the fees were collected) and shows the cumulative amounts that must be spent by those deadlines. The report dated September 30, 2025, was the first version to incorporate all seven (7) benefit districts following establishment of two (2) new benefit districts.

The report is provided to County staff responsible for managing mobility-fee-funded projects, who use it to monitor the mobility fee trust funds and track progress toward meeting the ten (10) year expenditure requirements.

The Customer Accounts & Fiscal Support Manager also uses the report to coordinate expenditures with the Management & Budget Department, conduct periodic reviews of trust fund activity throughout the year, and ensure that deposits made earliest in each trust fund are spent first.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the mobility funds usage monitoring activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team reviewed the most recent Impact/Mobility Fee Threshold Report dated March 31, 2025, which presents mobility fee benefit district, monthly cumulative thresholds, and their associated ten (10) year expenditure deadlines. The Audit Team selected a random sample of three (3) FY2022 months (District 3: July 2022; District 4: August 2022; District 5: April 2022) to evaluate threshold amounts tied to the 2032 expenditure deadlines shown in the report. For each of the selected FY2022 months, the Audit Team:

- Compared the cumulative threshold amount tied to the 2032 expenditure deadline to the corresponding FY2022 revenue in Oracle Cloud.
- Calculated the difference between each cumulative threshold and the prior month threshold and verified that the amount matched the revenue collected for the corresponding FY2022 month and benefit district.

The Audit Team also reviewed the Impact/Mobility Fee Threshold Report and communications between Development Services and Management & Budget to determine whether management used the report to monitor fund activity, identify available balances, review district-specific thresholds, and apply a first-in, first-out approach when coordinating with Management & Budget.

<table>
<tr><th colspan="3">Figure 9 – Mobility Funds Usage Monitoring
CONTROL OBJECTIVE: To ensure that mobility fee revenues are accurately tracked, managed, and expended within ten years of collection, with the earliest deposits used first, per Mobility Fee Ordinance §40-85(b)(4)(a) and (b).
COSO CONTROL: Direct Controls Related to Business Systems – There are specific direct controls built into business systems to ensure the desired results are achieved.</th></tr>
<tr><th>Written Guiding Principle</th><th colspan="2">Activities Performed Comply with Written Guiding Principle</th></tr>
<tr><td>Hillsborough County Mobility Fee Program Ordinance, §40-85(b)(4)(a),(b), Expenditures from trust funds, states that "(a) Mobility fee revenues shall be spent within ten years of collection (b) For County or other governmental expenditures of mobility fees, the first fees deposited into a mobility fee trust fund shall be deemed the first fees spent."</td><td colspan="2">Yes</td></tr>
<tr><th>Standard Operating Procedure (SOP)</th><th colspan="2">SOP Provides Adequate Guidance and Aligns with Written Guiding Principle</th></tr>
<tr><td>Mobility and Impact Fee Assessments SOP §3.3, states, "The Customer Accounts & Fiscal Support Manager monitors the funds and budgets for the impact and mobility fees in coordination with Management & Budget. On a yearly basis, the Customer Accounts & Fiscal Support Manager runs a Threshold Report that assists in ensuring that all impact and mobility fees are being spent within the timeframe as determined by the respective Ordinance."</td><td colspan="2">Yes</td></tr>
<tr><th>Control Design Evaluated and Tested</th><th>Control Design is Efficient and Effective</th><th>Activities Performed Conform with Control Design</th></tr>
<tr><td>An Impact/Mobility Fee Threshold Report is generated annually by Development Services to identify available balances in each mobility fee trust fund and determine when funds are approaching their deadline for encumbrance or expenditure. Using this report, Development Services coordinates with Management & Budget to ensure timely action on funds nearing the threshold date. In addition to the annual report, fund activity is monitored throughout the year by these departments, and guidance is issued as needed to prevent lapses.</td><td>Yes</td><td>Yes</td></tr>
</table>

RESULTS

The test results below indicate that the mobility funds usage monitoring activity enables Development Services to ensure that mobility fee revenues are tracked and managed so they are spent within ten (10) years of collection, with the earliest deposits in the mobility fee trust fund spent first, per Mobility Fee Ordinance §40-85(b)(4)(a),(b).

<u>Compliance With Written Guiding Principle</u>

The Audit Team determined that the activities performed comply with the written guiding principle. Per Mobility Fee Ordinance §40-85(b)(4)(a),(b), for the sample of three (3) months and mobility fee benefit districts from FY2022, the Audit Team compared the cumulative amounts in the Impact/Mobility Fee Threshold Report that become due in 2032 to the revenue collected for those same months in FY2022. This testing confirmed that the Impact/Mobility Fee Threshold Report accurately reflects the ten (10) year expenditure requirement and appropriately applies the first-in, first-out approach. Because the mobility fee program began in 2017, no funds have yet reached the ten (10) year threshold; however, the results indicate that the Impact/Mobility Fee Threshold Report displays the required information accurately and in a manner consistent with the Mobility Fee Ordinance.

SOP Provides Adequate Guidance and Aligns With Written Guiding Principle

Mobility Fee SOP §3.3 provides adequate detailed written guidance and aligns with Mobility Fee Ordinance §40-85(b)(4)(a),(b). The Mobility Fee SOP assigns clear responsibility for monitoring mobility fee funds and budgets to the Customer Accounts & Fiscal Support Manager and designates coordination with Management & Budget. The Mobility Fee SOP also specifies running an Impact/Mobility Fee Threshold Report annually to ensure all mobility fees are spent within the ten (10) year timeframe established by the Mobility Fee Ordinance. This language provides staff with clear, actionable steps to consistently perform the mobility funds usage monitoring activity.

Control Design Efficiency and Effectiveness

The control design is efficient and effective. It is efficient because the Impact/Mobility Fee Threshold Report is automatically generated from Oracle Cloud and provides the Customer Accounts & Fiscal Support Manager with all relevant mobility fee benefit district and month information in a single report, which minimizes manual work and supports coordination with Management & Budget. It is effective because the report identifies the specific months of revenue that are entering the ten (10) year threshold period and is supported by the Customer Accounts & Fiscal Support Manager's periodic review of mobility fee trust fund activity during the year. Together, these features give management clear, timely information to prepare for required expenditures and reduce the risk that funds remain unspent past the required ten (10) year expenditure timeframe.

Conformance with Control Design

The Audit Team determined that the activities performed conform with the control design. The most recent Impact/Mobility Fee Threshold Report dated March 31, 2025, and related email communications distributed on April 22, 2025, demonstrated that management used the Impact/Mobility Fee Threshold Report to monitor mobility fee fund activity, identify available balances, review district-specific threshold dates and cumulative amounts, and apply a first-in, first-out approach. Management also coordinated with Management & Budget during the year in a manner consistent with the control design.

4.2 MOBILITY PROJECTS ELIGIBILITY & EXPENDITURES REVIEW

ACTIVITY OVERVIEW

Per Mobility Fee Ordinance §40-85(a), (b)(3)(a), and (b)(3)(b)(2)), mobility fees generally must be used to fund mobility facilities within the mobility fee benefit district where the fees are collected. The Mobility Fee Ordinance allows the BOCC to authorize the use of mobility fees in an adjacent mobility fee benefit district when there is a clear, lawful, and rational nexus between the expenditure and the benefits received by the developments that generated the impact.

Project Eligibility Review

During development of the annual Capital Improvement Program (CIP), Management & Budget, Public Works, Fire Rescue, Parks, and other relevant departments jointly assess project eligibility for mobility fee funding. These departments review project documentation to confirm alignment with transportation priorities and with Mobility Fee Ordinance requirements. Any issues requiring clarification are escalated to the Customer Accounts & Fiscal Support Manager within Development Services prior to finalizing funding recommendations.

Authorization and Initiation of Mobility Fee Expenditures

Following BOCC approval of the CIP, Management & Budget and the responsible departments initiate mobility fee expenditures and validate that planned uses comply with the Mobility Fee Ordinance.

CIP Invoice Processing

Upon completion of CIP work, vendors submit a Hillsborough County Application for Payment to the Project Manager in the Capital Programs Department. The Project Manager reviews and signs the application. After approval, the signed application is sent to the Accounting Clerk for the relevant department (e.g., the Public Works Accounting Clerk) for a fiscal review. Once that review is complete, the invoice and supporting documentation are forwarded to County Finance.

Financial Review and Accounting

County Finance reviews all related transactions in Oracle Cloud to ensure the accounting string correctly identifies the appropriate benefit district. County Finance also processes journal entries needed to return any unused mobility fee balances to the originating mobility fee trust fund.

AUDIT PROCEDURES

The Audit Team determined if SOPs provide adequate guidance and align with written guiding principles, and if the control design is efficient and effective to support management in achieving the mobility projects eligibility and expenditures review activity.

To determine if the activities performed comply with written guiding principles and conform with the control design, the Audit Team selected a judgmental sample of ten (10) mobility fee expenditures from FY2025. For each expenditure tested, the Audit Team:

- Verified that funds were used solely for eligible purposes and spent within the appropriate mobility fee benefit district unless an exception applied.
- Reviewed exceptions to assess whether a rational nexus was established and documented.
- Verified that expenditures were initiated only after BOCC approval of the CIP.
- Reviewed Oracle Cloud records to confirm that the correct accounting string was used and that the transaction posted to the appropriate mobility fee trust fund.

- Determined whether any unused mobility fee balances were returned to the originating mobility fee trust fund.

<table>
<tr><td colspan="3">Figure 10 – Mobility Projects Eligibility & Expenditures Review
CONTROL OBJECTIVE: To ensure mobility fees are used only for eligible project expenditures and within the mobility fee benefit district from which they were collected, per Mobility Fee Ordinance §40-85(a), (b)(3)(a), and (b)(3)(b)(2).
COSO CONTROL: Code of Accounts Structure – The design of the general ledger or sub ledger account codes assists in minimizing errors and allow for effective data capture and reporting.</td></tr>
<tr><th>Written Guiding Principle</th><th colspan="2">Activities Performed Comply with Written Guiding Principle</th></tr>
<tr><td>Hillsborough County Mobility Fee Program Ordinance, §40-85(a), (b)(3)(a), (b)(3)(b)(2), Expenditures from trust funds[8], establishes the requirements governing how mobility fee revenues may be expended within and across mobility fee benefit districts.</td><td colspan="2">Yes</td></tr>
<tr><th>Standard Operating Procedure (SOP)</th><th colspan="2">SOP Provides Adequate Guidance and Aligns with Written Guiding Principle</th></tr>
<tr><td>Mobility and Impact Fee Assessments SOP, §3.4, states, “Expenditures of mobility and impact fee funds are governed by the respective Ordinance. Management & Budget divisional staff coordinate with the relevant department (Public Works, Fire Rescue, and Parks) on project expenditures to book them to the Capital Improvement Plan (CIP). If there are any questions to project eligibility the impact fee staff as well as the Customer Accounts & Fiscal Support Manager are available to provide guidance as needed.”</td><td colspan="2">Yes</td></tr>
<tr><th>Control Design Evaluated and Tested</th><th>Control Design is Efficient and Effective</th><th>Activities Performed Conform with Control Design</th></tr>
<tr><td>Management & Budget, together with the relevant departments (Public Works, Fire Rescue, and Parks), initiates mobility fee expenditures only after the BOCC has approved the CIP and verifies that the expenditures are allowable under the Mobility Fee Ordinance. County Finance reviews all transactions in Oracle Cloud and ensures that the accounting string accurately reflects the mobility fee benefit district for which the mobility fees were collected. County Finance processes journal entries to return unused mobility fee balances to the originating mobility fee trust fund.</td><td>Yes</td><td>Yes</td></tr>
</table>

[8] **Hillsborough County Mobility Fee Program Ordinance §40-85(a), (b)(3)(a), (b)(3)(b)(2)**, states,
“(a) Generally. Mobility fees collected shall be used for new mobility facilities on the mobility network and for the purposes set forth in this section.
(b)(3)(a) Expenditures within mobility fee benefit district where collected. Except as provided in Subsection (b)(3)b., mobility fee revenues shall be used for the provision of mobility facilities within the mobility fee benefit district from which they were collected.
(b)(3)(b)(2) The Board may allow the allocation of mobility fee revenues for use in a mobility fee benefit district adjacent to the district in which they were collected, provided that the Board establishes a rational nexus between the expenditure of the revenues and the benefits accruing to the developments within the district generating the impact, as required by law.”

RESULTS

The test results below indicate that the mobility projects eligibility and expenditures review activity enables Development Services to ensure mobility fees are used for eligible expenditures and within the mobility fee benefit district from which they were collected per Mobility Fee Ordinance §40-85(a), (b)(3)(a), (b)(3)(b)(2).

Compliance With Written Guiding Principle

The Audit Team determined that the activities performed were in compliance with the written guiding principle. Per Mobility Fee Ordinance §40-85(a), (b)(3)(a), (b)(3)(b)(2) for the sample of ten (10) mobility fee expenditures, all expenditures were used solely for eligible purposes, such as new mobility facilities on the mobility network (e.g., intersections, roads, sidewalks), and all funds were spent within the same mobility fee benefit district where the fees were collected. No exceptions requiring approval were identified; therefore, testing related to exception approval or rational nexus documentation was not applicable.

SOP Provides Adequate Guidance and Aligns With Written Guiding Principle

Mobility Fee SOP §3.4 provides adequate detailed written guidance and aligns with Mobility Fee Ordinance §40-85(a), (b)(3)(a), (b)(3)(b)(2). The Mobility Fee SOP accurately reflects the mobility fee team's role as an advisory resource that provides guidance on project eligibility when consulted. This language appropriately supports coordination with Management & Budget and the relevant departments that carry out the mobility projects eligibility and expenditure activities.

Control Design Efficiency and Effectiveness

The control design is efficient and effective. Expenditures are initiated only after BOCC approval of the CIP and are reviewed to ensure they comply with the Mobility Fee Ordinance. County Finance performs multi-level review and approval of each transaction in Oracle Cloud, confirming that expenditure details and accounting strings reflect the correct mobility fee benefit district. Testing confirmed that these activities consistently supported the proper use of mobility fees to ensure funds were spent on eligible purposes within the mobility fee benefit district where the fees were collected.

Conformance with Control Design

The Audit Team determined that the activities performed conform with the control design. Per Mobility Fee SOP §3.4, for the sample of ten (10) mobility fee expenditures, all expenditures were initiated only after BOCC approval of the FY2025-2029 CIP, the correct accounting strings were applied for the appropriate mobility fee benefit district, and all transactions were reviewed in Oracle Cloud. None of the sampled projects had unused mobility fee balances.