



AUDIT OF BUILDING PERMIT PROCESSES

ABSTRACT

In general, the City has established effective controls related to the management of building permit application reviews and fee payment; however, additional oversight of non-annexation agreement property applications and refund requests is needed.

Finally, additional quality controls over the building inspection process would provide further assurance that permitted work was completed appropriately.

Audit Team

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Audit at a Glance

Why we did this Audit:

Permitted building construction must be appropriately reviewed and inspected to ensure all improvements comply with life and safety codes. In addition, the Division processes about \$23 million in fee payments annually for City departments. This audit project was included on the City's fiscal year 2020-21 Audit Plan as approved by the City Council.

What we Recommend:

Recommendation 2

Formalize a training & review process for non-annexation agreement properties.

Recommendation 3

Develop a process to ensure refund review & approvals are adequately documented.

Recommendations 5, 6, & 7

Improve building inspection quality review & monitoring processes including re-inspection fee guidance.

Recommendations 8 & 9

Periodically evaluate staffing knowledge gaps & use this analysis to inform the building inspector progression plan & job descriptions.

Recommendations 1, 4, & 10

Finalize & implement developed standard operating procedures.

Recommendation 11

Develop a formal process for staff to disclose potential conflicts of interest before being assigned permits.

What we Found:

In order to construct, enlarge, or alter a building, an applicant must receive permission – granted by a building permit – from the applicable jurisdiction. This audit generally evaluated all parts of the City's building permit process, including application & plan review, fee payment, & inspections. Our findings for each section are summarized below:

Application & Plan Review. Submitted permit applications generally appear to be processed, reviewed, & issued per the City's procedures and rules. In addition, permits are generally approved & then issued in a timely manner. That being said, neither the City nor the County previously had a process to ensure properties with non-annexation agreements were permitted by the City of Denton, resulting in several of these building improvements being permitted through the County.

Fee Payment. The City has established adequate cash handling controls to ensure payments are processed appropriately; however, there is currently no process to document refund review and approvals.

Inspections. Building inspection results are generally well documented; however, there is currently no process to review completed inspections to ensure they meet quality standards. Furthermore, current inspection scheduling practices may impact quality as there is no limit on the number of inspections that can be scheduled & all scheduled inspections must be completed by the next day. In addition, there is an opportunity to provide greater consistency in the way inspectors assess re-inspection fees.

Finally, many of the City's building inspectors do not meet minimum licensing expectations as described by their job descriptions – potentially leading to knowledge gaps that could impact City building inspections. In addition, the building inspector progression plan does not clearly align with job description expectations.

Introduction

The Internal Audit Department is responsible for providing: (a) an independent appraisal¹ of City operations to ensure policies and procedures are in place and complied with, inclusive of purchasing and contracting; (b) information that is accurate and reliable; (c) assurance that assets are properly recorded and safeguarded; (d) assurance that risks are identified and minimized; and (e) assurance that resources are used economically and efficiently and that the City's objectives are being achieved.

The Internal Audit Department has completed a performance audit of the building permit process. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Management Responsibility

City management is responsible for ensuring that resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

Audit Objectives, Scope, and Methodology

The Internal Audit Department has completed an audit of the City's building permit processes including application & plan review, fee payment, and inspections. This report is intended to provide assurance that the City has established adequate processes and procedures to ensure building permits are managed efficiently, effectively, and in accordance with rules and regulations.

Audit fieldwork was conducted during April, May, and June 2021. The scope of review varied depending on the procedure being performed. The following list summarizes major procedures performed during this time:

- Reviewed documentation to develop criteria including documented policies and procedures;
- Developed process narratives to identify current control activities in the building permit application intake, inspection, and payment

¹ The City of Denton's Internal Audit Department is considered structurally independent as defined by generally accepted government auditing standard 3.56.

management processes that were certified by Development Services Building Safety staff;

- Interviewed City of Denton Development Services Building Safety and Planning staff and Denton County Development Services staff;
- Inspected a statistical sample of 95 permits and 76 processed refunds² including supporting documentation to ensure they were reviewed, managed, and approved in accordance with rules and documented policies and procedures;
- Reviewed a randomly selected judgement sample of 20 Building Safety Daily Deposit Reports to verify that collected payments were appropriately processed, reconciled, and accurately reported to the Accounting Division;
- Reviewed a randomly selected judgement sample of 30 properties with established non-annexation agreements for potential property improvements within the Denton Central Appraisal District's database and within the City's permitting software to determine whether the property contained non-annexation agreement or extraterritorial jurisdiction restrictions;
- Conducted inspection walkthroughs with a Building Inspector; and
- Verified applicable staff completed cash handling training and defensive driver safety course training as required per City policies 403.01 and 409.05.

² These samples provide with 95% confidence that the true population is $\pm 10\%$ of the sample estimate.

Findings & Analysis

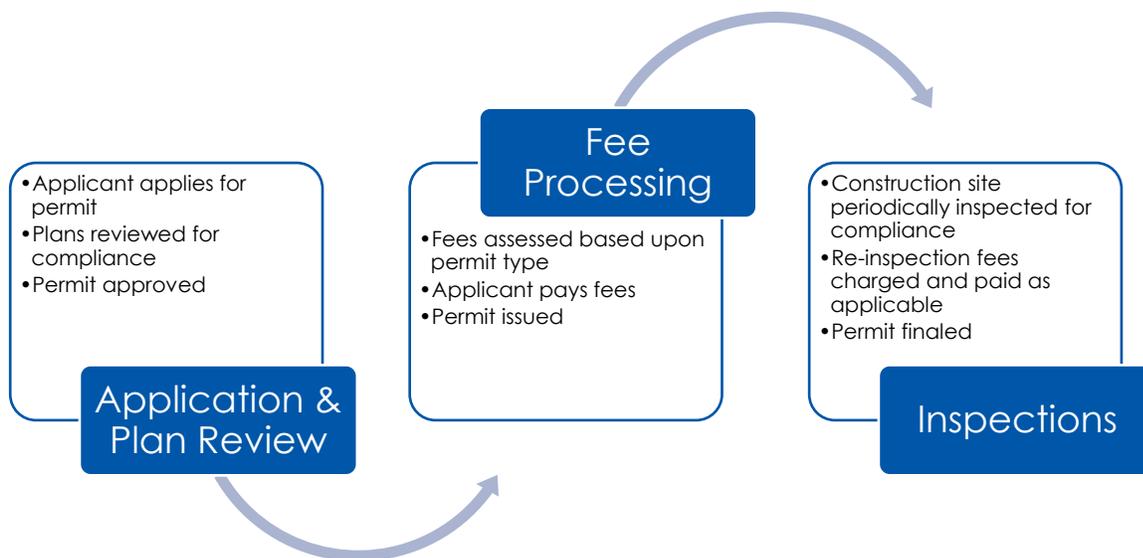
In order to construct, enlarge, or alter a building, an applicant must receive permission – granted by a building permit – from the applicable jurisdiction. In the City of Denton, the Department of Development Services' Building Safety Division is responsible for issuing building permits after reviewing submitted permit applications and plans to ensure they are complete and comply with the City's building rules, regulations and adopted safety codes.

Once the permit application or building plans are approved, the applicant³ is assessed permit fees based on the type of building permit sought. These assessed fees must be paid before the permit is issued and applicants are not allowed to begin construction before receiving a permit.

During construction, the applicant is required to request inspections from the Building Safety Division periodically in order to ensure the building is built per the approved plans and in compliance with the City's adopted building codes.

This audit generally evaluated all parts of the City's building permit process, including application & plan review, fee payment, and inspections. An overview of this process is illustrated in Figure 1.

Figure 1: Building Permit Process Overview



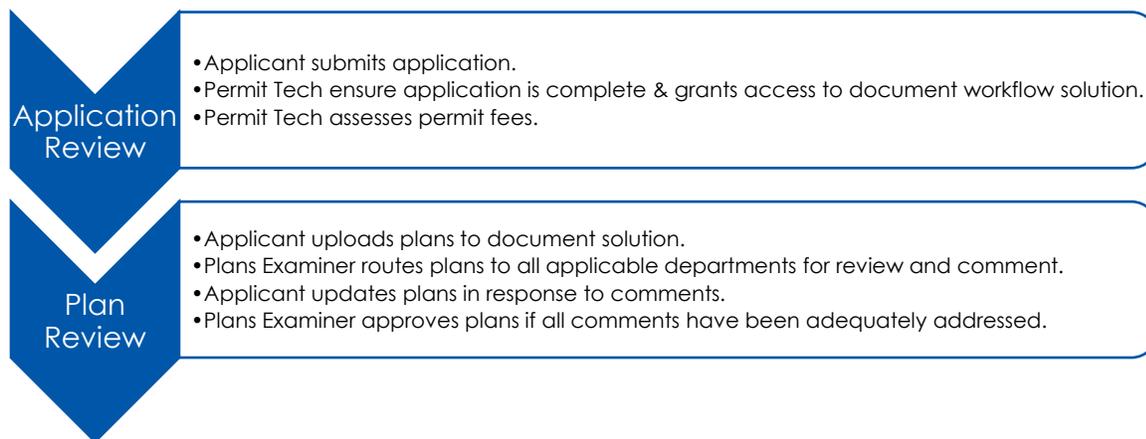
³ A building permit applicant may be the property owner, authorized agent, or licensed contractor.

Permits Reviewed Appropriately Except For Some NAA Properties

The first step of the building permit process is application and plan review. During this subprocess, permit applications are submitted by applicants using the City’s online permitting system. Permit Technicians then review these applications to determine if the application is complete and if plan review is needed.⁴

If plan review is needed, the applicant must upload their plans into the City’s web-based document workflow solution where they are reviewed by a Plans Examiner and routed to other departments necessary for the permit type. Review comments are then provided to the applicant and updated plans are resubmitted until the plans are approved. This subprocess is illustrated in Figure 2:

Figure 2: Permit Application & Plan Review Process



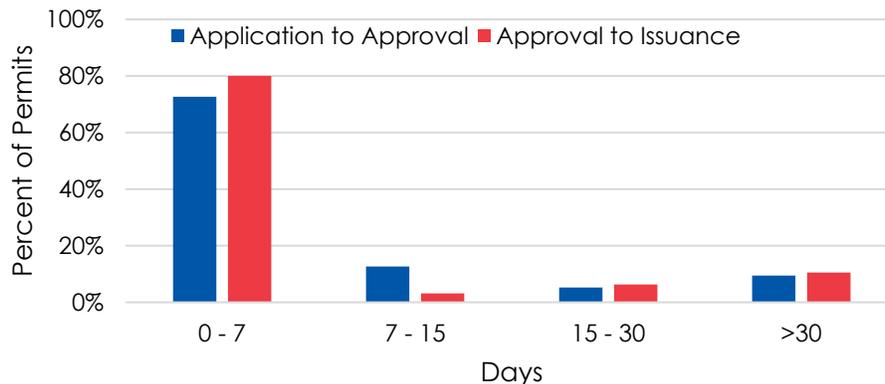
What We Found

- Based on review of a statistical sample of 95 permits within the City’s permitting system, all permits appeared to be handled, managed, and issued in accordance with current procedures and rules.
 - This included fee assessment, plan review and approval, inspection documentation, and the issuance and finalization of permits.
- The permit application review process appears timely and consistent with department and applicant expectations.
 - Based on review of the statistical sample of 95 permits, it took about 16 days on average for a permit application to be approved and about 15 days for a permit to be issued from an approved application. On

⁴ Some “over-the-counter” permit types can be reviewed and approved by Permit Technicians without the involvement of a Plans Examiner.

average, about 90 percent of permit applications are approved within one month and about 90 percent of permits are issued less than a month later. Figure 3 summarizes the time it took to approve and issue permits overall.

Figure 3: Permit Approval and Issuance Timeliness



- While this indicates that the application review process is generally timely, about ten percent of permit approvals and ten percent of permit issuances take more than one month. Based on discussion with staff, Building Safety had developed a process to periodically identify pending permit applications with no recent status updates; however, this was discontinued due to reduction in staff and workload constraints during the COVID-19 Pandemic. Reinstating this process would further ensure all permits are approved and issued within a timely manner.
- Based on a customer service survey administered to Licensed Contractors by Development Services staff, over 98 percent of respondents believed the City of Denton’s Building Safety team was doing great or doing okay with potentially some improvements needed.⁵
- The City has previously handled building permit applications for properties under non-annexation agreements inconsistently.
 - In general, the City does not process building permits for properties located outside its city limits; however, the City originally executed 265 non-annexation agreements – or NAAs – with property owners just outside of the City in 2010. These agreements require these property

⁵ Improvements noted by respondents included the permitting process being difficult to complete online and making the process easier to navigate for TRAKiT and ProjectDox. These applications are currently in the process of being upgraded.

owners to have any building improvements permitted through the City of Denton instead of Denton County.

- Based on a review of data received from Denton County, there appeared to have been 82 permits issued by the County for properties with City of Denton NAAs since they were established.
- Based on discussions with City of Denton and Denton County staff, there was no process to verify in which jurisdiction a property should be permitted until about three months ago. Currently, Denton County requires property owners to complete an extraterritorial jurisdiction⁶ verification form before processing their permit application. In addition, the City has recently flagged non-annexation agreement properties in its permitting system to ensure they are not inappropriately denied and sent to the County.

Why It Matters

While most permits are approved and issued in a timely manner, a notable portion take more than one month to approve or issue. Reinstating the Department’s previous practice of periodically identifying pending permit applications will provide further assurance that these outstanding permits are not due to City inaction and should expedite permit issuance.

In addition, without an adequate process, several building improvements on properties with NAAs have been permitted through the County instead of the City. This may have resulted in these building improvements not being built to the City’s building codes.

Recommendations:

1. Reinstitute the Department’s prior process to periodically identify pending permit applications to ensure applications are managed and updated timely and appropriately.

Building Safety Comments: *Process has been reinstated and applications are now being updated appropriately.*

2. Coordinate with City Planning to formalize a training program and review process for non-annexation agreement properties.

Building Safety Comments: *Staff is developing a review process and will implement a training program for these types of permits.*

⁶ Extraterritorial jurisdiction is the legal ability of a government to exercise authority beyond its normal boundaries.

Permit Fees Processed Appropriately; Refunds Not Formally Approved

Permit fees are assessed and charged to applicants based on the type of permit they have requested. The Building Safety Division is responsible for assessing and processing payments for all permitting fees, even those services completed outside of the Development Services Department.

Refunds are typically issued due to applicant overpayment or changes in approved plans that result in a reduction of assessed permit fees. In general, refunds should be properly approved and documented to ensure they are issued appropriately.

What We Found

- The Division has established a Daily Cash Processing Standard Operating Procedure Manual which details deposit and reconciliation procedures and cash handling controls.
 - Permit fees can be paid via check, money order, or credit card and must be paid in-person, online or over-the-phone. No cash is accepted for payment.
 - Building Safety maintains a safe within the Development Services' office that is secured to the building; however, there is currently no process to update the code to the safe periodically or upon employee turnover.
 - All Building Safety staff who handle cash have completed the City's cash handling training.
- Each day, received payments are verified by two permit technicians and deposits are secured in the Division's safe until being transferred to the City's Customer Service Division. In addition, the Customer Support & Permit Administrator reconciles processed payments each day. Permit Technicians are also required to retain receipts from each transaction in the City's permitting system.
 - Based on a random judgement sample of 20 daily deposit reconciliation reports between fiscal year 2018-19 and 2019-20 totaling about \$1,367,000, the payment management and reconciliation process appeared to be effective and all payments were accurately posted and reported.
- Based on review of building permit fees charged to applicants during review of the statistical sample of 95 permits, fees appeared to be generally charged to applicants appropriately dependent on the permit type.

- Based on the permit type, the City’s permitting system limits which fee types Division can charge to an application. Once the fee types are charged, the permitting system automatically calculates the fee amount to be assessed based on information provided by the applicant including square feet and valuation.
- In addition, Building Safety staff generally verify that entered information is complete in order to ensure that fees are accurately assessed.
- According to Division staff, refunds are generally requested by a Permit Technician or Plans Examiner and processed by the Customer Support & Permit Administrator; however, a process has not been developed to formally document supervisor approval and support documentation.⁷
 - Based on a statistical sample of 76 issued applicant refunds between fiscal year 2018-19 and 2019-20 totaling around \$78,000, refunds generally appeared to be issued for a reasonable purpose. Results of this sample are summarized in Table 1:

Table 1: Refund Sample Results

Criteria	Results (out of 76)	
Reasonable Purpose	76	100%
Attached Receipt	76	100%
Documented Formal Review & Approval	33	43%
Support Documentation ⁸	50	66%

Why It Matters

Refunds processed for permitting fees can result in large sums of money being refunded to applicants. While all refunds reviewed appeared to be for a reasonable purpose, ensuring each refund is properly reviewed and approved by a supervisor prior to being processed will provide further assurance that the refund is issued appropriately. Additionally, development of a formal process or standard operating procedure will ensure each refund is handled consistently and there is proper oversight and segregation of duties in the refund process.

⁷ There is a payment authorization process for refunds that is required by the Accounts Payable Division. Under this process, Department Directors must approve payments greater than \$5,000; these documents were considered evidence of approval as part of the refund sample if found. Still, refunds should be approved by supervisors with direct knowledge of the fee process in order to ensure adequate review.

⁸ Support documentation includes calculation documentation, email attachments, and support attached timely upon issuance of the refund.

Finally, while controls over cash handling appear to be generally effective, periodically updating the code to the safe will further safeguard City assets.

Recommendations:

3. Develop a formal refund request process for permitting fees to document supervisor approval. Consider requiring escalating approval authority based on certain dollar thresholds.

Building Safety Comments: *Policy for refund requests is currently in process.*

4. Develop a process to periodically update the code to the safe, including upon employee turnover.

Building Safety Comments: *Staff is developing an improved security process.*

Additional Monitoring of Inspections Would Further Ensure Quality

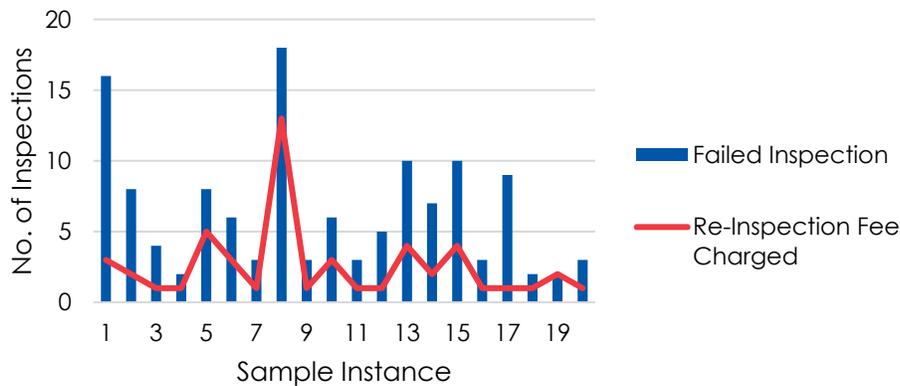
Once a building permit is issued, the applicant is notified of the issued permit and begins construction work according to their approved plans. The City of Denton requires applicants to schedule building inspections throughout construction to ensure the work is done in accordance with the approved plans and in compliance with the City's adopted building codes.

What We Found

- Building inspectors complete inspections and document results and applicable notes within each permit record in the City's permitting system. Inspections can result in either a pass, fail, or approved with conditions as determined by the assigned inspector.
 - Inspection results and notes can be seen by contractors online in the City's permitting system.
 - For failed or approved with conditions inspections, building inspectors are instructed to document detailed, useful notes that allow the contractor and next building inspector to understand the identified deficiencies to facilitate correction and re-inspection.
 - Inspectors are not required to provide notes for inspections that result in a pass.
 - There is currently no process to review completed inspections to ensure they were conducted in accordance with the Division's quality standards.
- Building inspectors may charge a re-inspection fee upon a failed inspection.

- Based on a random judgement sample of 20 re-inspection fees charged to applicants between fiscal year 2018-19 and 2019-20, 41 percent of failed inspections were charged a re-inspection fee on average; however, there appeared to be significant variation in the ratio of failed inspections to assessed re-inspection fees as illustrated in Figure 4.

Figure 4: Re-Inspection Fee Assessment



- Allowing building inspectors flexibility when charging re-inspection fees may be appropriate, but without any formal guidance or approval process there is a risk that applicants will be inequitably or inappropriately charged for re-inspections. Developing formal guidelines around when re-inspection fees should be charged will encourage greater consistency during the fee assessment process.
- Current building inspection scheduling procedures may impact inspection quality.
 - Applicants are responsible for scheduling inspections as required by their permit type.⁹ These inspections are scheduled and assigned to building inspectors and other relevant inspectors, such as right-of-way inspectors and fire inspectors, daily.
 - There is not currently a maximum number of inspections that can be scheduled each day. Instead all inspections requests assigned to building inspectors must be completed by the end of the next business day.
 - Currently, building inspectors are only required to track the amount of time each inspection takes to complete in the City’s permitting system during cost of service fee studies.

⁹ Inspections can be scheduled for a day until 6:00 AM on that day. Any inspection requests received after 6:00 AM are scheduled for the next business day.

Why It Matters

Building inspections are required to ensure applicants are completing construction per the approved plans. While current inspection result documentation practices help ensure identified deficiencies are corrected, there is currently no quality control or review process to ensure that all deficiencies were identified, potentially leading to life and safety concerns.

In addition, current inspection scheduling practices do not limit the number of inspections that are scheduled each day and require all inspections assigned to building inspectors to be completed on that day. This may lead to building inspectors having to rush through their inspections – potentially impacting quality.

Finally, building permit fees should be assessed and charged to applicants appropriately based on permit type. While most permit fees are calculated based on the submitted plans or application, re-inspection fees are generally subject to building inspectors' professional judgement, leaving them vulnerable to being charged inequitably or inappropriately. There may be operational reasons to allow flexibility when charging re-inspection fees; however, standard guidance and training should be distributed to building inspectors to provide assurance that they are not being charged inequitably or inappropriately and to facilitate greater consistency across the building inspections function.

Recommendations:

5. Develop a formal inspection review process to provide assurance that inspections are being completed effectively and in accordance with the Division's quality standards.

Building Safety Comments: *Staff is documenting the quality control measures to establish a documented formal policy and checklist.*

6. Establish a process to provide assurance that variable daily inspection workload does not impact the quality of inspections.

Building Safety Comments: *New software will be up and running by the end of July, the update includes time tracking for inspections.*

7. Develop re-inspection fee assessment guidelines or a review process. Ensure building inspectors receive consistent training on re-inspection fee assessment.

Building Safety Comments: *Policy will be documented and quarterly training provided to ensure consistent application of the policy.*

Lack of Formal Inspector Development Plan May Hinder Effectiveness

The City has established three levels of building inspectors – Building Inspector I, Building Inspector II, and Building Inspector III – who all report to the Assistant Building Official & Building Inspector Supervisor. These individuals should have the combined relevant knowledge, skills, licenses, and certifications to effectively perform building inspections for the City of Denton.

What We Found

- Based on comparison of the Building Inspector job description requirements and minimum qualifications to current staff licensing and certifications, not all staff meet certification and licensing expectations as detailed in Table 2 on the next page. In addition, the Division has not established a clear development program or incentives to encourage staff to meet these expectations.
 - The Building Inspector I job description requires staff to obtain a Texas State Plumbing Inspector license and Residential Energy Code Inspector/Plans Examiner certification within 18 months of employment; however, about 20 percent of relevant inspection staff (i.e. Building Inspector Is, IIs, IIIs, and supervisors) do not have a Plumbing Inspector license and 40 percent do not have a Residential Energy Code Inspector certification.
 - Similarly, the Building Inspector II and III job descriptions list certain model code certifications as minimum qualifications for these higher-level positions; however, not all staff at these levels have acquired these certifications. While the Building Inspector II and III job descriptions do provide the hiring manager with flexibility, including these certifications as minimum qualifications in the job description would imply that acquiring these licenses is expected.
 - The Division has developed a building inspector progression plan; however, it is informal and does not clearly match up to minimum licensing or experience qualifications stated in the job descriptions.

Table 2: Building Inspector License & Certifications¹⁰

Certification/License	Building Inspector I	Building Inspector II	Building Inspector III	Building Inspection Supervisor	All Relevant Positions
Texas State Plumbing Inspector	100%	50%	100%	100%	82%
Residential Energy Inspector/ Plans Examiner	0%	0%	100%	100%	44%
Commercial Energy Inspector	N/A	0%	100%	100%	50%
Commercial Building Inspector	N/A	0%	0%	100%	13%

- It is possible that the current job descriptions do not reflect the actual certification and licensing expectations or requirements of the building inspections function. If so, job descriptions should be updated to ensure that they reflect the actual duties, responsibilities, and knowledge, skill, and ability expectations of the position.
- Based on Building Safety Division Licenses and Certification data, the Building Safety Division does not include a Med Gas Inspector.
 - While this certification appears to be a gap in the Division's skill set based on its own analysis, it is not entirely clear if this gap needs to be filled as it is not required by a Building Inspector job description or included in the building inspector progression plan.

Why It Matters

Building inspectors are assigned inspections based on their knowledge, skills, licensing, and certifications. For this reason, job descriptions should include adequate information about what is required to effectively perform. If some or many employees are not meeting these expectations, the Division may be unable to adequately distribute its workload.

In addition, without a clear career progression plan, employees may not be motivated to meet expected educational achievements or fill gaps in the Division's knowledge base. This lack of knowledge could negatively impact the effectiveness and quality of inspections the Division can perform. Similarly, knowledge gaps may lead to the Division requiring applicants to obtain third-party inspectors, who may have conflicts of interest that impact inspection quality.

¹⁰ These certifications and licenses do not reflect all certifications and licenses within the department. These four identified are the certifications and licensed noted within the job descriptions as conditions of employment and/or minimum qualifications per each job position.

Recommendations:

8. Formalize the building inspector progression plan to clearly delineate the expectations and requirements for promotion within the Building Inspector roles. Include expected timelines and required licenses/certifications to expand the offered inspection services by the City.

Building Safety Comments: *Draft progression plan has been completed, but not yet formally approved.*

9. Develop a process to periodically review staffing capacities to evaluate and identify potential license and certification gaps. This evaluation should be used to update the building inspector career progression plan and building inspector job descriptions.

Building Safety Comments: *Staff will develop an updated policy.*

Standard Operating Procedures Should be Finalized

Best practices generally suggest that organizations develop and maintain policies and procedures to help retain institutional knowledge, navigate emergency situations, and facilitate consistency.

What We Found

- The Building Safety Division has begun developing standard operating procedures for each step of the building permit process, including applications, plan review, inspections, and fee processing; however, the majority of these have not been formally approved or implemented.
 - Additionally, based on discussions with staff, there are still numerous processes for which a standard operating procedure has not been developed, including residential and commercial plan reviews.
 - The Division is currently in the process of updating its permitting software. While this update will likely improve the permitting process, any developed standard operating procedures will need to be revised to reflect updated processes.
- Currently, the Division relies on Building Safety staff to verbally inform management of a potential conflict of interest¹¹ when one arises. A formal

¹¹ Conflict of interests within the building permit process could arise when an employee applies for a permit, a friend/family member of an employee applies for a permit, or a business an employee is financially involved with applies for a permit.

documented procedure detailing staff expectations and requirements for conflict of interest disclosures has not been developed.

Why It Matters

The Building Safety Division manages all incoming permit applications through permit issuance and finalization, which includes numerous services related to permits, plan reviews, and inspections. Detailed procedures would provide assurance that these functions were carried out consistently and appropriately throughout the permitting process.

For this reason, the Division's draft standard operating procedures should be reviewed and finalized by a supervisor for accuracy prior to formal implementation. All standard operating procedures should be periodically reviewed and updated as needed.

Furthermore, the Building Safety Division is particularly vulnerable to conflicts of interest as it involves verifying that new developments meet life and safety standards. For that reason, requiring employees to disclose potential conflicts of interest prior to receiving projects will help ensure that plan reviews and inspections are completed appropriately.

Recommendations:

10. Review and finalize departmental standard operating procedures to ensure each step of the building permit process is documented and reflects actual processes. These should incorporate references and images as necessary to provide clarity, including a periodic review process.

Building Safety Comments: *Currently in-process. Process developed will be reviewed on an annual basis and with code changes.*

11. Develop a formal conflict of interest procedure detailing employee responsibility, expectations, and process to report potential conflict of interests within the permitting process. Consider development of an annual conflict of interest ethics statement.

Building Safety Comments: *Staff will develop a policy.*

Appendix A: Management Response Summary

The following summarizes the recommendations issued throughout this report. The auditors found that staff and the Department were receptive and willing to make improvements to controls where needed. Management has provided their response to each recommendation.

<p>1 <i>Reinstitute the Department's prior process to periodically identify pending permit applications to ensure applications are managed and updated timely and appropriately.</i></p>	<p>Concur</p>	<p>Expected Completion: June 2021</p>
<p>Building Safety Comments: Process has been reinstated and applications are now being updated appropriately.</p>		<p>Responsibility: Emily Loiselle/Glenda Gailliard</p>
<p>2 <i>Coordinate with City Planning to formalize a training program and review process for non-annexation agreement properties.</i></p>	<p>Concur</p>	<p>Expected Completion: July 2021</p>
<p>Building Safety Comments: Staff is developing a review process and will implement a training program for these types of permits.</p>		<p>Responsibility: Amber Rodgers</p>
<p>3 <i>Develop a formal refund request process for permitting fees to document supervisor approval. Consider requiring escalating approval authority based on certain dollar thresholds.</i></p>	<p>Concur</p>	<p>Expected Completion: August 2021</p>
<p>Building Safety Comments: Policy for refund requests is currently in process.</p>		<p>Responsibility: Glenda Gailliard/Emily Loiselle/Charlie Rosendahl</p>
<p>4 <i>Develop a process to periodically update the code to the safe, including upon employee turnover.</i></p>	<p>Concur</p>	<p>Expected Completion: July 2021</p>
<p>Building Safety Comments: Staff is developing an improved security process.</p>		<p>Responsibility: Glenda Gailliard</p>
<p>5 <i>Develop a formal inspection review process to provide assurance that inspections are being completed</i></p>	<p>Concur</p>	<p>Expected Completion: August 2021</p>

	<i>effectively and in accordance with the Division's quality standards.</i>		
	Building Safety Comments: Staff is documenting the quality control measures to establish a documented formal policy and checklist.		Responsibility: Billy Ewton
6	<i>Establish a process to provide assurance that variable daily inspection workload does not impact the quality of inspections.</i>	Concur	Expected Completion: September 2021
	Building Safety Comments: New software will be up and running by the end of July, the update includes time tracking for inspections.		Responsibility: Billy Ewton/Charlie Rosendahl
7	<i>Develop re-inspection fee assessment guidelines or a review process. Ensure building inspectors receive consistent training on re-inspection fee assessment.</i>	Concur	Expected Completion: July 2021
	Building Safety Comments: Policy will be documented and quarterly training provided to ensure consistent application of the policy.		Responsibility: Billy Ewton
8	<i>Formalize the building inspector progression plan to clearly delineate the expectations and requirements for promotion within the Building Inspector roles. Include expected timelines and required licenses/certifications to expand the offered inspection services by the City.</i>	Concur	Expected Completion: August 2021
	Building Safety Comments: Draft progression plan has been completed, but not yet formally approved.		Responsibility: Emily Loiselle/Charlie Rosendahl/Scott McDonald
9	<i>Develop a process to periodically review staffing capacities to evaluate and identify potential license and certification gaps. This evaluation should be used to update the building inspector career progression plan and building inspector job descriptions.</i>	Concur	Expected Completion: September 2021
	Building Safety Comments: Staff will develop an updated policy.		Responsibility: Amber Rodgers/Billy

		Ewton/Emily Loiselle
10	<i>Review and finalize departmental standard operating procedures to ensure each step of the building permit process is documented and reflects actual processes. These should incorporate references and images as necessary to provide clarity, including a periodic review process.</i>	Expected Completion: April 2022
	Concur	
	Building Safety Comments: Currently in-process. Process developed will be reviewed on an annual basis and with code changes.	Responsibility: Amber Rodgers/Billy Ewton/Charlie Rosendahl/Emily Loiselle/Glenda Gailliard
11	<i>Develop a formal conflict of interest procedure detailing employee responsibility, expectations, and process to report potential conflict of interests within the permitting process. Consider development of an annual conflict of interest ethics statement.</i>	Expected Completion: September 2021
	Concur	
	Building Safety Comments: Staff will develop a policy.	Responsibility: Amber Rodgers/Billy Ewton/Glenda Gailliard