TO: Honorable Council Members
FROM: John H. Sanderlin, Jr., City Auditor

DATE: December 19, 2016
SUBJECT: Department of City Planning – Audit of the Final Inspection Process

Please find attached our final audit report on the final inspection process for the Department of City Planning. Should you have any questions please feel free to contact me at 664-4045.

cc: Douglas Smith, Interim City Manager
Wynter Benda, Deputy City Manager
George Homewood, Director of City Planning
DEPARTMENT OF CITY PLANNING

Audit of the Final Inspection Process for New Construction: Challenges and Hurdles of the Permit Process

December 19, 2016

John H. Sanderlin, Jr.
City Auditor

Bradford Smith
Deputy City Auditor
Auditor-in-Charge

Report No. 17-2R
December 19, 2016

Honorable Council Members

Subject: Audit of the Final Inspection Process for New Construction – Department of City Planning (Report No. 17-2R)

The attached report contains the results of our audit of the final inspection process for new construction in the Department of City Planning. The audit report presents four major areas of opportunities for improvement in regards to the overall management control system; and it highlights management initiatives, taken or planned, in regards to identified challenges or in response to our recommendations. We appreciate the cooperation and assistance of the staff during the audit.

Respectfully submitted,

John H. Sanderlin, Jr.

John H. Sanderlin, Jr., CPA, CIA, CGFM, CFE, CGMA
City Auditor
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Executive Summary
City Management and the Director of the Department of City Planning (Planning) requested our office to perform an audit of the final inspection process for new construction. As a result, we initiated and completed an audit to assess the challenges and hurdles of the permit process by determining the effectiveness and adequacy of controls related to final inspections to include the level of compliance with existing policies and procedures or standard operating procedures. Also, we focused on whether proper management controls existed for expiring permits. The Division of Building Safety in Planning provides coordinated administration and enforcement of all codes and regulatory standards related to new construction. This division is responsible for issuing permits to contractors and homeowners when they intend to perform electrical and plumbing, mechanical and structural modifications to homes and businesses and ensures building safety during the construction process by inspecting construction work as well as enforcing the Virginia Uniform Statewide Building Code (VUSBC), referred also from this point on some occasions as the building code. The last phase of the permit process for new construction is the final inspection. According to the VUSBC, Section 113 Inspections, 113.1.2, Duty to Notify, when construction reaches a stage of completion that requires an inspection, the permit holder is to notify the Code Official.

It is critical that contractors are diligent in requesting inspections, which is required by the building code. In doing so, this helps the City to manage final inspections. When a building or structure is completed, a final inspection needs to be completed before the issuance of a certificate of occupancy. A final inspection is to be conducted to ensure that any poor work has been corrected and that all work complies with the building code, including any work associated with modifications of any provision of the building code. Due to the nature of the building inspection process, there may be a going back and forth between the permit holders (a contractor or homeowner) and the inspector until the work is in full compliance with the building code. This frequent interaction between the permit holder and the inspector may cause situations in which an inspector is vulnerable to being offered favors, gifts, rewards, etc. for the desired act. The Division of Building Safety is conscious of this inherent risk and realizes that serving the public interest and having public trust are of the utmost importance and expects its inspectors to have this understanding in carrying out their duties. The environment of code enforcement does not preclude itself from the attempts by persons to influence inspectors, and it is, therefore, feasible that collusion may occur between inspectors and permit holders, which may result in a personal gain such as a bribe or other favors.

The permit process for new construction is a series of application and building plan reviews, authorizations, and a web of trade inspections. As a result, the permit process can present hurdles that have to be managed by the contractor and the City to ensure permits are properly executed. Some of the difficulties that may be encountered include:

1) contractors beginning construction without obtaining a permit;
2) contractors performing work that is not covered by the permit;
3) permit holders having to pay for the permit before starting the work;
4) contractors calling in to have the wrong inspection performed; or
5) contractors not obtaining a permit because their license has expired in the City’s HTE database system\(^1\), the system used to record contractor and permit information and track inspection activities.

In general, we found inspectors performed final inspections following the building code and expired permits are being adequately managed. Taking a proactive approach at the beginning of the fiscal year 2014, Planning implemented two major initiatives; one involved a change in how expired permits are monitored and the other increased surveillance and survey of properties. Under initiative one, procedures were developed to identify and flag expiring permits within 30 days of their expiration. The second initiative established a \textit{360-degree look around policy} that reinforces that all Planning employees are to increase their awareness of anomalies or potential issues in the field to include identifying contractors who are working without a permit; and also to improve the reporting of such anomalies. Planning also began researching new permit management systems to automate the scheduling of field inspections and reviews, increasing the speed of printing permit related documents in seconds, and making permit history available in the office and the field as well as within multiple departments.\(^1\)

Our audit disclosed additional areas of opportunities for improvements to enhance the existing management control system, which are as follows:

- Inspectors and Team Leaders should sign a conflict of interest statements on an annual basis to disclose impairments that may affect the inspector’s impartiality and objectivity.
- Inspectors should rotate their area of coverage on a regular basis.
- More advanced mobile devices should be provided to inspectors to help them perform their jobs more efficiently when they are out in the field.
- Reports from the HTE database system should be prepared and analyzed to determine whether the implemented procedure for expiring permits is effective.

We discussed our conclusions, findings, and recommendations with the Director of City Planning and his management team on September 23, 2016, and have included management’s responses in this report. We also provided a copy of our draft report to City Administration along with management's responses on October 25, 2016. Deputy City Auditor Bradford Smith and Assistant City Auditor Michael Helmke conducted the audit under the general direction of City Auditor John Sanderlin.

**Background**

The permit process for contractors or homeowners begins within the Development Services Center Division within the Department of City Planning. Contractors complete an application, which is then approved by Land Use Services (Zoning). After Zoning’s approval and depending on the type of permit (residential or commercial), the permit is appropriately routed for completion. If it

\(^1\) On July 5, 2016, a new database system, Norfolk ePermitting (the permits and inspection module of the web-based software BasicGov Systems) was implemented to replace HTE. Our audit covered activities before the implementation of this system.
is a residential permit, a Permit Technician or Permit Specialist determines the type of permit needed, reviews the application for completeness, checks credentials of the applicant, enters the application into a database, forwards the plan to a Residential Plan Reviewer, issues the permit, collects permit fees and receives the approved plan from the Residential Plan Reviewer. A commercial permit follows a similar process with an additional step of generating an application tracking number. Each applicant that receives a permit whether it is for plumbing, electrical, mechanical, residential or commercial building would then proceed with the respective work and upon completion requests the applicable inspection (i.e. plumbing, electrical, etc.) to be performed by the Division of Building Safety. Appendix A of this report contains the complete flow of the permit application submittal review and issuance process.

As shown below, the number of permits issued ranged from 10,245 to 11,337 for fiscal years 2010 through 2014. For the same period, the number of expired permits ranged from 1 to 508, excluding expired elevator permits.

![Total Permits Issued and Expired FY10-FY14](image)

+ The Department of City Planning placed emphasis on reviewing expired permits within the HTE system.
Source: HTE database system

Inspections are performed by three teams (Mechanical/Plumbing, Electrical/Elevator, and Structural) in the Building Safety Division. Each team is led by a team leader who oversees the work of Senior Codes Specialists (inspectors). These three teams have a combined number of 17 Senior Codes Specialists, based on the most recent organizational chart at the time of the audit. The Senior Codes Specialists have to obtain a minimum of 16 continuing professional education hours for their trade, attend mandatory state code updates that occur every three years and pass a residential and commercial inspector exam within 18 months of being to maintain employment.
The 17 full-time employees, plus the three team leaders, have standard work hours of 7:00 am-3:30 pm. These Building Safety Division's employees conducted between 22,485 and 32,138 inspections for fiscal years 2010 through 2014, averaging from 1,124 to 1,567 inspections per inspector.

The above chart is based on the following data:

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th># of Employees</th>
<th># of Inspections</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>20</td>
<td>26,865</td>
</tr>
<tr>
<td>2011</td>
<td>20</td>
<td>22,485</td>
</tr>
<tr>
<td>2012</td>
<td>23</td>
<td>29,762</td>
</tr>
<tr>
<td>2013</td>
<td>20</td>
<td>31,334</td>
</tr>
<tr>
<td>2014</td>
<td>21</td>
<td>32,138</td>
</tr>
</tbody>
</table>

**Objective, Scope and Methodology**

Our overall audit objective was to determine the effectiveness and adequacy of controls over final inspections and to assess whether proper management of expiring permits existed. To accomplish our objective, we performed the following:

- Reviewed applicable policies and procedures and other applicable documents, such as the Virginia Uniform Statewide Building Code, Permit Status Reports, Building Permit Inspector Activity Summary Reports, etc.
- Interviewed high-level Planning staff responsible for building inspections (Code Official, Development Services Center Manager and the Records and Research Manager) as well as Building Safety Team Leaders to obtain explanations and descriptions of processes in place to support how inspections are performed.
• Rode along with and interviewed six Senior Codes Specialists, randomly selected from each of the three teams, as they performed inspections to assess practices performed.
• Analyzed expired permit reports to determine whether newly implemented procedures were being performed.
• Benchmarked with surrounding cities to obtain best practices and performance measure information.
• Discussed with the Department of Neighborhood Development to determine if there are collaborative efforts between their Inspectors and Planning to help mitigate potential code violations.

We performed limited testing of the general and user controls along with minor testing of the application controls of the HTE database system. Based on our testing, we relied on the information provided by Planning for the number of permits issued, expired permits and yearly inspections performed. Our audit did not include physical inspection of properties to assess the status of open or inactive permits.

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.

Conclusion
The final inspection is the last requirement before a building permit is closed. A house built without any inspections is the worst case scenario. Similarly, when plumbing, electrical and mechanical inspections are performed, and a final inspection is not, this scenario is also not good. Why? Because a final inspection is performed to ensure any poor work has been corrected and all other work complies with the building code and has been approved. The inspection process relies on contractors contacting the City to schedule inspections of completed work. The building code endorses a self-reporting approach, putting the onus on the contractor to inform the City when a construction project is completed (Virginia Uniform Statewide Building Code, Section 113 Inspections; 113.1.2). During fiscal years 2010 through 2014, the city conducted between 22,485 and 32,138 inspections a year, averaging 28,516 a year or between 86 and 123 completed per day. The volume of inspections performed based on the number of permits issued suggests contractors, for the most part, do comply with the state requirement of scheduling final inspections. Also, contractors have the incentive to comply with state requirements or otherwise face damaging their reputations and ability to do work or face legal consequences, potentially impacting their livelihood.

Before events unfolded that were spotlighted in the press regarding the permit process, particularly final inspections, the City relied solely on permit holders (contractors or homeowners) communicating with city inspectors the status of their construction projects, as stipulated by the permit type issued. Operating in this fashion was based on two premises. First, it was not feasible to follow-up on final inspections if the permit holder did not call for one because of the volume of open permits, particularly during times of economic expansions. Otherwise, City inspectors would...
be required to travel to all sites of open permits to complete inspections, and if the work were not completed, resources would be deployed unnecessarily. Secondly, the building code allows the closure of expired permits without physically conducting an inspection.

In response to the properties highlighted in the media, Planning performed steps to assess whether final inspections were performed. Although a final inspection was not completed because the contractor did not call to have one performed, each of the properties was considered safe. The properties were considered safe because the appropriate trade inspections (electrical, plumbing, mechanical, etc.) were completed. As a point of emphasis, Planning stressed to us that a certificate of occupancy is not issued until a final inspection is conducted and banks will not close a property loan without a certificate of occupancy. Therefore, if a bank did close a property loan without a certificate of occupancy being issued, they possibly did not follow normal procedures. However, if a contractor self-finances the project, a certificate of occupancy does not have to be obtained, and once the property is constructed the contractor can then sell it.

Before our audit, the Department of City Planning launched initiatives to address the overall risk associated with contractors’ self-reporting of finished work. They included identifying and flagging permits expiring within 30 days of their expiration date for which no action had been taken or work performed and conducting heavier surveillance or scouting for new construction activities. These implemented measures should substantially reduce the risk of houses being built without any inspections or houses built with inspections, but without a final inspection. However, whether intentional or unintentional, the inherent risk remains that contractors may not call for final inspections and the possibility exists where a contractor may attempt to influence an inspector with favors, gifts, money, etc. As such, we found the City has the continued challenge of reducing these risk by implementing a strong follow-up system, taking advantage of technology, increasing community awareness, taking preventive measures through mandatory rotations of inspectors, and encouraging an ethical climate to reduce potential conflict of interest.

Audit Findings
We found the Department of City Planning management control system needed minor improvements pertaining to the final inspection process to address because of the following:

- Inspectors and team leaders do not complete Conflict of interest statements.
- Inspectors do not rotate their area of coverage on a regular basis.
- Inspectors do not have more advanced mobile device technology to perform their duties.
- Newly implemented procedures need to be enhanced.

We present details of each of our findings below along with our recommendations.

Inspectors and Team Leaders Do Not Complete Conflict of Interest Statements
The department did not have a policy requiring inspectors to sign a conflict of interest statement. In our discussions with six of the 17 Senior Code Specialists (35% of all inspectors), none of them had signed a conflict of interest statement. Our system of representative government is dependent, in part, upon citizens maintaining the highest trust in their public officials and employees. The citizens are entitled to be assured that the judgment of those public officials and employees will
not be compromised or affected by inappropriate conflicts. Inspectors, as public servants, hold positions of trust and confidence and are obligated to act solely in the interest of the citizenry and the good of the public. A conflict of interest statement would increase assurance to the public that inspectors are expected to maintain integrity throughout the process and avoid conflicts of interest.

According to the City’s Code of Ethics Policy, the Virginia Conflict of Interest Act governs the conduct of City employees regarding the acceptance of gifts, favors, rewards, participation in contracts and transactions, and further outlines conduct prohibited by City employees. The policy provides some examples of prohibited conduct that includes such practices as:

a. Asking or accepting money for services performed during the scope of official duties.
b. Accepting money, gifts, favors, services, or business or professional opportunities that may influence an employee’s performance of official duties.
c. Accepting gifts on a continuous basis that appears to be used for public office or public gain.

Although the City’s Code of Ethics policy governs the conduct of City employees, it does not require signing a conflict of interest statement. Signing a conflict of interest statement would be a good mechanism to document impairments that may affect an inspector’s impartiality and objectivity. At a minimum, the conflict of interest statement should include, but not be limited to, the declaration of personal relationships with City employees or contractors, affiliated organizations, property owned or co-owned within the City, former employment with contractors, persons of whom there is a business relationship; and any direct financial interests with local businesses. A signed statement would hold inspectors to a higher standard and provide an increased perception of responsibility and integrity. In discussing having a conflict of interest statement with the Building Safety Team Leaders, they indicated inspectors should sign a conflict of interest statement to ensure they understand their duties and responsibilities as employees of the City.

We recommend the Director of the Department of City Planning:

I. Develop a conflict of interest statement and require the inspectors and team leaders to sign on an annual basis, and at a minimum, include the provision to declare personal relationships with city employees or contractors, affiliated organizations, property owned or co-owned within the city, former employment with contractors, persons which there are a business relationship and any direct financial interest with local businesses.

Management’s Response:
See Appendix C for response to the above recommendation.

Inspectors Do Not Rotate Area of Coverage on a Regular Basis
From our survey of six inspectors (35% of all the inspectors) in the Division of Building Safety, some indicated they had rotated their area of coverage while others stated they had not. In one case we noted a Building Safety Inspector had been assigned to the same areas of the City for 20 years.
Inspectors are assigned specific areas based on various census tract and boundaries within the city. Census tract and boundaries are areas in which numbers and names are assigned as related to specific areas, communities and neighborhoods of the City. Appendix B contains details of the City of Norfolk Census Tract Numbers and Boundaries. Each team (mechanical/plumbing, electrical/elevator and structural) divides the number of census tracts/areas among their inspectors. There are 80 census tract areas and the average area of coverage by an inspector varies from 12 to 32, depending on the team. It appeared the reason inspectors were not rotated more consistently is because some areas of coverage required an inspector to have more experience and a higher skill level since the nature of the work or projects to be inspected were more complex. By not rotating inspectors, some areas of the City are deprived of having the more skilled and experienced inspectors when needed, posing an inherent burden on less skilled inspectors. Although there are several factors that may play a significant part in the rotation of inspectors, such as the experience and skill level of staff and the overall workload, the rotation of coverage areas within each team can fill a void by providing needed elements of checks and balances. For instance, the newly rotated inspector can ensure the previous inspector in the area provided an adequate assessment of the work performed, in addition to the added experience component of exposure to other areas of the City. Further, rotating inspectors’ areas of coverage within each team would also provide beneficial cross-training for the staff that will allow for better backup, more in-depth experience among inspectors, and improved efficiency when there are turnover and retirement among the inspectors.

We recommend the Director of the Department of City Planning:

2. To the extent possible, develop and implement a plan for rotating coverage areas of inspectors once every 24 months.

Management’s Response:
See Appendix C for response to the above recommendation.

Inspectors Do Not Have More Advanced Mobile Devices to Perform Their Job Duties
Building Safety Inspectors did not have more advanced mobile devices to adequately perform their duties when they were in the field, which is essential to improving operational efficiency. In the age of technology; smartphones, laptops, think pads, and iPads are used by organizations to improve services and provide operational efficiency. During the audit, we noted inspectors were using old analog flip-style phones to call in status updates to the HTE database system. The use of such outdated devices limited the inspectors while in the field to assessing HTE (by calling up) to report inspection results or assessments. In reporting results on the system, inspectors have defined screen options such as approve, approve with exception, cancel, disapprove, disapprove with penalty, or waive. However, if inspectors need to explain why an inspection did not pass or to note other observation or comments, he or she would have to wait until they return to the office. Also, the use of the flip-style phone by inspectors while in the field precludes inspectors from being able to look up code regulations in the VUSBC electronically. As a result, inspectors carry a bulky manual of the building code while performing inspections. As presented in the chart below, we benchmarked with six surrounding cities and found inspectors in each of the cities were using either iPads, laptops, smartphones, or a combination to perform their duties while in the field. These devices were being used by inspectors to look up permit information, retrieve permit
history, enter inspection results into the data system from the field, and to monitor and reply to emails.

### Comparison of Use of Mobile Devices Among Localities

<table>
<thead>
<tr>
<th>City</th>
<th>iPads</th>
<th>Laptops</th>
<th>Smartphones</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norfolk</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Portsmouth</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td>Chesapeake</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Hampton</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Suffolk</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Virginia Beach</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>Newport News</td>
<td>YES</td>
<td>NO</td>
<td>YES</td>
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</table>

In riding along with some inspectors on their regular inspection runs, we noted inefficiencies in the process due to the lack of advanced mobile devices. From our ride along with inspectors, we observed City inspectors used the hard copy Uniform Building Code manual to look up code violations and made handwritten notes on the inspection ticket. The use of these paper copies was sometimes being performed in some of the most stressful situations and weather conditions, such as high winds and rain. As a result, some of the inspection tickets or paperwork became ravaged. From our discussion with inspectors, they stressed that it would be more efficient and effective to have more advanced mobile devices while performing their duties.

From our understanding more advanced mobile devices had been requested, however; the department has not purchased them due to budgetary concerns. More advanced mobile devices would allow the inspectors to stay in the field longer to complete more inspections and reduce duplication of effort from writing notes and then having to type them in the system when they return to the office. Advanced mobile devices would also provide an opportunity to implement further the 360-degree policy which asks inspectors in the field to maintain full awareness of their surroundings, not just the location they are headed to, and also to see if work is being performed without permits.

**We recommend the Director of the Department of City Planning:**

3. Develop and implement a plan for upgrading its equipment to provide inspectors with advanced mobile devices to perform their duties when in the field.

**Management’s Response:**

See Appendix C for response to the above recommendation.

### Newly Implemented Procedures Need to Be Enhanced

A standard operating procedure for expiring permits became effective July 1, 2014, however, a process had not been implemented to assess or monitor whether the established procedure is effective. The newly developed procedure included generating a report of expiring permits, making telephone calls and site visits, and sending notification letters of the pending expiration date of the permit to the contractors. We commend the Department of City Planning for establishing the process to change how expired permits are monitored. However, when new
processes are implemented, management should put in place management controls to ensure objectives are being achieved. It is management’s responsibility to monitor controls to ensure they are operating as intended and that they are modified as appropriate for changes in conditions.

From interviews with staff and documents reviewed, the procedures implemented appeared to have influence permit holders not to let their permits expire. For example, the number of expiring permits was reduced, and permit holders were requesting more assistance with issues. It appeared to have been an oversight that a process had not been implemented to measure the effectiveness of the procedure.

**We recommend the Director of the Department of City Planning:**

4. Establish a process to assess whether the operating procedure for expired permits is effective, such as printing monthly reports from the database system and evaluating if the number of expired permits is being reduced as this could be a performance measure for inspectors.

**Management’s Response:**

See Appendix C for response to the above recommendation.

**Other Observations**

In benchmarking with other cities during our audit, we found one city had a higher penalty than the City of Norfolk for contractors or homeowners working without a permit while another city was proposing a higher one. Possibly increasing the penalty would be a proactive measure to reduce contractors and homeowners from working without a permit. Likewise, if the penalty is increased for working without a permit, it may be a deterrent for contractors and homeowners alike from performing unsanctioned and unauthorized repairs and additions to their homes. Established penalties send a serious message to encourage compliance, particularly to those who willfully do not do so.

Also, as a part of our audit, we met with the Director of the Department of Neighborhood Development to determine if there were any collaborative efforts between his department and City Planning. We did so because Neighborhood Development inspectors also travel throughout the City enforcing the State of Virginia Maintenance Code for existing structures and inspecting exterior home upkeep, such as chipping paint, missing and broken vinyl siding on homes, broken fences, etc., as well as inspecting for tall weeds and grass. Collaboration and communication between Neighborhood Development and City Planning inspectors are something that both directors agreed on, whereby inspectors would inform each other of potential code violations as they inspect throughout the City in their respective roles.
Applicant proceeds with scope of work under permit calling for all appropriate inspections in the correct sequence as shown on the permit.

Inspectors inspect all work according to the approved plans and in accordance with the Virginia Uniform Statewide Building Code (USBC).

Contractor corrects deficiencies and calls for re-inspection.

Does Work comply with the code?

Is this the final approved building inspection?

Inspector turns in final approved inspection copy to office for staff to process CO.

Staff has 48 hours to process CO.

End.
MEMORANDUM

TO: John H. Sanderlin, CPA, CFE, CIA, CGFM, CGMA, City Auditor
Bradford Smith, Deputy City Auditor

CC TO: Wynter C. Benda, Deputy City Manager

FROM: George M. Homewood, FAICP, CFM, Director, City Planning

SUBJECT: Audit of the Final Inspection Process for New Construction

DATE: 14 November 2016

Norfolk City Planning would like to express its appreciation to the City Auditor’s team for its audit of the City’s Building Inspection Process. As you may recall, when the issue of construction without permits and closings without inspections first arose, the then Building Official could not provide an answer as to how this could have occurred. Thus, we turned to your office to help us understand how we can prevent future occurrences, and certainly large-scale occurrences. Your thorough review and analysis has helped us to better understand our processes and how they can be improved. These improvements do far more than simply address the missing permits and inspections; they help us be more effective and efficient daily.

The Audit recognized 2 initiatives taken by the City Planning Department:

- Implementing a 360-degree “look-around” policy where inspectors are expected to observe surrounding properties at inspection sites and along routes taken to inspections for anomalies and, if any are observed, report them.

- Developing a process to flag soon-to-be expiring permits to commence tracking them before they expire and continuing to follow-up until the permits are closed out or revoked. As part of the new cloud-based permits management system, an enhancement is being added that will automatically e-mail the permit holder and the Building Commissioner when a permit has been dormant for five months (permits expire upon being dormant for six months).

Additionally, the Audit provided the following recommendations:

- Inspectors and Team Leaders should sign conflict of interest statements to document impairments that may affect the inspector’s impartiality and objectivity.
• Inspectors should rotate their area of coverage on a regular basis.

• Mobile devices should be provided to inspectors to help them perform their jobs more efficiently when they are out in the field.

• Reports from the HTE database system, the system used to record permit information, should be prepared and analyzed to determine whether the implemented procedure for expiring permits is effective.

We have implemented or are in the process of implementing each of these recommendations in the following manner:

• The City Attorney’s Office is working with us to develop a conflict of interest statement which will be annually executed by all employees of City Planning. The City Manager has made ethics awareness and training a priority and City Planning requires all current employees and new hires to participate in the ethical behavior training provider by the City.

• The Building Commissioner has promulgated a written Standard Operating Procedure mandating that building inspector service areas rotate no less frequently than biennially. There is an exception for a major project which takes longer than two years to complete (e.g. The Main, Consolidated Courts Building, etc.).

• A new cloud-based permits management system (Norfolk ePermits) has been acquired and implantation began in early July. This system utilizes iPads in the field so that inspection results are entered on-site which then updates the on-line database and electronically notifies the permit holder of the inspection outcome. This improves efficiency and allows each inspector to be more productive. I credit the preliminary Audit Report with helping make the case for this significant process improvement.

• The new Norfolk ePermits has a much wider variety of reporting functionality and reports, many of which are automatically generated, but also has an open data architecture allowing queries to occur quickly and simply. Ultimately, we anticipate that the public will be able to run many queries on the Norfolk ePermits data themselves from the City’s website.

I cannot reiterate enough how helpful the City Auditor’s Office has been in this effort. We have been guided to new best practices and process improvements that will improve the service we deliver to our customers and the citizens of Norfolk. That could not have happened without the professionalism and dedication of your staff. Please express my appreciation to them for their help in this endeavor.