AUDIT TEAM Matt Weller, CPA, Interim City Auditor Lori Rice, CIA, MBA, Audit Manager

Tim Alvarez, CICA, Senior Auditor

FIRE DEPARTMENT CONSTRUCTION INSPECTIONS FOLLOW-UP AUDIT

MARCH 15, 2022

MAYOR AND CITY COUNCIL

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Bradley Carter	Audit Committee,	Ward 1
James Cooper		Ward 2
Barbara Young	Audit Committee,	Ward 3
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Executive Summary

Audit Report 20-04B

March 15, 2022

The Mayor and City Council:

The Office of the City Auditor has completed an audit to evaluate the status of recommendations and related management responses included in our previous report dated September 15, 2015, on the audit of construction inspections completed by the Fire Department – Fire Prevention Services Division (Fire Prevention).

Based upon the results of our audit, we believe that as of July 31, 2021, Fire Prevention has significantly improved construction inspection timeliness, completing a higher percentage of inspections in a shorter period. During our previous audit we determined that during the six months ended December 31, 2014, Fire Prevention completed 50% of inspections within three days of request. For the 22 months ended December 31, 2020, Fire Prevention completed 85% of inspections within two days of request. The average number of days from request to inspection completion has improved from 5.7 days to 1.7 days during these same time periods.

Management has addressed a substantial number of recommendations from our prior report; however, some recommendations have not been implemented. While the significant improvement in inspection timeliness since our last audit mitigates related risks, the importance of these unresolved issues could reappear in the event future service levels decline.

The content and emphasis of the items included in this report have been discussed with appropriate management representatives to assure a complete understanding of the comments, observations, and conclusions arising from our audit. Management responses are attached to this report in their entirety.

Matt Weller

Interim City Auditor

Matt Weller

Lori Rice Audit Manager

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FIRE DEPARTMENT FIRE PREVENTION SERVICES DIVISION CONSTRUCTION INSPECTIONS FOLLOW-UP AUDIT

AUDIT OBJECTIVE, BACKGROUND, SCOPE AND METHODOLOGY

The objective of this audit was to evaluate the status, as of July 31, 2021, of recommendations and related management responses included in our previous report dated September 15, 2015, on the audit of construction inspections completed by the Fire Department – Fire Prevention Services Division (Fire Prevention).

We determined in our previous audit that established procedures were not adequate to ensure the timely completion of Fire Prevention inspections for fire code compliance in new construction, including buildings and fire suppression systems such as sprinklers, alarms, and hood/ducts (construction inspections).

Fire Prevention provides education, code enforcement and investigation services to Oklahoma City residents, property owners, and businesses to reduce risk of loss from fire and injury. Fire Prevention performs various code enforcement inspections to ensure fire code compliance (e.g., construction, special events, annual fire code compliance, complaint-based, etc.). Our previous audit and this follow-up audit considered only construction inspections. Performing construction inspections in a timely manner is a customer service concern, as the development community strives to minimize construction delays and their associated costs. Four uniformed inspectors in Fire Prevention perform approximately 4,000 construction inspections annually, which approximates the levels existing during our previous audit.

Procedures performed during this audit included assessing the accuracy of reported response times; examining documents, reports, and standard operating procedures; and interviewing department managers and contractors/customers.

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 audit 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.

The following presents the status of findings, related recommendations, and management responses from our previous audit. Each status is immediately followed by management's response. Management responses are attached to this report in their entirety.

RESULTS OF WORK PERFORMED

Management has addressed a substantial number of recommendations from our prior report; however, some recommendations have not been implemented. While the significant improvement in inspection timeliness since our last audit mitigates related risks, the importance of these unresolved issues could reappear in the event future service levels decline.

Improved Inspection Timeliness

Fire Prevention has significantly improved construction inspection timeliness, completing a higher percentage of inspections in a shorter period. During our previous audit we determined that during the six months ended December 31, 2014, Fire Prevention completed 50% of inspections within three days of request¹. For the 22 months ended December 31, 2020, Fire Prevention completed 85% of inspections within two days of request.

Exhibit 1 illustrates how the average number of days from inspection request to completion have improved from 5.7 days to 1.7 days.

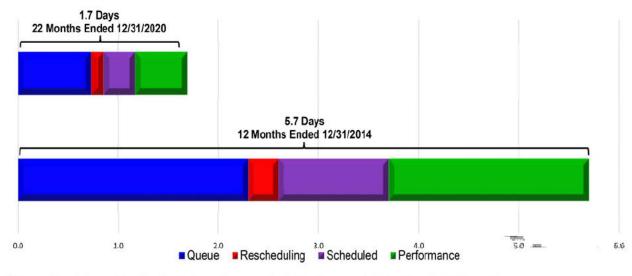


Exhibit 1: Average Inspection Response Time

Queue - Time between date of contractor inspection request and date of inspector's first call to schedule inspection.

Rescheduling - Time between date of inspector's first call to schedule inspection and inspector's final call to schedule inspection.

Scheduled - Time between date of inspector's final call to schedule inspection and the date the inspection is scheduled for.

Performance - Time between date inspection is scheduled for and date inspection is completed.

¹ Prior to July 1, 2014, Fire Prevention used 10-days for measuring timeliness, completing 83% of inspections within this period during the preceding six months.

Status of Recommendations from Previous Report

Status 1 and 2

Management disagreed with our recommendations to civilianize and consolidate fire construction inspections and consolidate the related fire plan review function in the Development Center, believing that potential efficiencies from consolidation were outweighed by the difficulty of negotiating these changes with the labor union.

Status 3

Addressed – Time available for construction inspectors to perform inspections has been increased. While work schedules were not revised, inspections are scheduled throughout scheduled shifts and activities performed during flex hours are tracked.

Fire Department Response 3

Agree with status.

Status 4

Not implemented – Policies have not been established to assign only construction inspections (rather than inspections that are not construction-related) to construction inspectors when performance targets are not being met.

Fire Department Response 4

Agree with status. Though a policy has not been established, our current inspection system in Accela only assigns NCO inspections to the NCO team. By June 30, 2022, we will have the assignment procedures formally documented in our "smart book".

Status 5

Implemented – To reduce inefficiencies resulting from rescheduling inspections, contractors are no longer directed to request an inspection at least ten days before they are ready. Instead, contractors are directed to submit an inspection request only when they are ready and published guidance has been revised to reflect this change.

Fire Department Response 5

Agree with status.

Status 6

Addressed – While individual inspector productivity targets have not been formally established, inspector productivity reports have been developed to supplement existing construction inspection program performance monitoring. Performance monitoring is discussed further in Status 24.

Agree with status.

Status 7

Implemented – To consistently treat and properly prioritize inspections, a policy directing that all inspection requests be placed in the same holding queue and that oldest inspections be worked first has been established.

Fire Department Response 7

Agree with status.

Status 8

Addressed – While inspectors continue to assign themselves inspections from the inspection request holding queue daily, a supervisor ensures inspection requests are selected in accordance with the inspection priorities discussed in Status 7.

Fire Department Response 8

Agree with status.

Status 9

Addressed – While GPS technology has not been fitted to vehicles to aid in monitoring inspector performance, such technology is incorporated into the electronic device used by inspectors to record inspection results in the field.

Fire Department Response 9

Agree with status.

Status 10

Addressed – A policy has been established directing the inspector completing the inspection to record results in Accela, the inspection management system. This identifies the inspector performing the inspection and allows for accurate inspector productivity reporting. Information Technology was unable to correct the system error failing to consistently record the completion time on the inspection record without significantly impairing system capabilities needed by inspectors in completing their work.

Fire Department Response 10

Implemented – During our previous audit we noted that the key measure used in evaluating fire construction inspection timeliness was "75% of initial new construction inspections completed within three working days of request". We recommended that the target be revised using a completion percentage of 95% to provide assurance that performance is being evenly achieved and is in line with peer city targets. In FY17 the target was modified to complete a higher percentage of inspections (90%) in a shorter period (two days). For FY22 the target was raised again to target completing 95% of inspections within two days.

Fire Department Response 11

Agree with status.

Status 12

Not implemented – Inaccurate inspection timeliness reporting has not been corrected to reflect the entire customer experience from origination date² to completion date. When an inspection is assigned to an inspector from the holding queue (and if subsequently cancelled/rescheduled by the assigned inspector) a new inspection record is created in Accela with a new origination date. This new origination date, rather than the initial origination date, is used in calculating inspection timeliness. The impact on inspection timeliness is depicted in Exhibit 2.



² When the contractor contacts Fire Prevention to initiate an inspection.

Agree with status. The current reporting of timeliness inspections could be inaccurate on very rare occasions where the inspector is initiating the re-scheduling. However, typically the only time an inspection is canceled or re-scheduled, the contractors are the ones requesting that action. They usually request to be cancelled or re-scheduled because they are not ready as initially thought and they don't want an inspector to show up and reject. By June 30, 2021, we will work with Accela IT to create a way to report when the customer requests the cancel/re-schedule vs. if the inspector requests the re-schedule. We will also work with Accela IT to ensure our timeliness is based on capturing the initial origination date rather than the new origination date that is created when the inspection is assigned from the holding queue. This would improve the accuracy of the current report.

Status 13

Addressed – A policy directing that the Accela inspection record be completed at the time of inspection has been established to provide for the accuracy of data used in calculating inspection timeliness and inspector productivity reports.

Fire Department Response 13

Agree with status.

Status 14

Not implemented – Management has not created routine Accela edit reports identifying potential duplicate records and unreasonably dated inspections to ensure the accuracy of data used in calculating inspection timeliness. We identified 10 duplicate inspections and 337 inspections with unreasonable dates from the almost 7,000 inspections completed during the 22 months ended December 31, 2020. These records were excluded from the analyses depicted in Exhibits 1 and 2.

Fire Department Response 14

Agree with the status. By June 30, 2022, we will work with Accela IT to program our system so that duplicate inspections cannot be entered. We will also work with Accela IT and our Business Intelligence Specialist to capture all Accela data for building our own specialized reports. Unreasonable dates usually happen because of human error. We will also work with Accela IT to run a quarterly report to track dates out of range.

Status 15

Addressed – Information Technology was unable to enhance Accela system security to prevent inspectors from 'modifying dates used in calculating inspection timeliness without significantly impairing system capabilities needed by inspectors in completing their work.

Fire Department Response 15

Implemented – Expedited inspection fees are charged at the approved amount listed in the Schedule of Fees.

Fire Department Response 16

Agree with status.

Status 17

Addressed – A policy directing that expedited inspections (inspections performed within one business day of request for an additional fee) be performed only using overtime has been established. This provides for performing expedited inspections without negatively impacting timeliness of routine inspections.

Fire Department Response 17

Agree with status.

Status 18

Partially Addressed – A policy has been established directing that any waived fees be authorized by supervisory personnel; however, a monitoring report identifying these occurrences has not been developed.

Fire Department Response 18

Agree with status. By June 30, 2022, we will work with Accela IT to build a report that we can run periodically to track "waived fees" and who authorized the waiving.

Status 19

Not implemented – Management has not negotiated with the labor union to eliminate the firearm requirement for construction inspectors, which would increase time available for performing construction inspections. Carrying a firearm requires Council on Law Enforcement Education and Training (CLEET) certification. To obtain certification an individual must initially complete 3 months of training followed by 25 hours of annual continuing education.

Fire Department Response 19

Agree with status. Currently the firearm qualification is done once a year and the CLEET continued education hours are 25 total hours per year. Our NCO team has re-established the standard for NCO inspection timeliness by averaging well over 95% of inspections being completed in their "within days" target. Their firearms qualification and continued education mandatories are not affecting their production.

Implemented – The Mandatory Training Compliance report has been developed to track training time and subject matter and to provide a means of monitoring the impact of training time on inspector productivity and performance.

Fire Department Response 20

Agree with status.

Status 21

Implemented – The Interactive Voice Response system, which reduces risk of human error by eliminating manual entry into Accela, has been activated to receive inspection requests.

Fire Department Response 21

Agree with status.

Status 22

Not implemented — Management has not developed a process to obtain feedback for assessing customer satisfaction and identifying potential service issues that should be addressed. Contractors interviewed were complimentary of the services provided by the construction inspectors and were very interested in establishing routine meetings with Fire Prevention to exchange information pertinent to the services being provided.

Fire Department Response 22

Agree with status. We will work with Accela IT and our Business Intelligence Specialist to routinely issue a customer service survey to our contractors. This customer service survey will be sent out electronically following the close out of each inspection. We will run a report monthly to not only monitor our customer feedback, but also use the report to improve customer service and business practices.

Status 23

Not Implemented – The weekly inspection status report reflecting the number and oldest date of open inspections is still manually created and does not reflect a complete depiction of the count and age of all outstanding inspections.

Fire Department Response 23

Agree with status. We will work with Accela IT to create a report that captures the oldest date of open inspections by June 30, 2022. This will give us a more accurate depiction of the count and age of each outstanding inspection.

Addressed – Routine reports have been developed through the training tracking system and Accela to aid Fire Prevention and department management in monitoring performance, alert management of changing trends, and aid in decision making.

Fire Department Response 24

Agree with status.

Additional Recommendation

Comment

As previously described in Status 11, Fire Prevention uses "95% of initial new construction inspections completed within two working days of request" to measure service timeliness. In our previous audit we noted that while the measure was stated in terms of "initial" construction inspections, the measure was calculated using all construction inspections. This methodology is appropriate since responsiveness to subsequent inspection requests is not contingent upon previous inspection results. Since our previous audit, management has calculated the measure using only the first inspection relating to each permit. While we determined that reported performance has not been materially misstated (i.e., timeliness for initial inspections is consistent with timeliness for all inspections), using only the initial inspection could result in misleading performance information.

Recommendation

Fire Prevention's performance measure should not be limited to "initial" construction inspections and response to all construction inspection requests should be used in calculating service timeliness.

Fire Department Response

Agree with recommendation. By June 30, 2022, we will work with Accela IT to modify the current NCO "within days" report to also capture the data of all NCO inspections requests. Doing this will allow us to measure overall timeliness of NCO inspections.





TO:

Matt Weller, Interim City Auditor

THROUGH

Craig Freeman, City Manager

FROM:

Richard Kelley, Fire Chief

DATE:

February 25, 2022

SUBJECT:

Fire Department, Fire Prevention-Code Compliance, Construction Fire Safety Inspections follow up responses

Following are management's responses to the status of recommendations outlined in the Construction Inspections follow -up audit from 2015.

Status 3

Addressed – Time available for construction inspectors to perform inspections has been increased. While work schedules were not revised, inspections are scheduled throughout scheduled shifts and activities performed during flex hours are tracked.

Fire Department Response 3

Agree with status.

Status 4

Not implemented – Policies have not been established to assign only construction inspections (rather than inspections that are not construction-related) to construction inspectors when performance targets are not being met.

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Agree with status. Though a policy has not been established, our current inspection system in Accela only assigns NCO inspections to the NCO team. By June 30, 2022, we will have the assignment procedures formally documented in our "smart book".

Implemented – To reduce inefficiencies resulting from rescheduling inspections, contractors are no longer directed to request an inspection at least ten days before they are ready. Instead, contractors are directed to submit an inspection request only when they are ready and published guidance has been revised to reflect this change.

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Agree with status.

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Fire Department Response 10

Agree with status.

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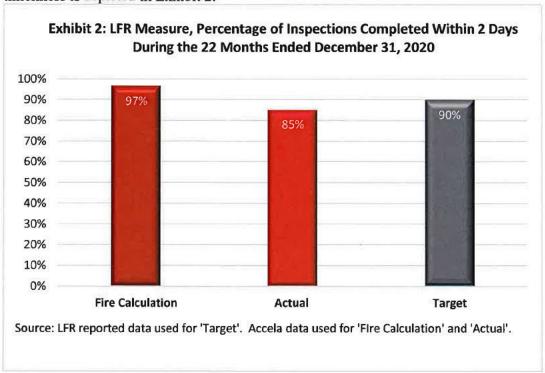
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Recommendation

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