

FIRE PREVENTION BUREAU OPERATIONAL AUDIT

NUMBER OF RECOMMENDATIONS



*City of Glendale
Internal Audit*

09.27.2018



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Acknowledgment

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For questions regarding the contents of this report, please contact the lead auditor, Sameel Salim, Sr. Internal Auditor, or Jessie Zhang, Internal Audit Manager at jpa@glendaleca.gov
This report is also available online at <http://www.glendaleca.gov>

A. Overview

Key Outcomes

The Fire Prevention Bureau (FPB) is challenged in keeping up with their current workload and thus not performing their various inspections, plans checks, and other related duties in a timely manner. Based on our research, it appears that this challenge is not uncommon among other fire departments in California. The primary reasons for the FPB’s challenges appear to be a combination of the following factors:

- Inspection frequencies are not risk-based, and in some cases more frequent than what are required by the applicable regulatory agencies.
- Inconsistencies between the disparate systems used for scheduling inspections, documenting results, and billing for inspections and poor data quality within the department prevent adequate oversight of the various programs.
- The lack of personnel designated with analytical and reporting responsibilities has prevented the FPB from performing the required data analytics for effective prioritizing, scheduling, and monitoring of tasks.

Internal Audit recommends the FPB identify all mandated inspections and ensure they are appropriately prioritized and timely completed. Internal Audit also recommends the FPB conduct a risk assessment¹, and to re-prioritize their workload accordingly.

Internal Audit identified twelve improvement opportunities mainly related to switching to a risk based approach for managing and prioritizing workloads through conducting periodic risk assessments, improving data quality through data cleanup and ongoing reconciliation, establishing a collection process, and updating standard operating procedures.

Impact Dashboard

This table summarizes the applicable value-added categories (total 25) for the twelve recommendations based on their priority rankings and four innovation opportunities.

	Value Added Categories				Innovation Opportunities
	Risk Reduction	Compliance	Cost Saving	Efficiency	
Priority 1 1	1	1	0	1	0
Priority 2 7	6	7	0	3	3
Priority 3 4	2	2	0	2	1

(Definitions of Priority Rankings and Value-added impacts are located at Appendix 1)

¹ Refer to “A Guide for Conducting a Community Risk Assessment” published by Vision 20/20, National Strategies for Fire Loss Prevention for additional information.

B. Action Plan and Target Completion Dates

The action plan and target completion dates are summarized in the table below. Internal Audit will perform quarterly status follow-up to provide assurance that management is taking appropriate and timely corrective action to address audit recommendations.

Ref.	Management Action Plan	Completion Date ²
Priority 1		
1.	Perform a risk assessment to assist in prioritizing workloads. <i>Value added:</i> Risk Reduction , Compliance , Efficiency	07/31/2019
Priority 2		
2.	Monitor CERS database to ensure CUPA inspection program is operating as required. <i>Value added:</i> Risk Reduction , Compliance , Innovation	07/31/2019
3.	Reconcile billing database to inspection database to ensure inspection data consistency and accuracy. <i>Value added:</i> Risk Reduction , Compliance , Efficiency , Innovation	07/31/2019
4.	Establish collection procedures to recover uncollected fees. <i>Value added:</i> Risk Reduction , Compliance , Innovation	01/31/2019
5.	Ensure APSA billings are made in accordance with City Fee Schedule. <i>Value added:</i> Compliance	07/31/2019
6.	Consult City Attorney's Office regarding Industrial Waste (IW) permit renewal fees to ensure consistency between Glendale Municipal Code and current practice. <i>Value added:</i> Risk Reduction , Compliance	07/31/2019
7.	Develop standard operating procedures to promote consistency and inspection quality. <i>Value added:</i> Risk Reduction , Compliance , Efficiency	01/31/2019
8.	Prioritize mandatory and higher risk inspections and conduct cost benefit analysis on outsourcing to the County of Los Angeles. <i>Value added:</i> Risk Reduction , Compliance , Efficiency	01/31/2019

² The completion dates are based on the complexities involved with performing a first time risk assessment, unanticipated executive leadership changes, and the required interdepartmental coordination needed to implement the recommendations.

Ref.	Management Action Plan	Completion Date ²
Priority 3		
9.	Reduce overflow plan check turnaround time by considering relinquishing single family home plan check to Building & Safety and/or utilizing outside consultant. <i>Value added: <u>Efficiency</u></i>	07/31/2019
10.	Revise Express Plan Check Agreement to include Fire signoff. <i>Value added: <u>Risk Reduction, Compliance</u></i>	01/31/2019
11.	Create internal goals for completing plan checks to improve productivity and measurable performance metrics. <i>Value added: <u>Efficiency, Innovation</u></i>	01/31/2019
12.	Remove inactive rates from billing databases to reduce the risk of them being inadvertently used. <i>Value added: <u>Risk Reduction, Compliance</u></i>	01/31/2019

C. Background

In accordance with the Fiscal Year 2018-19 audit work plan, Internal Audit completed an audit of the City of Glendale's Fire Prevention Bureau operations.

The FPB is one of the seven divisions within the Fire Department. The mission of the FPB is to prevent fires, restore and protect property, enhance the environment, ensure public health, environmental quality, and economic vitality. The FPB ensures the fire, life, and environmental safety of the community by performing plan reviews and construction and occupancy inspections. The Fire Prevention / Environmental Management Center (FPEMC), which is also where the Household Hazardous Waste (HHW) is collected, is the FPB's headquarters and houses the majority of the section's inspectors.

Programmatic Inspections

The following three types of programmatic inspections are performed by the FPB inspectors located at the bureau:

1) Fire/Life Safety

Fire/Life Safety inspections include annual reviews of most buildings within the City, including multi-family dwellings and commercial properties.

2) Certified Unified Program Agency (CUPA)

CUPA inspections include testing some or all of the following applicable elements found in businesses:

- Hazardous Materials Management and Release Reporting (Hazardous Materials)
- California Accidental Release Prevention (CalARP)
- Underground Storage Tanks (UST)
- Aboveground Storage Tanks (APSA)
- Hazardous Waste Generator & Treatment (Hazardous Waste)
- Overall compliance with the California Fire Code

Given both the number of applicable inspections and the overall regulatory requirements, including mandatory state audits every three years, this is the most time consuming inspection category.

3) Industrial Waste

IW inspections include testing the wastewater discharge coming from facilities and the sampling and testing of wastewater from large quantity dischargers known as Significant Industrial Users (SIUs).

Plan Checks and New Construction Inspections

The Fire Engineering (FE) Unit of the FPB is located within the Permit Services Center in City Hall. This unit performs various reviews needed to undertake work in the City for residential and commercial remodels and new construction projects. Personnel conduct technical plan reviews throughout the entire development cycle of the plan review/permitting process. This unit also performs new construction related inspections typically associated with fire sprinkler and/or alarm work.

Inspection Workloads and Staffing

As mentioned above, the three main programmatic inspections performed by the FPB are Fire/Life Safety, CUPA, and IW. The applicable federal and state regulatory agencies have established minimum inspection frequencies for each type of inspection. However, in some cases, the FPB has established inspection frequencies that are more frequent than what are mandated by the applicable regulatory agency. The following examples are based on the data obtained during our field work:

- One example of more frequent inspection frequencies are Fire/Life Safety inspections. The California State Fire Marshal's Office has four mandated annual inspection categories: 1) Schools, 2) High-Rises, 3) R1-R2s (hotels, motels, apartments), and 4) Jails (once every two years). Of the 684 total Fire/Life Safety scheduled inspections, about half appear to be related to the four state mandated inspection types. The remaining half, including nearly 200 "Assembly" inspections, do not have defined inspection frequencies by the California State Fire Marshal's

Office. There were 2.5 full time equivalent (FTE) inspectors assigned to conduct all Fire/Life Safety inspections. This equates to approximately 274 inspections per FTE per year.

- Another example of more frequent inspections being conducted than required, are the approximately 444 IW sites subject to annual inspection by the FPB. However, only ten of these are mandated as annual inspections by the federal Environmental Protection Agency (EPA) based on their SIU categorization. There were 1.4 FTEs assigned to conduct all 444 IW inspections on an annual basis. This equates to approximately 317 inspections per FTE per year.

Establishing inspection frequencies that exceed regulatory timelines are acceptable, only after the mandated inspections are completed in a timely manner. However, as detailed in the Observations, Recommendations & Management Responses Matrix, the FPB is not consistently meeting the timelines for their mandated inspections. Without performing a risk assessment to determine the appropriate frequencies for each type of inspection, the proper workload and required staffing cannot reasonably be determined³. Additionally, any staffing change from one inspection program impacts other programs by way of redirected staff. For example, due to the recent loss of a plan checker, programmatic inspections were impacted when staff was pulled away to complete timely plan checks and inspections.

Please refer to Appendix II for a summary of the main inspections conducted by the FPB, the mandatory requirements, the frequency and the staffing level at the time of our fieldwork.

D.Objective, Scope and Methodology

The objective of this audit was to perform a high level operational assessment of the entire Fire Prevention Bureau. The scope of the audit covered Fiscal Year 2017-2018. In order to accomplish the audit objectives, Internal Audit performed the following procedures:

- Reviewed applicable regulatory documentation to determine plan check and various inspection frequencies and requirements.
- Conducted interviews and walkthroughs with key FPB and Building and Safety personnel to obtain an understanding of the programs and operational activities.
- Conducted interviews with management from the California State Fire Marshal's Office, the City of Los Angeles, and the City of Burbank's Fire Prevention Bureau for common challenges and industry best practices.

³ Annex C of NFPA 1730 "Standard on Organization and Deployment of Fire Prevention Inspection and Code Enforcement, Plan Review, Investigation, and Public Education Operations" has a risk based sample staffing exercise for reference.

- Attended two-day Fire/Life Safety training held by the California State Fire Marshal's Office to obtain an understanding of the Fire/Life Safety regulatory requirements.
- Performed detailed testwork to determine completeness and accuracy of the applicable inspection data and the overall current state of the various inspection programs.

As a result of these audit procedures performed, 12 observations have been identified and are detailed in the Observations, Recommendations & Management Responses Matrix starting on the next page.

E. Observations, Recommendations & Management Responses

Ref	Observation	Recommendation	Management Response
1.	Mandatory Inspections / Risk Assessment		
Priority 1	<p>As the remaining observations will demonstrate, the FPB is challenged with keeping up with their current inspection workload. This is partly due to inspection frequencies not being established based on a risk assessment, and in some cases, are more frequent than what is required by applicable regulatory agencies.</p> <p>As a result, mandatory inspections are not being consistently completed according to the timelines established by the applicable regulatory agencies.</p>	<p>The practice of attempting to inspect all inspections on a uniform basis should be re-evaluated. The FPB should prioritize mandatory and higher risk inspections over optional low-risk inspections.</p> <p>Additionally, the FPB should perform an initial and subsequent risk assessment and use the information therein to prioritize and adjust the frequency for the remaining non-mandatory inspections accordingly.</p> <p>For example, the risk assessment may be used to determine the inspection frequency based on the type of business, IW discharge, and other critical factors.</p>	<p>Agree and will implement by July 31, 2019.</p> <p>The FPB will perform a risk assessment and re-prioritize their workload accordingly. The risk assessment result will assist the FPB in prioritizing mandatory and higher risk inspections.</p>

Ref	Observation	Recommendation	Management Response
2. CUPA Inspections			
<p style="color: orange; font-weight: bold;">Priority 2</p>	<p>Violations from CUPA inspections are documented within the California Environmental Reporting System (CERS). We noted the FPB is not upgrading violations after they reach the 30-day milestones, and penalties are not being assessed on unaddressed violations.</p> <p>The FPB is also not monitoring violations to closure (Return to Compliance) consistently and timely. As of April 5, 2018, there were a total of 1,194 violations documented within CERS, of which 907 violations were returned to compliance and 287 violations were still open.</p> <p>It took an average of 179 days to close the 907 violations. As of April 5, 2018, it had been 627 days on average for the 287 open violations.</p> <p>According to FPB personnel, the violations to closure have not been consistently updated by inspectors, therefore, it is not clear how many of these were actually open versus their status not being updated.</p>	<p>The FPB should routinely monitor CERS to ensure:</p> <ul style="list-style-type: none"> • Open violations are being escalated after 30 days. • Financial penalties are being assessed on non-compliant businesses. • Inspectors are tracking their violations to closure timely. <p>The administrative time that is required to perform these functions is an essential component of the CUPA program. If the FPB is not staffed to perform these duties, they should consider delegating some or all CUPA inspections to the County of Los Angeles.</p>	<p>Agree and will implement by July 31, 2019.</p> <p>The FPB will perform a risk assessment and re-prioritize workload accordingly. The time required to perform these various CUPA activities will be taken into account and analyzed within the risk assessment.</p>

Ref	Observation	Recommendation	Management Response
3. Billing and Inspection Database Reconciliations			
Priority 2	<p>Most annual programmatic inspection fees are billed through Glendale Water and Power (GWP)'s utility billing system (Northstar). The actual inspections are managed through CSI or CERS.</p> <p>Internal Audit noted discrepancies between the total count of inspections being billed via Northstar and the total count of inspections for each of the three main programmatic inspections (IW, Fire/Life Safety, and CUPA) in CSI and CERS.</p> <p>For example, there were 611 Fire/Life Safety billings in Northstar for calendar year 2018. However, CSI had 684 Fire/Life Safety inspections. Due to the lack of a common identifier referenced in both systems, Internal Audit could not identify the exact accounts that make up the 73 discrepancies, nor could Internal Audit determine which database was correct.</p>	<p>The FPB should determine the best way to reconcile CSI and CERS to Northstar. One way to accomplish this is to establish a unique identifier for each site and reference them in both systems.</p> <p>Discrepancies between the systems should be acted upon accordingly. The reconciliation between the sites billed and inspected should be performed annually to ensure consistency and accuracy of the inspection databases.</p>	<p>Agree and will implement by July 31, 2019.</p> <p>The FPB will request the assistance of the Innovation, Performance and Audit Department to design a tool to streamline the reconciliation process. The feasibility of adding a unique identifier or other options will be explored with ISD and GWP, since the City is in the process of conducting a needs assessment for a new land use and permit system.</p>

Ref	Observation	Recommendation	Management Response
4. Uncollected Fees			
Priority 2	<p>The FPB does not have a collections process. Internal Audit noted that collection procedures are not documented, unpaid inspection fees are not being sent to the City's collection agency, and overpayments are not being returned to customers in a timely manner.</p> <p>Based on a June 4, 2018 Northstar inspection fee open balance report, there was a net balance of \$368,148 from 237 accounts due to the City.</p> <ul style="list-style-type: none"> • \$409,346 from 200 accounts represent unpaid amounts due to the City. • \$41,198 from 37 accounts represent overpayments to the City. 	<p>The FPB should create documented collection procedures, including establishing timelines of forwarding unpaid accounts to the City's collection agency. The FPB should also obtain and review the existing "open balance" report from Northstar on a periodic basis.</p> <p>Each of the 237 accounts with open balances should be reviewed and acted upon accordingly. Amounts owed should be sent to collections and any overpayments should be refunded following the City's policy.</p>	<p>Agree and will implement by January 31, 2019.</p> <p>The FPB will request the assistance of the Innovation, Performance and Audit Department to identify collection procedure templates that can be used by the FPB to create a standard operating procedure for collections. Each of the 237 accounts will be reviewed and acted upon appropriately.</p>

Ref	Observation	Recommendation	Management Response
5.	AST Fees		
Priority 2	<p>Above Ground Storage Tank (AST) fees were approved by the City Council and added to the Citywide Fee Schedule, effective July 1, 2017. However, the FPB was not prepared with the necessary data required to bill each applicable customer. As a result, the FPB granted a one-time exemption for calendar year 2018 for at least 30 AST sites. The fees for these sites range from \$313 - \$1,586 (depending on size) per tank.</p>	<p>The FPB should gather and prepare necessary data required to bill businesses for AST fees for calendar year 2019.</p> <p>Additionally, FPB should establish controls to ensure new fees are billed timely in the future.</p>	<p>Agree and will implement by July 31, 2019.</p> <p>The FPB will gather and prepare necessary data required to bill AST sites for calendar year 2019.</p> <p>FPB will establish an annual fee review process to ensure all fees are billed correctly and timely.</p>

Ref	Observation	Recommendation	Management Response
6. Industrial Waste Permit Renewal			
Priority 2	<p>The City bills an annual connection fee of \$201 and additional discharge fee based on the business type/operation for IW permits. In calendar year 2018, 1,006 IW permits were billed through Northstar.</p> <p>Internal Audit noted inconsistencies between actual IW permit billings and the frequency established in the Glendale Municipal Code (GMC). The GMC states IW permits are "renewable every three years". However, the FPB has been annually billing a renewal fee for IW permits.</p> <p>Also, the GMC states applicants are "subject to a nonrefundable annual permit inspection and sampling fee" implying that inspections are to be conducted annually, but the code does not clearly state the required inspection frequency.</p> <p>Furthermore, the GMC refers to an outdated permit numbering system for IW permit renewals. That numbering system is no longer used by the FPB.</p>	<p>The FPB should work with the City Attorney's Office on the best course of action to take regarding the billings that were made in contradiction with the GMC.</p> <p>Additionally, the GMC should be updated to reflect actual practice, including the inspection frequency and permit numbering system, or the practice should be corrected to be consistent with the GMC.</p>	<p>Agree and will implement by July 31, 2019.</p> <p>The FPB will work with the City Attorney's Office on the best available options regarding the need to update the GMC and how to address past permit renewal billings.</p>

Ref	Observation	Recommendation	Management Response
7. Standard Operating Procedures			
Priority 2	<p>The FPB does not have Standard Operating Procedures (SOP). SOPs promote consistency and the preparation of high-quality, well documented inspection reports.</p>	<p>The FPB should create SOPs to address the following areas (at a minimum):</p> <ul style="list-style-type: none"> • Type of questions to ask and data to collect (checklists) • Expected/acceptable behavior (ethics) • Expected/acceptable requirements for documenting inspection results and violations • How to communicate inspection results to business owners • How to follow up and track violations to completion • Cite the applicable local/state/federal codes for the particular inspections • Safety guidelines • Enforcement actions • Training/Certifications required for each inspection type 	<p>Agree and will implement by January 31, 2019.</p> <p>The FPB is currently in the process of creating SOPs.</p>

Ref	Observation	Recommendation	Management Response
8.	Completion of Inspections		
Priority 2	<p>Based on a review of fire inspection reports generated from CSI and CERS for Fiscal Year 2018, Internal Audit noted inspections were not being completed in a timely manner:</p> <ul style="list-style-type: none"> • IW Inspections: 145 (or 64%) of the approximately 227 applicable inspections have not been conducted within the last year. • Fire/Life Safety Inspections: 96 (or 14%) of the approximately 684 inspections have not been conducted within the last year. • CUPA (UST): 36 (or 56%) of the approximately 64 inspections have not been conducted within the last year. • CUPA (AST): 35 (or 71%) of the approximately 49 inspections have not been conducted within the last three years. <p>As these figures were based on system generated data, any inspections completed, but not documented, would be counted as an incomplete inspection. Internal Audit noted an unknown number of IW inspections were in fact completed but the results were not updated in the system.</p>	<p>Given the resources that are required to complete and document all of the inspections in a timely manner, the FPB should consider identifying and reducing the low-risk inspections that are also not mandated by regulatory agencies. Only after the demonstrated ability to complete all aspects of the mandatory inspection process, should low-risk inspections be included into the program.</p> <p>FPB should review and redirect resources to complete the mandatory inspections.</p> <p>The FPB should also determine whether it would be beneficial to delegate the inspection duties of the Hazardous Material and Hazardous Waste CUPA inspections to the County of Los Angeles.</p>	<p>Agree and will implement by January 31, 2019.</p> <p>The FPB will perform a risk assessment and re-prioritize their workload accordingly. The risk assessment will include prioritizing mandatory and risk based inspections over inspections deemed low-risk.</p> <p>The FPB will also conduct a cost benefit analysis regarding outsourcing of the Hazardous Material and Hazardous Waste inspections to the County of Los Angeles.</p>

Ref	Observation	Recommendation	Management Response
9. Plan Check Turnaround Time			
Priority 3	<p>According to the FPB Key Performance Indicators (KPI), the average number of days to perform plan checks has been increasing over the last 3 fiscal years as noted below:</p> <ul style="list-style-type: none"> • FY 2014-2015: 19.5 days • FY 2015-2016: 30.5 days • FY 2016-2017: 37.2 days <p>Additionally, FPB completed approximately 1,800 plan checks per year on average for the past three years. However, there are currently 1.2 FTE inspectors assigned to verify these plans.</p> <p>Some plan checks (such as fire sprinkler and fire alarm) are specialized reviews requiring the expertise of the FPB. Other plan checks, such as single family dwelling (SFD) reviews, are redundant reviews that Building and Safety (B&S) personnel also perform.</p>	<p>The FPB should consider reducing workload by relinquishing review of redundant single family home reviews to B&S.</p> <p>The FPB should also consider utilizing outside consultants to perform overflow plan checks to reduce the turnaround time, and to alleviate some of the staffing constraints related to new construction inspections.</p>	<p>Agree and will implement by July 31, 2019.</p> <p>The FPB will meet with (B&S) management and discuss the feasibility of transferring the remaining SFD plan checks.</p> <p>The FPB will start the process of establishing a professional service agreement with a consultant to perform overflow plan checks.</p>

Ref	Observation	Recommendation	Management Response
10. Express Plan Check Form			
Priority 3	<p>For express plan check reviews, customers pay an additional fee in exchange for quicker plan check by both (B&S) and the FPB. However, the form is only reviewed and signed by B&S and the customer. The FPB is not a signatory, even though they are accountable for the timelines set forth therein.</p>	<p>The Express Plan Check Form should be revised to include a signature line for the appropriate FPB personnel.</p>	<p>Agree and will implement by January 31, 2019.</p> <p>The FPB will work with B&S to modify the current process once the Express Plan Check Form is revised by B&S.</p>
11. Plan Check Goals			
Priority 3	<p>The FPB reports the average number of days to complete plan check as a KPI. These KPIs were established by the City Manager's Office (CMO). However, benchmark or goals of what the average number of days should be were not established.</p> <p>In the absence of these goals, there are no objective criteria to measure performance.</p>	<p>The FPB should create internal goals related to average plan check turnaround time, by plan type.</p>	<p>Agree and will implement by January 31, 2019.</p> <p>The FPB will work with IPA's Performance Team to create internal performance metrics that will establish meaningful criteria to measure performance.</p>

Ref	Observation	Recommendation	Management Response
12. Inactive Billing Rates			
<p style="color: green; font-weight: bold;">Priority 3</p>	<p>Customers are billed through two billing systems, Northstar and CSI. Internal Audit reviewed the active rates within each system, compared the active rates to the Citywide Fee Schedule, and noted the following exceptions:</p> <ul style="list-style-type: none"> • 11 of the 68 active Northstar rates could not be found in the Fee Schedule and appear to be inactive. • 39 of the 204 active CSI rates could not be found in the Fee Schedule and appear to be inactive. • 2 immaterial billings were made within Northstar for "Camps" (youth camps). However, the Fee Schedule does not list "Camps" as a fee type. 	<p>In order to prevent inactive rates from inadvertently being used, both billing tables from Northstar and CSI should be reviewed and updated accordingly.</p> <p>Additionally, the Citywide Fee Schedule should be updated to include a fee type for camp inspections.</p>	<p>Agree and will implement by January 31, 2019.</p> <p>The FPB will review the rates within Northstar and CSI and will make the necessary updates accordingly.</p>

Appendix 1: Definitions of Priority Rankings and Value-Added Categories

Definitions of Priority Rankings

The priority rankings are assigned by internal auditors based on their professional judgment. They are also agreed upon by management based on their evaluation of the alignment with the strategic goals, priorities and available resources. A timeline has been established based on each priority ranking:

- a. **PRIORITY 1** - Critical control weakness that exposes the City to a high degree of combined risks. Priority 1 recommendations should be implemented within **3 months** from the first day of the month following report issuance or sooner if so directed.
- b. **PRIORITY 2** - Less than critical control weakness that exposes the City to a moderate degree of combined risks. Priority 2 recommendations should be implemented within **6 months** from the first day of the month following the report issuance or sooner if so directed.
- c. **PRIORITY 3** - Opportunity for good or better practice for improved efficiency or reduce exposure to combined risks. Priority 3 recommendations should be implemented within **9 months** from the first day of the month following the report issuance or sooner if so directed.

Definitions of Value-Added Categories

The four value-added impact categories are defined based on their impact from the audit recommendations:

- a. **COMPLIANCE** - adherence to laws, regulations, policies, procedures, contracts, or other requirements.
- b. **COST SAVING** - lower the costs related to conducting City business.
- c. **EFFICIENCY** - ability to avoid wasting resources (money or time) in achieving goals.
- d. **RISK REDUCTION** - lower the risks related to strategic, financial, operations and compliance.

In addition, the **INNOVATION OPPORTUNITY** tag indicates the assistance and consulting services that may be provided by the Innovation and Performance Team.

Appendix 2: Summary of Inspections

Inspection	Type	Regulatory Body	Inspection Frequency Mandated by Regulation?	Mandated Inspection Frequency	FPB Inspection Frequency	Staffing ⁴ (FTEs)	Count of Inspections
Hazardous Materials	CUPA	California Governor's Office of Emergency Services	Yes; FPB may choose to delegate inspections to County of Los Angeles	Once every three years	Once every three years	1.9	568 ⁵
CalARP							2 ⁵
Hazardous Waste		400 ⁵					
AST		49 ⁵					
UST		State Water Resources Control Board		Annual	Annual		64 ⁵
Significant Industrial User	Industrial Waste	U.S. Environmental Protection Agency	Yes	Annual	Annual	1.4	10 ⁶
Other			No	Not Specified	Annual		434 ⁶
High Rises	Fire/Life Safety	CA State Fire Marshal's Office	Yes	Annual	Annual	2.5	26 ⁷
Jails			Yes	Every two years	Every two years		1 ⁷
Institutions			No	Not Specified	Annual		13 ⁷
Apartment, Hotels, Multi-Family			Yes	Annual	Annual		284 ⁷
Schools			Yes	Annual	Annual		51 ⁷
Public Assemblies			No	Not Specified	Annual		198 ⁷
Other			No	Not Specified	Annual		119 ⁷
Construction Inspections	Plan Check	CA Building Standards Commission	Yes	As Needed	As Needed	1.2	1,722 ⁸

⁴ Source: FPB FY 17/18 Proposed Span of Control, Rev. 02.27.2018

⁵ Source: CERS as of May 31, 2018.

⁶ Source: Calendar Year 2018 Northstar billings show 444 total IW billings with 4 SIUs. However on 9/13/18, Assistant Fire Marshal (AFM) indicated there are 10 SIUs.

⁷ Source: Fire/Life Safety inspection report from CSI for Calendar Year 2018. CSI showed 18 High Rises. However, on 9/26/18, AFM indicated there are actually 26 High Rises.

⁸ Source: 2016/2017 KPI; Completed Plan Checks (not including over the counter plan checks). Permit type dictates inspection due date.