

**CONSTRUCTION  
PLAN REVIEW, PERMITTING,  
AND INSPECTION  
PROCESSES**



**JANUARY 2006**

## THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA

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# Miami-Dade County Public Schools

*giving our students the world*

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**Chief Auditor**  
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January 20, 2006

**Miami-Dade County School Board**

Agustin J. Barrera, Chair

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Members of The School Board of Miami-Dade County, Florida  
Members of the School Board Audit Committee  
Dr. Rudolph F. Crew, Superintendent of Schools

Ladies and Gentlemen:

In accordance with the Audit Plan for the fiscal year 2006, we have performed an audit of plan review, permitting and inspection operations administered by the Department of Educational Facilities Compliance during the period July 1, 2003 to March 31, 2005. The objectives of the audit were to determine whether the construction plan review, permitting and inspection processes in place are adequately controlled, function in an efficient and expeditious manner and are in compliance with applicable Florida Statutes and Building Code, and District's policies and procedures.

We found that the Department's operations are adequately controlled, comply with applicable laws and regulations; and that the Department and the contracted Building Code Consultants appear to perform their reviews of construction plans in a thorough manner. However, we found delays in completing inspections within certain disciplines, as well as delays in the timeliness of issuing building permits and completing plan reviews. The Department would benefit from adopting performance standards, which would enable it to compare more favorably to other selected school districts. Improvements are also needed in the project information and filing system.

Our findings and recommendations were discussed with management. Their responses along with explanations needed to assure that the findings and recommendations are addressed are included herein. As always, we would like to thank the administration for their cooperation and courtesies extended to our staff during the audit.

Sincerely,

Allen M. Vann, CPA  
Chief Auditor

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## **EXECUTIVE SUMMARY**

Our audit of the construction plan review, permitting and inspection processes at the Department of Educational Facilities Compliance (commonly and hereinafter referred to as DFDQC) disclosed that the Department's operations comply with applicable laws and regulations. We found the qualifications of DFDQC employees to be current and in compliance with the guidelines set forth in Florida Statutes section 468.609. The Department also does a good job monitoring the contracted Building Code Consultants, ensuring that the consultants have the required qualifications according to the laws and contract. Both DFDQC and the consultants appear to be performing their reviews of construction plans in a thorough manner.

Overall, the majority of inspections performed were timely; however, we did find significant delays in completing inspections within certain disciplines, as well as delays in issuing building permits and completing plan reviews. Additionally, it would appear that in some cases, the productivity of other selected school districts exceeds that of DFDQC. This suggests that the Department needs to develop performance measures and standards, which it currently does not have. The project information and filing system used to manage DFDQC, which is in the process of being replaced, was not adequately serving the needs of the Department in fulfilling its mission.

Based on our observations, we made 10 recommendations. Our detailed findings and recommendations begin on page 5.

## **BACKGROUND**

The Department of Educational Facilities Compliance is responsible for performing technical reviews of construction plans, issuing building permits and performing inspections of construction work in place, including inspections for the acceptance and occupancy of construction projects. Two professional architectural and engineering (A/E) firms designated as Building Code Consultants (BCCs) are engaged to provide similar services.

The functions of DFDQC and its employees' qualifications, as outlined in the Miami-Dade County Public Schools New Code Compliance and Administrative Procedures Manual, are governed by School Board Rule 6Gx13-7B-1.02; Florida Statutes, Chapter 468 Title XXXII and the Florida Building Code sections 102, 103, 104 and 105. Based on these procedures, rules, laws and regulations, DFDQC has the authority to coordinate, perform, and monitor the building code inspection, technical review and building permitting services of the School District. The Department oversees the functions of the two BCCs. The BCCs' scope of work is limited to only code-related matters. They are not required to inspect construction projects for matters related to workmanship.

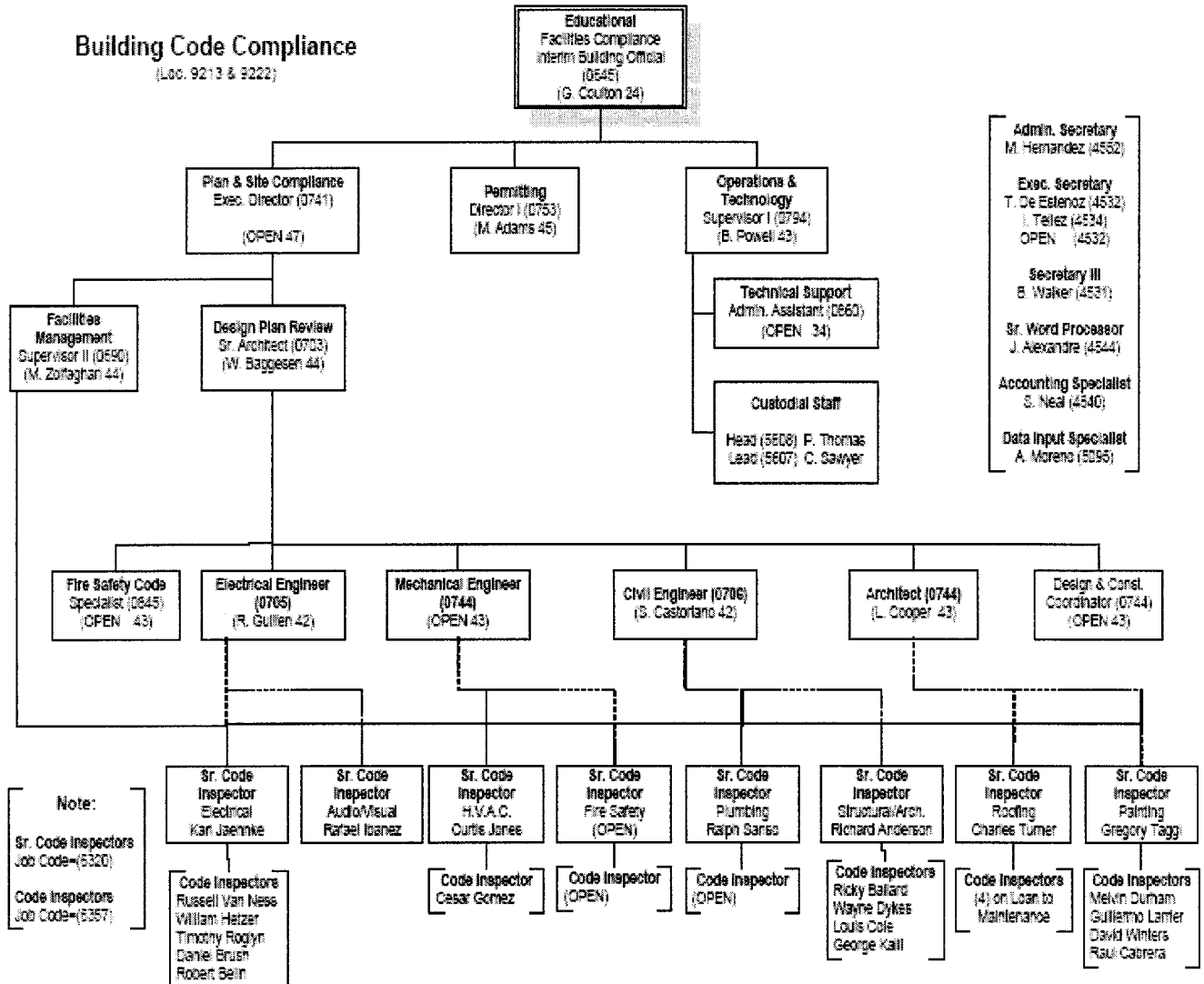
The Department of Educational Facilities Compliance is managed by a Building Official. The Building Official reports directly to the Deputy Superintendent of Business Operations and not to the Chief Facilities Officer. This provides a good system of checks and balances over the construction process. The current Building Official was appointed in July 2004. Accordingly, some of our audit results reflect operations prior to his tenure as Building Official.

During fiscal year 2005 the Department's operating budget was \$2.8 million compared to actual expenditures of \$2.5 million. The Department was staffed by 38 employees, including two architects, four professional engineers, seven trades masters, 14 building inspectors, and 11 clerical and support staff. There were approximately 1,340 active plan review projects during the audit period.

The two BCCs under contract with the District perform construction plan review and code inspection services valued up to \$750,000 each, annually. In fiscal year 2005, the District paid the BCC's approximately \$875,000 and \$1,468,000 each for work assigned over the course of multiple contract years. Based on the increased need for these services, the School Board approved Board agenda item F-62, at its September 7, 2005 meeting, which increased each contract limit to \$1.8 million per year and authorized the selection of two additional BCC firms for a three-year term with the same fee limit.

# ORGANIZATIONAL CHART

## The Department of Educational Facilities Compliance



All positions, except Custodians, located to Program 9900/9904, Function 7420

12/14/2005

## OBJECTIVES, SCOPE AND METHODOLOGY

In accordance with the FY 2006 approved audit plan, we performed an audit of plan review, permitting and inspection operations at the Department of Educational Facilities Compliance. The objectives of the audit were to determine whether the construction plan review, permitting and inspection processes in place:

- function in a manner that allow for efficient and expeditious plan reviewing, permitting and inspecting of scheduled facilities projects;
- comply with applicable State of Florida Building Code and District's policies and procedures; and
- compare favorably with other school districts and with the two firms the District has contracted to perform similar services.

The scope of our audit covered operations during the period of July 1, 2003 to March 31, 2005. Procedures performed to satisfy the audit objectives were as follow:

- interviewed District staff;
- reviewed the organizational structure;
- reviewed operating procedures, applicable Florida Statutes, building code and School Board rules;
- benchmarked operations to other school districts;
- examined, on a sample basis, documentation of plan reviews, inspections, building permits, invoices and other pertinent documents; and
- performed various other audit procedures as deemed necessary.

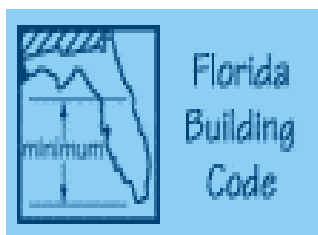
Our audit was conducted in accordance with generally accepted governmental auditing standards applicable to performance audits contained in Government Auditing Standards issued by the Comptroller General of the United States of America. This audit included an assessment of applicable internal controls.



## **FINDINGS AND RECOMMENDATIONS**

Based on our audit, we concluded that the Department of Educational Facilities Compliance (DFDQC) is in compliance with applicable laws and regulations. We reviewed the current qualifications of DFDQC staff and found that employees' qualifications are current and in compliance with the guidelines set forth in Florida Statutes section 468.609. Further, the department does a commendable job monitoring BCCs, to ensure that they have the required qualification according to the laws and contract.

Based on our audit, the Department of Educational Facilities Compliance and the contracted BCCs appear to be performing their reviews of construction plans in a thorough manner. We reviewed existing change orders executed for a sample of projects, comparing the number and type of code-related and other type of change items that could be attributed to ineffective plan reviews, and found them to be negligible in terms of number and amounts. We found no significant problems, or evidence that plans were not being thoroughly reviewed.



### **State Requirements for Educational Facilities (SREF)**

# 1. COMPLETE PLAN REVIEWS IN A TIMELY MANNER

Three-quarters of the Phase III (construction document) plan reviews were completed seven or more days late. This may result in delays in moving construction projects forward and in some instances; construction may start prior to the required completion of the review.

We selected a statistical sample of 64 active projects.<sup>1</sup> Of the 64 sampled projects, there were four (4) for which we could not find data pertaining to the Phase III reviews<sup>2</sup>, two (2) were in the pre-design phase, and one (1) was cancelled. The remaining 57 projects had a combined total of 86 Phase III reviews (including re-submittals). Of the 86 reviews, DFDQC completed 50 and the contracted BCCs completed 36. Overall, we found that 17 reviews, approximately 20%, were completed within 15 days, which is the time allowed for timely review completion and four (4) were completed within 16 to 21 days, for which we took no exception. However, in 65 cases, roughly 75%, Phase III reviews were not completed until after 22 or more days from the time of their submission to the respective building code compliance plan reviewer. The table below presents the results of our analysis broken down between DFDQC and the contracted BCCs.

Sampled Construction Plan Review Broken Down Between Plan Reviewers						
	DFDQC		Contracted BCCs		Combined	
	Number	Percent	Number	Percent	Number	Percent
Reviews completed within 15 days	7	14%	10	28%	17	20%
Reviews completed within 16-21 days	4	8%	0	0%	4	5%
Reviews completed after 22 or more days	39	78%	26	72%	65	75%
Total	50	100%	36	100%	86	100%

According to the administration, delays in plan reviews were due to staff shortages. Consequently, some plan reviews had to be conducted by inspectors, who are in the field most of the time. Additionally, reviews were conducted depending on the priority of each project.

<sup>1</sup> Our sample was designed to provide a reliability or confidence factor of 90%.

<sup>2</sup> Three (3) projects were completed under Annual Maintenance Permits, and according to staff, include two (2) that did not require Phase III review because they were covered by approved district-wide manual and plans and one (1) that did not require drawings. The remaining project did require Phase III review.

According to the Miami-Dade County Public Schools New Code Compliance and Administrative Procedures Manual, the plan review process starts when the Project Manager (PM) submits a Work Order Request Form for Building Code Consultant Services to the DFDQC. The Building Official assigns the project to either the in-house staff or to one of the two contracted Building Code Consultant (BCC) firms and issues a work order for the services to be performed. The PM submits the Phase reviews to the appropriate BCC (either in-house or contracted) through the Department of Document Control. Ten (10) working days are allowed for the Phases I and II reviews and 15 working days for Phase III reviews. The BCC review comments and “mandatories” must be addressed by the Architect/Engineer (A/E) of record and re-submitted to the BCC through the PM and Document Control. The BCC is again allotted either 10 or 15 working days to review and respond to the re-submittal. The process repeats until the Phase being reviewed is approved. Phase III packages cannot be approved for permit until all outstanding “mandatories” have been resolved and corrected in the documents and specifications.

Of the 64 active projects sampled, 47 had either achieved Phase III approval or were under construction.<sup>3</sup> We found that for nine (9) projects (including two portable classrooms) out of the 47 reviewed, or 19%; construction and inspections were performed prior to obtaining Phase III approval. Facilities Construction staff complained that the plan review and permitting process took too long and they needed to proceed with the construction work to meet established deadlines. In some cases, Maintenance staff stated that prior Phase III approval was not needed, for example, portable classroom foundations and portable move projects. However, projects involving portable classroom hook-up do require Phase reviews.

Section V.A. of the Department’s procedures manual states:

“Some projects covered under the Annual Facilities Permit will require review and/or inspection services... If there is a question regarding whether a project should be submitted for review and inspection, the Building Department shall be contacted for a determination. ALL minor renovation projects over \$50,000.00 shall be submitted for review and inspections... Note: Florida Statutes makes it the responsibility of the School Boards that ALL projects (regardless of cost or fund source) be performed to comply with all applicable codes.”

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<sup>3</sup> The remaining 17 projects were in the design phase and would not be subject to construction or inspection activities.

Florida Department of Education (FDOE) Rule, State Requirements for Educational Facilities (SREF) Section 4.1(2)(c) states: “[m]aintenance and repair projects may not require professional services [i.e., design services]; however, they must be reviewed and approved for compliance with applicable federal and state laws and building and life-safety codes, and constructed accordingly...Maintenance and repair projects include: roof or roofing replacement, short of complete replacement of membrane or structure... the placement and hookup of relocatables [portable classrooms]...”

State Requirements for Educational Facilities Section 4.1(2)(d) states that: “[t]he services of a registered architect shall not be required for minor renovation projects with a construction cost of less than fifty thousand dollars (\$50,000) or for the placement and hookup of relocatables.” Florida Statutes, Section 1013.45(4), reiterates the provisions of SREF 4.1(2)(d). However, it further states that: “...boards must provide compliance with building code requirements and ensure that these structures are adequately anchored for wind resistance as required by law...”

We observed that the frequent need for urgent access to, and completion of, certain construction projects to satisfy the District’s educational program stresses the plan review approval process. The planned increased use of BCCs (See Background, page 2) should result in timelier plan reviews.

## **RECOMMENDATIONS**

### **1.1 Develop management reports that track due dates for plan review completion.**

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** The implementation of a web based system known as “INSPECT” which is currently in the development stage. The circumstances related to the number of late plan reviews by the BCCs can only be addressed by a detailed review of each. There are a multitude of reasons, including holding documents until all findings have been resolved

before return to the Architect (done at Capital's request to expedite the approval process). Currently the performance of each BCC firm is monitored by Building Official with quarterly reports on late reviews.

The existing Code Compliance Tracking System (CCTS) was not developed to the degree that these types of reports could be generated. Consequently it was done manually utilizing an Excel spread sheet. This deficiency was identified in the very early stages of the change in Administration. The Deputy Superintendent, Business Operations set in motion the development of a comprehensive web based system which is expected to be operational within the first quarter of 2006.

**Completion Timetable:** Expected system operation commencement within the first quarter of 2006.

**URGENCY OF CORRECTIVE ACTION**

**IMPLEMENTATION  
SCHEDULE**

- ☐ Critical
- ☒ Important
- ☐ Desirable

- ☐ Immediately (Short Term)
- ☒ By March 31, 2006
- ☐ Contingent upon Funding

- 1.2 **Require (and cite) District staff to adhere to DOE rules and Florida Statutes by not proceeding with construction prior to the approval of Phase III construction document approval.**

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** Distribute announcements to all M-DCPS' facility users stressing the importance of compliance with this statute. Building permits are issued after approval of the construction documents. The stipulation that no inspection will be performed unless the Building Permit has been issued is stated in the code compliance procedures available on the website of Educational Facilities Compliance. However, the Fl. Statute and Building Code allow exceptions for certain types of projects. For those types of projects examination of the construction documents by the

Building Official is not a requirement. However, M-DCPS' departments, at times, chose to submit these for review anyway.

**Completion Timetable:** Distribute announcement within two weeks.

**URGENCY OF CORRECTIVE ACTION**

- ☐ Critical
- ☒ Important
- ☐ Desirable

**IMPLEMENTATION  
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By \_\_\_\_\_
- ☐ Contingent upon Funding

## **2. THE PERMIT APPLICATION/ISSUANCE PROCESS NEEDS ENHANCEMENTS**

Of the 64 projects examined, actual permits were issued to 25<sup>4</sup>, which we examined and found that they were all issued after the required 48-hours from the time DFDQC received the completed permit applications. Further, DFDQC did not notify contractors within the 48-hours as required when a permit could not be issued. The contractor generally cannot begin work until a permit for the work has been issued, with some exceptions as approved by the Building Official. For projects awaiting permits, DFDQC does not have an adequate follow-up system in place, which more than likely contributed to project delays.

The Florida Building Code (FBC) and the DFDQC administrative procedures require that a permit application be filed before a building permit can be issued. These forms are furnished by the Building Official. Once the application is completed, DFDQC has 48 hours to either issue a building permit or notify the contractor that a building permit cannot be issued and the reasons why.

The permit application form contains a general description of the work or structure and the location where work is to be performed. The project manager completes various sections of the form and forwards it to his/her Executive Director (for capital projects) or Maintenance Supervisor (for maintenance projects) for signature. The partially completed permit application is routed to DFDQC through Document Control, and is logged manually, then electronically in the Code Compliance Tracking System (CCTS).

We found that the application review function is an almost entirely non-technical support function of verifying that the required documents were submitted along with the permit application. A DFDQC registered professional uses a checklist to review the permit application package to ensure that the required documents are included. The checklist does not provide space for the reviewer of the permit application to indicate whether the required documents have been received or action taken. DFDQC maintains the permit application on file, awaiting the contractor to come in, complete the remaining sections of the application and signs it before the building permit is issued.

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<sup>4</sup> Twenty-one (21) were awaiting permits to be issued, 13 were completed under Annual Maintenance Permits, and five (5) were cancelled before permits were issued.

## RECOMMENDATIONS

- 2.1 Implement a follow-up system that includes the aging of permit applications so that project managers and contractors can be timely notified on the status of pending and approved permit applications.

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** It is the contractor's responsibility to monitor his/her own permit activity. Computer generated warning letters are planned for distribution to permit holders or applicants. It is proposed that the Magellan **INSPECT** Tracking system, will provide automatic notice to the appropriate recipients a month prior to expiration of either a permit or permit application.

**Completion Timetable:** Schedule is tied to the implementation of the Magellan **INSPECT** system.

**URGENCY OF CORRECTIVE ACTION**

**IMPLEMENTATION  
SCHEDULE**

- ☒ Critical  
☐ Important  
☐ Desirable

- ☐ Immediately (Short Term)  
☒ By March 31, 2006  
☐ Contingent upon Funding

- 2.2 Enhance the permit application documentation checklist to include space for documenting the dates required documents were received and when the required actions were taken.

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].



**Solution Plan:** This recommendation is in the process of being implemented by augmenting the department's existing checklist to extend to a spreadsheet to allow for centralization of records of signatures, dates and notes on significant documentation.

**Completion Timetable:** Within the next three months

**URGENCY OF CORRECTIVE ACTION**

**IMPLEMENTATION  
SCHEDULE**

☐ Critical

☐ Important

☒ Desirable

☒ Immediately (Short Term)

☐ By \_\_\_\_\_

☐ Contingent upon Funding

- 2.3 Consider re-assigning the permit application review function to clerical and support staff and provide them adequate supervision and training to properly execute this function.

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** This assignment requires a skill set that is not met by existing clerical staff. It is expected that the full operation of the **INSPECT** system will result in significantly reduced secretarial type functions. This will permit redeployment and training of existing clerical staff to fully focus on the permitting procedures and operations. In this area currently existing clerical staff is not fully dedicated to properly address this need. Clerical staff assigned this task, other secretarial type duties such as telephone calls, payroll, and the copying, faxing, filing, logging in of reports as is now required for proper inspection and permit support operations.

**Completion Timetable:** Operational testing and full deployment of INSPECT expected to be the second quarter of this year.

**URGENCY OF CORRECTIVE ACTION**

- ☐ Critical
- ☐ Important
- ☒ Desirable

**IMPLEMENTATION  
SCHEDULE**

- ☐ Immediately (Short Term)
- ☒ By June 30, 2006
- ☐ Contingent upon Funding

### 3. IMPROVEMENTS NEEDED ON THE TIMELINESS OF INSPECTIONS AND THE ACCURACY OF REPORTING

Florida Building Code, Section 105 requires inspections of construction work in place. According to the Miami-Dade County Public Schools New Code Compliance and Administrative Procedures Manual, contractors shall contact the assigned BCC to request and schedule inspections, as required, at least 48 hours in advance of when such inspections are needed. According to management, DFDQC's policy is to complete scheduled inspections within 48 hours of the time the requests for inspection are received.

We reviewed inspections scheduled during fiscal year 2005 as generated by the FoxPro inspection database. Inspections generally occurred within 48 hours of their scheduled dates, as DFDQC policy requires, but some disciplines, as outlined in the table below, encountered significant inspection delays.

<b>Inspections Scheduled During the 2004-2005 Fiscal Year By Discipline</b>					
<b>Disciplines</b>	<b>Inspections</b>		<b>Analysis of Late Inspections</b>		
	<b>Scheduled</b>	<b>Late</b>	<b>Percent</b>	<b>Median</b>	<b>Largest</b>
Electrical	1,681	205	12.2%	6 days	279 days
Structural	2,221	20	0.9%	2 days	50 days
Sheet Metal	225	7	3.1%	94 days	101 days
Plumbing	660	412	62.4%	125 days	282 days
Roofing	229	22	9.6%	5 days	28 days
Mechanical (HVAC)	524	22	4.2%	62 days	174 days
Communication (A/V)	117	34	29.1%	6 days	276 days
Painting	728	106	14.6%	4 days	246 days
Total	6,385	828	13.0%		

Management explained that inspection delays were caused by understaffing of some of the disciplines. For example, there was only one audio/visual trades master, one HVAC and sheet metal trades master, one HVAC and sheet metal inspector; and only one plumbing trades master. Some of these professionals also perform plan reviews. The Department needs to better align the composition of its staff to fit its workload. In addition, the planned increased use of BCCs (See Background, page 2) should result in timelier inspections.

We applied further auditing procedures to determine the accuracy of the inspection reports in both the FoxPro inspection database and CCTS. We examined a total of 863 inspection reports and found various exceptions, as presented in the following table.

<b>Inspection-Related Exceptions Noted In Sample Projects</b>		
<b>Description of Exception</b>	<b>Total Exceptions</b>	<b>Exception Rate</b>
Inspection report generated in FoxPro does not contain CCTS document number and could not be traced to CCTS	450	52%
Individual inspection report (log number) not listed in FoxPro inspection summary logs received	152	18%
Dates of inspection did not agree in FoxPro and CCTS	16	2%
Information regarding quality assurance inspection completion was not presented for audit	69	8%

Inspectors' original comments regarding workmanship and non-code-related matters are maintained in the CCTS system. However, CCTS does not track either the original comments or their updates. Hence, a query of CCTS for outstanding comments would return a list of only outstanding code-related comments or mandatories. Accordingly, DFDQC enters the comments, either in duplicate or by reference, into both the FoxPro and CCTS databases. The two systems currently used by DFDQC are scheduled to be replaced with a new inspection tracking system currently under development.

## **RECOMMENDATIONS**

### **3.1 Align the composition of staff to fit the department's workload.**

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** This need was recognized by senior management and hiring freeze waivers granted for critical positions. Those positions, authorized for hire, have been advertised and are at varying stages of selection. The justification to fill the additional positions requested by EFC will be reviewed following the compilation and analysis of ongoing performance data.

**Completion Timetable:** a) Most of the approved positions should be filled by the end of the first quarter of 2006; b) additional needs determination

made by the end of February, 2006 and hiring waivers authorized within two weeks thereafter.

**URGENCY OF CORRECTIVE ACTION**

**IMPLEMENTATION  
SCHEDULE**

☒ Critical

☐ Important

☐ Desirable

☐ Immediately (Short Term)

☒ By March 31, 2006

☐ Contingent upon Funding

**3.2 Consider assigning inspection work to the BCCs as needed.**

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** This will be considered for inclusion in the Agreements resulting from Request For Proposal for BCC services received by M-DCPS on November 18, 2005.

**Completion Timetable:** Agreement to be negotiated and firms commissioned by the Board on March 15, 2006.

**URGENCY OF CORRECTIVE ACTION**

**IMPLEMENTATION  
SCHEDULE**

☒ Critical

☐ Important

☐ Desirable

☐ Immediately (Short Term)

☒ By March 15, 2006

☐ Contingent upon Funding

**3.3 Ensure that deficiencies of the two databases used in the inspection and plan review processes are resolved during the design and introduction of the planned inspection information system.**

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** This effort commenced with the identification of all deficiencies in the two database/information systems currently being utilized. This information was transmitted to ITS and the Magellan Group, developers of the new **INSPECT** information system. This was done at the initial stages of the design/development.

**Completion Timetable:** The **INSPECT** system is scheduled by ITS to commence utilization on January 23, 2006. The determination of extent to which deficiencies in the existing system have been eliminated will become evident to staff during the staff training period scheduled by ITS to commence January 17, 2006 and actual utilization after January 23, 2006.

**URGENCY OF CORRECTIVE ACTION**

- ☒ Critical
- ☐ Important
- ☐ Desirable

**IMPLEMENTATION  
SCHEDULE**

- ☒ Immediately (Short Term)
- ☐ By \_\_\_\_\_
- ☐ Contingent upon Funding

#### 4. PERFORMANCE MEASURES AND STANDARDS NEEDED

We surveyed six school districts, Miami-Dade County Building Department and the two firms under contract with M-DCPS. The organizations surveyed were requested to provide information about the number and qualifications of their staff, including plan reviewers, inspectors, employees in-charge of issuing permits and administrative and support staff. We also requested information on plan reviews and inspections completed, as well as permits issued during FY 2005. For some of the entities surveyed, some of the requested information was either not available or not comparable; hence, those entities were not included in our analyses.<sup>5</sup> The data collected are limited but provide some informative indicators. The following table summarizes our analyses of the information received.

COMPARISON OF M-DCPS TO OTHER SCHOOL DISTRICTS								
Florida School Districts	Total Staff	Ratio of Technical Staff to Admin. and Support Staff	Plans Reviewed		Inspections Completed		Monthly Average Permits Issued (*Annual Maintenance Permits)	
			Monthly Average	Monthly Average Per Technical Employee	Monthly Average	Monthly Average Per Employee		
M-DCPS	36	2.6 to 1	135	5	637	24	19	33*
Seminole	7	6 to 1	NA	NA	NA	NA	12	NA
Palm Beach	32	3 to 1	NA	NA	1000	41	19	16*
Orange	7	2.5 to 1**	644	128	1538	307	NA	NA
Hillsborough	10	9 to 1	9	1	NA	NA	>100	NA

NA - School District did not provide information.

\*\* - Ratio does not include four additional technical staff positions that are currently vacant.

In general, the results of our analyses and comparisons indicate that M-DCPS performance could improve in relation to the other school districts. As illustrated

<sup>5</sup> The data collected had certain limitations. Some of the districts surveyed provided information on plans reviewed and inspections completed; however, specified that they contracted with outside inspections firms on an as needed basis. Additionally, information provided by Building Code Consultants contracted by M-DCPS reflected work performed on M-DCPS' projects only.

above, M-DCPS is at the top of the range with 36 employees working in the plan review, permitting and inspection processes. The next closest district employs approximately 11% less employees than M-DCPS in these processes. Another important indicator noted is the ratio of technical staff to administrative and support staff. Compared to other organizations, M-DCPS is ranked the second lowest at 2.6 to 1. Three other organizations from which this kind of information was received range from 3 to 9 technical staff to each administrative and support staff.

M-DCPS' averages for monthly plans reviewed and plans reviewed per employee were the second lowest of organizations from which such information was received. Regarding plan reviews, the average monthly plan review per employee among the various disciplines ranged from one (1) to 46 reviews. Regarding inspections, M-DCPS has the lowest amount completed. The closest organization completed 57% more inspections per month than M-DCPS, or nearly 71% more when calculated on a per employee basis. Furthermore, average monthly permits issued were not as low in comparison to the other districts. Except for one district, M-DCPS issued the most permits on a monthly average, as well as the most annual maintenance permits.

The above conditions highlight the necessity for DFDQC to establish performance measures, i.e. benchmarks for monitoring staff productivity and performance. While management informed us that DFDQC plan reviewers are held to the same standards outlined in the third-party BCC contract, and DFDQC inspectors are required to complete inspections within 48 hours of the inspection requests receipt or by their scheduled date, those policies are not in writing. Further, our audit test results indicated that these unwritten policies were not consistently applied or enforced.

## **RECOMMENDATIONS**

### **4.1 Develop performance measures and standards for plan reviews and inspections.**

**Responsible Department:**      **The Department of Educational Facilities Compliance**

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].



**Solution Plan:** This need was identified in the very early stages of the new senior management changes. The process for defining these performance standards has been in the data gathering stage and is currently under analysis. This is being done in conjunction with benchmarking activities for other similar school districts. The Department of Performance Improvement, Business Operations is spearheading this task.

**Completion Timetable:** Completion of this process and establishment of performance standards for plan reviews and inspections are expected to be completed within the first quarter of 2006.

**URGENCY OF CORRECTIVE ACTION**

**IMPLEMENTATION  
SCHEDULE**

☒ Critical

☐ Important

☐ Desirable

☐ Immediately (Short Term)

☒ By March 31, 2006

☐ Contingent upon Funding

**4.2 Re-evaluate the ratio of technical to administrative and support staff and adjust as deemed necessary.**

**Responsible Department:** The Department of Educational Facilities Compliance

**Management Response:**

[Management] [a]Agree[s] [with the recommendation and provides the following solution and implementation schedule].

**Solution Plan:** This re-evaluation had already been planned at the direction of the Deputy Superintendent, Business Operations. It will be best accomplished after the commencement of the new **INSPECT** management system under development by ITS. The new **INSPECT** system is expected to result in significant reduction of functions carried out manually by secretarial and administrative staff. Among these are facsimile transmittals of reports, generation of reports, reproductions, responses to queries, etc.

**Completion Timetable:** Full operation of **INSPECT** and termination of use of the current two systems expected to be by March, 2006.

**URGENCY OF CORRECTIVE ACTION**

- ☒ Critical
- ☐ Important
- ☐ Desirable


**IMPLEMENTATION  
SCHEDULE**

- ☐ Immediately (Short Term)
- ☒ By March 2006
- ☐ Contingent upon Funding

OSP:60  
January 18, 2006  
OSP:995-4581

**MEMORANDUM**

TO: Mr. Allen M. Vann, Chief Auditor  
Office of Management and Compliance Audits

FROM: Ofelia San Pedro, Deputy Superintendent   
Business Operations

SUBJECT: **RESPONSE TO DRAFT REPORT – AUDIT OF CONSTRUCTION PLAN  
REVIEW, PERMITTING, AND INSPECTION PROCESSES**

This provides responses to the Draft Internal Audit Report received with your memorandum of December 6, 2005. Those responses are indicated on the attached titled “Responses by the Building Official to Draft Internal Audit Report of Construction Plan Review, Permitting, and Inspection Processes.”

It provides responses, as requested, to your findings and recommendations indicating:

- Agreement or disagreement,
- Reasons for any disagreements,
- Plans for implementing solutions to identified problems, and
- Timetable to complete such activities.

We were pleased to see the many positive things identified. As you know this administration had identified many of the changes recommended and have in fact put in motion action for implementation. Some of these are summarized as follows:

- We are in the process of developing performance standards,
- A new web-based information system is in the process of being installed that will add substantial accountability to the process, and
- Additional outside contracting is being done because of the ambitious capital outlay program approved by the School Board.

I would like to take this opportunity to commend you and your staff on a very comprehensive and extensive audit. As a result, we have refocused on a number of issues to significantly improve the code enforcement operations of the District.

OSP/GCC:mh  
Attachments

cc: Dr. Rudolph F. Crew  
Mr. Gilbert C. Coulton  
Mr. Trevor Williams

The School Board of Miami-Dade County, Florida, adheres to a policy of nondiscrimination in employment and educational programs/activities and programs/activities receiving Federal financial assistance from the Department of Education, and strives affirmatively to provide equal opportunity for all as required by:

**Title VI of the Civil Rights Act of 1964** - prohibits discrimination on the basis of race, color, religion, or national origin.

**Title VII of the Civil Rights Act of 1964**, as amended - prohibits discrimination in employment on the basis of race, color, religion, gender, or national origin.

**Title IX of the Education Amendments of 1972** - prohibits discrimination on the basis of gender.

**Age Discrimination in Employment Act of 1967 (ADEA)**, as amended - prohibits discrimination on the basis of age with respect to individuals who are at least 40.

**The Equal Pay Act of 1963**, as amended - prohibits sex discrimination in payment of wages to women and men performing substantially equal work in the same establishment.

**Section 504 of the Rehabilitation Act of 1973** - prohibits discrimination against the disabled.

**Americans with Disabilities Act of 1990 (ADA)** - prohibits discrimination against individuals with disabilities in employment, public service, public accommodations and telecommunications.

**The Family and Medical Leave Act of 1993 (FMLA)** - requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to "eligible" employees for certain family and medical reasons.

**The Pregnancy Discrimination Act of 1978** - prohibits discrimination in employment on the basis of pregnancy, childbirth, or related medical conditions.

**Florida Educational Equity Act (FEEA)** - prohibits discrimination on the basis of race, gender, national origin, marital status, or handicap against a student or employee.

**Florida Civil Rights Act of 1992** - secures for all individuals within the state freedom from discrimination because of race, color, religion, sex, national origin, age, handicap, or marital status.

**School Board Rules 6Gx13- 4A-1.01, 6Gx13- 4A-1.32, and 6Gx13- 5D-1.10** - prohibit harassment and/or discrimination against a student or employee on the basis of gender, race, color, religion, ethnic or national origin, political beliefs, marital status, age, sexual orientation, social and family background, linguistic preference, pregnancy, or disability.

*Veterans are provided re-employment rights in accordance with P.L. 93-508 (Federal Law) and Section 295.07 (Florida Statutes), which stipulate categorical preferences for employment.*



**Miami-Dade County Public Schools**  
*giving our students the world*