

AUDIT TEAM

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**DEVELOPMENT SERVICES DEPARTMENT
FOLLOW-UP AUDIT**

JULY 5, 2011

MAYOR AND CITY COUNCIL

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Executive Summary

Audit Report 11-01

July 5, 2011

The Mayor and City Council:

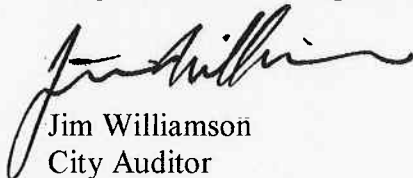
The Office of the City Auditor has completed an audit to evaluate the status of comments, recommendations and related management responses included in reports on our previous audits of various departmental operations reassigned to the Development Services Department on July 1, 2009.

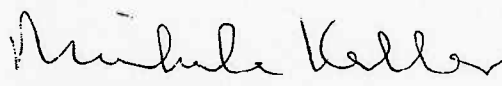
Based on the results of our audit, we believe that, as of December 31, 2010, recommendations included in our previous reports have not been adequately addressed. Management efforts to address these recommendations, including the following, are discussed in more detail in the attached report:

- Nuisance and construction inspection services have been consolidated, however, related operating efficiencies have not been fully realized because inspectors have not been cross-trained. See Status 1 and 2.
- Procedures to identify potentially unlicensed businesses have not been implemented. See Status 3.
- A process to address long-outstanding construction permits and potential inspector conflict of interest has not been implemented. See Status 9 and 10.

A new recommendation to further improve oversight of the Permits and Licensing Program is included in the Additional Recommendation section of this report.

All comments, recommendations, suggestions and observations arising from our audit have been discussed in detail with appropriate representatives from management. These discussions were held to assure a complete understanding of the content and emphasis of items in this report. Responses from management are attached to this report.


Jim Williamson
City Auditor


Michele Keller
Audit Manager

DEVELOPMENT SERVICES DEPARTMENT FOLLOW-UP AUDIT

AUDIT OBJECTIVES, SCOPE, METHODOLOGY AND BACKGROUND

The objective of this audit was to evaluate the status, as of December 31, 2010, of comments, recommendations and related management responses included in reports on our previous audits of various departmental operations reassigned to the Development Services Department on July 1, 2009.

The following reports were included in the scope of this follow-up audit:

- #08-04 Planning and Finance Departments - Zoning and License Inspection Services audit report dated April 28, 2009. The report included recommendations to consolidate inspection services, cross-train inspectors and redirect licensing enforcement efforts to realize operational efficiencies, improve service levels and enhance enforcement results.
- #178 Public Works Department - Development Center Division investigation report dated October 9, 2007. The report included recommendations to strengthen procedures ensuring complete, objective and consistent construction inspection services.
- #06-05 Finance Department - Hotel Tax follow-up audit report dated November 7, 2006. The report included recommendations to redirect licensing enforcement efforts to realize operational efficiencies and enhance enforcement results. While the scope of this audit was limited to hotel licensing, we indicated that our recommendations should be considered for applicability to other business licenses.

Procedures performed during this audit included interviewing management; analyzing data, reports and financial information from Accela, the automated system used to manage licenses, permits and construction inspections; reviewing documentation supporting work processes; and examining inspector work logs.

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 a summary of the findings, related recommendations and management responses from the previous audit reports followed by the current status. Each summary and related current status is immediately followed by management's response. Responses from management are attached to this report in their entirety.

CONSOLIDATING NUISANCE INSPECTION SERVICES

Previous recommendations to consolidate nuisance inspection services have been implemented; however, operating efficiencies from this consolidation have not been fully realized because inspectors have not been cross-trained to perform licensing inspections.

During our #08-04 Zoning and Licensing Inspection Services audit we noted that similar nuisance inspection services were provided by multiple departments. The Neighborhood Services Department employed 26 inspectors to perform almost 50,000 property maintenance related inspections per year; six full-time equivalent inspector positions in the Planning Department carried out over 6,000 zoning related inspections per year; while three inspectors in the Finance Department performed approximately 60 license related inspections per year. Additionally, we noted that inspection activity was not adequately documented in the Planning and Finance Departments.

We recommended that zoning and licensing inspection services be consolidated with property maintenance enforcement and that property maintenance inspectors be cross-trained to handle all of these inspection types. In conjunction with this consolidation, we recommended that six zoning inspector positions and two license inspector positions be moved to the Neighborhood Services Department.

Management concurred with our recommendations.

Status 1 – #08-04 Recommendations 1, 2, 9, 10 and 11

Partially Implemented – The Development Services Department was created effective July 1, 2009. Various departmental operations were reassigned to this new department, including property maintenance, zoning and licensing enforcement. As part of this reorganization, five zoning inspector positions were moved to the Development Services Department, one zoning inspector position was eliminated, and all three license inspector positions were temporarily moved to the Development Services Department until being eliminated effective July 1, 2010. Additionally, licensing and zoning related inspector activity is now recorded in the City's citizen complaint management system.

Previous recommendation to cross-train inspectors to perform licensing inspections should be implemented. As of December 31, 2010, property maintenance inspectors were cross-trained to perform zoning related inspections. However, cross-training for licensing related inspections did not begin until after initiation of our audit. Cross-training is critical to realizing operating efficiencies from consolidating services.

Management Response 1

Agree with status. By December 31, 2011, cross-training of inspectors to perform licensing inspections will be fully implemented.

CONSOLIDATING CONSTRUCTION INSPECTION SERVICES

Previous recommendations to consolidate construction inspection services have been implemented; however, operating efficiencies from this consolidation have not been realized because inspectors have not been cross-trained to perform certain construction inspections.

During our #08-04 Zoning and Licensing Inspection Services audit we noted that similar construction inspection services were provided by the Development Center in the Public Works Department and the Planning Department. The Development Center employed 39 inspectors to perform almost 50,000 construction related inspections per year, while three full-time equivalent positions in the Planning Department carried out approximately 3,000 construction related inspections per year. Additionally we noted that inspection activity was not adequately documented in the Planning Department.

We recommended that construction inspection services be consolidated in the Development Center; cross-training building inspectors to perform fence and commercial building zoning inspections; and cross-training electrical inspectors to perform sign inspections. In conjunction with this consolidation, we recommended that three zoning inspector positions be moved to the Development Center.

Management agreed with our recommendations.

Status 2 – #08-04 Recommendations 3, 4, 5 and 11

Partially Implemented – The Development Center was moved to the Development Services Department as part of the July 1, 2009 reorganization. In conjunction with this reorganization, construction related inspections along with three inspector positions from the Planning Department were consolidated in the Development Center. Additionally, zoning related inspector activity is now recorded in the City's citizen complaint management system and/or Accela.

Previous recommendations to cross-train inspectors to perform certain construction inspections should be implemented. Building inspectors have not been cross-trained to perform fence and commercial building zoning inspections and electrical inspectors have not been cross-trained to perform sign inspections. Cross-training is critical to realizing operating efficiencies from consolidating services.

Management Response 2

Agree with status. By September 30, 2011, cross-training of inspectors to perform certain construction inspections will be fully implemented.

ENHANCING BUSINESS LICENSE ENFORCEMENT

Previous recommendations to redirect business license enforcement efforts to realize operational efficiencies and enhance enforcement results have not been implemented.

During our #06-05 Hotel Tax and #08-04 Zoning and Licensing Inspection Services audits, we noted that renewable business license enforcement efforts in the Finance Department were inefficient, lacked coherence and were not adequately documented. Renewable business licenses are generally those issued to an applicant with anticipated annual renewals (e.g., business licenses, contractor licenses, occupational licenses, etc.). Garage sale permits or vehicle for hire licenses are not considered renewable licenses.

Previous efforts to identify unlicensed businesses were limited to such instances coming to the attention of license inspectors while visiting other businesses to notify them of delinquent licenses and/or collect renewal fees. This visit by a license inspector was the first contact a business with a delinquent license received. Additionally, delinquent license reports were not complete and weaknesses existed in accounting for license inspector receipt stock.

We recommended identifying potentially unlicensed businesses by comparing the City's licensing database with business data from other sources (e.g., Oklahoma Alcoholic Beverage Laws Enforcement Commission, the Oklahoma Tax Commission, private utility companies, State licensed pawnbrokers, the Oklahoma City/County Health Department, the City's Utilities Department, certificates of occupancy issued by the Development Center, etc.). To facilitate these comparisons, we recommended including fields in Accela to capture data common with other City and oversight agency databases.

We also recommended that management develop reliable past due license reports and implement more efficient methods of addressing delinquent business licenses (e.g., mailing past due notices, making phone calls, and considering penalties for untimely renewals) before referring a business for an inspector site visit.

Management agreed with our recommendations indicating that efforts to identify unlicensed businesses through data analysis had begun, new data fields in Accela would be explored, and that alternative means of contacting businesses with delinquent licenses would be developed.

The Finance Department's business licensing program was moved to the Development Services Department as part of the July 1, 2009 reorganization. In conjunction with this reorganization, the licensing supervisor position was moved to the Development Center along with the temporary assignment of three license inspector positions previously discussed in the Consolidating Nuisance Inspection Services section of this report.

As of April 29, 2011 the Development Center issued over 11,000 renewable business licenses/permits with related fees totaling approximately \$3.8 million during fiscal year 2011.

Unlicensed Businesses

Status 3 – #08-04 Recommendation 7 and #06-05 Recommendation 13

Not Implemented – Procedures to cost-effectively identify potentially unlicensed businesses by comparing the City’s licensing database with business data from other sources have not been implemented (i.e., it may not be cost-effective to investigate licenses with lower fees, licenses without ready sources of comparative data, or licenses with alternative enforcement procedures such as withholding construction permits from unlicensed contractors).

In anticipation of such comparisons, data fields for sales tax identification numbers and permit numbers issued by the Oklahoma Alcoholic Beverage Laws Enforcement Commission were added to Accela. However, we noted that meaningful sales tax identification numbers are not being captured. We identified over 800 invalid numbers recorded in the licensing database as of April 29, 2011 for renewable licenses issued in fiscal year 2011.

Management Response 3

Agree with status. Procedures to cost-effectively identify potentially unlicensed businesses by comparing the City’s licensing database with business data from other sources will be implemented on an on-going basis. Initial data checks with the ABLE Commission and Oklahoma City/County Health Department data were attempted in March 2011. These checks were not efficient due to insufficient data collection in Accela. Permits and Licensing will continue to collect proper data and pursue data checks deemed most effective in terms of data availability and dollar impact. The City Treasurer’s Office is providing a data check of business license holders against State Sales Tax license data with an anticipated completion date in the first quarter of FY 11-12.

Status 4 – #06-05 Recommendations 10, 11 and 14

Partially Implemented – Late fees for untimely license renewals have not been developed. Instead management will use citations to enforce licensing requirements for those businesses that refuse to obtain and/or renew licenses. After the start of our audit, the Development Services Department began working with the Municipal Counselor’s Office to develop a process for citing and prosecuting businesses operating without a current license.

Management Response 4

Agree with status. By December 31, 2011, a process using citations to enforce licensing requirements for those businesses that refuse to obtain and/or renew licenses will be fully implemented.

Status 5 – #06-05 Recommendation 15

Not Implemented – A current inspection by the Oklahoma City/County Health Department is not verified before renewing hotel licenses. Management is reviewing the Municipal Code to assess applicability for other licenses requiring such inspections.

Management Response 5

Agree with status. By August 31, 2011, all applicable licenses will require a verification of Oklahoma City/County Health Department inspection before issuance.

Status 6 – #06-05 Recommendation 16

Addressed – Management explored our recommendation to capture information relating to business owners unsuccessfully applying for a license so that license inspectors could visit the location to ensure the business is not operating without a license. Through consultation with the Information Technology Department, it was determined that incomplete license applications cannot be recorded in Accela.

Management Response 6

Agree with status. The recommendation to capture incomplete license application data in Accela cannot be fulfilled due to limitations to the system and is therefore addressed.

License Renewals

Status 7 – #08-04 Recommendation 6 and #06-05 Recommendations 6 and 9

Not Implemented – Management has not developed an efficient, practical process to address delinquent license renewals.

Development Center management indicated that business owners are notified via U.S. mail before and after each license expires. While we were able to verify that form letters and reporting processes have been developed, we were unable to confirm that these notices are mailed consistently.

Accela data indicates that a significant number of business licenses expire each year without being renewed. As of February 9, 2011, we noted that the licensing system reflected 3,785 renewable licenses expiring during the audit period July 1, 2008 through December 31, 2010 with unknown dispositions. However, our limited testing indicates the number of expired licenses in Accela may not be indicative of businesses operating without a license. We randomly selected 13 locations with 37 expired licenses. We contacted the business owners and determined:

- 6 locations, 16 licenses, have new owners with existing valid licenses

- 5 locations, 13 licenses, are no longer in business
- 1 location, 4 licenses, was operating without a license
- 1 location, 4 licenses, renewed their license prior to our contact

Previous recommendations to develop an efficient, practical process to address delinquent business licenses should be implemented. This process should include the following:

- Completely capturing contact information when licenses are issued
- Updating the status of prior licenses at a location when new owners obtain licenses
- Designing efficient methods of notifying businesses (e.g., letter, email or telephone) before and/or after licenses expire
- For locations/businesses with multiple licenses, sending one combined notice rather than separate notices for each license
- Developing criteria balancing public safety with site inspection costs for unresponsive businesses (i.e., it may not be cost-effective to request inspectors visit sites with lower-fee licenses or licenses with alternative enforcement procedures such as withholding construction permits from unlicensed contractors)
- Consistently carrying out established procedures
- Completely and accurately updating Accela to reflect results of delinquent license follow-up procedures
- Periodically assessing the effectiveness of established procedures and evaluating whether specific aspects of the process should be modified or discontinued

An arbitrary date for implementing the procedures described above should be selected, given the overwhelming amount of effort that would be necessary to resolve all unreliable information currently in Accela.

Management Response 7

Agree with status. By October 31, 2011, an efficient, practical process to address delinquent business licenses will be fully implemented. The process will be periodically assessed for effectiveness and evaluated for modification or whether certain practice should be discontinued.

Special Event Permits

Status 8 – #08-04 Recommendation 8 and #06-05 Recommendations 7 and 8

Implemented – On January 4, 2011, the City Council approved an agreement with the Oklahoma City/County Health Department whereby Health Department inspectors will issue City licenses and collect related fees at Special Events. This agreement eliminated duplicative efforts by City inspectors and, combined with policies adopted by the Development Services Department requiring businesses to renew licenses through the Development Center also eliminated the practice of City inspectors collecting cash in the field.

Management Response 8

Agree with status. The recommendation to enter into an agreement with the Oklahoma City/County Health Department whereby the Health Department issues City special event licenses and collects the related fees has been implemented.

STRENGTHENING CONSTRUCTION INSPECTION SERVICES

Recommendations to strengthen procedures ensuring complete, objective and consistent construction inspection services have not been adequately addressed.

Outstanding Permits

While investigating an allegation that a certain homebuilder was given preferential treatment, we noted that the Development Center did not periodically review open permits to determine whether authorized work was completed and inspected. This could result in substandard work being performed without detection. Incomplete inspections could also create a perception of favoritism. We recommended that the Development Center periodically identify and follow-up on permits that have been outstanding for long periods of time, particularly those where life-safety is a more likely issue. Management agreed with our recommendation.

Status 9 – #178 Recommendation 1

Not Addressed – Management developed a process whereby property owners and/or contractors are notified via letter at 30 days and again at 60 days after a permit has no activity in nine months or when temporary occupancy or electric service is 90 days past expiration.

We noted that these notices do not contain the specific reason for which the notice is being sent and do not describe associated possible negative consequences (e.g., potential citation for work performed without inspection, occupancy without approval, etc.). Additionally, we could not confirm that the described notification procedures are carried out consistently.

Accela included 3,244 permits without activity in nine months¹ and 511 temporary occupancy or electric service authorizations 90 days past expiration during the period July 1, 2008 through December 31, 2010.

Previous recommendation to identify and follow-up on permits outstanding for a long period of time should be addressed. The existing process should be expanded to include the following:

- Completely capturing contact information when permits are issued

¹ This figure does not include permits inaccurately appearing on management's report of permits without activity discussed in Recommendation 1.

- Designing efficient methods of contacting these property owners/contractors (e.g., letter, email or telephone)
- Providing property owners/contractors with sufficient information regarding long-outstanding permits and possible penalties for noncompliance
- Developing criteria balancing public safety with costs of additional follow-up efforts for unresponsive property owners/contractors (i.e., it may not be cost-effective to pursue permits or temporary authorizations where life-safety issues are not likely and/or further follow-up efforts may be more cost-effective for contractors with a higher number of long-outstanding permits)
- Consistently carrying out established procedures
- Periodically assessing the effectiveness of established procedures and evaluating whether specific aspects of the process should be modified or discontinued

An arbitrary date for implementing the procedures described above should be selected, given the overwhelming amount of effort that would be necessary to resolve all long-outstanding permits in Accela.

Management Response 9

Agree with status. By October 31, 2011, an efficient, practical process to identify and follow-up on permits outstanding for a long period of time will be fully implemented. The process will be periodically assessed for effectiveness and evaluated for modification or whether certain practices should be discontinued.

Conflict of Interest

While investigating allegations that a certain contractor was given preferential treatment, we noted that the Development Center did not have procedures in place to identify and address instances where inspectors may not be objective, in fact or appearance, to perform their work. We recommended that the Development Center require inspectors to disclose such instances, develop criteria for assessing inspector disclosures, and consider known potential conflicts in assigning work. Management agreed with our recommendation.

Status 10 – #178 Recommendation 2

Not Addressed – In calendar year 2007 inspectors were required to complete disclosure statements and Development Center management obtained guidance from the Municipal Counselor’s Office regarding conflicts of interest. Identified conflicts were entered into Accela, which was programmed to reroute conflicting inspection requests to an inspector’s supervisor. We were not able to confirm that inspectors have disclosed possible conflicts of interest since 2007.

Management Response 10

Agree with status. Disclosure statements for conflicts of interest involving construction inspectors have been updated for FY 10-11 and will be updated on an annual basis or upon a change in conflict status moving forward.

Citation Issuance

While investigating allegations of both preferential and unfair treatment in being cited for Municipal Code violations, we noted that the Development Center did not have procedures in place to reasonably ensure consistent use of citations. We recommended developing guidelines for when a citation is warranted, better tracking of violation notices and citations issued to contractors, and all inspectors possessing current citation books. Management agreed with our recommendations relating to developing issuance guidelines and tracking inspector enforcement actions.

Status 11 – #178 Recommendation 3

Not Addressed – Guidelines for issuing violation notices and citations have been developed and a database for tracking violation notices and citations by contractor has been developed. However, we could not confirm that the guidelines have been issued to inspectors and activity had not been consistently entered into the tracking database.

Management Response 11

Agree with status. Guidelines for issuing violation notices and citations have been issued to all inspectors. The database for tracking violation notices and citations by contractor has been updated for FY 10-11 and will be maintained timely moving forward and reviewed by management quarterly.

Customer Feedback

In an audit report issued in February 1998, we recommended that Development Center management establish a system for proactively eliciting customer feedback and to record, summarize and report the receipt, investigation and disposition of customer complaints. Management did not implement our recommendations, which we reaffirmed in our October 2007 investigation report. Management again agreed with our recommendations.

Status 12 – #178 Recommendation 4

Not Implemented – Efforts to obtain, investigate and utilize customer input are unchanged. A comment box is available in an inconspicuous location in the permit counter area, few comments

are collected, investigation and disposition of complaints is not documented and comments are not periodically summarized for overall operational assessment.

Previous recommendations to expand customer feedback efforts should be implemented.

Producing summarized complaint reports and proactively eliciting feedback from a wide customer base will provide helpful management information and perspective.

Management Response 12

Agree with status. By August 31, 2011, a system to proactively elicit customer feedback and to record, summarize and report the receipt, investigation and disposition of customer complaints will be fully implemented.

ADDITIONAL RECOMMENDATION

Management oversight of the Permits and Licensing Program should be improved.

The following instances of Permits and Licensing Program operational activities not being consistently performed/documented or assessed for cost-effectiveness have been previously discussed in this report:

- Meaningless sales tax identification numbers recorded in Accela (Status 3)
- Incomplete understanding of which licenses require Oklahoma City/County Health Department inspections and such known requirements not performed during hotel license renewal (Status 5)
- Delinquent license renewal follow-up procedures undocumented, process effectiveness not assessed, and license disposition unknown (Status 7)
- Long-outstanding permit follow-up procedures undocumented, inadequate notices mailed to property owners/contractors, and process effectiveness not assessed (Status 9)

In addition to the issues above, we noted other similar instances during our audit that are indicative of inadequate program oversight:

- The number of issued licenses and residential sale permits included in Leading for Results program reports could not be verified due to known and unresolved problems with supporting reports from Accela.
- Inconsistent data entry in placing a license in inactive status resulted in more than 450 licenses inaccurately appearing on management's report of expired licenses during the period July 1, 2008 through December 31, 2010. As stated in Status 7, we could not confirm that business owner notification procedures were carried out during our audit period. If these procedures were carried out, the inaccurate management report would have resulted in erroneous notices.
- Inconsistent data entry in closing permits resulted in more than 7,000 permits inaccurately appearing on management's report of long-outstanding permits during our audit period. Based on conditions described in Status 9, the risk of erroneous notices

relating to these permits appears to be the same as that discussed above for expired licenses.

Finally, while not within the scope of this audit, we also noted the following issues during our investigation of allegations pertaining to program cash collections of which we have initiated a separate audit:

- Inability to reconcile permits/licenses issued with revenues recorded in the City's financial system.
- Untimely entry of license renewal applications in Accela.

Recommendation 1

Oversight of the Permits and Licensing Program should be improved. Additional effort and attention are needed to ensure operations are designed to achieve desired results, designed processes are carried out, and control/enforcement efforts are periodically assessed for cost-effectiveness.

Management Response 1

Agree with recommendation. By October 31, 2011, oversight of the Permits and Licensing Program to ensure operations are designed to achieve desired results, designed processes are carried out, and control/enforcement efforts are periodically assessed for cost effectiveness will be fully implemented.



MEMORANDUM

The City of
OKLAHOMA CITY

TO: Jim Williamson, City Auditor

THROUGH: James D. Couch, City Manager *JDC*

FROM: *BT* Bob Tener, Development Services Director

DATE: June 24, 2011

SUBJECT: Development Services Department Follow-up Audit



Following are management's responses to the status of recommendations outlined in the recent Development Services Department Follow-up Audit.

1. Agree with status. By December 31, 2011, cross-training of inspectors to perform licensing inspections will be fully implemented.
2. Agree with status. By September 30, 2011, cross-training of inspectors to perform certain construction inspections will be fully implemented.
3. Agree with status. Procedures to cost-effectively identify potentially unlicensed businesses by comparing the City's licensing database with business data from other sources will be implemented on an on-going basis. Initial data checks with the ABLE, Commission and Oklahoma City/County Health Department data were attempted in March 2011. These checks were not efficient due to insufficient data collection in Accela. Permits and Licensing will continue to collect proper data and pursue data checks deemed most effective in terms of data availability and dollar impact. The City Treasurer's Office is providing a data check of business license holders against State Sales Tax license data with an anticipated completion date in the first quarter of FY 11-12.
4. Agree with status. By December 31, 2011, a process using citations to enforce licensing requirements for those businesses that refuse to obtain and/or renew licenses will be fully implemented.
5. Agree with status. By August 31, 2011, all applicable licenses will require a verification of Oklahoma City/County Health Department inspection before issuance.
6. Agree with status. The recommendation to capture incomplete license application data in Accela cannot be fulfilled due to limitations to the system and is therefore addressed.

7. Agree with status. By October 31, 2011, an efficient, practical process to address delinquent business licenses will be fully implemented. The process will be periodically assessed for effectiveness and evaluated for modification or whether certain practice should be discontinued.
8. Agree with status. The recommendation to enter into an agreement with the Oklahoma City/County Health Department whereby the Health Department issues City special event licenses and collects the related fees has been implemented.
9. Agree with status. By October 31, 2011, an efficient, practical process to identify and follow-up on permits outstanding for a long period of time will be fully implemented. The process will be periodically assessed for effectiveness and evaluated for modification or whether certain practices should be discontinued.
10. Agree with status. Disclosure statements for conflicts of interest involving construction inspectors have been updated for FY 10-11 and will be updated on an annual basis or upon a change in conflict status moving forward.
11. Agree with status. Guidelines for issuing violation notices and citations have been issued to all inspectors. The database for tracking violation notices and citations by contractor has been updated for FY 10-11 and will be maintained timely moving forward and reviewed by management quarterly.
12. Agree with status. By August 31, 2011, a system to proactively elicit customer feedback and to record, summarize and report the receipt, investigation and disposition of customer complaints will be fully implemented.
13. Agree with recommendation. By October 31, 2011, oversight of the Permits and Licensing Program to ensure operations are designed to achieve desired results, designed processes are carried out, and control/enforcement efforts are periodically assessed for cost effectiveness will be fully implemented.

Thank you for your professional review of this program.