

**Post-Audit Review 17-07:
ECD Codes Enforcement**

June 2019

City Auditor

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OFFICE OF INTERNAL AUDIT

Stan Sewell, City Auditor

June 19, 2019

To: Mayor Andy Berke
City Council Members

Subject: Post-Audit Review of ECD Codes Enforcement (Report #17-07)

Dear Mayor Berke and City Council Members:

Attached is a summary report on the status of audit recommendations in our 2018 Economic and Community Development Codes Enforcement report. The purpose of this report is to confirm whether, and to what degree, management has implemented the recommendations made in the original audit.

The original audit concluded:

1. ECD Codes Division had some deviations from stated policies; and,
2. Opportunities existed to improve operational procedures; and
3. There was a need to develop a comprehensive policy and procedures manual to provide guidance for ensuring violations are processed consistently and according to City Code; and,
4. Management needed to provide supervisory review to ensure violations are closed accurately.

The audit had three recommendations to improve efficiency and effectiveness of the ECD Codes Division operations. At the time of this Post-Audit Review, all three were implemented.

This Post-Audit Review consisted principally of inquiries of City personnel and examinations of various supporting documentation. It was substantially less in scope than an audit in accordance with generally accepted government auditing standards. The evidence obtained provided a reasonable basis for our conclusions; however, had an audit been performed, other matters might have come to our attention that would have been reported to you and our conclusions may have been modified.

Sincerely,

Stan Sewell, CPA, CGFM, CFE
City Auditor

Attachment

cc: Audit Committee Members
 Stacy Richardson, Chief of Staff
 Maura Sullivan, Chief Operating Officer
 Donna Williams, ECD Administrator
 Beverly Moultrie, Human Resources Director
 Jim Arnette, TN Local Government Audit

RECOMMENDATIONS IMPLEMENTED (3)

Recommendation

- 1 We recommended ECD management consolidate all their policies and procedures into one comprehensive manual and include day-to-day operations, functions, and expectations of departmental personnel, as well as the process and requirements for each type of inspection and court proceeding. The procedures should also include instructions on documenting evidence in both CityView and court case files.
- 2 We recommended ECD management develop and implement written procedures to require supervisor review of inspectors' CityView cases and court documents to ensure they have been properly handled and are closed with sufficient documentation. The procedure should include steps to verify photos are present to close the case properly and inspections are performed.
- 3 We recommended ECD management enforce the stated certification requirements for their inspectors. Only individuals meeting minimum requirements should be appointed to positions. Individuals given conditional employment should be released from employment if they fail to meet the required conditions in the time frame specified. ECD management should take appropriate action to remove employees who do not meet the requirements of their employment.

Actions Taken

ECD management has developed and implemented a comprehensive policies and procedures manual. The manual covers each type of violation and the procedures to process each one. In addition, the manual specifically requires photos and proper documentation to close a case. There are specific details on how to handle court cases and the documentation required. Staff are provided weekly training on the manual information.

ECD management has reduced the size of each supervisor's territory to provide them more time to review cases and train staff. They have implemented written supervisor procedures which require a weekly review of a sample of each inspector's cases to ensure they are processed accurately. The procedures specifically require the supervisors to ensure the cases are complete with photos and documentation. The supervisors are also observing inspector's court performance to ensure the case is properly documented and presented. In addition, they are driving each inspector's territory at least once a month and discussing any issues found.

ECD staff who lacked the required certification by the set deadline either retired or were demoted. ECD management has hired three new inspectors who are currently working on passing the required certifications.

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