

CITY OF PHILADELPHIA PENNSYLVANIA

OFFICE OF THE CONTROLLER

DEPARTMENT OF
LICENSES AND INSPECTIONS

Special Investigation of L+I Operations

September 2015

City Controller
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DEPARTMENT OF LICENSES AND INSPECTIONS FOLLOW-UP INVESTIGATION

SPECIAL INVESTIGATION OF L+I OPERATIONS

Background

The Office of the Controller (City Controller's Office) has conducted several investigations and audits of the Department of Licenses and Inspections (L+I) since the tragic June 2013 deadly building collapse at 22nd and Market Streets. These reviews were performed to assess L+I's ability to meet public safety measures with regard to demolition and construction standards, imminently dangerous and unsafe building structures, and overall internal controls and management performance.

Recent efforts by the City Controller's Office to conduct a performance audit of the L+I's building inspection processes, for both construction and demolition, to determine if they were properly controlled to minimize the danger of substandard building practices to the public were met with huge resistance by L+I management. What started as an audit evolved into a special investigation, fueled by various sources that provided anecdotal information that we attempted to validate. The investigation centered on determining whether: 1) all L+I inspectors are certified in the Pennsylvania Department of Labor and Industry Uniform Construction Code (UCC); 2) newly hired inspectors receive performance evaluations; 3) overtime is properly substantiated and documented; 4) only certified individuals can make UCC related permit and inspection entries within the department's database of inspection activities (HANSEN); 5) an adequate audit trail of inspection activities exists within HANSEN; and 6) inspectors are systematically rotated between L+I Districts.

What the Controller's Office Found

After reviewing payroll documentation received as part of a subpoena issued to L+I and conducting inquiries with staff, we found that L+I:

- Continues to jeopardize public safety by employing inspector trainees who fail to obtain the required UCC certifications and allowing those trainees to conduct inspections.
- Is not in compliance with Civil Service Regulation 23.031, which requires newly hired employees to receive a two and five-month probationary performance report.
- Does not adequately monitor overtime worked by its inspectors, resulting in a 235 percent cost overage in fiscal year 2015.
- Staff and/or management can easily manipulate data within the HANSEN System. Specifically, HANSEN allows uncertified inspectors the ability to update inspection records. Additionally, the system allows comments to be overwritten, significantly curtailing audit trail capabilities.
- Does not have a formalized and institutionalized policy of systematically rotating its inspectors between the five inspection districts.

What the Controller's Office Recommends

The City Controller's Office has developed a number of recommendations to address the above findings. These include: 1) revising the job specifications or the probationary period for the construction codes specialist trainee position; 2) requiring the preparation of probationary employee performance reports; 3) monitoring overtime more effectively; 4) limiting data entry for inspection activity within the permit and inspection database to UCC certified inspectors only; 5) maintaining a proper audit trail of all activity within the permit and inspection database; 6) developing and implementing a formalized policy for inspector rotations.

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Background

In response to the June 5, 2013 building collapse at 2136 Market Street, that killed six people and injured 13 others, the mayor of Philadelphia formed a panel of experts to review and evaluate the Philadelphia Department of Licenses and Inspections (L+I). The panel of experts, referred to as the Special Independent Advisory Commission, issued its report to the mayor in September 2014. Among the many recommendations made in that report, the Commission urged the Office of the Controller (City Controller's Office) to conduct more in-depth audits that include an assessment of the effectiveness of internal controls and report any weaknesses.

In reply to the recommendations of the Advisory Commission, the mayor formed a sub-committee consisting of members of the mayor's cabinet, including the city's Finance Director. That sub-committee agreed that the City Controller's Office should conduct additional financial and programmatic audits of L+I for at least the next three fiscal years.

With that backdrop in mind, the City Controller's Office attempted to initiate an audit of L+I's building inspection processes, for both construction and demolition, to determine if they were properly controlled to minimize the danger of substandard building practices to the public. Encompassed in the audit was to be a follow-up on the status of recommendations we made regarding demolition inspections in our report titled *Performance Audit of Oversight for Private Property Demolitions* issued in May 2014 http://www.philadelphiacontroller.org/publications/audits/L&I_DemolitionsAudit2014.pdf.

Despite L+I's outward appearance of being willing to cooperate, our efforts to conduct the audit were met with resistance. Resistance took the form of either responding incompletely, responding slowly, or, in some instances not responding at all to our requests for information. Because of the lack of full cooperation, the audit took a turn and evolved into a special investigation. This investigation focused on determining whether: 1) all L+I inspectors are certified in the Pennsylvania Department of Labor and Industry Uniform Construction Code (UCC); 2) newly hired inspectors receive performance evaluations; 3) overtime is properly substantiated and documented; 4) only certified individuals can make UCC related permit and inspection entries within HANSEN;¹ 5) an adequate audit trail of inspection activities exists within HANSEN; and 6) inspectors are systematically rotated between L+I Districts.

Inspectors Are Not Properly Certified

After the tragic event of June 2013, the Nutter Administration provided additional funding to L+I to increase its inspector workforce. As it rebuilds its workforce from a staffing level low of 292 employees in fiscal year 2011, L+I is under intense pressure to find qualified individuals to carry out its mission and to fill the 393 positions budgeted for fiscal year 2016. In the interim, however, L+I continues to jeopardize public safety by using non-certified Construction Codes Specialist Trainees to perform inspections within the city.

In order for a construction site inspection to be valid and legal, the Pennsylvania Department of Labor and Industry requires inspectors to be certified in accordance with the state's Uniform Construction Code (UCC). As such, the city requires an individual employed as an L+I Construction Codes Specialist Trainee to obtain four UCC certifications within 18 months of their hire date.² Despite the state regulation and city employment requirement, we found that non-certified inspector trainees conduct construction site inspections, and record related inspection entries in the HANSEN System. As such, we believe that L+I is jeopardizing public safety, and apparently so did the Pennsylvania Department of Labor and Industry who in a letter dated March 27, 2015 ordered L+I to stop the practice.

¹ HANSEN is L+I's current database system used to document and house permit application and inspection reports.

² According to the Civil Service job specification, the candidate has 18 months to obtain the following certifications: building inspector; accessibility inspector/plan examiner; mechanical inspector; and energy inspector.

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Table 1: UCC Certifications, Probationary Performance Reports, and Inspections							
Trainee	Start Date	Required UCC Certifications Obtained*	Required UCC Certifications Obtained Within Six Months	Compliant With Job Specifications	Two-Month Probationary Rating Filed Date	Five-Month Probationary Rating Filed Date	Conducted Inspections Without UCC Certifications
1	10/2014	3	Yes	N/A	None	None	No
2	11/2014	3	Yes	N/A	None	None	No
3	10/2014	3	Yes	N/A	None	None	No
4	7/2014	2	Yes	N/A	9/2014	None	No
5	10/2014	4	Yes	Yes	None	None	No
6	11/2014	0	No	N/A	None	None	Yes
7	10/2014	1	No	N/A	None	None	Yes
8	10/2014	3	Yes	N/A	None	None	No
9	10/2014	3	Yes	N/A	None	None	No
10	10/2014	2	Yes	N/A	None	None	No
11	10/2014	2	Yes	N/A	None	None	Yes
12	10/2014	1	No	N/A	None	None	No
13	10/2014	4	Yes	Yes	None	None	No
14	10/2014	4	Yes	Yes	None	None	No
15	10/2014	3	Yes	N/A	None	None	No
16	10/2014	3	Yes	N/A	None	None	No
17	10/2014	1	No	N/A	None	None	No
18	10/2014	4	Yes	Yes	None	None	No
19	10/2014	3	Yes	N/A	None	None	No
20	10/2014	2	Yes	N/A	None	None	No
21	10/2014	1	No	N/A	None	None	Yes
22	10/2014	4	Yes	Yes	None	None	No
23	10/2014	4	Yes	Yes	None	None	No
24	11/2014	0	No	N/A	None	None	No
25	11/2014	2	Yes	N/A	None	None	No
26	11/2014	4	Yes	Yes	None	None	No
27	11/2014	1	No	N/A	None	None	No
28	11/2014	4	Yes	Yes	None	None	No
29	11/2014	2	Yes	N/A	None	None	Yes
30	11/2014	0	No	N/A	None	None	Yes
31	11/2014	4	Yes	Yes	None	None	No

N/A - Not applicable. Employee has not yet reached 18 months as a trainee.
 * - Job specification requires UCC certification in:
 Building Inspector; Accessibility Inspector/Plan Examiner; Mechanical Inspector; and Energy Inspector.

Source: Prepared by the City Controller's Office based on a review of the city's Payroll System

Sources told us that it was the department's past practice to terminate inspector trainees who did not pass at least two UCC certifications prior to the end of their six month employment probationary period. However, we were informed L+I has done away with that practice and instead, now allows trainees a full 18 months (as provided in the job specification) to obtain the required certification. Sometimes if trainees have not obtained the required certifications by the end of the 18-month period, they may be transferred to the Construction Site Task Force (CSTF) unit where UCC certification is not mandated.³ However, it should be noted that they are still working under the same job title for which they are not qualified.

As shown in Table 1 above, our review of the state's UCC certification website disclosed that, of the 31 recently hired L+I construction codes specialist trainees, three did not have any of the four required certifications, while another five only had one of the necessary certifications. According to the HANSEN System, it appears that six of these 31 trainees conducted 103 inspections prior to obtaining the required

³ The CSTF was created in 2013 to address construction site licensing issues. These issues are considered more administrative in nature, and not technical inspections, which are conducted for safety purposes.

UCC certifications. Further investigation disclosed two additional inspectors that appeared to have conducted over 1,908 inspections without the appropriate UCC certifications.

In our opinion, employing individuals who do not meet the minimum required UCC certifications outlined in the job specification unnecessarily jeopardizes the safety of the public. As such, we recommend that L+I management, in conjunction with the city's Department of Human Resources (HR), consider revising the job specifications for the L+I construction codes specialist trainee position, so that a minimum of two UCC certifications must be obtained prior to six months. Any candidate that has not met this requirement should then be terminated during the six month probationary period. Alternatively, L+I management can request an extension of the probationary period for this position, from six months to 18 months, from the Civil Service Commission. Either option will enable L+I management to terminate a candidate with cause during the probationary period if the required certifications are not obtained.

Probationary Employee Performance Reports Are Not Prepared

Civil Service Regulation 23.031 stipulates that "a performance report on each probationary employee must be prepared and filed within ten days following the completion of the second and fifth months of the probationary period." These reports should provide employees with feedback on their performance and guide them on where improvements are necessary to meet the established and anticipated performance level of their job title specifications.

Given the importance of their work to public safety, newly hired L+I inspectors should be timely evaluated and, when necessary, terminated if they fail to obtain the required UCC certifications. To validate whether the second and fifth-month performance reports had been given to newly hired inspectors as required, we requested a sample of personnel files from L+I. However, management would not provide us with timely access to the files, and we therefore had to rely solely on records maintained within the city's HR data management system, Oracle.

As Table 1 above illustrates, of the 31 L+I construction codes specialist trainees hired since January 2014, Oracle showed that only one had received a two-month probationary report. The system also showed that none of the 31 trainees had received a five-month report. Failure to complete the required probationary performance reports increases the risk that unqualified employees will attain permanent civil service status.

We recommend that L+I management require supervisory personnel to prepare probationary performance reports for all newly hired civil service employees and to upload them into Oracle. Moreover, we also suggest that evaluated employees be given an opportunity to review their performance reports and sign them, in accordance with civil service regulations. If the employee has not met all the minimum qualification of their job specification, then L+I management must take appropriate action to terminate the employee.

Overtime is Not Monitored Sufficiently by L+I Management

Our recent investigation issued on August 27, 2015 uncovered emails between L+I officials that suggested overtime may have been abused by some employees of the department, and the abuse ignored by management. With the influx of budgetary dollars arising out of the tragedy that occurred in June 2013, overtime availability at L+I increased significantly — from \$471,000 in fiscal year 2010 to over \$1.6 million in fiscal year 2015. Actual overtime costs exceeded budgeted costs by 113 percent and 235 percent, in fiscal years 2014 and 2015, respectively, as shown in Table 2 below.

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Fiscal Year	Budget	Actual	Over/(Under) Budget	Percent Over/(Under) Budget
2010	\$ 788,245	\$ 470,904	\$ (317,341)	(40.3)
2011	\$ 607,352	\$ 553,338	\$ (54,014)	(8.9)
2012	\$ 532,000	\$ 600,389	\$ 68,389	12.9
2013	\$ 591,089	\$ 650,832	\$ 59,743	10.1
2014	\$ 479,642	\$1,026,147	\$ 546,505	113.9
2015	\$ 485,000	\$1,628,803	\$ 1,143,803	235.8
Source: Prepared by the City Controller's Office based on a review of the city's FAMIS system				

Subpoenaed evidence we obtained showed that in some instances L+I inspectors created the need for more overtime than necessary. L+I policy allows a total of four hours overtime when an employee is called out on an emergency to inspect a property while off duty. If the actual inspection time takes 30 minutes, the inspector receives the entire four-hour block of overtime. Additionally, if there is at least a 30-minute break in time from the last four-hour block of overtime, then inspectors can charge an additional four hours of overtime to respond to a second emergency call.

At least one L+I employee asserted that the above policies have led to some L+I inspectors abusing the system. The employee's assertion was as follows:

An emergency call will come in to which an inspector responds and receives four hours overtime regardless of how long it takes to handle. A second emergency call comes in, but the inspector doesn't respond to it until after a 30-minute break occurs, therefore creating the need for another four-hour block of overtime.

Because L+I management chose to be unresponsive or slow in fulfilling our requests for information, we were unable to validate the above assertions within the time frame allotted for this project. To the extent we could, however, we reviewed calendar year 2014 overtime for the ten inspectors with the highest amount of overtime (see Table 3 below). Base plus overtime earnings for these ten inspectors totaled \$813,101 and ranged from \$59,695 to \$110,179 with many of them earning more than 50 percent of their base salary in overtime.

Employee Title	Unit/Division	Base Salary	Overtime	Base Plus Overtime	Overtime Percentage
Construction Plans Review Specialist	CSTF	\$ 59,627	\$ 50,552	\$ 110,179	84.78%
Construction Codes Specialist	CSU	\$ 52,595	\$ 41,060	\$ 93,655	78.07%
Construction Codes Specialist	CSTF	\$ 46,683	\$ 35,958	\$ 82,641	77.03%
Construction Codes Specialist	CSU	\$ 52,595	\$ 34,014	\$ 86,609	64.67%
Construction Plans Review Specialist	CSU	\$ 62,447	\$ 28,780	\$ 91,227	46.09%
Construction Plans Review Specialist	CSU	\$ 62,447	\$ 24,808	\$ 87,255	39.73%
Construction Codes Specialist Trainee	CSU	\$ 42,434	\$ 17,261	\$ 59,695	40.68%
Construction Codes Specialist	CU	\$ 52,195	\$ 17,117	\$ 69,312	32.79%
Construction Trades Inspector	CSU	\$ 49,335	\$ 16,899	\$ 66,234	34.25%
Construction Trades Inspector	CSU	\$ 49,735	\$ 16,559	\$ 66,294	33.29%
Total		\$ 530,093	\$283,008	\$ 813,101	53.39%
CSTF - Construction Site Task Force; CSU – Contractual Services Unit; CU – Compliance Unit					
Source: Prepared by the City Controller's Office based on a review of the city's Payroll System					

In most instances, reasons for the overtime on authorization forms of the top ten inspectors earning overtime were vague. However, for at least one inspector, we were able to glean information that suggests L+I's overtime system permits opportunities for allowing abuse. For instance, during 2014 the inspector, who worked in the Emergency Services Division, submitted 247 overtime authorizations for a total of 1,089 hours. Of the 247 authorizations, 147 of them were for overtime to be worked in conjunction with their daily normal work hours, and of these, 127 (or 86 percent) involved overtime for exactly four-hour blocks of time. Many of these authorizations listed emergencies, service calls, and other non-administrative activities. Other observations we made about this inspector's overtime authorizations included:

- On 42 occasions, the inspector submitted more than one overtime authorization on the same day and 27 (64 percent) of the authorizations occurred within one hour of completing the previous four-hour block of overtime. For instance, overtime authorizations on July 29 and 30, 2014 show two back-to-back emergency calls for "Vehicle collision," the second one being exactly one hour after the inspector completed work on the first call. In another instance, four separate four-hour overtime requests were submitted on August 2 and 3, 2014, for a total of 16 hours of overtime each day. After the first request, each of the next three came exactly 30 minutes after the inspector was "off the clock."
- Two separate four-hour overtime requests dated February 19 and 20, 2014, both starting at 2:30 AM for a "Car collision with structure" at the exact same address.
- Two separate four-hour overtime requests, both dated February 22, 2014 and both with a starting time of 3:30 PM and ending time of 7:30 PM, but with different details of work.
- Two overtime requests, both on May 30, 2014 — one for four hours from 3:30 PM to 7:30 PM and the other for 6 hours from 3:30 PM to 9:30 PM. The hours appear to overlap and both were for different activities.

Although the need for overtime in the name of public safety may be inevitable, management must provide proper oversight. Our inspection of the overtime records for the ten inspectors earning the highest amount of overtime suggested the culture in L+I for approving overtime appeared very lenient. We noted, for example, that several inspectors failed to adequately describe the work to be done on overtime. Many of the descriptions documented by the inspectors were vague, and in some instances, nonexistent. A description might read only as "Complaints" or "CSTF Admin." In addition, as Table 4 below depicts, of 930 overtime authorization forms reviewed, we observed that:

- 906 (97.4 percent) showed only one approval signature;
- 11 (1.2 percent) showed two approval signatures;
- 12 (1.3 percent) showed no approval signatures; and
- 1 (0.1 percent) did not have an authorization form.

Although there is no citywide policy requiring two approval signatures for overtime, many city agencies have adopted such a policy and the standard city authorization forms for overtime or compensatory time include two approval lines. Given the nature of L+I's work and the propensity for possible abuse, clearly supervisors need to take responsibility for monitoring overtime to ensure that the hours worked are necessary and appropriate, and to hold employees working overtime accountable. In the example of the one inspector above, despite the extensive overtime hours, the only documentation submitted to substantiate the hours worked in many instances was a single supervisor's signature on the overtime

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authorization document. We believe that such minimal documentation is inadequate to properly justify the necessity of the substantial overtime hours being claimed.

Title	Number of Approval Signatures			No Overtime Authorization	Total Overtime Occurrences
	Two	One	None		
Construction Plans Review Specialist	-	182	-	-	182
Constructions Codes Specialist	-	77	2	-	79
Constructions Codes Specialist	6	154	4	-	164
Constructions Codes Specialist	-	125	-	-	125
Construction Plans Review Specialist	-	92	-	-	92
Construction Plans Review Specialist	-	59	-	-	59
Construction Codes Specialist Trainee*	-	-	-	-	-
Construction Codes Specialist	-	70	1	-	71
Construction Trades Inspector	4	98	1	-	103
Construction Trades Inspector	1	49	4	1	55
Total	11	906	12	1	930
*Information not available					
Source: Prepared by the City Controller's Office based on a review of overtime authorizations					

We recommend that prior to supervisory approval of emergency overtime, the supervisor obtain the listing of call-outs and compare them to the overtime authorization. If multiple calls are made during the same four hour period, the supervisor should scrutinize the overtime authorization and ask the inspector for a detailed account of the overtime worked. In addition, we recommend that all overtime authorizations be approved by two superiors as required on the authorization form.

HANSEN Access Controls Do Not Restrict Activities and Lack an Audit Trail

In a performance audit of L+I's oversight for private property demolitions, the City Controller's Office cited numerous deficiencies with the department's HANSEN database management system.⁴ That report included various matters affecting the HANSEN System's data integrity. Auditors found that there were no formal policies and procedures for several critical control activities involving security. They also had numerous concerns about certain incompatible duties among Information Technology employees and the lack of controls to provide reasonable assurance that access to the HANSEN System data was reasonably restricted to authorized individuals. Recent newspaper accounts suggest that access to the HANSEN System is still not adequately controlled. For instance, in March 2015, the Philadelphia Inquirer reported that a group of nine newly hired and non-certified L+I inspectors conducted over 600 inspections of unsafe buildings in a single week. These inspections were then recorded in L+I's HANSEN System under the name of an experienced inspector, therefore, creating a false inspection record within the HANSEN System. According to the Pennsylvania Department of Labor and Industry, any inspection not performed by a UCC certified individual is invalid. As a result, the city had to re-inspect all the affected properties. We believe this condition illustrates why it is imperative that employees without adequate UCC certifications should not be given the ability to update information involving UCC inspections in the HANSEN System if they are not certified for those inspection types.

Again, in May 2015, the Philadelphia Inquirer reported that to ensure contractors paid their fines for minor violations at construction sites, L+I began placing holds on further construction ("hold"). Once a "hold" was placed into the HANSEN System by CSTF employees, it prevented L+I inspectors from inspecting new construction and renovation projects throughout the city, because the system restricted further input capabilities. Consequently, in December 2014, L+I management eliminated the practice of

⁴ See Department of Licenses and Inspections report titled *Performance Audit of Oversight for Private Property Demolitions, May 2014*.

placing “holds” on projects. However, records of projects put on “hold” were eliminated, having been overwritten within the HANSEN System. Consequently, there is no audit trail and the possibility exists that projects were completed without proper and adequate inspections.

Inspectors we spoke to during this investigation informed us that access to the HANSEN System is given to anyone who requests it, without regard to their training or certification status. Additionally, the HANSEN System has no programmed controls to prevent unauthorized data entry. For instance, the system does not prompt the inspector to enter his or her UCC certification number before making an entry or keep track of the certification status of L+I’s inspectors. Consequently, employees without UCC certifications can update inspection records in the HANSEN System without authorization. Moreover, a supervisor does not independently review entries into the HANSEN System for accuracy. This lack of review could result in errors or irregularities occurring without timely detection. This control deficiency is one of the primary causes of the situation cited in the media report above in which nine new CSTF employees conducted what the state called invalid inspections. If these employees were not given the ability to update UCC inspections in the HANSEN System prior to obtaining their required certifications, this condition would not exist.

Additionally, L+I inspectors we interviewed informed us that the HANSEN System allows inspectors to add, delete, revise, or modify information, such as waiving or deleting inspection steps, on any case within HANSEN, regardless of whether it is assigned to them. Not surprisingly, even the inspectors to whom we spoke considered this a significant deficiency in the system. But equally important, inspector comments or notations in the HANSEN System can be edited or removed after initial input. Once edited, the comments are permanently overwritten. Capturing comments that have been overwritten can be critical during an inquiry or investigation into the history of a property. In our opinion, because L+I inspections deal with public safety, the system should capture all such comments and maintain them permanently within the system for future reference, if necessary.

The above conditions illustrate the vulnerability of data stored within the HANSEN System and that records can be easily manipulated by staff and/or management. In our opinion, such manipulation of the HANSEN System is unacceptable and should be stopped immediately.

To ensure that only qualified individuals make entries within L+I’s permit and inspection records database, we recommend that as L+I develops its planned new eCLIPSE⁵ database system, inspection update capabilities only be given to UCC certified inspectors. When non-certified individuals must make entries into inspection records, their access should be limited, and any entries made must be reviewed and approved by a certified individual. Also, evidence of such a review should be maintained within the system. Further, we recommend that L+I ensure that the permit and inspection record database maintains a proper audit trail of all activity pertaining to each inspection case.

Inspectors Are Not Rotated on a Regular Basis

Given the risk of negative influences on professional judgment, it would be wise for L+I management to mandate rotating its inspectors on a regular basis. Sources to whom we spoke informed us that although inspectors are assigned different census tracts within their assigned district, they are not transferred from one district to the next on a routine basis.

One inspector, to whom we spoke, informed us that L+I is in the process of implementing a rotation schedule in which all inspectors are to be rotated between districts every three years. To accomplish this, each district will rotate one third of their inspectors to different districts every year. Although we

⁵ Project eCLIPSE, or Electronic Commercial Licensing, Inspection & Permit Services Enterprises, launched in January 2014, will replace the current permit and inspection database, HANSEN.

attempted to obtain the official inspector rotation policy, L+I management would not timely provide it to us. As such, we could not determine if one actually exists.

As Table 5 on the following page indicates, payroll records show transfers from one district to another were practically non-existent prior to calendar year 2014. More recently, in calendar year 2015, 20 inspectors were rotated between districts. However most of these transfers occurred in the North and East District, leading us to doubt that this was part of a larger effort to rotate inspectors between districts. Further, we noted that 8 inspectors have been at the same district since October 2012. Although we commend L+I for initiating inspector rotations, we believe a more concerted effort should be made to systematically rotate all inspectors between the various districts on a more frequent basis.

To decrease opportunities for improper conduct, L+I management needs to develop and implement a formalized policy for inspector rotations. The policy should require inspectors to be rotated between districts on a routine, fair, and systematic basis.

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Table 5: Infrequency of Inspector Rotations								
District/Inspector		Oct 2012	Apr 2013	Oct 2013	Apr 2014	Oct 2014	Apr 2015	Aug 2015
Central	District Supervisor	◇	◇	✓	◇	◇	✓	◇
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	◇	◇	✓	◇	◇	◇	◇
	Inspector	*	*	◇	◇	✓	◇	◇
	Inspector	◇	◇	◇	◇	◇	✓	◇
	Inspector	◇	◇	◇	◇	✓	✓	◇
	Inspector	◇	✓	◇	◇	◇	◇	✓
Total Rotated		0	1	2	0	2	3	1
East	District Supervisor	◇	◇	◇	◇	✓	✓	◇
	Inspector	*	*	*	*	*	◇	◇
	Inspector	◇	◇	◇	◇	◇	✓	◇
	Inspector	◇	◇	◇	◇	◇	✓	◇
	Inspector	◇	◇	✓	◇	✓	✓	◇
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	*	*	◇	◇	✓	◇	◇
	Inspector	*	*	*	*	◇	✓	◇
	Inspector	◇	◇	◇	◇	✓	◇	◇
	Inspector	◇	◇	◇	◇	✓	◇	◇
Total Rotated		0	0	1	0	4	5	2
North	District Supervisor	◇	◇	◇	◇	◇	◇	✓
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	*	*	◇	◇	✓	◇	◇
	Inspector	◇	◇	◇	◇	◇	✓	◇
Total Rotated		0	0	0	0	1	1	4
South	District Supervisor	◇	◇	◇	◇	✓	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	◇	✓	◇	◇	◇	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	✓
	Inspector	◇	◇	◇	◇	✓	◇	✓
Total Rotated		0	1	0	0	2	0	2
West	District Supervisor	◇	◇	◇	✓	◇	✓	◇
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	◇	◇	✓	◇	✓	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	◇
	Inspector	*	*	◇	◇	◇	◇	◇
	Inspector	◇	◇	◇	◇	◇	◇	✓
Total Rotated		0	0	1	1	1	1	1
Total Rotations in All Districts		0	2	4	1	10	10	10
◇ – No Change in Location ✓ – Change in Location * – Not an L+I Employee during this time period								
Source: Prepared by the City Controller's Office based on a review of Payroll records								