

CITY OF PHILADELPHIA PENNSYLVANIA

OFFICE OF THE CONTROLLER

Promoting honest, efficient, and fully accountable government

DEPARTMENT OF LICENSES AND INSPECTIONS

**Performance Audit of Oversight
for Private Property Demolitions**

May 2014



City Controller
ALAN BUTKOVITZ



CITY OF PHILADELPHIA

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May 20, 2014

Carlton Williams, Sr., Commissioner
Department of Licenses and Inspections
Municipal Services Building – 11th Floor
Philadelphia, PA 19102-1687

Dear Commissioner Williams:

Pursuant to Section 6-400(d) of the Home Rule Charter, the City Controller's Office conducted a performance audit of the Department of Licenses and Inspections' (L&I) oversight of private property demolitions since the June 5, 2013 building collapse at 2136 Market Street. Our objectives were to ascertain the extent of work performed for the demolition inspections L&I asserted were performed in the week after the collapse and to determine the adequacy of L&I's newly adopted regulations and procedures for private demolitions and its compliance with these new standards. Our audit also included an evaluation of L&I's computer system controls over private demolitions. A synopsis of the results of our work, which was performed in accordance with *Government Auditing Standards*, is provided in the executive summary to the report.

We discussed our findings and recommendations with you and your staff at an exit conference. We have included your written response to the findings and recommendations and our comments on that response as part of the report. We believe that our recommendations, if implemented by management, will improve the efficiency and effectiveness of the private property demolition process overseen by L&I. Our recommendations have been numbered to facilitate tracking and follow-up in subsequent years.

We would like to express our thanks to you and your staff for the courtesy and cooperation displayed during the conduct of our work.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alan Butkovitz', written over a horizontal line.

ALAN BUTKOVITZ
City Controller

cc: Honorable Michael A. Nutter, Mayor
Honorable Darrell L. Clarke, President
and Honorable Members of City Council
Members of the Mayor's Cabinet



DEPARTMENT OF LICENSES AND INSPECTIONS PERFORMANCE AUDIT OF OVERSIGHT FOR PRIVATE PROPERTY DEMOLITIONS

EXECUTIVE SUMMARY

Why The Controller's Office Conducted The Audit

Pursuant to Section 6-400(d) of the Home Rule Charter, the City Controller's Office conducted a performance audit of the Department of Licenses and Inspections' (L&I) oversight of private property demolitions since the June 5, 2013 building collapse at 2136 Market Street. Our objectives were to (1) ascertain the extent of work that L&I performed for the demolition inspections it asserted were completed in the week after the collapse; (2) evaluate the adequacy of L&I's newly adopted procedures for private demolitions; (3) determine compliance with these new standards; and (4) assess controls over L&I's HANSEN System, the system used to document and house inspection reports.

What The Controller's Office Found

Despite assertions of having inspected 442 demolition projects and promises of a major revamp in the oversight of private demolitions after the building collapse, the culture of informality over these inspections that existed in L&I prior to the collapse still prevails and, therefore, jeopardizes public safety. Significant findings included:

- Almost half (210 of 442) of the inspections claimed to have been made in the week following the building collapse were questionable because there were no documented inspection reports.
- For over 70 percent (10 of 14) of the demolition permit applications we reviewed, plan examiners inconsistently enforced the new standards because the examiners lacked clear criteria for applying some standards, felt certain standards were unnecessary, or waived requirements when imminently dangerous properties needed expedited processing.
- For nearly 85 percent (15 of 18) of the completed demolitions occurring after the June 2013 building collapse, inspectors routinely failed to perform all demolition inspections required by newly established procedures, waiving the inspections in L&I's HANSEN System without explanation or supervisory approval. Some inspectors also lacked required professional certifications to perform the inspections.
- L&I's inspection records were insufficient, often lacking required photographs for demolition site visits and failing to document important details about work performed during inspections. Moreover, frequently, there was no evidence of independent supervisory review of inspectors' activity.

What The Controller's Office Recommends

The Controller's Office has developed a number of recommendations to address the above findings. Some of the more significant recommendations are: (1) prepare detailed inspection reports for all site visits, including those for special projects; (2) revise permit application requirements to develop clearer criteria where needed, address examiners' questions, and create a pool of pre-qualified contractors for imminently dangerous structures; (3) train inspectors in the new demolition inspection standards; (4) ensure the planned new database requires all waived inspections be fully explained and approved by supervisors, includes appropriate fields to provide details on inspection work performed, and facilitates timely supervisory reviews of inspectors' activity; and (5) require that all employees inspecting permitted demolitions possess the required professional certifications.

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INTRODUCTION

Background



On June 5, 2013, a tragedy occurred during the demolition of a building at 2136 Market Street. Six people were killed and another 14 injured when a four-story brick wall fell onto an adjoining single-story Salvation Army thrift shop that was open for business. Given the demolition project at 2136 Market Street had been permitted and inspected by the

City of Philadelphia's (City's) Department of Licenses and Inspections (L&I), serious concerns were raised regarding how effective the City's demolition permit and inspection process was in ensuring the safety of citizens.

L&I Units Responsible for Demolition Oversight

When a private property owner plans to demolish a structure within the city limits, the City requires a permit before the work can commence. L&I is the City agency responsible for demolition oversight. Demolition permit applications are received by L&I's Engineering Services Unit, whose plan examiners review the applications and all accompanying documents for compliance with City application requirements. After the plan examiner approves an application, the applicant pays the required fees and obtains the permit. Upon issuance of the permit, inspectors in L&I's Construction Services Unit (Construction Services) are responsible for monitoring the demolition work from start through completion to ensure the safety of the workers and the public. When L&I has deemed a structure to be imminently dangerous or unsafe and the property owner takes responsibility for remediating the condition by obtaining a permit to demolish the structure, the inspections of those demolitions are handled by L&I's Contractual Services Unit (Contractual Services).¹ Upon completion of the final inspection, supervisory personnel are required to review and approve the permit record, as evidenced by a certificate of approval entry, which closes out the permit.

L&I's Database for Tracking Demolition Activity

All activity for demolition permits, including the review and approval of the permit application, inspector site visits, and final supervisory approval/close-out, is to be entered and captured in L&I's HANSEN System. Inspection reports contained in HANSEN are L&I's official inspection documentation for demolition permits. Additional background information on HANSEN appears in Appendix II

¹ The Philadelphia Property Maintenance Code (Philadelphia Code Title 4, Subcode PM) Section PM-308.1 defines an imminently dangerous structure as one where there is an immediate threat of "failure or collapse of a structure or any part thereof which endangers life, or when any structure or part of a structure has fallen and life is endangered by the occupation of the structure." Section PM-307.1 describes unsafe structures as those that have "inadequate means of egress facilities, or which constitute a fire hazard, or are otherwise dangerous to human life or the public welfare, or which involve illegal or improper occupancy or inadequate maintenance." When a property owner rejects or fails to obey L&I's order to eliminate the imminently dangerous or unsafe condition, L&I has the authority to abate the condition by itself or by contract. These demolitions are initially City-funded and then the cost is billed to the property owner.

of this report. In January 2014, the City announced plans for a new L&I database system – Project eCLIPSE (electronic Commercial Licensing, Inspection and Permit Services Enterprise). With Project eCLIPSE, L&I is looking to expand online functions and make the inspection process more efficient. The estimated completion date for Project eCLIPSE is late 2015.

**Applicable
Laws**

On July 8, 2004, the City adopted the Pennsylvania statewide building code – the Uniform Construction Code (UCC) – and elected to enforce the UCC locally through L&I. The UCC requires the City to follow the technical standards of the International Building Code (IBC), which has been adopted throughout most of the United States, and is a model building code created by the International Code Council.² Philadelphia’s Building Construction and Occupancy Code (Philadelphia Code Title 4) adopts the IBC by reference and contains the local modifications to the IBC. Title 4 sections relevant to private demolitions include the Philadelphia Administrative Code (Subcode A) and the Philadelphia Building Code (Subcode B). Subcode A details the administrative, enforcement, and appeals processes L&I must follow in monitoring compliance with Subcode B, which establishes the minimum technical requirements that apply to the construction and demolition of every building in Philadelphia.

**Demolition
Practices
Before
Building
Collapse**

Prior to the June 5, 2013 building collapse, requests to perform demolition work were submitted on the standard building permit application form, the requirements for which included:

- Location and general description of the proposed work.
- Total valuation of work to be performed.
- Name, address, and license number of contractor performing the work.
- Contractor’s insurance certificate.
- Contractor’s certification of tax clearance from the City’s Department of Revenue.
- Site plan showing all construction to be demolished and the location and size of all existing structures and construction to remain on the site.
- Confirmation from the Pennsylvania One Call system, which alerts appropriate underground facility owners of the intent to dig.

L&I’s demolition permit process did not include checking the contractor’s qualifications for the demolition work or reviewing the contractor’s planned demolition procedures and safety measures.

² The International Code Council is a non-profit organization dedicated to developing a single set of comprehensive and coordinated national model construction codes.

Before the building collapse, L&I's demolition inspection practices appeared to be informal. Despite our requests, L&I management did not provide us with any formalized inspection procedures for private property demolitions effective prior to the collapse. Based upon our discussions with inspection personnel, accepted L&I practices for demolition inspections appeared to be communicated mostly through on-the-job training with other inspectors and supervisors.³

According to statements made by the L&I Commissioner, L&I inspectors generally conducted two site inspections for private property demolitions – one prior to the start of the demolition and another once the demolition was completed.⁴ As indicated by the Commissioner, these were the only two inspections required by the Philadelphia Code.

With regard to pre-building collapse regulations for the conduct of demolitions, the IBC and Philadelphia Code required demolitions to be conducted in a workmanlike manner and required protection of the public and adjoining properties. However, the codes did not dictate the means and methods by which contractors should conduct private property demolitions and did not provide detailed guidance on what constituted workmanlike manner and public protection.

**City
Asserts All
Open
Demolition
Permits
Inspected**

In response to public concerns raised by the June 5, 2013 building collapse, the City administration asserted in a press release that, in the one-week period following the building collapse, L&I inspectors had proactively inspected approximately 300 sites with open demolition permits, checking site safety conditions and looking for any other possible violations. When we requested from L&I management a list of the sites inspected, they provided us with a listing of 442 demolition permits. When asked about the difference between the 300 properties cited in the press release and the 442 permits on the listing, L&I management stated the “300 was a ballpark figure thrown out to describe what we were doing to ease public concern.” Management further explained that, for many of the 442 permits, the site was no longer an active demolition site, but the permit remained open due to “administrative reasons.” L&I management asserted that inspectors visited and performed safety assessments for all 442 demolition sites, even the inactive ones.

**Collapse Spurs
Changes to
Demolition
Regulations**

On June 7, 2013, the Mayor issued Executive Order No. 4-13, which suspended the mandatory 30-day public notice requirement for promulgating rules⁵ to allow L&I to immediately put into effect increased safety requirements regarding building demolitions. The Mayor directed L&I to “take all appropriate steps to insure [*sic*] that demolition work in this City is performed safely and

³ This on-the-job training was preceded by classroom training in the applicable construction codes.

⁴ The source of this information was the Commissioner's testimony at the July 9, 2013 Pennsylvania House Labor and Industry Committee and Urban Affairs Committee hearing on House Bill 1591, which dealt with standards for building demolitions.

⁵ Philadelphia Home Rule Charter Section 8-407 establishes public notice and comment requirements for departmental regulations.

appropriately, with the safety of the public always the paramount consideration.”

In response to the Mayor’s directive, on June 12, 2013, L&I issued Code Bulletin of Information No. B-1302: *Demolition Standards and Activity Controls*, which detailed new standards for demolition permits and inspections. To provide guidance to its employees in carrying out these new standards, L&I distributed Work Instructions PR-1319: *Demolition Permit Processing and Review* and CS-1314: *Demolition Permit Inspections* effective June 14, 2013 and June 12, 2013, respectively.

The goal of the new permit standards was to ensure that a private property owner selected a contractor who possessed the necessary qualifications and implemented an adequate plan to complete the demolition safely. To accomplish this objective, as summarized in Table 1 below, L&I’s new regulations now required the following items be submitted with demolition permit applications:⁶

Table 1: Required Submission Information With Demolition Permit Application

Required Documentation	Description
Experience	Documentation regarding the previous demolition work experience of the contractor and his/her employees.
Contract	A copy of the contract with the owner/developer for the proposed demolition showing the cost of the demolition work.
Safety Plan	A site safety plan which addresses the methods used to conduct the demolition, as well as the proposed measures for protecting adjoining structures, property, and pedestrian/vehicle traffic. ⁷
Schedule	A schedule of proposed demolition which includes the start date, identification of demolition milestones and projected dates of completion, and proposed start and stop times for daily activity.
Commitment	Commitment signed by the contractor to maintain the site safety plan on site during all demolition activity and review the plan on site with an L&I inspector prior to the demolition’s start.

Source: L&I’s Code Bulletin of Information No. B-1302

In addition to reviewing the above information, plan examiners are required to perform a search in HANSEN to determine if there are any outstanding or previous violations of conduct against the contractor. Work Instruction PR-1319 states that no permits will be issued until all violations against the contractor have been resolved.

⁶ These new submittal requirements were in addition to the items required before the building collapse.

⁷ The demolition industry refers to this plan as an “engineering study.”

Code Bulletin B-1302 and Work Instruction CS-1314 list the required inspections for each demolition permit and describe the work to be performed at each inspection, as shown in Table 2 that follows:⁸

Table 2: Required Inspection Activity Under Bulletin B-1302 and Work Instruction CS-1314

Required Inspection Visits	Description
Initial	The inspector should conduct this visit before the demolition work begins. During the visit, the inspector shall review the site safety plan with the contractor and verify utility terminations as well as pedestrian protection.
Under-slab/floor	This inspection verifies that the contractor is following the safety measures detailed in the site safety plan and applying the means and methods detailed in the plan in a safe and workmanlike manner. An under-slab/floor inspection is required for each floor of the structure being demolished. At a minimum, two under-slab/floor inspections shall be performed for each demolition permit.
Framing/close-in	The inspector ensures that an application of parging and waterproofing is applied to adjacent foundation walls prior to backfilling the cellar cavity. Additionally, the inspector shall verify all openings in exposed party walls are closed prior to covering and abandoned chimneys are capped with remaining chimneys left in service.
Prefinal/wallboard	During this visit, the inspector should determine the readiness of the project for final inspection, prepare a list of deficiencies, and verify removal of all debris and improper fill from the site prior to backfilling the cellar cavity.
Final	This inspection checks for final compliance of the permitted demolition and proper grading of the site.

Source: L&I's Code Bulletin of Information No. B-1302 and Work Instruction CS-1314

Work Instruction CS-1314 requires that inspectors take dated photos at all demolition inspections. Inspectors are directed to store these dated photos on the department's local area network drive with the file identified by street name, then number.

Code Bulletin B-1302 also dictates that all private property demolition activities be carried out in accordance with requirements mandated by City-funded demolitions. The new regulations require that all demolitions be conducted using hand methods, and the demolition proceed from top to bottom, one floor at a time unless mechanical demolitions are specifically authorized by L&I in

⁸ Code Bulletin B-1302 states that the contractor is responsible for scheduling all required inspections a minimum of 48 hours prior to each inspection.

writing. Mechanical demolitions must be based on a site safety plan and endorsed in writing by a professional structural engineer licensed in the Commonwealth of Pennsylvania. Also, Code Bulletin B-1302 provides guidance for what constitutes workmanlike manner and protection of adjacent properties.

Another L&I initiative in response to the collapse was the implementation of a Construction Site Task Force (CSTF) in July 2013. The CSTF consists of a manager and team of inspectors whose function is to inspect each permitted construction and demolition site at least once, focusing on site safety, proper licensure, and tax compliance. Effective August 4, 2013, HANSEN required a CSTF inspection for all full demolition permits.

In February and March 2014, the Mayor signed a five-bill package from City Council, which amended the Philadelphia Code by imposing additional requirements for the permit, inspection, conduct, and licensing of demolition projects in the City.⁹ These bills codified several of the provisions already instituted by Code Bulletin B-1302, such as the site safety plan, the required demolition inspections, and restrictions on mechanical demolition. Some of the legislation's new requirements, many of which are effective within 18 months of enactment, include:

- City inspectors will now be required to attend **safety training courses** designed and approved by the U.S. Occupational Safety and Health Administration (OSHA). There will also be mandatory OSHA or other safety training for all demolition workers.
- There will now be a special **demolition contractor's license** as well as a separate **demolition permit application** form.
- Special **third party site supervision** will be required in certain circumstances, such as for the use of mechanical demolition methods.

Controller Audits L&I's Demolition Oversight Since Building Collapse

It was against this backdrop that the Office of the Controller (City Controller's Office) undertook an audit of L&I's oversight of private property demolitions since the June 5, 2013 building collapse. Our audit objectives were as follows:

- For the 442 demolition site inspections that L&I management asserted were performed in the one-week period after the building collapse, ascertain the extent of work performed.
- Ascertain the adequacy of newly adopted oversight procedures for private demolitions.

⁹ The five-bill package included Bills No. 130685, 130691-A, 130698-A, 130847-A, and 130688-AA.

- Determine whether L&I was compliant with its newly adopted oversight regulations and procedures for private demolitions.
- Assess HANSEN System controls over private demolitions to identify deficiencies which could compromise the completeness, integrity, and/or usefulness of permit inspection records.

INFORMAL CULTURE OF DEMOLITION OVERSIGHT JEOPARDIZES PUBLIC SAFETY

Despite assertions of having inspected over 400 demolition projects and promises of a major revamp in the oversight of private demolitions after the June 5, 2013 building collapse, the culture of informality over these inspections that existed in L&I prior to the collapse, still prevails. Our review disclosed that almost half of the inspections claimed to have been made in the days immediately following the collapse were questionable because there were no documented inspection reports. Moreover, we found that newly implemented procedures to monitor private demolition projects, while more comprehensive and restrictive than requirements of applicable laws and other cities, were often applied inconsistently and/or carried out in such a way that raised doubt about their effectiveness. And L&I's electronic system for tracking inspection workflow – HANSEN – did not contain all the appropriate fields for documenting inspection activities, which along with several systemic control weaknesses, raise doubt about the integrity and usefulness of the data stored within the system. Years of inadequate supervision together with an inspection system that lacks structure and accountability have contributed to a casual and undocumented methodology for completing inspections and ensuring public safety.

**Asserted
Post-Building
Collapse
Inspections
Not
Documented**

L&I officials asserted that inspectors visited sites for 442 open demolition permits during the week following the June 5, 2013 building collapse, reviewing site safety conditions and looking for any other violations. However, L&I management was unable to provide complete inspection documentation to confirm this assertion for nearly 50 percent (210 of 442 permits). According to HANSEN records, almost all of the 210 permits were previously completed demolitions that had not yet been closed out in HANSEN. L&I management informed us that inspectors visited these sites to verify the demolition was completed, no new work was started, and the site remained safe. For this group, instead of inspection reports to document the site visits, we were only provided with the close-out entries inspection staff posted to HANSEN. Also, we observed that several of these previously completed demolitions lacked final inspection reports so the inspector waived the final inspection report before initiating the close-out entry.

As part of our inquiries of management concerning the asserted inspections, we asked for the formal written instructions given to inspectors who carried out the inspections. However, management disclosed there were no formal written instructions given to inspectors – nor were there any formal checklists or detailed procedures to ensure that work was consistently carried out among the inspectors. Consequently, because of the lack of documentation surrounding the asserted demolition inspections, we were unable to determine whether all of the asserted inspections had actually been performed or how thorough a job L&I did.

Recommendation:

We recommend that management require that detailed inspection reports be prepared for all site visits performed by inspectors, including those conducted as part of a special initiative outside the regular inspection process. For special inspection initiatives, management should also ensure that inspectors receive formal guidance, such as a checklist [402614.01].

L&I’s New Demolition Procedures Exceed Other Standards

When we compared L&I’s new demolition oversight procedures, to the demolition requirements of applicable building codes (i.e. Uniform Construction Code (UCC), International Building Code (IBC), and Philadelphia Code) and the oversight procedures of applicable standard setting organizations and other major cities, they appeared to exceed the other standards.¹⁰ Additionally, our survey of the other entities found that L&I’s new procedures provided more comprehensive and specific guidance to plan examiners and inspectors for demolition oversight than procedures of the other entities.

Inconsistent Enforcement of New Demolition Permit Requirements

Despite the comprehensiveness and specificity of L&I’s new procedures, our observations of permit applications for 14 demolitions¹¹ revealed that L&I plan examiners (examiners) did not always consistently enforce the new demolition permit requirements. As depicted in Table 3 below, for 10 of 14 demolitions examined, we did not observe one or more of the permit application documents required by the new regulations.

Table 3: Inconsistent Enforcement of Demolition Permit Requirements

Address	Experience	Contract	Safety Plan	Schedule	Commitment
5317 Germantown Ave.	✓	✓	✓	✓	✓
2140 Market St.	✗	✓	✓	✓	✓
1244 W. Tucker St.	✓	✓	✗	✗	✗
3400 Lancaster Ave.	✓	✓	✓	✓	✓
1700 W. Indiana Ave.	✗	✓	✗	✗	✗
8737 Sagamore Rd.	✗	✓	✓	✗	✗
1123 N. Bodine St.	✓	✓	✓	✓	✓
811 N. Capitol St.	✗	N/A	✓	✓	✗
738 N. 19th St.	✗	✓	✓	✓	✓
69 W. School House Ln.	✓	✓	✓	✓	✓
503 S. 23rd St.	✗	✓	✗	✓	✓
1808 Bainbridge St.	✓	✓	✓	✓	✗
3237-3243 Chaucer St.	✗	✓	✗	✓	✗
4444 Cresson St.	✗	✓	✓	✓	✗

✓ Fully Compliant

✗ Not Compliant

N/A Not Applicable (no contract for proposed demolition required)

Source: Prepared by the City Controller’s Office based on review of L&I’s permit application files.

¹⁰ The recent legislation passed in February and March 2014, as discussed on page 6 of the report, revises the Philadelphia Code to include many of the provisions from the regulations adopted by L&I in June 2013 and imposes additional standards to further heighten requirements.

¹¹ As of January 30, 2014, we identified 18 completed demolitions subject to L&I’s post-collapse permitting requirements. We examined demolition permit applications for 14 of these 18 completed demolitions.

In several instances, examiners appeared to question the necessity of certain documentation requirements and employed other methods to verify contractor experience or planned demolition procedures, which they deemed sufficient. In some cases, examiners waived requirements when an application to demolish an imminently dangerous structure required immediate action. Additionally, we noted that certain requirements lacked standardized criteria for their application.

When examiners inconsistently enforce permit regulations, there is an increased risk that contractors with inadequate qualifications and/or potentially unsafe demolition plans will receive approval to conduct demolitions. Examples of inconsistent enforcement noted by our review are presented below, arranged by requirement area.

Contractor Experience Documentation

L&I's permit guidelines list the following as minimum documentation requirements to verify the contractor's demolition experience: contracts, engineering surveys, and permits for three previous demolition jobs. For 8 of the 14 demolitions tested, L&I's permit application files did not contain all or part of this required documentation. With regard to four of these eight demolitions – two of which were imminently dangerous properties – examiners indicated the contractor's previous demolition experience was confirmed through review of past demolition permits or contracts the company received from the City. For another imminently dangerous case, which required expedited processing, the contractor was not able to provide the required documentation in the shorter timeframe. Instead, the examiner included on the permit a statement requiring compliance with Code Bulletin B-1302. For the remaining three demolitions missing required documents, examiners explained they accepted contracts or permits to confirm past demolition experience and did not require the submittal of engineering surveys that, in their opinion, provided no additional insight into the contractors' qualifications anyway.

In addition, L&I permit requirements direct contractors to identify at least two employees who will perform the demolition and details on their work history. In one case involving an unsafe structure destroyed by fire with little structure remaining, the examiner waived this requirement, believing the scope of the work involved was limited. For two other demolitions, we observed a list identifying two employees, but there were no details on their work history. Examiners indicated there had been confusion in applying this provision because L&I did not establish criteria for the minimum required work experience. Therefore, examiners accepted any statement that confirmed the contractors' employees were experienced in structural demolition.

Permit guidelines also require that examiners review HANSEN violation records to verify whether demolition contractors have any current violations related to other construction or demolition projects. L&I Work Instruction PR-1319 states that no permit will be issued until all violations against the contractor have been

resolved. However, for two demolitions tested, we noted outstanding conduct violations against the contractors at the time the permits were issued.

In one case, the examiner believed the nature of the violations (*construction debris not maintained and sidewalk blocked during non-working hours*) did not warrant delaying the demolition of an imminently dangerous structure. While, in our opinion, it is reasonable that not all violations should automatically disqualify a contractor from obtaining a permit because there are varying degrees of seriousness, L&I failed to establish criteria identifying which violations should result in denying a permit. Also, our observations revealed that examiners did not formally document their review for outstanding violations against contractors.

Regarding the other case where the contractor had outstanding violations, the violations occurred after the permit application had been approved by the examiner, but before the permit was issued. The violations, which pertained to construction projects the contractor was handling, were described as “*permit not posted, unsafe/unkempt job site, no right of way permit, and expired contractor’s information.*” When we asked whether these violations should have delayed the permit’s issuance, L&I management responded that the review for open violations was performed by the examiner, not by the clerk who accepted the check for permit fees and issued the permit. L&I had no mechanism to delay issuance of an already approved permit when contractor violations occurred in the period between permit approval and issuance.

Demolition Planning Documentation

Demolition planning documents required by the new permit standards include (1) a site safety plan detailing the means and methods to protect the public and adjacent properties; (2) a demolition schedule identifying the proposed start date, demolition milestones, projected dates of completion, and proposed start and stop times for daily activity; and (3) a signed commitment by the contractor to maintain the site safety plan on site during all demolition activity and review it with an L&I inspector prior to the start of the demolition.

Site Safety Plans and Demolition Schedules

Our testing of 14 demolitions found one approved permit application with no site safety plan submitted and three other demolitions where the contractor’s site safety plan did not include a report on the means and methods for protecting adjacent properties. For 3 of 14 demolitions tested, the contractor did not submit a demolition schedule.

Examiners provided various explanations for waiving these requirements including:

- Two permits involved imminently dangerous properties needing immediate attention so contractors were unable to provide the

required site safety plans and demolition schedules within a short timeframe. Instead, in the permit's description of authorized work, the examiner included the means and methods for protecting adjoining structures and/or a statement requiring compliance with Code Bulletin B-1302.

- The demolition for another imminently dangerous structure requiring prompt action was being handled by one of the City's pre-approved contractors for emergency public demolitions so the report on protecting adjacent property was waived.
- For one application where the site safety plan did not detail how adjoining property would be protected, the examiner opined that, since the structure being demolished was a two-story building attached to another three-story structure, there was no unusual threat to safety. The examiner pointed to the contractor's statement that the building would be demolished by hand as being sufficient.
- When an examiner deemed the demolition work for one unsafe building limited in scope because there was little structure remaining after a fire, the examiner waived the submission of a demolition schedule.

Signed Commitments

The permit applications for 7 of 14 demolitions did not contain the signed commitment from the contractor regarding the site safety plan. Examiners appeared to question the necessity of this document, stating that the Philadelphia Administrative Code already requires contractors to keep permit documents on site and contact the inspector prior to starting work. As such, examiners were less stringent in enforcing this documentation requirement when a property was deemed imminently dangerous or unsafe, or the examiner had difficulty obtaining the signed commitment from the contractor. Also, since there was no standard language and format established by L&I for the signed commitment, examiners accepted a variety of forms.

When we inquired why L&I had not developed a standard format for such requirements as the signed commitment, management stated that the revised demolition permit requirements were prepared on an emergency basis in response to the June 5, 2013 building collapse. Given that demolitions represented less than two percent of building permits and legislation was needed to determine final permit requirements, L&I management deemed it unnecessary at that point to develop new forms. Management indicated that recent legislation passed in February and March 2014 imposes additional permit standards, such as a separate demolition permit application. These additional standards, several of which are effective within 18 months of enactment, will require L&I to revise departmental procedures and forms.

Recommendations:

To ensure more uniform enforcement of demolition permit standards, we offer the following recommendations:

- As L&I management revises departmental procedures to incorporate changes from recent legislation, they should reevaluate documentation requirements in light of examiners' questions to determine which standards require change and adjust them accordingly. Acceptable alternative methods for verifying the adequacy of contractor qualifications and demolition plans should be incorporated into L&I procedures [402614.02].
- Since the urgency in processing imminently dangerous applications often resulted in waiving requirements and recent legislation now requires that these applications be processed within seven days of receipt,¹² management should establish minimum acceptable permit standards for this application type. For example, L&I could establish a pool of pre-qualified contractors to handle permitted demolitions of imminently dangerous structures [402614.03].
- Management should develop standardized criteria for examiners to follow in determining which conduct violations will result in denying a permit. Also, examiners should formally document their review for current violations. As L&I develops its new Project eCLIPSE (eCLIPSE) database (as discussed in the Introduction Section of the report), management should automate the review for open violations and include a mechanism to flag contractor violations that occur between permit approval and issuance [402614.04].
- For other requirements lacking clear guidance, management should establish clear criteria for their application, such as the minimum required work experience for contractors' employees and a standard language and format for the contractor's signed commitment [402614.05].
- When there is a need to waive a permit requirement, the examiner should fully document the reason for the waiver in the permit's application record [402614.06].

**Required
Inspections
Not Being
Performed**

The formalized inspection procedures established by L&I after the June 5, 2013 building collapse required the assigned Construction Services or Contractual Services inspector to perform the following six demolition permit inspections:¹³

¹² Bill No. 130698-A, signed by the Mayor on February 19, 2014, imposed this seven day processing requirement, which was effective immediately upon enactment.

¹³ The work to be performed during each of these inspections is discussed in further detail on page 5 of the report.

- Initial
- First under-slab/floor
- Second under-slab/floor¹⁴
- Framing/close-in
- Prefinal/wallboard
- Final

In addition, effective August 4, 2013, an inspector from L&I’s newly formed Construction Site Task Force (CSTF), is required to visit all permitted demolitions, focusing on site safety, proper licensure, and tax compliance.

Inspectors Frequently Waived Required Inspections

The L&I Commissioner indicated that, before the building collapse, inspectors usually only visited demolition sites prior to the demolition’s start and at its completion. Our audit revealed no significant change in this practice after the collapse. We examined HANSEN System inspection records for 18 completed private property demolitions occurring after the June 5, 2013 building collapse. Table 4 below summarizes the results of our observations pertaining to the number of waived inspections for the 18 demolition projects we examined.

Table 4: Inspections Frequently Waived

Address	Initial	Under Slab/ Floor #1	Under Slab/ Floor #2	Framing/ Close-in	Pre-Final	Final
5317 Germantown Ave.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
2140 Market St.	✓	WAIVED	WAIVED	✓	WAIVED	✓
1244 W. Tucker St.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
3400 Lancaster Ave.	✓	WAIVED	WAIVED	✓	✓	✓
1700 W. Indiana Ave.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
8737 Sagamore Rd.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
1123 N. Bodine St.	✓	WAIVED	WAIVED	✓	WAIVED	✓
738 N. 19th St.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
69 W. School House Ln.	WAIVED	WAIVED	WAIVED	WAIVED	WAIVED	✓
503 S. 23rd St.	✓	✓	WAIVED	✓	✓	✓
1808 Bainbridge St.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
754-56 S. Mole St.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
3237-43 Chaucer St.	✓	WAIVED	WAIVED	WAIVED	✓	✓
1614 N. Sydenham St.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
4444 Cresson St.	✓	WAIVED	WAIVED	WAIVED	WAIVED	✓
7146 Wissinoming St.	N/A	N/A	N/A	N/A	N/A	✓
811 N. Capitol St.	N/A	N/A	N/A	N/A	N/A	✓
518 Carpenter St.	✓	N/A	N/A	N/A	N/A	✓

✓ Inspection Work Performed
 WAIVED Inspection Step was Waived, No Reason Provided
 N/A Not Applicable - demolition completed before inspection process began

Source: Prepared by the City Controller’s Office based on data residing in the HANSEN System.

¹⁴ Since this inspection shall be performed for each floor being demolished, at least two inspections of this type are required on each permit.

Appendix III of the report presents an illustration of a HANSEN inspection detail report showing required inspections waived with no explanation.

For 15 of the 18 demolitions, HANSEN records indicated that the assigned Construction Services or Contractual Services inspector waived one or more of the six required inspections. The other three demolitions were completed either before the permit was issued or prior to the posting of the demolition notice on the property; therefore, the inspector could not perform all required inspections.¹⁵

For 9 of the 15 demolitions with waived inspections, the inspector performed only two of the required six inspections – the initial one before the demolition’s start and the final inspection at its completion. For another demolition, L&I records showed no site visits being performed until the final inspection. When we interviewed the responsible inspectors, they informed us that the waived inspection steps were not applicable to those demolition jobs. However, for all of these waived inspections, our review of HANSEN records found the inspectors did not include any comments to explain why the inspection steps were not applicable. In addition, HANSEN did not require supervisory approval for waived inspections.

Our discussions with inspection staff revealed concerns regarding the titles for certain required demolition inspections (*under-slab/floor, framing/close-in, and prefinal/wallboard*). The inspectors stated that the use of those titles for demolition inspections caused confusion because they were also utilized for inspections of construction sites and were more appropriate for that activity.

Lack of Adequate Training

Additionally, our inquiries revealed an apparent lack of adequate training for inspectors in implementing the new inspection procedures. Inquiries of management regarding training for the new procedures disclosed there was a meeting with Construction Services and Contractual Services inspection staff on June 14, 2013 that lasted approximately four hours. During this training, management stated they reviewed the new requirements with staff, who were provided with copies of the new procedures. Supervisors were also asked to separately review the new procedures with assigned staff. However, a supervisor and an inspector from one of the Construction Services’ districts¹⁶ expressed to us their belief that they did not receive adequate instruction for implementing the new inspection procedures.

¹⁵ One of these three demolitions was conducted under the Pennsylvania Department of Transportation’s supervision. For the other two demolitions, the inspectors issued violations to the offending contractors.

¹⁶ The supervisors and inspectors in Construction Services are assigned to one of five districts: central, east, north, south, or west.

Construction Site Task Force Inspections Not Performed

Our audit also disclosed the required CSTF inspections were not performed in most cases. For 10 of 14 demolitions we examined which required a CSTF inspection,¹⁷ the inspection was waived by the Construction Services or Contractual Services inspector. Again, we noted no comments in HANSEN to explain why any of these CSTF inspections were waived. When we inquired about these waivers, the Construction Services and Contractual Services inspectors asserted that, since the CSTF inspections had not been made before the demolitions were completed, they waived the CSTF inspections in order to close out the permits. Our review of HANSEN records showed that 9 of the 10 CSTF inspection waivers were entered into HANSEN on or near the final inspection date. However, the other CSTF waiver was made by a Contractual Services inspector approximately two months before the final inspection date. When we inquired about the adequacy of the CSTF's staffing, the unit's manager stated that personnel was limited with only six inspectors assigned to perform CSTF inspections of all permitted construction and demolition sites.

Recommendations:

To ensure that demolition inspections are conducted in accordance with established procedures, management should:

- Ensure that L&I's planned new eCLIPSE database require that any waived inspection be fully explained and approved by a supervisor [402614.07].
- Change the current titles used for demolition inspections to more demolition specific terminology [402614.08].
- Develop a formalized training program to instruct inspection staff on the department's requirements for conducting demolition inspections and provide this training to current staff and new hires [402614.09].
- Require that CSTF inspections be performed earlier in the demolition process, preferably around the time of the initial inspection [402614.10].
- Analyze CSTF staffing needs to determine how many inspectors are required and request the proper funding from City Council [402614.11].

Inspection Documentation Was Insufficient

Our review found that L&I's inspection records routinely did not comply with established standards and failed to document important details about the work performed by inspectors during site visits. The accuracy and completeness of

¹⁷ A CSTF inspection was not applicable for 4 of the 18 demolitions we examined because (1) the demolition was completed before the permit was issued or the demolition notice was posted or (2) the permit was issued before CSTF inspections were required.

documentation is important in supporting inspection pass and fail decisions, particularly in view of potential legal liability.

Required Photographs Missing

Inspection procedures established after the building collapse required that dated photographs be taken at all demolition inspections and stored on the department’s local area network (LAN) drive. However, as shown below in Table 5, for 17 of 18 post-building collapse demolitions reviewed by us, we found one or more of the required photographs were missing. For 10 of the 18 demolitions, inspectors could not provide any photographs. One inspector

Table 5: Summary of Missing Demolition Photos†

Address	Initial	Under Slab/ Floor #1	Under Slab/ Floor #2	Framing/ Close-in	Pre-Final	Final
5317 Germantown Ave.	NP	NP	NP	NP	NP	NP
2140 Market St.	NP	NP	NP		NP	NP
1244 W. Tucker St.		NP	NP	NP	NP	
3400 Lancaster Ave.		NP	NP	NP	NP	NP
1700 W. Indiana Ave	NP	NP	NP	NP	NP	NP
8737 Sagamore Rd.		NP	NP	NP	NP	NP
1123 N. Bodine St.	NP	NP	NP	NP	NP	
738 N. 19th St.	NP	NP	NP	NP	NP	NP
69 W. School House Ln.	NP	NP	NP	NP	NP	NP
503 S. 23rd St.		NP	NP	NP	NP	
1808 Bainbridge St.	NP	NP	NP	NP	NP	NP
754-56 S. Mole St.	NP	NP	NP	NP	NP	NP
3237-43 Chaucer St.		NP	NP	NP	NP	NP
1614 N. Sydenham St.	NP	NP	NP	NP	NP	NP
4444 Cresson St.		NP	NP	NP	NP	NP
7146 Wissinoming St.	NP	NP	NP	NP	NP	NP
811 N. Capitol St.	NP	NP	NP	NP	NP	NP
518 Carpenter St.	NP	NP	NP	NP	NP	NP



Required Photo Documented

NP No Photo was Documented

†In many instances, no photo was taken because the inspection was waived or not applicable. See Table 4. Source: Prepared by the City Controller’s Office based on photos provided by responsible L&I inspectors.

asserted he had taken the photographs on his cell phone, but had not gotten around to storing them on the LAN drive. Another inspector informed us that some inspectors in the Construction Services’ district where he worked did not know how to upload photographs to the LAN drive. That district’s supervisor reiterated the need for some of his inspection staff to receive technology training.

Insufficient Detail About Inspections

In addition to the unexplained inspection waivers discussed above, our audit noted other instances where L&I’s inspection documentation was not sufficiently detailed. The HANSEN inspection report contained fields for inspection type, the inspector’s payroll number, start date/time, completed date/time, status (i.e. passed, failed, or waived), violations found, and comments. However, HANSEN’s design was deficient in that the inspector was not required to provide information on the specific steps performed during each inspection site visit. Instead of having a standard checklist for the inspector to indicate performance of the minimum required steps for each inspection, HANSEN only had an open-text comments section for the inspector’s use. Moreover, HANSEN did not require the inspector to insert an entry in the comments section, even for a failed inspection.

Also, we observed certain fields in the HANSEN inspection report were not properly filled out. The start date/time and completed date/time fields were designed to record the actual start and completion dates and times of an inspection visit. Such information can serve as a useful management tool in evaluating inspection performance times. However, as illustrated in Figure 1 below, the entries in these two fields were routinely the exact same date and time, thus giving no information on how long inspections took.

Figure 1: HANSEN Date Fields Were Incomplete

Application Information			
Type	BP_DEMO	DEMOLITION PERMIT	Priority
Type of Work	FULL	Dept of Comm&ES	Square Footage
Desc of Work	COMPLETE DEMOLITION OF EXISTING THREE (3) STORY SINGLE FAMILY ROW HOME AND ONE (1) STORY DETACHED GARAGE AS PER ENGINEER'S PLANS & SPECIFICATIONS & CODE BULLETIN B-1302. ASBESTOS ABATEMENT SHALL TAKE PLACE PRIOR TO COMMENCEMENT OF DEMOLITION. A MINIMUM 8'-0" HIGH FENCING BARRIER TO BE PROVIDED AT THE SIDE OF WALKWAY NEAREST DEMOLITION, TO EXTEND THE ENTIRE LENGTH OF CONSTRUCTION SITE.		
Initial Inspection			
Call Date/Time	10/10/2013 13:51	<input type="checkbox"/> System Generated	Assigned To
Schedule Date/Time	10/10/2013 13:51	Order/Group	2
Waived		Preference	PM
Location	P&P 200-000 1000 11:00 CALL BEFORE		
Inspection Results			
Inspected By		Same Trip as Insp #	0
Start Date/Time	10/10/2013 13:52	Odometer Start	0
Completed Date/Time	10/10/2013 13:52	Odometer Stop	0
		<input type="checkbox"/> Partial Inspection	Status
			Passed
Comments			
Demo complete, asbestos report on file. Lateral sealed.			
Code Violations			
No Code Violation			

Fields do not represent actual start & completion dates and times

Source: HANSEN System

Recommendations:

To improve the accuracy and completeness of inspection documentation, we recommend L&I management:

- Reinforce to inspection staff the requirement to take photographs at all demolition inspections and store the photographs on L&I's LAN drive. Training should be provided to inspectors on how to store photographs. Also, analyze equipment needs to comply with this requirement and request the appropriate funding from City Council [402614.12].
- Ensure that the planned new eCLIPSE database includes a standard checklist for inspectors to indicate the specific steps performed during site visits in addition to an open comments field. Inspectors should be required to insert an entry for all failed inspections [402614.13].
- Instruct inspectors to insert actual start and completion dates and times into the inspection reports. This information could be used to evaluate inspector performance [402614.14].

No Evidence of Supervisory Review in Many Cases

Frequently, there was no evidence of independent supervisory review of inspectors' activity. In fact, we found that the HANSEN System was not designed to require supervisory approval for each inspection report entered by an inspector. The only supervisory review required by HANSEN was the certificate of approval entry made by the supervisor to close out the permit after the inspector's final inspection.

Demolition Inspections Frequently Lacked Certificate of Approvals

In examining L&I's practices before the June 5, 2013 building collapse, we found that supervisors frequently failed to perform this certificate of approval review. Out of the 442 open demolition permits L&I asserted to have been inspected in the week after the building collapse, 192 were completed demolitions where the inspector had completed the final inspection, but the supervisor had never applied the certificate of approval entry. For 136 of these 192 completed demolitions, the final inspection reports were filed over one year before the building collapse, with some dating as far back as 2006.

Our examination of 18 demolitions occurring after the building collapse revealed that a lack of independent supervisory review remained a problem. For 8 of the 18 demolitions, there was no certificate of approval entry made by a supervisor. Additionally, we noted that, in five cases, four of which involved the demolition of an imminently dangerous or unsafe structure inspected by Contractual Services, the inspector who performed the site visit made the certificate of approval entry in the HANSEN System instead of an independent supervisor.

In our discussions with L&I management, they attributed the lack of supervisory review to inspection staff shortages and the large workloads being handled by supervisors in the Construction Services and Contractual Services units. In addition, management stated that HANSEN was not designed to facilitate the supervisor's review of inspector activity. While HANSEN had a work viewer which allowed an inspector to view all assigned activity, there was no system

feature which identified for the supervisor all permits requiring a certificate of approval entry.

Supervisory Review of Inspection Activity Reports Questionable

In addition to the certificate of approval in HANSEN, L&I procedures require supervisors to review and sign-off on inspectors' daily inspection activity reports (also known as route sheets) on a weekly basis. The daily route sheet shows all of the stops made by an inspector during the work day. Guidelines instruct supervisors to spot-check and compare stops listed on route sheets to the inspector's HANSEN entries to ensure consistency and accuracy. After the supervisor has completed the review, the route sheet should be signed and dated. For 15 of the 18 demolitions we examined, there was no evidence that the supervisor reviewed the route sheets.

Recommendations:

In developing the new eCLIPSE database, we recommend management build into the system more frequent supervisory reviews of inspectors' activity. In addition to the supervisor's certificate of approval entry at the demolition's completion, the system should require supervisory approval for each inspection report filed [402614.15]. Also, the ability to perform the certificate of approval entry should be restricted to supervisory personnel [402614.16].

Additionally, the new database should have reporting features to facilitate timely supervisory reviews of inspectors' activity. Examples include reports of permit inspections not yet performed, filed inspection reports awaiting approval, and permits requiring the certificate of approval entry [402614.17].

In light of their stated concerns regarding personnel shortages in the Construction and Contractual Services Units, management should analyze staffing levels to determine the number of inspection and supervisory staff needed for demolitions and then request proper funding from City Council [402614.18].

**Some
Inspectors
Lacked
Required
Professional
Certifications**

The Pennsylvania UCC, the statewide building code adopted by the City, requires that any person who inspects construction or equipment, or administers and enforces the UCC must be certified by the Pennsylvania Department of Labor and Industry (PA L&I) in the category applicable to the work being performed. Our inquiries of the PA L&I's building code official disclosed that an individual performing inspections of permitted demolitions must possess the UCC certification of building inspector.

To test L&I's compliance with state certification requirements, we reviewed the UCC certifications for the employees who inspected the 18 post-building collapse demolitions tested by us. Our audit found two employees were not certified by the state as a building inspector.

The first case involved a Contractual Services inspector whose Civil Service position did not require the UCC building inspector certification. City L&I management informed us that the inspector was a long-term employee whose job title was no longer used by the department for hiring purposes. We observed that, in addition to performing inspections for permitted demolitions of imminently dangerous structures, this employee also posted the certificate of approval entry for one of the 18 demolitions tested by us.

In the second instance, management asserted that a construction codes specialist trainee (trainee) had passed the exams needed to obtain the building inspector certification but had not yet submitted the required application and fee to the PA L&I. The employee started as a trainee in Construction Services in late October 2011. According to our November 2013 interview with the employee, after a period of classroom instruction and on-the-job training with experienced inspectors, he began performing inspections on his own around August 2012. Since a trainee is required to obtain UCC certifications in the building inspector and three other categories within 18 months of appointment, this employee also did not meet the professional qualifications needed for his Civil Service position. As of the end of our fieldwork, management informed us the employee would be instructed to obtain the required UCC certifications. In the meantime, the individual is working as a CSTF inspector for which UCC certifications are not required.

Recommendations:

To comply with UCC certification requirements for demolitions, management must ensure that all employees performing inspections of permitted demolitions are certified by the state as building inspectors [402614.19].

L&I's Human Resources Unit should verify that recently appointed inspection staff possess the UCC certifications required by their Civil Service positions, particularly the trainees who must obtain the certifications within 18 months of appointment [402614.20].

MATTERS AFFECTING HANSEN SYSTEM'S DATA INTEGRITY

As part of the audit, we also reviewed selected controls impacting the integrity of data within the HANSEN System. We found L&I's information technology (IT) governance deficient, as IT management could not provide formal policies and procedures for several critical control activities involving security. In addition, we have numerous concerns about certain incompatible duties among IT employees, and the lack of controls to provide reasonable assurance that access to the HANSEN System data is reasonably restricted to authorized individuals. In our opinion, these deficiencies create the potential for permit or inspection information to be manipulated without detection. Each of the above matters is discussed in more detail below.

Deficiencies in IT Governance

IT management did not provide us with formal comprehensive policies and procedures governing several of its critical control activities over security, including the:

- process for authorizing, testing, and approving changes made to the HANSEN application;
- process for initiating and approving corrections to HANSEN transaction data files;
- review and approval procedures for granting access to new users and removing access rights;
- management of passwords, such as assigning, changing, resetting passwords, and handling lost or compromised passwords; and
- assessment and scrutinization of risk to ensure effective management of security threats.

In addition to providing no evidence of risk assessment procedures, IT management informed us there was no assigned technology security officer for the HANSEN System. We believe this deficiency further increases the vulnerability of the system to security threats.

When policies and procedures have not been formally developed and adequately documented, there is an increased risk that critical control procedures may be inconsistently applied or not performed at all. Formal policies and procedures help prevent errors by ensuring uniformity in routine processes.

Recommendations:

As L&I develops its planned new eCLIPSE database, we recommend management strengthen IT governance by performing the following steps:

- Develop and document formal comprehensive policies and procedures for controls over making changes or corrections to programs and transaction data; granting, changing, and removing user access; managing passwords; and assessing and monitoring security threats [402614.21].
- Design and implement appropriate monitoring controls to ensure that policies and procedures, once established, are complied with on a consistent basis [402614.22].
- Formally assign a technology security officer, whose duties should include assessing and monitoring the risk of system security threats [402614.23].

**Concerns
about
Incompatible
Duties and
Deficient
Access
Controls**

Two other concerns we had about L&I's HANSEN System centered on incompatible duties and the lack of controls in place to restrict access to the system's data. As to the first concern, three IT employees – the IT director, programmer analyst supervisor, and programmer analyst project leader – responsible for HANSEN System programming also had the ability to make changes to the system's transaction data. Only users – not programmers – should be responsible for transaction origination and correction.

With regards to deficiencies that might allow for unauthorized access to HANSEN System data and thus increase the risk that errors or intentional manipulation of permit and inspection data might occur without detection by management, we observed that:

- Demolition inspection data was not restricted only to the inspector assigned to the permit. All inspectors with the ability to update a permit inspection report in HANSEN can access any open permit record and make changes to the inspection report data.
- The HANSEN System audit trail was inadequate to document changes to transaction data and user activity. The audit trail only retained the date and user name for the last change made to data. Also, it provided no detail on the specific data modified. Lastly, while HANSEN had the ability to show users currently logged in, it did not store a history of when users accessed the system and for how long.
- L&I did not ensure that HANSEN System access for separated employees was terminated on a timely basis. When we compared the HANSEN active users list against City payroll records of current employees, we found that 209 of the 774 active users (27 percent) were not listed as current City employees.¹⁸ From this group of 209, we selected a sample of ten individuals and observed they had separation dates ranging from January 2004 to October 2010. When we inquired as to why these ten individuals were still listed as active users, IT management was unable

¹⁸ IT personnel provided us with the HANSEN active users list on January 9, 2014. We compared this users list against the City payroll run for the pay period ending December 22, 2013, which was the most recent run available at the time of our testing.

to offer an explanation, but agreed that the individuals' access should have been inactivated upon separation. In addition, IT management informed us that two of the ten selected user accounts still had active passwords.

- The HANSEN active users list also included eight generic user names, such as "DESKTOP2", "FIRE", and "LAW". User IDs should identify the names of the actual users to hold employees accountable for activities performed in the system.
- User accounts were not locked out or disabled after multiple invalid login attempts. This weakness created the risk that an unauthorized person could attempt a user ID and password login with no system limit. If an unauthorized individual accesses the system with a user account that has the ability to change transaction data, HANSEN System information could be compromised.

Recommendations:

In developing its new eCLIPSE database, we recommend that management improve access controls by taking the following actions:

- Segregate duties and responsibilities for system programmers. Specifically, the ability to add, change, or remove data should be delegated to individuals who are not responsible for programming activities [402614.24].
- Restrict the ability to modify a permit's inspection data to the assigned inspector and supervisor. If there is a need to change the assigned inspector or give another inspector access, the supervisor should send a request to responsible IT personnel [402614.25].
- Establish a system audit trail which records the date, user ID, and specific information changed for all data modifications. In addition, information on user login activity (when and how long) should be recorded and retained. Management should periodically review the audit trail log for unusual activity [402614.26].
- Establish and implement a procedure to ensure mandatory and timely notification to responsible IT personnel of employee separations. Responsible IT personnel should disable and remove accounts for separated employees in a timely manner [402614.27].
- Remove access authorizations for all generic user accounts. While generic users are often created during system implementations, they should be deleted, for security purposes, once the system is live. Users should be assigned a unique account to provide a mechanism to log,

monitor, and hold individuals accountable for activities performed [402614.28].

- Ensure that account lockout settings are properly configured to disable user accounts after multiple invalid login attempts [402614.29].

APPENDIX I: OBJECTIVES, SCOPE, AND METHODOLOGY

This appendix provides information on the scope of work and methodology used to (1) ascertain the extent of work performed by L&I with respect to the 442 demolition site inspections asserted to have been completed in the one-week period following the June 5, 2013 building collapse; (2) evaluate the adequacy of newly adopted oversight procedures for private demolitions; (3) determine whether L&I has been compliant with the newly adopted procedures; and (4) assess controls over L&I's HANSEN System to identify deficiencies that could compromise the completeness, integrity, and/or usefulness of demolition inspection records.

To satisfy the first objective, we requested from L&I management and then reviewed documentation providing evidence that asserted inspections had been completed. In trying to gain an understanding of the inspection work performed on the asserted 442 sites, we interviewed the L&I personnel responsible for the inspections – the manager, supervisors, and inspectors from L&I's Construction Services Unit. We also requested written guidelines these employees use to carry out the building code standards followed when conducting demolition inspections, but found there were no written guidelines at the time the asserted inspections were completed.

To address the second objective, we ascertained the private demolition permit and inspection procedures developed by L&I after the building collapse. We did this by:

- Reviewing written demolition procedures established by L&I after the collapse, which included (1) Code Bulletin of Information No. B-1302: *Demolition Standards and Activity Controls* (issued June 12, 2013); (2) Work Instruction PR-1319: *Demolition Permit Processing and Review* (issued June 14, 2013); and (3) Work Instruction CS-1314: *Demolition Permit Inspections* (issued June 12, 2013).
- Examining L&I procedures in effect before and after the collapse, which addressed the inspectors' preparation of daily activity sheets and supervisor responsibilities for monitoring inspectors' activity, and included Operational Procedure No. OP-0001: *Completion of Daily Inspection Activity Reports* (effective December 13, 2011) and *L&I Policy on Supervisory Responsibilities* (effective February 1, 2011).
- Interviewing various inspectors and supervisory personnel from the Construction Services and Contractual Services Units to determine post-building collapse inspection procedures for private demolitions.

As part of the second objective we researched best practice standards for demolitions, by contacting applicable standard setting organizations and conducting phone interviews with key Licenses and Inspection experts of several major cities. The organizations and cities we contacted included the International Code Council; International Accreditation Service;

National Demolition Association; Occupational Safety and Health Administration; Baltimore, MD; Boston, MA; Dallas, TX; Houston, TX; Los Angeles, CA; New York, NY; and Pittsburgh, PA. We also reviewed laws and regulations governing private property demolitions. More specifically, we reviewed (1) sections of the Pennsylvania Uniform Construction Code (UCC), the statewide building code which the City elected to enforce locally as of July 8, 2004; (2) applicable sections of the International Code Council's International Building Code (IBC), a model building code which the UCC requires the City to adopt; and (3) relevant sections of the Philadelphia Building Construction and Occupancy Code (Philadelphia Code Title 4), which adopts the IBC and contains the local modifications to the IBC.

To complete the second objective, we then evaluated L&I's newly adopted oversight procedures for private demolitions against the demolition practices of standard setting organizations and other cities as well as the applicable laws and regulations that have been adopted by the City of Philadelphia.

To address the third objective, we identified completed demolition jobs subject to L&I's post-building collapse demolition permit and inspection requirements. To accomplish this we:

- Confirmed with L&I management that all demolition permits applied for after June 12, 2013 (issue date of Code Bulletin No. B-1302) were subject to the post-building collapse requirements.
- Obtained from L&I information technology (IT) personnel a listing of all full demolition permits applied for after June 12, 2013. The listing provided showed all demolition permits applied for from June 12, 2013 through January 30, 2014 and detailed activity for those permits through January 30, 2014.
- Using the listing provided by IT personnel, identified all completed demolition projects (i.e. those with a final inspection report).

As of January 30, 2014, there were 18 completed demolition jobs subject to the post-collapse requirements. All 18 completed demolition jobs were examined for compliance with inspection requirements while 14 of the 18 completed demolitions were reviewed for compliance with permit application standards.

To determine whether L&I's oversight for the completed demolition projects complied with the post-collapse requirements, we:

- Reviewed the permit application records, ascertaining whether all required documents were present. For all missing documents, we obtained explanations from the responsible plan examiners.

APPENDIX I: OBJECTIVES, SCOPE, AND METHODOLOGY

- Examined the HANSEN inspection records to determine if all required inspections and supervisory reviews were performed. For any required inspections and supervisory reviews not performed, we interviewed responsible inspectors and supervisors to determine why.

In addressing objective three we also ascertained whether inspectors and supervisors for the 18 completed demolitions possessed the necessary professional certifications. We did this by:

- Reviewing the relevant UCC sections and interviewing the Pennsylvania Department of Labor and Industry's (PA L&I's) building code official to determine the certification requirements for permitted demolition inspections.
- Reviewing the job specifications for the Civil Service titles of the inspectors and supervisors to determine the UCC certifications required for their positions.
- Determining the UCC certifications currently held by the inspectors and supervisors through review of the list of certified code officials maintained on the PA L&I's website, and comparing these certifications to those required by the state and for Civil Service positions.
- Made inquiries of management regarding any inspectors and/or supervisors not possessing the required certifications.

To satisfy the fourth objective, we evaluated HANSEN System controls for demolition permits, focusing on controls over data input, processing, and output. We did this by:

- Examining procedures over system access, including processes for making changes to programs and transaction data, granting new user access, terminating access, and managing passwords.
- Obtaining a list of active HANSEN users and comparing the list to City records of current employees to identify any terminated employees that still had active HANSEN accounts.
- Reviewing help desk procedures and related logs of issues reported/resolved, and also determining whether HANSEN contained appropriate audit trails to record user activity and data modifications.
- Determining whether procedures were in place to ensure that system data was reviewed by supervisory personnel on a timely basis.

APPENDIX I: OBJECTIVES, SCOPE, AND METHODOLOGY

- Examining the design and use of the HANSEN inspection report to determine whether all appropriate fields were included and existing fields were being properly used.

We performed our work from October 2013 through April 2014 in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our 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.

APPENDIX II: BACKGROUND INFORMATION ON HANSEN SYSTEM

L&I's HANSEN System, which was developed by Hansen Information Technologies, first became operational in August 1999. HANSEN's Construction Permitting module, which includes demolition permits, was implemented in 2006.

The HANSEN System is used by L&I for the following activities:

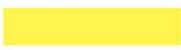
- Managing workflows and record keeping related to a variety of building and land use permits, trade licenses, code enforcement cases, periodic inspections, and regulatory enforcement programs.
- Tracking all application, review, issuance, inspection, and closure activities for construction permits, including building, demolition, grading and site work, and various trade permits.
- Handling complaint and case management for areas of code enforcement activity, including notices of violation and citation issuance and tracking.

HANSEN operates in a client-server environment, meaning that the application runs on a dedicated server and users are granted application access on their desktop or laptop computers via a security system of user names and passwords. The current running version of the system is HANSEN 7.7 release 410, which is linked to an Oracle relational database.

HANSEN is managed by an information technology (IT) director who has a supporting staff of seven employees. The IT director and her staff are employees of the City's Office of Innovation and Technology (OIT) who have been assigned to L&I. Other OIT employees handle the help desk function for HANSEN.

APPENDIX III: ILLUSTRATION OF WAIVED INSPECTIONS

Report Date		Submitted By		Page 2	
<p>Department of Licenses & Inspections 1401 JFK Blvd Philadelphia, PA 19102</p> <p style="text-align: right;">Building Inspection Detail</p>					
History					
Inspection #	2236049	Inspection Type	BP_FINAL FINAL INSPECTION	#	1 Status Passed <input type="checkbox"/> Waived
Inspected By	200013	Order/Group	2 Scheduled 10/10/2013 13:51 Started 10/10/2013 13:52 Completed 10/10/2013 13:52		
Location	11:00 CALL BEFORE				
Comments	Demo complete, asbestos report on file. Lateral sealed.				
Inspection #	2236047	Inspection Type	BP_FRAME FRAMING/CLOSE-IN INSPECTION	#	1 Status No Action <input checked="" type="checkbox"/> Waived
Inspected By		Order/Group	1 Scheduled Started Completed		
Location					
Comments					
Inspection #	2236045	Inspection Type	BP_INITIAL INITIAL/SITE INSPECTION	#	1 Status No Action <input checked="" type="checkbox"/> Waived
Inspected By		Order/Group	1 Scheduled Started Completed		
Location	11:00 CALL BEFORE				
Comments					
Inspection #	2236051	Inspection Type	BP_POSTDEMISTRIB DEMO POSTER & LETTERS	#	1 Status Passed <input type="checkbox"/> Waived
Inspected By	200013	Order/Group	1 Scheduled 09/09/2013 12:58 Started 09/09/2013 08:52 Completed 09/09/2013 08:52		
Location					
Comments	Posted demo sticker.				
Inspection #	2236048	Inspection Type	BP_PREFINA PREFINAL/WALLBOARD INSPECTION	#	1 Status No Action <input checked="" type="checkbox"/> Waived
Inspected By		Order/Group	1 Scheduled Started Completed		
Location					
Comments					
Inspection #	2236046	Inspection Type	BP_SLAB UNDER SLAB/FLOOR INSPECTION	#	1 Status No Action <input checked="" type="checkbox"/> Waived
Inspected By		Order/Group	1 Scheduled Started Completed		
Location					
Comments					
Inspection #	2236044	Inspection Type	CSTF INSP CONSTRUCTION SITE TASK FORCE	#	1 Status No Action <input checked="" type="checkbox"/> Waived
Inspected By		Order/Group	2 Scheduled Started Completed		
Location					
Comments					



Items highlighted show required inspections being waived with no explanation provided in the comments sections

Source: L&I's HANSEN System – Building Inspection Detail report for demolition of 69 West School House Lane

AGENCY RESPONSE



CITY OF PHILADELPHIA

DEPARTMENT OF LICENSES & INSPECTIONS
Municipal Services Building - 11th Floor
Philadelphia, PA 19102-1687
(215) 686-2400

CARLTON WILLIAMS SR.
Commissioner

May 19, 2014

The Honorable Alan Butkovitz
Office of the Controller
1230 Municipal Services Building
1401 John F. Kennedy Boulevard
Philadelphia, PA 19102

Dear Controller Butkovitz:

The Department of Licenses + Inspections is in receipt of a copy of the *Performance Audit of the Oversight for Private Property Demolitions*. We thank you and your office for the opportunity to review the report, as well as for your time during an exit meeting held Wednesday May 14, 2014. The report addresses many of the key concerns identified in the findings and provides justifications and detailed explanations along with appendixes documenting L+I's processes and procedures for demolition inspections.

The performance audit also highlighted several recommendations to improve the efficiency and effectiveness of the private property demolition process. The Department has undergone many changes since the culmination of the audit and the response report highlights many of these changes in relationship to the recommendations offered by your office. Our objectives in this response are to demonstrate the significant strides the Department has made toward meeting our shared goal of improving public safety for the citizens of Philadelphia.

Again, we would like to thank you and your staff for the time, resources, and hard work that went into the audit and for your continued dedication and commitment to public safety for the citizens of our great city.

Sincerely,

A handwritten signature in blue ink that reads "Carlton Williams Sr." with a stylized flourish at the end.

Carlton Williams Sr.
Commissioner

cc: Honorable Michael A. Nutter, Mayor
Honorable Darrell L. Clarke, Council President & Philadelphia City Council
Members of the Mayor's Executive Cabinet



The City of Philadelphia Department of Licenses + Inspections

Response to the Performance Audit of Oversight for Private Property
Demolitions

May 19, 2014

EXECUTIVE SUMMARY

The Department of Licenses + Inspections (“Department”) has reviewed the *Performance Audit of Oversight for Private Property Demolitions* (“Report”) authored by the Office of the Controller and offers the attached response.

The Report’s authors investigated – through their independent review of Hansen, the Department’s data and performance management system – various functions of the Department, specifically the inspection of private demolition sites and related documentation. The Report identifies areas for improvement within the Department and offers a list of recommendations based on the authors’ findings.

The Department welcomes this opportunity to respond to these recommendations, as well as clarify misunderstandings that appear to have risen in the authors’ review of Department data. Most importantly, the Department seeks to highlight our existing implementation of the recommendations suggested in the Report. While we dispute some of the Report’s findings, the Department shares the Controller’s goal of improving oversight of the private demolition process.

Report’s Key Area of Concern

The Report characterizes the Department’s demolition inspection process as “informal” and refers specifically to the Department’s permit issuance standards, the documentation and supervisory review of demolition permit inspections – including the safety assessments performed at 442 demolition sites in the week following June 5, 2013 – and qualifications of staff performing inspections.

The Department strongly disagrees with this characterization and in the attached response offers a clear explanation to each of the Report’s identified areas of concern. Specifically, the Department’s response will demonstrate – listed in order of the Report’s recommendations – that:

- (1) The Department’s inspections of construction and demolition sites, including the special site safety assessments performed in June 2013, are properly performed and documented in Hansen. While there is always room for improvement – and necessary changes will be made with the implementation of the Department’s new data management system (see below) – the Department believes that its inspection records are as thorough as possible within the confines of the current system. (*See Response to Recommendation #1*, p. 1 of attached *L+I Response to Recommendations*). The Department is confident in the work of our staff and in the dedication with which they approach every inspection and plan review.
- (2) The Department has worked with City Council to develop legislation to help strengthen our oversight of demolition sites. This legislation includes new demolition permit application controls and new standards for demolition contractors, including a demolition contractor license, bonding and insurance requirements, and OSHA training requirements. The majority of this legislation has been codified and is being enforced by the Department. (*See Response to Recommendation #2*, p. 2-3).
- (3) The Department has taken multiple steps to educate both contractors and our inspectors about the new demolition standards required by this legislation, including through the internal and external issuance of code bulletins. The Department established a Compliance Division to provide additional training on the new standards to inspectors and plans examiners and to review inspector work to ensure the new standards are applied consistently. In addition, the Department will hire an experienced demolition consultant recommended by the National Demolition

- (4) Association to provide additional assistance with the implementation of the new standards. (*See Response to Recommendation #3, p. 3*).
 The Department’s ongoing adoption of Project eCLIPSE (electronic Commercial Licensing, Inspections, and Permit Services Enterprise) – a new data management system with an anticipated completion date of December 2015 – will, among other important upgrades, significantly improve the recording of inspection results by inspectors. The system will establish clearer, more user-friendly procedures for the inspection process, including prompts and flags to ensure all documentation and explanations are recorded in an easy-to-read format. Key features of the system include a new requirement that photographs accompany all inspection results in order to illustrate the inspection history for properties and a new security level that will require additional supervisory oversight of permit closures. (*See Response to Recommendation #4, p. 3-4*).
- (5) The Department is developing a new training program to expand the education of Development Division inspectors (those inspectors that handle inspections of work done on permitted construction and demolition sites) on top of the required national and state certifications they all already have. The Compliance Division will ensure that inspectors continue to have up-to-date demolition training, including OSHA30 training as required by the new demolition legislation. (*See Response to Recommendation #5, p. 4*).

Department’s Existing and Ongoing Implementation of the Report’s Recommendations

Since the commencement of the Controller’s audit, the Department has implemented a number of key changes and undertaken new initiatives. We believe these changes address all of the concerns identified in the Report and, most significantly, position us to provide a higher level of oversight of the building industry that will meet our goal of the continuous enhancement of public safety in the City.

L+I’s New Structure

The Department has undergone a major restructuring process with the goal of increasing building safety and contractor accountability without compromising development.

This restructuring has created six operating divisions, up from three. There are two new divisions: Emergency Services Division and Compliance Division. The Emergency Services Division was created to increase our effectiveness in addressing unsafe construction sites as well as improving our processes for responding to dangerous buildings and conducting public demolitions. The Compliance Division will provide continuous audits of both contractors and Departmental practices to ensure that all applicable codes, regulations, and procedures are followed. In addition to these new divisions, the Development Division has been reorganized into two separate divisions: Building (permit inspections) and Development (licensing, permitting, and zoning). This separates the inspection process from the development process to provide better management and accountability on these critical functions.

L+I’s Staffing Levels

The FY15 budget includes funds for additional staffing; these new employees will allow the Department to enhance its oversight of construction and demolition projects. The Department will add a total of 27 new inspectors to the Emergency Services and Compliance Divisions. The Department will also hire two additional attorneys to work in the Law Department’s Code Enforcement Unit, which is the unit that prosecutes property owners and contractors who do not comply with code enforcement citations issued by Department inspectors. These positions are critical to address illegal contractors and unsafe construction

projects, to increase internal effectiveness, and to hold property owners accountable for the condition of their properties. The budget also includes additional funding for the demolition of imminently dangerous buildings, as well as funding for new staff training programs.

L+I's New Data Management System

The Department has long-recognized the need for an improved data management system. Project eCLIPSE, which was launched in January 2014, is a wholesale replacement of the Department's current data and performance management system. This \$4.5 million project will result in a data system that is transparent and user friendly and that will allow the Department to improve its documentation of inspection results and demand greater levels of accountability from inspectors, contractors, and property owners. One key feature of the new system includes mobile solutions that will decrease administrative time, allowing inspectors to spend more time in the field. Once fully implemented, the new system will revolutionize the Department's inspection processes.

Looking to the Future

The Department has experienced major challenges in recent years. The devastating fire on York Street in 2012 and the tragic June 5, 2013 demolition accident have made us take a closer look at our processes and procedures and identify areas of improvement. That is why we are developing new standards that exceed state, national, and international code requirements and shifting the Department's focus to our core mission: building safety. There is both great demand and great opportunity for change in the Department, and no one understands this more than our dedicated staff. We are committed to continuing to evolve and change in order to make Philadelphia the nation's leader in building safety.

L+I RESPONSE TO RECOMMENDATIONS

The Report's authors used their review of Department data to offer five recommendations for improvements within the Department. The Department acknowledges that improvement is a constant process and that ongoing evolution is necessary to uphold our obligation to put in place certain controls that will protect public safety. As such, we carefully reviewed and considered each recommendation. After this review, we are pleased to say that we have already developed and implemented almost all of the process changes suggested in each recommendation. Moreover, while we concur with the intent of the recommendations, the Department must raise objections to the incomplete, inaccurate, and misleading interpretations of Department data that underlie the Report's recommendations.

The Department's changes – which have been ongoing since prior to the commencement of the Controller's audit – are summarized briefly below.

Response to Report Recommendation #1

The Report's first recommendation is that the Department *prepare detailed inspection reports for all site visits, including those for special projects.*

This corresponds to the Report's stated concern (*see Report Executive Summary p. 1, Report Introduction p. 3, Report Findings and Recommendations p. 8-9*) that inspections made in the week following June 5, 2013 were questionable. Specifically, the report stated that "almost half (210 of 442) of the inspections

claimed to have been made in the week following the building collapse were questionable because there were no documented inspection reports.” While the Department shares the goal of the recommendation, we dispute the specific conclusions that gave rise to the recommendation.

In the immediate aftermath of the June 5, 2013 demolition accident, the Department made a decision to proactively visit all properties that had demolition permits marked as open in Hansen for the purpose of conducting a site safety assessment. These assessments were not inspections – as in, not the detailed, code-required inspections performed at specific intervals on all construction and demolition permits – but rather a basic review of the site to ensure that site conditions did not pose a threat to public safety. To assign the inspections, the Department queried Hansen and determined that 442 properties had open full and partial demolition permits. Inspectors were directed to visit each site, assess any potential safety hazards such as dangerous conditions near the right of way or a threat to adjacent structures, issue stop work orders or other citations at any dangerous site, and record their findings on the permit in Hansen.¹

In response to the Controller’s audit, the Department ran a Hansen report to review the assessment result entries on each of these 442 permits (See Appendix A). This review revealed that 437 of the 442 permits had an entry to record the conditions found at the site. This means that 98.96% of permits had an entry. The review did reveal a lack of consistency in where the entry was actually recorded in Hansen, which likely made it difficult for the Report’s authors to see the data on each permit. Most significantly, however, this review directly refutes the Report’s conclusion that 210 of the 442 permits did not have documented inspection reports. Rather, these 210 permits did in fact have an entry; in many cases, the entry was the closure of the permit itself, which we understand may be difficult for a person unfamiliar with Hansen to interpret.

To be clear, our inspectors entered results for nearly every assessment as part of this special project, as they do for all inspections and site visits. The Department agrees that the recording of these results in Hansen is cumbersome and lacking in transparency and detail. Project eCLIPSE will eliminate this issue with enhanced and more cohesive reporting capabilities.

Response to Recommendation #2

The Report’s second recommendation is that the Department *revise permit application requirements to develop clearer criteria where needed, address examiners’ questions, and create a pool of pre-qualified contractors for imminently dangerous structures.*

This corresponds to the Report’s stated concern (see *Report Executive Summary* p.1, *Report Introduction* p. 3-4, *Report Findings and Recommendations* p. 9-13) that “for over 70 percent (10 of 14) of the demolition permit applications [the Controller’s office] reviewed, [the Department’s] plan examiners inconsistently enforced the new standards because the examiners lacked clear criteria for applying some standards, felt certain standards were unnecessary, or waived requirements when imminently dangerous

¹ The 442 site safety assessments were performed over a six-and-a-half working day period between the afternoon of June 5, 2013 and June 12, 2013, including one day of weekend work. During this time, inspectors placed a hold on most of their other work and prioritized these assessments. The assessments were done by approximately 35 inspectors (from both the Development Division and what is now the Emergency Services Division). This works out to each inspector performing an average of 13 assessments in six-and-a-half days. For context, Development Division inspectors average approximately 60 permit-based inspections in a typical five-day work week.

properties needed expedited processing. While the Department shares the goal of the recommendation, we dispute the specific conclusions that gave rise to the recommendation.

Since July 1, 2013, the Department has processed 284 demolition permits. The Report’s authors reviewed 14, or 4.9%, of these. Of the 14 permits selected for review, most were processed between July 1, 2013 and July 31, 2013, meaning the processing was done during the first days of implementation of the brand-new safety controls. In addition, five of the 14 permits were for the demolition of imminently dangerous structures that posed an immediate threat to public safety²; these permits are necessarily processed using different standards and issued with different requirements, due to the dangerous conditions presented by the structure. Both the date of permit processing and the extenuating circumstance of dangerous buildings requiring expedited review to accelerate the demolition process are critical to understand the Department’s handling of the selected permit applications, yet the Report’s authors failed to include or take into account this important information. Rather, the authors concluded that the 14 permits were instead processed inconsistently.

The Department’s review of the same permits reviewed by the Report’s authors yielded significantly different findings, as demonstrated fully in the attached chart, which mirrors the Report’s chart (*See* Appendix B). Most significantly, our review proves that on all 14 permits, plans examiners fulfilled the five critical functions cited by the Report: (1) verified contractor qualifications and experience, whether through documentation provided by applicant or through information already available to the Department, such as previous demolition permits or a pre-qualification through the City’s Master Demolition Program³; (2) verified that the contractor had a contract to perform the work; (3) defined acceptable demolition practices, whether through verifying a site safety plan or, in the case of permits for demolition of imminently dangerous structures, by imposing means and methods applicable to the particulars of the job; (4) reviewed and approved the work schedule, based on the particulars of the job and, in the case of permits for demolition of imminently dangerous structures, as dictated by code requirements; and (5) enforced the contractors’ commitment to maintaining permit documents on the jobsite through a letter. The Report express concern that in some instances the submission of certain documents was waived by plans examiners – but in all cases this was done as conditions warranted and as specifically permitted by Section 305.1.1 of the Philadelphia Administrative Code.

While all plan reviews were complete and proper, as evidenced in Appendix B, the Department acknowledges that deviations from typical processing standards were not documented in a manner that can be easily deciphered by the public. The Department has already addressed this issue by developing a comprehensive review checklist for inclusion in the permit record. Moreover, this issue will be eliminated entirely in the coming months with the enhanced documentation capabilities of Project eCLIPSE.

² In the first weeks of these new controls, our plans examination staff worked diligently and quickly to incorporate the new controls while also focusing on resolving incomplete permit applications from the previous month in an effort to advance critical demolition projects, including those of imminently dangerous structures.

³ Demolition contractors are required to demonstrate competence and experience with demolitions, as part of the new demolition legislation. While the legislation requires the permit application to contain information regarding the contractor’s experience and competence, this information can also be obtained by the plans examiner through an internal review of demolition permits previously obtained by the contractor. In addition, demolition contractors that are on the City’s Master Demolition Program list – meaning that they are eligible to perform City-funded demolitions – are considered “pre-qualified” because of the rigorous screening process for Master Demolition Program contractors.

Response to Report Recommendation #3

The Report's third recommendation is that the Department *train inspectors in the new demolition inspection standards*.

This corresponds to the Report's stated concern (*see Report Executive Summary p.1, Report Introduction p. 4-5, Report Findings and Recommendations p. 13-16*) that "for nearly 85 percent (15 of 18) of the completed demolitions occurring after the June 2013 building collapse, inspectors routinely failed to perform all demolition inspections required by newly establish procedures, waiving the inspections in L&I's [Hansen] system without explanation or supervisory approval. [...]" While the Department shares the goal of the recommendation – and long ago put plans in place to reach this goal – we dispute the specific conclusions that gave rise to the recommendation.

The Report's authors reviewed 18 demolition permits and concluded that the Department did not complete required inspections on 15 of the permits. To put this sample in context, the Department has issued 284 demolition permits since July 1, 2013, meaning that the authors' review of 18 permits constitutes 6.3% of issued permits. The Report's conclusion from this small sample of demolition permits is inaccurate, and likely stems from the authors' misinterpretation of the Department's data and misunderstanding of the term "waived." The Department's review of the same permits yielded significantly different findings, as demonstrated fully in the attached chart, which mirrors the Report's chart (*See Appendix D*). This review clearly demonstrates that the Department completed all six required inspections on all but one of the 15 permits – meaning that of the 90 total inspections for these permits, 89, or 98.88%, were properly completed and documented.

To fully understand this review, further explanation of Hansen's functionality, and its limitations, is critical. Hansen is a rigid database used as both a data management system and a performance management tool. There are many "quirks" to the system that are not easily understood by those who have not been extensively trained on it; the one most relevant to this discussion is the system's pre-programmed, unchangeable list of required inspections for all permits, including demolition permits. This means that when an approved permit is added into Hansen, the inspections to be performed by the inspector on that permit are automatically inserted into the permit based on permit type, even if those inspections are not necessary for that specific jobsite. This often results in a permit showing inspections that are not required or that can be combined with other inspections for recording purposes.

When faced with recording entries on a permit that has a pre-programmed inspection that is not required,⁴ the inspector's only option is to enter a pre-programmed log noting that the inspection was "waived." While the inspection was decidedly not waived and rather was simply not applicable to the specific permit, Hansen does not permit the user to enter that type of explanation. Rather, the inspector must simply check "waived," and while those within the Department know what that means, those outside the Department, regrettably, do not. The Department acknowledges that "waived" is a poor word choice to convey the actual activity completed and will keeps semantics in mind when building the documentation process in Project eCLIPSE.

⁴ For example, a demolition permit has pre-programmed logs for two underslab floor inspections. However, for one-story buildings, there necessarily will be one underslab floor inspection, as there is only one floor. Therefore, the second underslab floor inspection is marked as "waived," even though it is simply not applicable.

The same problem occurs when a permit delineates separate inspections for inspections that are in practice combined during one visit to the jobsite, such as when a contractor is completing two or more tasks at the site simultaneously.⁵ Hansen does not allow inspectors to enter results of multiple inspections on a single site visit, even if the inspector inspects two or more aspects of the job on one visit, as this would lead to inaccurate performance measures.⁶ Therefore, inspectors will mark one of the inspections as completed and the rest as “waived,” even though those inspections were conducted and recorded under another inspection. Again, this is a problem of semantics, not a failure to complete required tasks. This issue will be resolved with Project eCLIPSE, which will allow for much more detailed and specific explanations for all permit inspections.

Response to Report Recommendation #4

The Report’s fourth recommendation is that the Department *ensure the new planned database requires all waived inspections to be fully explained and approved by supervisors, include appropriate fields to provide details on inspection work performed, and facilitates timely supervisory review of inspectors’ activity.*

This corresponds to the Report’s stated concern (*see Report Executive Summary p.1, Report Findings and Recommendations p. 16-20*) that “L&I’s inspection records were insufficient, often lacking required photographs for demolition site visits and failing to document important details about work performed during inspections. Moreover, frequently, there was no evidence of independent supervisory review of inspectors’ activity.” While the Department shares – and has already taken major steps toward – the goal of the recommendation, we dispute the specific conclusions that gave rise to the recommendation.

Project eCLIPSE will provide the Department with an entirely new toolbox for conducting and documenting inspections and reviewing and issuing permits. These increased reporting capabilities and the ability to enter more specific details on all inspections ultimately allow for greater oversight of all construction and demolition sites. The full capabilities of Project eCLIPSE to address the specific concerns raised in the report are available for review (*See Appendix D*).

Before that explanation, however, we must clarify misstatements in the Report regarding a purported lack of photographs and supervisory approval for the small sample of demolition inspections. To address the first concern, the Department currently does not require inspectors to take photographs at demolition inspections because Hansen does not allow for photograph storage and because photographs are not required by code or regulation. Project eCLIPSE has much greater photographic capabilities and will allow for seamless entry of photographs and inspection results into a single system, as can be seen in Appendix D. Therefore, the Department will begin requiring photographs of all inspections once Project eCLIPSE implementation is complete. To address the second concern, the Department currently has multiple mandatory levels of supervisory review, including built-in checks in Hansen that require

⁵ For example, a contractor completing a demolition of an imminently dangerous structure may be permitted to work more quickly if the structure is compromised, threatens adjacent buildings, etc. Therefore, inspections may take place after several stages of work are completed, which is permitted by code; in practice, these inspections would be waived in Hansen, even though the work was properly vetted.

⁶ Specifically, this would skew the number of inspections an inspector enters as being completed daily and weekly. This data is invaluable to the Department as it monitors and manages inspector workloads based on inspection totals in order to ensure efficient, expeditious inspections on all permits.

supervisory review before any permit can be closed or any violation is issued and a system for daily review of inspectors' electronically-submitted route sheets. This review process will be further enhanced in Project eCLIPSE, as also can be seen in Appendix D.

Response to Report Recommendation #5

The Report's fifth and final recommendation is that the Department *require that all employees inspecting permitted demolitions possess the required professional certifications.*

This corresponds to the Report's stated concern (*see Report Executive Summary p.1, Report Findings and Recommendations p. 20-21*) that "some inspectors also lacked the professional certifications to perform the inspections." While the Department shares the goal of the recommendation – and has already made the necessary internal changes to accomplish it – we dispute the specific conclusions that gave rise to the recommendation.

All inspectors assigned to our Development Division are fully certified with training and certifications that frequently exceed national and state requirements.⁷ The two inspectors identified in the Report as uncertified were fully certified at the time they completed the site safety assessments in June 2013; however, one subsequently allowed his certifications to lapse and the other failed to convert his national certificates to state-recognized certificates. This has since been corrected. The certification status of all inspectors is recorded by the Department and was verified in the preparation of this Response (*See Appendix E*). The status can be further verified through a search of certified code officials on the websites of the International Code Council (www.iccsafe.org) and the Department of Labor and Industry (www.portal.state.pa.us).

As part of its commitment this type of ongoing certification and education, the Department is developing new training programs for inspectors that will focus on demolition safety as well as worksite safety, the latter of which will be administered through OSHA. These programs will begin in FY15.

⁷ By way of explanation as to required certifications, the Pennsylvania Uniform Construction Code requires that individuals who perform inspections or plan examinations for the purposes of enforcing construction codes must be certified by the Pennsylvania Department of Labor and Industry in the category applicable to the work they perform. Certifications are obtained through computer-based assessment exams that are administered through a third-party testing agency. In addition to attainment of required certifications, employees are required to complete coursework or continuing education credits (CEUs) necessary to maintain certifications during tenure of employment. Employees must obtain at least 45 CEUs every three years in order to maintain their certifications.

CONCLUSION

The Department believes strongly in the soundness and thoroughness of our current procedures, in the work of our dedicated inspectors and plans examiners, and in our commitment to the protection of public safety. We acknowledge that our internal practices are often opaque to the public, and, as seen in the Report, may seem antiquated and in need of upgrades. We concur with this assessment and going forward, particularly with the ongoing launch of Project eCLIPSE, will make it a priority to ensure that our inspection processes and documentation procedures are as transparent, detailed, and easily understood as possible. Code enforcement is a complicated, technical, and detailed process, and one that affects the lives of all those who live, work, and play in the City every day. The enforcement of our codes is a responsibility we take extremely seriously and we constantly strive to innovate, expand, and do better – and, right now, we believe we are doing just that.

The Department again thanks the Controller’s Office for the time and resources spent in its review of our practices and procedures. We appreciate the opportunity to review the Report and to offer this response. The Department prioritizes this type of collaboration and welcomes feedback from esteemed agencies like the Controller’s Office, as this can only help us reach our goal, and the City’s goal, of making Philadelphia the nation’s leader in building safety.

Appendix A

Area	Street#	Direction	Street Name	Suffix	City	State	Zip	Permit#	Issue Date	COA	COA Date	Inspection	Inspection Date
210	215		SHURS	LA	PHILADELPHIA	PA	19128-5039	16786	6/7/2006	COA	6/11/2013 14:14		
14	749	S	17TH	ST	PHILADELPHIA	PA	19146-2032	16868	6/7/2006	COA	6/11/2013 14:58		
149	1601	S	33RD	ST	PHILADELPHIA	PA	19121-2457	17488	6/8/2006	COA	6/12/2013 13:23	Inspection	6/12/2013 14:53
247	172	E	CHELLEN	AVE	PHILADELPHIA	PA	19144-2133	17752	7/6/2006	COA	6/12/2013 15:19	Inspection	6/12/2013 14:55
247	174	E	CHELLEN	AVE	PHILADELPHIA	PA	19144-2133	17801	7/6/2006	COA	6/12/2013 15:20	Inspection	6/12/2013 14:56
247	176	E	CHELLEN	AVE	PHILADELPHIA	PA	19144-2133	17802	7/6/2006	COA	6/12/2013 15:21	Inspection	6/12/2013 14:57
247	178	E	CHELLEN	AVE	PHILADELPHIA	PA	19144-2133	17803	7/6/2006	COA	6/12/2013 15:24	Inspection	6/12/2013 14:58
247	180	E	CHELLEN	AVE	PHILADELPHIA	PA	19144-2133	17804	7/6/2006	COA	6/12/2013 15:24	Inspection	6/12/2013 14:58
247	182	E	CHELLEN	AVE	PHILADELPHIA	PA	19144-2133	17805	7/6/2006	COA	6/11/2013 10:24	Inspection	6/11/2013 10:24
28	1026		CROSS	ST	PHILADELPHIA	PA	19147-6314	17975	6/13/2006	COA	6/10/2013 9:46	Inspection	6/10/2013 9:41
28	1026		CROSS	ST	PHILADELPHIA	PA	19147-6314	17977	6/13/2006	COA	6/10/2013 10:00	Inspection	6/10/2013 9:36
285	4917	N	FAIRHILL	ST	PHILADELPHIA	PA	19120-3711	18181	8/15/2006	COA	6/11/2013 15:50	Inspection	6/11/2013 15:28
283	1230	W	WYOMING	AVE	PHILADELPHIA	PA	19140-1249	20300	7/5/2006	COA	6/11/2013 15:50	Inspection	6/11/2013 15:30
140	1717		CAMBRIDGE	ST	PHILADELPHIA	PA	19130-1505	20371	10/18/2006	COA	6/11/2013 13:27	Inspection	6/11/2013 9:39
158	1234	E	OXFORD	ST	PHILADELPHIA	PA	19125-3923	20762	7/13/2006	COA	6/11/2013 13:53		
142	1002	N	02ND	ST	PHILADELPHIA	PA	19123-1602	20853	7/21/2006	COA	6/11/2013 10:58	Inspection	6/10/2013 14:51
140	1711		CAMBRIDGE	ST	PHILADELPHIA	PA	19130-1505	20952	10/18/2006	COA	6/11/2013 13:31	Inspection	6/10/2013 7:53
140	1713		CAMBRIDGE	ST	PHILADELPHIA	PA	19130-1505	20953	10/18/2006	COA	6/11/2013 13:31	Inspection	6/10/2013 7:58
140	1715		CAMBRIDGE	ST	PHILADELPHIA	PA	19130-1505	20954	10/18/2006	COA	6/11/2013 13:30	Inspection	6/10/2013 8:12
245	5317		GERMANTOWN	AVE	PHILADELPHIA	PA	19144-2303	21223	7/12/2006	COA	6/11/2013 14:53	Inspection	6/11/2013 12:29
142	1004	N	02ND	ST	PHILADELPHIA	PA	19123-1602	22020	7/21/2006	COA	6/11/2013 11:01	Inspection	6/10/2013 14:53
111	1409	N	52ND	ST	PHILADELPHIA	PA	19131-4413	22244	8/14/2006	COA	6/11/2013 13:55	Inspection	6/11/2013 9:31
140	1719		CAMBRIDGE	ST	PHILADELPHIA	PA	19130-1505	22853	10/18/2006	COA	6/11/2013 13:26	Inspection	6/11/2013 9:36
14	1514		BAINBRIDGE	ST	PHILADELPHIA	PA	19146-2121	23113	8/17/2006	COA	6/11/2013 15:08		
166	2353	N	PARK	AVE	PHILADELPHIA	PA	19132-4512	26338	8/28/2006	COA	6/11/2013 11:52		
19	1937		KIMBALL	ST	PHILADELPHIA	PA	19146-2620	26478	9/6/2006	COA	6/11/2013 15:03	Inspection	6/10/2013 13:23
28	1655	E	PASSYUNK	AVE	PHILADELPHIA	PA	19148-1121	29002	10/6/2006	COA	6/10/2013 14:23	Inspection	6/10/2013 8:35
347	8791		ASHTON	RD	PHILADELPHIA	PA	19136-1001	29182	5/2/2007	COA	6/7/2013 15:01		
113	5529		LANSDOWNE	AVE	PHILADELPHIA	PA	19131-3532	31744	10/12/2006	COA	6/11/2013 14:07	Inspection	6/11/2013 10:00
161	2057		AMBER	ST	PHILADELPHIA	PA	19125-1932	31748	10/20/2006	COA	6/11/2013 16:07	Inspection	6/11/2013 15:57
144	1238	N	05TH	ST	PHILADELPHIA	PA	19122-4302	32603	10/13/2006	COA	6/11/2013 13:15	Inspection	6/10/2013 15:52
20	2212		ALTER	ST	PHILADELPHIA	PA	19146-2800	33328	10/12/2006	COA	6/11/2013 11:17	Inspection	6/10/2013 11:16
16	700	S	03RD	ST	PHILADELPHIA	PA	19147-3311	35373	11/28/2006	COA	6/11/2013 15:11		
16	702	S	03RD	ST	PHILADELPHIA	PA	19147-3311	35375	11/28/2006	COA	6/11/2013 15:09		
16	704	S	03RD	ST	PHILADELPHIA	PA	19147-3311	35376	11/28/2006	COA	6/11/2013 15:08		
20	2217		TITAN	ST	PHILADELPHIA	PA	19146-4228	36546	11/3/2006	COA	6/11/2013 15:03	Inspection	6/10/2013 13:19
19	1905		KIMBALL	ST	PHILADELPHIA	PA	19146-2620	36547	11/3/2006	COA	6/11/2013 15:03	Inspection	6/10/2013 13:19
20	2219		TITAN	ST	PHILADELPHIA	PA	19146-4228	36551	11/3/2006	COA	6/11/2013 15:03	Inspection	6/10/2013 11:29
164	518	W	LEHIGH	AVE	PHILADELPHIA	PA	19133-2631	40786	11/28/2006	COA	6/11/2013 15:03	Inspection	6/10/2013 10:33
164	520	W	LEHIGH	AVE	PHILADELPHIA	PA	19133-2631	40788	11/28/2006	COA	6/11/2013 15:03	Inspection	6/10/2013 10:30
15	705	S	07TH	ST	PHILADELPHIA	PA	19147-2118	44158	12/15/2006	COA	6/11/2013 15:13		
183	3100		ORTHODOX	ST	PHILADELPHIA	PA	19137-2021	45670	1/30/2007	COA	6/11/2013 15:13	Inspection	6/11/2013 14:18

133	1619	RIDGE	AVE	PHILADELPHIA	PA	19130-2118	47088	1/18/2007	COA	6/11/2013 11:28	Inspection	6/10/2013 12:44
111	5173	JEFFERSON	ST	PHILADELPHIA	PA	19131-4710	48456	1/24/2007	COA	6/11/2013 14:05	Inspection	6/11/2013 9:56
15	606 S	13TH	ST	PHILADELPHIA	PA	19147-1808	48625	1/22/2007	COA	6/11/2013 15:15		
149	5100 W	COLUMBIA	AVE	PHILADELPHIA	PA	19131-4705	50008	1/24/2007				
186	3360 E	THOMPSON	ST	PHILADELPHIA	PA	19134-5309	53907	3/2/2007	COA	6/7/2013 14:47		
14	767 S	CLEVELAND	ST	PHILADELPHIA	PA	19146-1811	54321	2/22/2007	COA	6/11/2013 15:02		
161	2061 E	SUSQUEHANNA	AVE	PHILADELPHIA	PA	19125-1541	55186	2/7/2007	COA	6/11/2013 16:07	Inspection	6/11/2013 15:55
20	1210 S	24TH	ST	PHILADELPHIA	PA	19146-2430	62127	4/4/2007		Inspection	6/10/2013 11:23	
147	1524 N	17TH	ST	PHILADELPHIA	PA	19121-4209	63059	3/19/2007	COA	6/11/2013 13:09	Inspection	6/11/2013 11:55
352	4701	CONVENT	PL	PHILADELPHIA	PA	19114-3741	63732	3/22/2007	COA	6/11/2013 8:38		
31	1533 S	LAMBERT	ST	PHILADELPHIA	PA	19146-4519	68021	7/17/2007	COA	6/11/2013 14:56	Inspection	6/10/2013 7:13
31	1543 S	LAMBERT	ST	PHILADELPHIA	PA	19146-4519	68028	7/17/2007	COA	6/11/2013 14:58	Inspection	6/10/2013 9:05
2	122 N	13TH	ST	PHILADELPHIA	PA	19107-2131	71778	7/12/2007	COA	6/11/2013 12:24		
161	2011 E	HAZZARD	ST	PHILADELPHIA	PA	19125-1307	71965	5/3/2007				
2	134 N	13TH	ST	PHILADELPHIA	PA	19107-2025	72592	7/11/2007	COA	6/11/2013 12:25		
2	152 N	13TH	ST	PHILADELPHIA	PA	19107-2017	72594	7/11/2007	COA	6/11/2013 12:26		
2	1301	ARCH	ST	PHILADELPHIA	PA	19107-2112	72595	7/11/2007	COA	6/10/2013 9:53		
2	1319	ARCH	ST	PHILADELPHIA	PA	19107-2112	72596	7/11/2007	COA	6/10/2013 9:58		
2	1325	ARCH	ST	PHILADELPHIA	PA	19107-1915	72598	7/11/2007	COA	6/10/2013 10:02		
2	117 N	BROAD	ST	PHILADELPHIA	PA	19107-1909	72600	7/11/2007	COA	6/11/2013 12:22		
2	141 N	BROAD	ST	PHILADELPHIA	PA	19107-1915	72601	7/11/2007	COA	6/11/2013 12:23		
2	1315	CHERRY	ST	PHILADELPHIA	PA	19107-2013	72602	7/11/2007	COA	6/10/2013 9:58		
2	1333	CHERRY	ST	PHILADELPHIA	PA	19107-1900	72603	7/11/2007	COA	6/10/2013 10:03		
2	140 N	JUNIPER	ST	PHILADELPHIA	PA	19107-1900	72604	7/11/2007	COA	6/11/2013 12:27		
2	142 N	JUNIPER	ST	PHILADELPHIA	PA	19107-1900	72605	7/11/2007	COA	6/11/2013 12:28		
2	145 N	JUNIPER	ST	PHILADELPHIA	PA	19107-1900	72606	7/11/2007	COA	6/11/2013 12:29		
2	1302	RACE	ST	PHILADELPHIA	PA	19107-2014	72607	7/11/2007	COA	6/10/2013 9:56		
2	1308	RACE	ST	PHILADELPHIA	PA	19107-2014	72608	7/11/2007	COA	6/10/2013 9:57		
2	1320	RACE	ST	PHILADELPHIA	PA	19107-2014	72609	7/11/2007	COA	6/10/2013 10:00		
2	1322	RACE	ST	PHILADELPHIA	PA	19107-2014	72610	7/11/2007	COA	6/10/2013 10:01		
1	48 S	FRONT	ST	PHILADELPHIA	PA	19106-3001	72813	5/8/2007	COA	6/11/2013 11:48	Inspection	6/10/2013 11:46
1	50 S	FRONT	ST	PHILADELPHIA	PA	19106-3001	73848	5/8/2007	COA	6/11/2013 12:20	Inspection	6/10/2013 12:18
14	1521	BAINBRIDGE	ST	PHILADELPHIA	PA	19146-1634	74398	5/16/2007	COA	6/11/2013 15:05		
1	103	CHESTNUT	ST	PHILADELPHIA	PA	19106-3009	75052	5/21/2007	COA	6/11/2013 12:21		
138	1305 N	24TH	ST	PHILADELPHIA	PA	19121-4740	77873	6/1/2007	COA	6/12/2013 13:25		
14	1535	CATHARINE	ST	PHILADELPHIA	PA	19146-2138	80562	6/6/2007	COA	6/11/2013 15:10		
14	1537	CATHARINE	ST	PHILADELPHIA	PA	19146-2138	81186	6/6/2007	COA	6/11/2013 15:15		
14	753 S	20TH	ST	PHILADELPHIA	PA	19146-1846	81504	6/27/2008	COA	6/11/2013 14:59		
19	1022 S	COLORADO	ST	PHILADELPHIA	PA	19146-1910	83162	6/25/2007	COA	6/11/2013 15:02	Inspection	6/10/2013 13:12
140	1811	MASTER	ST	PHILADELPHIA	PA	19121-4907	88138	7/23/2007	COA	6/11/2013 13:24		
160	2320 E	FLETCHER	ST	PHILADELPHIA	PA	19125-2508	88780	10/30/2007	COA	6/11/2013 15:57	Inspection	6/10/2013 8:33
160	2318 E	FLETCHER	ST	PHILADELPHIA	PA	19125-2508	88788	10/30/2007	COA	6/10/2013 8:51		
139	2035	MASTER	ST	PHILADELPHIA	PA	19121-0000	93707	8/23/2007		Inspection	6/11/2013 14:02	

214	4405	SILVERWOOD	ST	PHILADELPHIA	PA	19127-1338	94475	9/12/2007	Inspection	6/11/2013 13:06
31	1427 S	21ST	ST	PHILADELPHIA	PA	19146-4541	98602	10/2/2007 COA	Inspection	6/10/2013 8:53
86	132 S	46TH	ST	PHILADELPHIA	PA	19139-3606	101840	4/14/2008 COA	Inspection	6/10/2013 7:55
86	138 S	46TH	ST	PHILADELPHIA	PA	19139-3606	101845	4/14/2008 COA	Inspection	6/10/2013 7:46
217	680	RENZ	ST	PHILADELPHIA	PA	19128-1421	103619	9/19/2007 COA	Inspection	6/11/2013 14:16
217	682	RENZ	ST	PHILADELPHIA	PA	19128-1421	103860	9/19/2007 COA	Inspection	6/10/2013 8:56
156	1721 N	03RD	ST	PHILADELPHIA	PA	19122-3004	106229	10/17/2007 COA	Inspection	6/11/2013 13:30
14	763 S	19TH	ST	PHILADELPHIA	PA	19146-1841	106462	10/17/2007 COA	Inspection	6/11/2013 13:21
143	1120 E	OXFORD	ST	PHILADELPHIA	PA	19125-4217	106711	10/22/2007 COA	Inspection	6/10/2013 10:58
189	2270 E	BUTLER	ST	PHILADELPHIA	PA	19137-1010	109488	10/16/2007 COA	Inspection	6/10/2013 9:08
25	115	WHARTON	ST	PHILADELPHIA	PA	19147-5426	112166	1/14/2008 COA	Inspection	6/11/2013 14:56
247	600 E	CHELTEN	AVE	PHILADELPHIA	PA	19144-1205	113444	11/30/2007 COA	Inspection	6/11/2013 15:18
14	1537	KATER	ST	PHILADELPHIA	PA	19146-1621	115846	12/12/2007 COA	Inspection	6/11/2013 15:17
14	1539	KATER	ST	PHILADELPHIA	PA	19146-1621	115848	12/12/2007 COA	Inspection	6/11/2013 15:12
15	1243	KATER	ST	PHILADELPHIA	PA	19147-1817	126844	4/15/2008 COA	Inspection	6/11/2013 15:14
15	1237	KATER	ST	PHILADELPHIA	PA	19147-1817	127821	4/15/2008 COA	Inspection	6/12/2013 13:24
15	613 S	13TH	ST	PHILADELPHIA	PA	19147-1807	127834	4/15/2008 COA	Inspection	6/11/2013 11:17
153	1726	DIAMOND	ST	PHILADELPHIA	PA	19121-0000	130913	2/6/2008 COA	Inspection	6/10/2013 14:45
133	1507	BRANDYWINE	ST	PHILADELPHIA	PA	19130-4002	134420	2/26/2008 COA	Inspection	6/11/2013 9:35
135	1926	PARRISH	ST	PHILADELPHIA	PA	19130-4002	136898	3/7/2008 COA	Inspection	6/11/2013 15:40
184	4745	GARDEN	ST	PHILADELPHIA	PA	19137-2202	142209	4/8/2008 COA	Inspection	6/11/2013 11:20
198	3713	OLD YORK	RD	PHILADELPHIA	PA	19140-3714	142777	6/5/2008 COA	Inspection	6/10/2013 12:41
13	2207	LEAGUE	ST	PHILADELPHIA	PA	19146-2525	145214	4/18/2008 COA	Inspection	6/11/2013 13:49
133	1527	RIDGE	AVE	PHILADELPHIA	PA	19130-2212	151576	5/27/2008 COA	Inspection	6/12/2013 13:24
157	1850	FRANKFORD	AVE	PHILADELPHIA	PA	19125-2416	152932	6/10/2008 COA	Inspection	6/11/2013 8:15
153	1944 N	BROAD	ST	PHILADELPHIA	PA	19121-3313	153807	6/20/2008 COA	Inspection	6/11/2013 13:35
153	1942 N	BROAD	ST	PHILADELPHIA	PA	19121-3313	153811	6/20/2008 COA	Inspection	6/11/2013 15:12
217	6651	RIDGE	AVE	PHILADELPHIA	PA	19128-2428	155633	10/1/2008 COA	Inspection	6/11/2013 10:58
14	764 S	16TH	ST	PHILADELPHIA	PA	19146-2031	158247	7/9/2008 COA	Inspection	6/10/2013 13:07
279	5737 E	WISTER	ST	PHILADELPHIA	PA	19138-0000	160615	7/16/2008 COA	Inspection	6/10/2013 15:03
210	3507 N	17TH	ST	PHILADELPHIA	PA	19140-0000	160898	7/15/2008 COA	Inspection	6/11/2013 11:04
105	915 N	MARKOE	ST	PHILADELPHIA	PA	19131-5208	161137	6/26/2008 COA	Inspection	6/10/2013 13:07
126	333 N	11TH	ST	PHILADELPHIA	PA	19107-1305	161689	7/18/2008 COA	Inspection	6/10/2013 15:39
205	4200	WISSAHICKON	AVE	PHILADELPHIA	PA	19129-0000	162053	7/15/2008 COA	Inspection	6/10/2013 15:16
96	160 N	60TH	ST	PHILADELPHIA	PA	19139-2314	163684	7/10/2008 COA	Inspection	6/11/2013 11:50
179	3037	AMBER	ST	PHILADELPHIA	PA	19134-3745	166687	7/24/2008 COA	Inspection	6/10/2013 8:46
144	1435 N	04TH	ST	PHILADELPHIA	PA	19122-3708	168930	8/7/2008 COA	Inspection	6/7/2013 11:15
22	1215 S	18TH	ST	PHILADELPHIA	PA	19146-3044	169422	8/6/2008 COA	Inspection	6/11/2013 14:42
189	2335 E	BUTLER	ST	PHILADELPHIA	PA	19137-1011	169519	8/15/2008 COA	Inspection	6/7/2013 14:43
189	2365 E	BUTLER	ST	PHILADELPHIA	PA	19137-1011	170358	8/15/2008 COA	Inspection	6/11/2013 14:52
245	4607	GERMANTOWN	AVE	PHILADELPHIA	PA	19144-3010	171630	8/2/2012 COA	Inspection	6/11/2013 13:19
140	1811	MASTER	ST	PHILADELPHIA	PA	19121-4907	171833	8/19/2008 COA	Inspection	6/11/2013 12:58
238	45 W	HAINES	ST	PHILADELPHIA	PA	19144-2705	172687	8/21/2008 COA	Inspection	

118	5400	WYNNFIELD	AVE	PHILADELPHIA	PA	19131-1324	178965	9/24/2008	COA	6/11/2013 14:09	Inspection	6/11/2013 8:05
106	639 N	43RD	ST	PHILADELPHIA	PA	19104-1467	179547	10/1/2008			Inspection	6/11/2013 9:23
214	172	GRAPE	ST	PHILADELPHIA	PA	19127-1409	193281	12/17/2008			Inspection	6/11/2013 13:04
158	1244 E	COLONA	ST	PHILADELPHIA	PA	19125-3502	194143	12/31/2008			Inspection	6/12/2013 10:15
14	1517	BAINBRIDGE	ST	PHILADELPHIA	PA	19146-1634	194169	12/29/2008				
238	11 W	RITTENHOUSE	ST	PHILADELPHIA	PA	19144-2711	196219	1/12/2009	COA	6/11/2013 13:31		
71	5414	CHESTER	AVE	PHILADELPHIA	PA	19143-4914	198188	1/26/2009			Inspection	6/11/2013 13:41
282	1301	WAGNER	AVE	PHILADELPHIA	PA	19141-2916	199923	2/18/2009	COA	6/11/2013 15:47	Inspection	6/11/2013 15:14
282	1305	WAGNER	AVE	PHILADELPHIA	PA	19141-2916	199926	2/18/2009	COA	6/11/2013 15:48	Inspection	6/11/2013 15:15
282	1303	WAGNER	AVE	PHILADELPHIA	PA	19141-2916	199928	2/18/2009	COA	6/11/2013 14:43		
282	1307	WAGNER	AVE	PHILADELPHIA	PA	19141-2916	199932	2/18/2009	COA	6/11/2013 14:44		
282	1309	WAGNER	AVE	PHILADELPHIA	PA	19141-2916	199935	2/18/2009	COA	6/11/2013 14:44		
282	1311	WAGNER	AVE	PHILADELPHIA	PA	19141-2916	199937	2/18/2009	COA	6/11/2013 14:45		
90	3313	BARING	ST	PHILADELPHIA	PA	19104-2528	202292	2/26/2009	COA	6/10/2013 14:46	Inspection	6/10/2013 14:42
153	1924 N	18TH	ST	PHILADELPHIA	PA	19121-3318	207204	3/26/2009	COA	6/10/2013 17:33	Inspection	6/10/2013 17:30
140	1240 N	15TH	ST	PHILADELPHIA	PA	19121-5132	207580	3/30/2009	COA	6/11/2013 13:32		
278	1419 W	GRANGE	AVE	PHILADELPHIA	PA	19141-2509	210332	4/14/2009	COA	6/11/2013 15:45		
189	3901	ARCADIA	ST	PHILADELPHIA	PA	19124-5008	211398	4/20/2009	COA	6/11/2013 11:34	Inspection	6/11/2013 10:57
30	1517 S	MOLE	ST	PHILADELPHIA	PA	19146-4837	214629	6/17/2009	COA	6/11/2013 15:03		
8	200 S	30TH	ST	PHILADELPHIA	PA	19104-4306	215547	7/7/2009	COA	6/10/2013 11:20		
85	5110	MARKET	ST	PHILADELPHIA	PA	19139-3422	221851	6/22/2009	COA	6/11/2013 9:10	Inspection	6/10/2013 9:06
5112		MARKET	ST	PHILADELPHIA	PA	19139-3422	222697	6/22/2009	COA	6/11/2013 9:15	Inspection	6/10/2013 9:11
201	1536 W	ERIE	AVE	PHILADELPHIA	PA	19140-4129	227434	7/20/2009				
265	6849	LIMEKILN	PK	PHILADELPHIA	PA	19138-3144	234341	9/1/2009	COA	6/11/2013 14:45		
158	1702	TULIP	ST	PHILADELPHIA	PA	19125-2410	242357	10/15/2009	COA	6/11/2013 13:55		
133	1508	FAIRMOUNT	AVE	PHILADELPHIA	PA	19130-2910	249122	11/19/2009	COA	6/11/2013 11:18		
135	1824	POPLAR	ST	PHILADELPHIA	PA	19130-1522	253299	12/14/2009			Inspection	6/7/2013 14:57
173	2846 N	17TH	ST	PHILADELPHIA	PA	19132-2239	258275	1/21/2010	COA	6/11/2013 11:56		
22	1536	ALTER	ST	PHILADELPHIA	PA	19146-3104	265323	3/5/2010	COA	6/11/2013 14:46		
133	1537	RIDGE	AVE	PHILADELPHIA	PA	19130-2212	266732	3/15/2010	COA	6/11/2013 11:22		
133	1539	RIDGE	AVE	PHILADELPHIA	PA	19130-2212	266735	3/15/2010	COA	6/11/2013 11:24		
246	5545	LENA	ST	PHILADELPHIA	PA	19144-2232	268951	3/25/2010	COA	6/11/2013 13:15		
167	2334 N	BROAD	ST	PHILADELPHIA	PA	19132-4503	273607	4/19/2010	COA	6/11/2013 11:58		
14	1413	BAINBRIDGE	ST	PHILADELPHIA	PA	19146-1648	277682	5/7/2010	COA	6/11/2013 14:47		
161	2627	KENSINGTON	AVE	PHILADELPHIA	PA	19125-1131	278642	5/19/2010	COA	6/11/2013 14:48		
161	2629	KENSINGTON	AVE	PHILADELPHIA	PA	19125-1131	278643	5/19/2010	COA	6/11/2013 14:48		
161	2631	KENSINGTON	AVE	PHILADELPHIA	PA	19125-1131	278644	5/19/2010	COA	6/11/2013 14:49		
233	7146	BRYAN	ST	PHILADELPHIA	PA	19119-2433	280983	5/24/2010	COA	6/11/2013 12:53		
155	1801 N	07TH	ST	PHILADELPHIA	PA	19122-2001	281269	5/26/2010	COA	6/11/2013 13:41		
133	1416	PARRISH	ST	PHILADELPHIA	PA	19130-2209	281816	5/27/2010	COA	6/11/2013 11:12		
203	1228 W	TIOGA	ST	PHILADELPHIA	PA	19140-4232	285892	6/17/2010	COA	6/11/2013 15:38		
188	3334	BRADDOCK	ST	PHILADELPHIA	PA	19134-3236	287918	1/19/2011	COA	6/11/2013 8:51		
34	3536	WHARTON	ST	PHILADELPHIA	PA	19146-3226	287991	6/30/2010	COA	6/11/2013 16:15		

34	3538	WHARTON	ST	PHILADELPHIA	PA	19146-3226	287995	6/30/2010 COA	6/11/2013 16:16
34	3540	WHARTON	ST	PHILADELPHIA	PA	19146-3226	287997	6/30/2010 COA	6/11/2013 16:17
104	600 N	49TH	ST	PHILADELPHIA	PA	19139-1701	289512	8/4/2010 COA	6/11/2013 13:42
22	1720	MANTON	ST	PHILADELPHIA	PA	19146-3018	291238	7/16/2010 COA	6/11/2013 15:04
104	4801	HAVERFORD	AVE	PHILADELPHIA	PA	19139-1703	296578	8/16/2010 COA	6/11/2013 13:44
74	1309 S	52ND	ST	PHILADELPHIA	PA	19143-4308	297612	8/24/2010 COA	6/11/2013 9:02
152	1931 N	UBER	ST	PHILADELPHIA	PA	19121-2234	300387	9/9/2010 COA	6/10/2013 17:34
344	9245	GRACE	LA	PHILADELPHIA	PA	19115-2824	300733	9/13/2010 COA	6/11/2013 7:56
233	7048	GERMANTOWN	AVE	PHILADELPHIA	PA	19119-1826	301131	10/12/2010 COA	6/11/2013 12:51
274	5324 N	02ND	ST	PHILADELPHIA	PA	19120-3248	301467	9/16/2010	Inspection
22	1722	MANTON	ST	PHILADELPHIA	PA	19146-3018	301862	10/4/2010 COA	6/11/2013 15:05
147	1801	CECIL B MOORE	AVE	PHILADELPHIA	PA	19103-1114	301875	9/27/2010 COA	6/11/2013 13:39
205	4301	WISSAHICKON	AVE	PHILADELPHIA	PA	19129-1216	305405	10/8/2010 COA	6/11/2013 15:40
42	2001 S	04TH	ST	PHILADELPHIA	PA	19148-2500	305753	10/12/2010 COA	6/10/2013 14:26
109	665 N	35TH	ST	PHILADELPHIA	PA	19104-1942	306432	10/14/2010 COA	6/10/2013 14:57
151	2030 N	31ST	ST	PHILADELPHIA	PA	19121-1721	306886	10/28/2010 COA	6/10/2013 17:36
151	2032 N	31ST	ST	PHILADELPHIA	PA	19121-1746	306889	10/28/2010 COA	6/10/2013 17:36
151	2034 N	31ST	ST	PHILADELPHIA	PA	19121-1746	306894	10/28/2010 COA	6/10/2013 17:35
210	4168	MAIN	ST	PHILADELPHIA	PA	19127-1618	308650	11/19/2010 COA	6/11/2013 14:25
175	3044 N	HUTCHINSON	ST	PHILADELPHIA	PA	19133-1822	311121	11/16/2010 COA	6/10/2013 11:39
161	1909 E	HAGERT	ST	PHILADELPHIA	PA	19122-1208	311125	11/16/2010	Inspection
155	2009 N	11TH	ST	PHILADELPHIA	PA	19122-1202	312434	1/6/2011 COA	6/11/2013 13:44
215	373	DELMAR	ST	PHILADELPHIA	PA	19128-4505	313237	11/23/2010	Inspection
83	254 S	62ND	ST	PHILADELPHIA	PA	19139-3720	314807	12/3/2010 COA	6/11/2013 12:46
83	6115	HAZEL	AVE	PHILADELPHIA	PA	19143-1021	315307	12/7/2010 COA	6/11/2013 13:05
142	1102	HOPE	ST	PHILADELPHIA	PA	19123-1659	315379	12/8/2010 COA	6/10/2013 11:31
31	1611 S	22ND	ST	PHILADELPHIA	PA	19145-1315	316248	12/16/2010 COA	6/11/2013 15:00
103	5227	HAVERFORD	AVE	PHILADELPHIA	PA	19139-1401	316902	12/16/2010 COA	6/11/2013 13:39
32	1353 S	TAYLOR	ST	PHILADELPHIA	PA	19146-4020	317364	12/21/2010 COA	6/10/2013 9:11
111	4996	MASTER	ST	PHILADELPHIA	PA	19131-4521	319279	1/19/2011 COA	6/11/2013 14:03
161	1903 E	HAGERT	ST	PHILADELPHIA	PA	19125-1208	320597	1/13/2011 COA	6/11/2013 16:10
161	1909 E	HAGERT	ST	PHILADELPHIA	PA	19125-1208	320598	1/13/2011 COA	6/11/2013 16:17
161	1917 E	HAGERT	ST	PHILADELPHIA	PA	19125-1208	320599	1/13/2011 COA	6/11/2013 16:09
143	1517 N	DELAWARE	AVE	PHILADELPHIA	PA	19125-4317	321599	1/21/2011 COA	6/10/2013 11:40
363	599	FRANKLIN MILLS	CIR	PHILADELPHIA	PA	19154-3105	323202	2/2/2011	Inspection
86	4800	WALNUT	ST	PHILADELPHIA	PA	19139-4336	324562	2/11/2011 COA	6/11/2013 7:31
135	880 N	19TH	ST	PHILADELPHIA	PA	19130-2022	325073	2/18/2011 COA	6/10/2013 9:27
83	6117	HAZEL	AVE	PHILADELPHIA	PA	19143-1021	325707	2/18/2011 COA	6/11/2013 13:08
297	2275	BRIDGE	ST	PHILADELPHIA	PA	19137-1800	326218	2/25/2011 COA	6/11/2013 7:41
297	2275	BRIDGE	ST	PHILADELPHIA	PA	19137-1800	326221	2/25/2011 COA	6/11/2013 7:43
15	1318	SOUTH	ST	PHILADELPHIA	PA	19147-1823	327420	3/3/2011 COA	6/11/2013 15:12
83	6111	HAZEL	AVE	PHILADELPHIA	PA	19143-1021	328058	3/4/2011 COA	6/11/2013 12:59
83	6113	HAZEL	AVE	PHILADELPHIA	PA	19143-1021	328064	3/4/2011 COA	6/11/2013 13:02

6	1213	WALNUT	ST	PHILADELPHIA	PA	19107-4914	333715	4/19/2011 COA	6/10/2013 11:18	
147	1518 N	CARLISLE	ST	PHILADELPHIA	PA	19121-4315	334183	4/7/2011 COA	6/11/2013 13:10	
30	1340 S	COLORADO	ST	PHILADELPHIA	PA	19146-4705	334928	4/11/2011 COA	6/11/2013 15:02	
240	5834	PULASKI	AVE	PHILADELPHIA	PA	19144-3813	337740	5/19/2011 COA	6/11/2013 13:00	
30	1522 S	COLORADO	ST	PHILADELPHIA	PA	19146-4735	339400	5/5/2011 COA	6/11/2013 15:04	
168	2367 N	VAN PELT	ST	PHILADELPHIA	PA	19132-4823	341213	1/4/2012	Inspection	6/11/2013 14:32
30	1321 S	COLORADO	ST	PHILADELPHIA	PA	19146-4704	341419	5/19/2011 COA	6/11/2013 15:01	
280	4508 N	BOUVIER	ST	PHILADELPHIA	PA	19140-1137	341649	5/18/2011	Inspection	6/11/2013 15:01
182	3439	RICHMOND	ST	PHILADELPHIA	PA	19134-6007	343257	5/26/2011 COA	6/11/2013 8:47	
304	4704 E	ROOSEVELT	BLV	PHILADELPHIA	PA	19124-2304	347757	6/15/2011 COA	6/7/2013 15:23	
241	5422	GERMANTOWN	AVE	PHILADELPHIA	PA	19144-2224	348899	6/22/2011 COA	6/11/2013 13:03	
92	522 N	PRESTON	ST	PHILADELPHIA	PA	19104-2229	349780	6/27/2011 COA	6/7/2013 15:05	
2	233 N	JUNIPER	ST	PHILADELPHIA	PA	19107-1516	349950	8/16/2011 COA	6/11/2013 12:30	
137	1236 N	30TH	ST	PHILADELPHIA	PA	19121-4544	350574	6/30/2011 COA	6/11/2013 16:19	
201	1424 W	ERIE	AVE	PHILADELPHIA	PA	19140-4111	352469	7/13/2011		
63	6710	GREENWAY	AVE	PHILADELPHIA	PA	19142-1610	353386	7/18/2011 COA	6/10/2013 14:47	
139	2012 W	GIRARD	AVE	PHILADELPHIA	PA	19130-1421	353434	8/8/2011	Inspection	6/11/2013 13:56
20	1258 S	BONSALL	ST	PHILADELPHIA	PA	19146-4137	353843	7/20/2011 COA	6/12/2013 10:39	
157	142	DIAMOND	ST	PHILADELPHIA	PA	19122-1722	356809	8/5/2011 COA	6/11/2013 13:48	6/11/2013 9:01
86	4714	MARKET	ST	PHILADELPHIA	PA	19139-4629	356813	8/12/2011 COA	6/7/2013 14:15	
86	4708	MARKET	ST	PHILADELPHIA	PA	19139-4629	356817	8/12/2011 COA	6/7/2013 14:13	
29	1133	DICKINSON	ST	PHILADELPHIA	PA	19147-6325	357178	8/12/2011 COA	6/10/2013 14:22	
41	2133 S	06TH	ST	PHILADELPHIA	PA	19148-3202	357305	8/24/2011 COA	6/10/2013 14:27	
160	2672	SEPVIVA	ST	PHILADELPHIA	PA	19125-1835	359358	8/22/2011 COA	6/11/2013 16:11	6/11/2013 15:59
160	2670	SEPVIVA	ST	PHILADELPHIA	PA	19125-1835	359360	8/22/2011 COA	6/11/2013 16:12	6/11/2013 15:57
184	5000	RICHMOND	ST	PHILADELPHIA	PA	19137-1815	360413	9/7/2011 COA	6/11/2013 8:49	
297	2275	BRIDGE	ST	PHILADELPHIA	PA	19137-1800	362425	9/13/2011 COA	6/11/2013 9:57	6/11/2013 9:55
201	1422 W	ERIE	AVE	PHILADELPHIA	PA	19140-4111	364665	9/27/2011 COA	6/11/2013 16:00	6/11/2013 15:38
21	1201 S	21ST	ST	PHILADELPHIA	PA	19146-4321	365079	9/26/2011	Inspection	6/7/2013 11:49
198	3731	OLD YORK	RD	PHILADELPHIA	PA	19140-3714	367629	10/7/2011 COA	6/11/2013 15:41	
198	3733	OLD YORK	RD	PHILADELPHIA	PA	19140-3714	367633	10/7/2011 COA	6/11/2013 15:42	
110	3916 W	GIRARD	AVE	PHILADELPHIA	PA	19104-1108	369668	10/24/2011 COA	6/10/2013 15:00	
201	1729 W	ATLANTIC	ST	PHILADELPHIA	PA	19140-4005	372168	2/1/2012 COA	6/10/2013 11:47	
286	198 W	ASHDALE	ST	PHILADELPHIA	PA	19120-3428	373752	11/14/2011 COA	6/11/2013 10:51	6/11/2013 10:50
246	120 E	CHELTON	AVE	PHILADELPHIA	PA	19144-2133	374202	11/23/2011 COA	6/11/2013 13:12	
147	1715	CECIL B MOORE	AVE	PHILADELPHIA	PA	19121-3211	375876	12/9/2011 COA	6/11/2013 13:03	
201	1731 W	ATLANTIC	ST	PHILADELPHIA	PA	19140-4005	376266	2/1/2012 COA	6/10/2013 11:43	
279	2000	CHURCH	LA	PHILADELPHIA	PA	19138-2427	377638	12/7/2011 COA	6/11/2013 13:06	
327	7353	MILNOR	ST	PHILADELPHIA	PA	19136-4210	378081	12/16/2011 COA	6/7/2013 14:57	
93	247 N	RUBY	ST	PHILADELPHIA	PA	19139-1412	379110	12/16/2011 COA	6/10/2013 15:15	6/10/2013 14:57
246	121 E	CHELTON	AVE	PHILADELPHIA	PA	19144-2153	380904	1/6/2012 COA	6/11/2013 13:13	
297	2275	BRIDGE	ST	PHILADELPHIA	PA	19137-1800	385946	2/15/2012	Inspection	6/11/2013 14:24
108	3933	BRANDYWINE	ST	PHILADELPHIA	PA	19104-4603	388080	2/29/2012 COA	6/10/2013 14:55	

153	1942 N	GRATZ	ST	PHILADELPHIA	PA	19121-2222	389974	2/24/2012 COA	6/10/2013 17:25	
147	1709	WILLINGTON	ST	PHILADELPHIA	PA	19121-0000	389975	2/24/2012 COA	6/11/2013 13:04	
147	1526	WILLINGTON	ST	PHILADELPHIA	PA	19121-0000	389978	2/24/2012 COA	6/11/2013 13:08	
152	2036 N	19TH	ST	PHILADELPHIA	PA	19121-1539	389980	2/24/2012 COA	6/11/2013 16:18	
158	421	MEMPHIS	ST	PHILADELPHIA	PA	19125-2626	392371	3/9/2012 COA	6/11/2013 13:51	Inspection
210	213	ROXBOROUGH	AVE	PHILADELPHIA	PA	19128-5011	393828	3/16/2012 COA	6/11/2013 13:59	6/11/2013 9:09
132	618 N	11TH	ST	PHILADELPHIA	PA	19123-3334	394649	4/27/2012		Inspection
175	701 W	LEHIGH	AVE	PHILADELPHIA	PA	19133-2233	396347	3/30/2012		Inspection
295	2366	ORTHODOX	ST	PHILADELPHIA	PA	19137-1126	397111	4/3/2012 COA	6/11/2013 9:37	Inspection
297	5301	TACONY	ST	PHILADELPHIA	PA	19137-	397517	4/11/2012 COA	6/11/2013 7:53	Inspection
235	6056	BRIDGET	ST	PHILADELPHIA	PA	19144-3702	397754	3/11/2013		Inspection
201	3100 N	15TH	ST	PHILADELPHIA	PA	19132-2306	398338	4/10/2012 COA	6/11/2013 15:58	
132	622 N	11TH	ST	PHILADELPHIA	PA	19123-2500	399201	4/27/2012		Inspection
14	727 S	19TH	ST	PHILADELPHIA	PA	19146-1840	399521	4/18/2012 COA	6/11/2013 14:51	
133	1553	RIDGE	AVE	PHILADELPHIA	PA	19130-2212	399760	4/18/2012 COA	6/11/2013 11:26	
142	942 N	O2ND	ST	PHILADELPHIA	PA	19123-2302	400528	4/20/2012 COA	6/10/2013 9:36	
161	1817 E	YORK	ST	PHILADELPHIA	PA	19125-1226	400929	4/25/2012 COA	6/11/2013 16:11	Inspection
213	480	LYCEUM	AVE	PHILADELPHIA	PA	19128-3419	401077	4/30/2012		Inspection
213	482	LYCEUM	AVE	PHILADELPHIA	PA	19128-3419	401081	4/30/2012		Inspection
144	1309 N	HOWARD	ST	PHILADELPHIA	PA	19122-4614	401838	4/27/2012 COA	6/11/2013 13:14	Inspection
164	2607 N	06TH	ST	PHILADELPHIA	PA	19133-2637	403382	5/7/2012		Inspection
152	2135 N	UBER	ST	PHILADELPHIA	PA	19121-1528	404244	5/14/2012 COA	6/10/2013 17:38	
144	1501 N	O2ND	ST	PHILADELPHIA	PA	19122-3809	405236	5/24/2012 COA	6/11/2013 13:11	
93	5305	MARKET	ST	PHILADELPHIA	PA	19139-3317	406457	5/21/2012		Inspection
169	2669 N	28TH	ST	PHILADELPHIA	PA	19132-3112	406535	7/10/2012 COA	6/11/2013 9:45	
215	4850	UMBRIA	ST	PHILADELPHIA	PA	19127-1930	407013	5/24/2012 COA	6/11/2013 13:10	
155	2010 N	10TH	ST	PHILADELPHIA	PA	19122-1201	408227	6/6/2012 COA	6/11/2013 13:47	
216	364	LIVEZEY	ST	PHILADELPHIA	PA	19128-4414	408231	5/31/2012		Inspection
179	2149 E	RUSH	ST	PHILADELPHIA	PA	19134-3910	409117	6/12/2012 COA	6/11/2013 11:48	Inspection
248	526 E	HAINES	ST	PHILADELPHIA	PA	19144-1215	410836	6/28/2012 COA	6/11/2013 14:58	
161	2428	JASPER	ST	PHILADELPHIA	PA	19125-1240	411449	6/18/2012		Inspection
71	1537 S	VOGDES	ST	PHILADELPHIA	PA	19143-5323	412536	6/21/2012		Inspection
241	5834	GERMANTOWN	AVE	PHILADELPHIA	PA	19144-2139	413514	7/6/2012 COA	6/11/2013 13:04	
158	1224	MARLBOROUGH	ST	PHILADELPHIA	PA	19125-3921	414815	7/5/2012 COA	6/11/2013 13:52	Inspection
21	1944	TITAN	ST	PHILADELPHIA	PA	19146-2929	414946	7/13/2012 COA	6/11/2013 15:06	
249	1269 E	CHELLEN	AVE	PHILADELPHIA	PA	19138-1928	415056	7/9/2012		Inspection
142	1118 N	FRONT	ST	PHILADELPHIA	PA	19123-1706	416256	7/17/2012 COA	6/11/2013 13:17	Inspection
139	1910	INGERSOLL	ST	PHILADELPHIA	PA	19121-4916	416609	7/19/2012		Inspection
83	6006	SPRUCE	ST	PHILADELPHIA	PA	19139-3738	418533	8/23/2012 COA	6/11/2013 12:53	Inspection
133	1555	RIDGE	AVE	PHILADELPHIA	PA	19130-2212	418801	7/27/2012 COA	6/11/2013 11:27	Inspection
174	1301 W	LEHIGH	AVE	PHILADELPHIA	PA	19132-2702	419596	8/3/2012 COA	6/11/2013 11:55	Inspection
263	7452	OGONTZ	AVE	PHILADELPHIA	PA	19138-1324	419759	8/3/2012 COA	6/10/2013 8:59	Inspection
92	4122	HAVERFORD	AVE	PHILADELPHIA	PA	19104-1708	420239	8/3/2012 COA	6/11/2013 13:35	Inspection

174	1303 W	LEHIGH	AVE	PHILADELPHIA	PA	19132-2702	420406	8/6/2012 COA	6/11/2013 11:54	Inspection	6/10/2013 9:05
211	538	WALNUT	LA	PHILADELPHIA	PA	19128-1741	420435	8/9/2012 COA	6/11/2013 14:29	Inspection	6/10/2013 14:06
14	711 S	MOLE	ST	PHILADELPHIA	PA	19146-2145	420473	8/6/2012 COA	6/11/2013 14:53	Inspection	6/11/2013 14:26
297	5301	TACONY	ST	PHILADELPHIA	PA	19137-	420728	8/15/2012			
211	530	WALNUT	LA	PHILADELPHIA	PA	19128-1741	421137	8/9/2012 COA	6/11/2013 14:26		6/10/2013 8:34
245	545 E	WISTER	ST	PHILADELPHIA	PA	19144-1517	421677	8/13/2012 COA	6/11/2013 13:10	Inspection	6/11/2013 12:16
108	3615	BRANDYWINE	ST	PHILADELPHIA	PA	19104-2347	421821	9/4/2012 COA	6/11/2013 12:18	Inspection	6/7/2013 14:32
351	5217	ARENDELL	AVE	PHILADELPHIA	PA	19114-4229	422163	8/15/2012			
144	1437 N	PHILIP	ST	PHILADELPHIA	PA	19122-3807	422629	8/30/2012 COA	6/11/2013 13:12		
129	601 N	02ND	ST	PHILADELPHIA	PA	19123-3001	423017	9/4/2012 COA	6/10/2013 9:45		
91	3835	HAMILTON	ST	PHILADELPHIA	PA	19104-2315	423821	8/24/2012 COA	6/7/2013 14:26		
161	2015	MARTHA	ST	PHILADELPHIA	PA	19125-1922	424025	8/24/2012 COA	6/11/2013 16:08	Inspection	6/11/2013 16:01
212	5901	RIDGE	AVE	PHILADELPHIA	PA	19128-1642	425348	9/6/2012 COA	6/11/2013 9:26	Inspection	6/10/2013 9:11
212	5905	RIDGE	AVE	PHILADELPHIA	PA	19128-1642	425349	9/6/2012 COA	6/11/2013 9:16	Inspection	6/10/2013 9:15
212	5907	RIDGE	AVE	PHILADELPHIA	PA	19128-1642	425349	9/6/2012 COA	6/11/2013 9:22	Inspection	6/10/2013 9:19
212	5909	RIDGE	AVE	PHILADELPHIA	PA	19128-1642	425351	9/6/2012 COA	6/11/2013 9:25	Inspection	6/10/2013 9:23
201	1524 W	ONTARIO	ST	PHILADELPHIA	PA	19140-5031	426262	9/10/2012 COA	6/11/2013 15:59	Inspection	6/11/2013 15:33
90	3104	SPRING GARDEN	ST	PHILADELPHIA	PA	19104-2567	426606	9/11/2012 COA	6/10/2013 15:19	Inspection	6/10/2013 15:17
169	2406 W	SERGEANT	ST	PHILADELPHIA	PA	19132-4134	429141	9/25/2012 COA	6/11/2013 9:40		
141	935 N	WATTS	ST	PHILADELPHIA	PA	19132-1014	429611	9/27/2012 COA	6/11/2013 13:17	Inspection	6/10/2013 8:36
129	838 N	AMERICAN	ST	PHILADELPHIA	PA	19123-2200	429959	10/3/2012 COA	6/11/2013 11:30	Inspection	6/11/2013 11:29
133	1511	PARRISH	ST	PHILADELPHIA	PA	19130-2210	431307	10/5/2012 COA	6/11/2013 11:19		
143	1100 N	DELAWARE	AVE	PHILADELPHIA	PA	19125-4305	432109	10/15/2012 COA	6/10/2013 11:36	Inspection	6/7/2013 13:23
188	1924 E	ONTARIO	ST	PHILADELPHIA	PA	19134-2006	432489	10/12/2012 COA	6/7/2013 14:37	Inspection	6/7/2013 14:36
126	1123	SPRING GARDEN	ST	PHILADELPHIA	PA	19123-3315	433001	11/21/2012			6/10/2013 13:29
108	3800	OLIVE	ST	PHILADELPHIA	PA	19104-1646	433300	10/17/2012 COA	6/10/2013 14:53		
8	1426	WALNUT	ST	PHILADELPHIA	PA	19102-4016	434069	11/6/2012			6/10/2013 15:35
8	1428	WALNUT	ST	PHILADELPHIA	PA	19102-4016	434072	11/6/2012			6/11/2013 15:09
139	1308 N	22ND	ST	PHILADELPHIA	PA	19121-4842	435461	10/31/2012 COA	6/10/2013 10:14	Inspection	6/7/2013 10:12
141	746	MASTER	ST	PHILADELPHIA	PA	19122-0000	435818	1/28/2013 COA	6/11/2013 13:18		
138	1234 W	COLLEGE	AVE	PHILADELPHIA	PA	19121-4826	436847	11/8/2012			6/11/2013 8:36
351	9226 N	DELAWARE	AVE	PHILADELPHIA	PA	19114-4209	438524	11/16/2012			6/7/2013 14:36
166	2228 N	11TH	ST	PHILADELPHIA	PA	19133-1002	438802	11/19/2012			6/10/2013 11:52
141	934 N	MARSHALL	ST	PHILADELPHIA	PA	19123-1307	439070	1/29/2013			6/10/2013 8:33
141	936 N	MARSHALL	ST	PHILADELPHIA	PA	19123-1307	439071	1/29/2013			6/10/2013 8:37
286	435 W	DUNCANNON	AVE	PHILADELPHIA	PA	19120-3338	440808	1/17/2013 COA	6/7/2013 14:50		6/7/2013 14:22
142	1034 N	BODINE	ST	PHILADELPHIA	PA	19123-1516	441696	1/9/2013 COA	6/10/2013 9:40	Inspection	
147	1623	WILLINGTON	ST	PHILADELPHIA	PA	19143-1626	442042	12/6/2012			6/11/2013 7:59
80	5051	BALTIMORE	AVE	PHILADELPHIA	PA	19143-1626	442042	12/6/2012			6/10/2013 11:40
33	2718	FEDERAL	ST	PHILADELPHIA	PA	19146-3715	443352	12/13/2012			6/11/2013 13:26
234	702	ST GEORGES	RD	PHILADELPHIA	PA	19119-3342	444268	12/18/2012			
356	1186	BARTLETT	PL	PHILADELPHIA	PA	19115-2026	444682	12/20/2012 COA	6/11/2013 7:55		
158	1337 E	BERKS	ST	PHILADELPHIA	PA	19125-2813	445395	12/27/2012 COA	6/10/2013 15:16	Inspection	6/7/2013 14:58

359	10169	NORTHEAST	BLV	PHILADELPHIA	PA	19116-3713	445482	4/8/2013	Inspection	6/11/2013 15:06
153	1808 W	BERKS	ST	PHILADELPHIA	PA	19121-2218	446046	1/2/2013 COA	Inspection	6/10/2013 17:27
265	2014	HAINES	ST	PHILADELPHIA	PA	19138-2633	446443	1/25/2013 COA	Inspection	6/11/2013 14:38
4	2205	LUDLOW	ST	PHILADELPHIA	PA	19103-3006	446770	3/1/2013	Inspection	6/6/2013 14:40
4	2208	MARKET	ST	PHILADELPHIA	PA	19103-3007	446772	1/24/2013	Inspection	6/6/2013 11:42
130	873 N	05TH	ST	PHILADELPHIA	PA	19123-2128	447495	1/11/2013 COA	Inspection	6/10/2013 9:52
130	831 N	LEITHGOW	ST	PHILADELPHIA	PA	19123-	447664	1/11/2013 COA	Inspection	6/10/2013 9:55
130	833 N	LEITHGOW	ST	PHILADELPHIA	PA	19123-	447675	1/11/2013 COA	Inspection	6/10/2013 9:57
130	835 N	LEITHGOW	ST	PHILADELPHIA	PA	19123-	447679	1/11/2013 COA	Inspection	6/11/2013 10:54
289	4210	G	ST	PHILADELPHIA	PA	19124-4821	448079	1/25/2013	Inspection	6/11/2013 16:04
161	1918 E	CUMBERLAND	PA	PHILADELPHIA	PA	19125-1302	448695	1/25/2013 COA	Inspection	6/10/2013 8:06
142	912 N	05TH	ST	PHILADELPHIA	PA	19123-1402	449969	1/29/2013	Inspection	6/11/2013 8:52
189	1933	BUCKIUS	ST	PHILADELPHIA	PA	19124-5624	450191	2/7/2013 COA	Inspection	6/10/2013 13:31
130	814 N	LAWRENCE	ST	PHILADELPHIA	PA	19123-2110	450728	2/19/2013	Inspection	6/10/2013 17:02
153	2034 N	BROAD	ST	PHILADELPHIA	PA	19121-2305	451299	2/1/2013	Inspection	6/7/2013 15:39
4	2134	MARKET	ST	PHILADELPHIA	PA	19103-3103	451301	2/1/2013	Inspection	6/7/2013 15:35
4	2132	MARKET	ST	PHILADELPHIA	PA	19103-3103	451307	2/1/2013	Inspection	6/11/2013 13:16
4	2136	MARKET	ST	PHILADELPHIA	PA	19103-3103	451309	2/1/2013	Inspection	6/7/2013 15:09
202	3400 N	19TH	ST	PHILADELPHIA	PA	19140-4815	451821	2/4/2013	Inspection	6/11/2013 8:19
92	4085	FILBERT	ST	PHILADELPHIA	PA	19104-2256	452401	2/7/2013	Inspection	6/10/2013 17:06
92	4087	FILBERT	ST	PHILADELPHIA	PA	19104-2256	452405	2/7/2013	Inspection	6/10/2013 17:11
158	1349 E	OXFORD	ST	PHILADELPHIA	PA	19125-3216	452699	2/8/2013 COA	Inspection	6/11/2013 13:16
221	8730	BRIERDALE	RD	PHILADELPHIA	PA	19128-	452901	2/11/2013	Inspection	6/7/2013 15:09
158	1318 E	BERKS	ST	PHILADELPHIA	PA	19125-2814	453722	2/14/2013	Inspection	6/11/2013 13:06
147	1631	WILLINGTON	ST	PHILADELPHIA	PA	19121-0000	453826	2/14/2013 COA	Inspection	6/11/2013 7:39
296	2205	WAKELING	ST	PHILADELPHIA	PA	19137-1214	454193	2/19/2013 COA	Inspection	6/10/2013 11:31
89	3201	WALNUT	ST	PHILADELPHIA	PA	19104-3405	454543	4/2/2013 COA	Inspection	6/7/2013 14:26
3	200 N	21ST	ST	PHILADELPHIA	PA	19103-1001	455510	3/5/2013	Inspection	6/10/2013 14:01
27	1332 S	03RD	ST	PHILADELPHIA	PA	19147-6031	455513	2/25/2013	Inspection	6/11/2013 11:24
27	1334 S	03RD	ST	PHILADELPHIA	PA	19147-6031	455517	2/25/2013	Inspection	6/11/2013 13:20
167	2437 N	CLEVELAND	ST	PHILADELPHIA	PA	19132-4308	455544	2/26/2013	Inspection	6/10/2013 9:47
277	6329 N	BEECHWOOD	ST	PHILADELPHIA	PA	19138-2517	455625	2/26/2013 COA	Inspection	6/11/2013 14:50
199	914	RIISING SUN	AVE	PHILADELPHIA	PA	19140-4331	456892	3/8/2013	Inspection	6/6/2013 12:19
325	6815	CAPITOL	ST	PHILADELPHIA	PA	19130-1444	456893	3/15/2013	Inspection	6/11/2013 9:12
332	7400 E	VANDIKE	ST	PHILADELPHIA	PA	19135-2315	457414	3/6/2013 COA	Inspection	6/7/2013 14:59
159	2629 E	ROOSEVELT	BLV	PHILADELPHIA	PA	19152-0000	457586	3/7/2013 COA	Inspection	6/10/2013 13:36
90	434 N	HUNTINGDON	ST	PHILADELPHIA	PA	19125-3705	458052	3/26/2013	Inspection	6/10/2013 15:07
157	1818 N	31ST	ST	PHILADELPHIA	PA	19104-	459159	3/15/2013 COA	Inspection	6/10/2013 14:40
139	1908	FRONT	ST	PHILADELPHIA	PA	19122-2403	459540	3/19/2013	Inspection	6/11/2013 16:19
166	1114 W	CAMBRIDGE	ST	PHILADELPHIA	PA	19130-1508	460833	3/26/2013 COA	Inspection	6/11/2013 11:15
166	1116 W	DAUPHIN	ST	PHILADELPHIA	PA	19133-1018	460865	4/1/2013	Inspection	6/11/2013 11:13
13	2538	DAUPHIN	ST	PHILADELPHIA	PA	19133-1018	460869	4/1/2013	Inspection	6/10/2013 10:46
		MONTROSE	ST	PHILADELPHIA	PA	19146-2333	461275	4/23/2013	Inspection	

13	2536	MONTROSE	ST	PHILADELPHIA	PA	19146-2333	461276	4/23/2013	Inspection	6/10/2013 10:44
13	2540	MONTROSE	ST	PHILADELPHIA	PA	19146-2333	461279	4/23/2013	Inspection	6/10/2013 11:48
158	415	MOYER	ST	PHILADELPHIA	PA	19125-3318	461329	3/26/2013 COA	Inspection	6/7/2013 14:43
78	716 S	49TH	ST	PHILADELPHIA	PA	19143-3434	462307	4/2/2013	Inspection	6/10/2013 9:21
247	351 E	CHELLEN	AVE	PHILADELPHIA	PA	19144-5751	462464	4/2/2013		
153	2018 N	CARLISLE	ST	PHILADELPHIA	PA	19121-2307	462535	4/5/2013 COA		
153	1701	ARLINGTON	ST	PHILADELPHIA	PA	19121-3319	463055	4/3/2013 COA		
153	1626 W	SUSQUEHANNA	AVE	PHILADELPHIA	PA	19121-1620	463470	4/5/2013		
3	206 N	22ND	ST	PHILADELPHIA	PA	19103-1004	463471	4/5/2013		
21	1226 S	18TH	ST	PHILADELPHIA	PA	19146-2933	463838	4/8/2013 COA		
127	908	CALLOWHILL	ST	PHILADELPHIA	PA	19123-3805	464647	4/26/2013 COA		
153	2010 N	CARLISLE	ST	PHILADELPHIA	PA	19121-2307	465190	4/15/2013 COA		
235	1027 W	ALLENS	LA	PHILADELPHIA	PA	19119-3316	465696	4/23/2013		
50	1400	KITTY HAWK	AVE	PHILADELPHIA	PA	19112-1801	466421	4/22/2013 COA		
283	4600	OLD YORK	RD	PHILADELPHIA	PA	19140-1222	466471	4/22/2013		
283	4602	OLD YORK	RD	PHILADELPHIA	PA	19140-1222	466473	4/22/2013		
23	1115	FEDERAL	ST	PHILADELPHIA	PA	19147-5020	466623	4/22/2013		
17	748 S	04TH	ST	PHILADELPHIA	PA	19147-3121	466782	4/23/2013		
15	716 S	SHELL	ST	PHILADELPHIA	PA	19147-2021	466886	4/23/2013		
18	751 S	07TH	ST	PHILADELPHIA	PA	19147-2938	466919	4/25/2013 COA		
14	711 S	20TH	ST	PHILADELPHIA	PA	19146-1805	467143	4/29/2013 COA		
147	1704	CECIL B MOORE	AVE	PHILADELPHIA	PA	19121-3212	467420	4/25/2013 COA		
327	7231	STATE	RD	PHILADELPHIA	PA	19135-1411	467588	4/26/2013 COA		
164	503 W	DAUPHIN	ST	PHILADELPHIA	PA	19133-2508	467692	4/26/2013		
279	5643 E	WISTER	ST	PHILADELPHIA	PA	19144-1522	467721	4/26/2013		
279	5645 E	WISTER	ST	PHILADELPHIA	PA	19144-1522	467723	4/26/2013		
20	2619	FEDERAL	ST	PHILADELPHIA	PA	19146-3828	467979	4/29/2013		
153	1826 W	NORRIS	ST	PHILADELPHIA	PA	19121-2232	468007	4/29/2013		
173	1815 W	SEDGLEY	AVE	PHILADELPHIA	PA	19132-2110	468290	4/30/2013		
211	5627	RIDGE	AVE	PHILADELPHIA	PA	19128-2729	468331	5/2/2013		
78	4718	CHESTER	AVE	PHILADELPHIA	PA	19143-3513	468457	5/3/2013		
78	4720	CHESTER	AVE	PHILADELPHIA	PA	19143-3513	468459	5/3/2013		
228	8200	GERMANTOWN	AVE	PHILADELPHIA	PA	19118-3402	468525	5/1/2013		
19	2006	CARPENTER	ST	PHILADELPHIA	PA	19146-2617	469586	5/7/2013		
297	5301	TACONY	ST	PHILADELPHIA	PA	19137-	469869	5/13/2013		
209	5302	RIDGE	AVE	PHILADELPHIA	PA	19128-3729	470214	5/10/2013		
209	5306	RIDGE	AVE	PHILADELPHIA	PA	19128-3729	470215	5/10/2013		
268	6600 N	12TH	ST	PHILADELPHIA	PA	19126-3201	470252	5/9/2013		
120	2411 N	54TH	ST	PHILADELPHIA	PA	19131-2423	470293	5/9/2013 COA		
293	4256	FRANKFORD	AVE	PHILADELPHIA	PA	19124-4521	471437	5/15/2013 COA		
293	1000	ORTHODOX	ST	PHILADELPHIA	PA	19124-3130	471483	5/15/2013		
265	2040	HAINES	ST	PHILADELPHIA	PA	19138-2637	471551	5/15/2013		
13	2539	MONTROSE	ST	PHILADELPHIA	PA	19146-2332	472281	5/17/2013		

13	2542	MONTROSE	ST	PHILADELPHIA	PA	19146-2333	472310	5/17/2013	COA	6/11/2013 16:20	Inspection	6/10/2013 10:10
13	2545	MONTROSE	ST	PHILADELPHIA	PA	19146-2332	472311	5/17/2013			Inspection	6/10/2013 9:44
13	2547	MONTROSE	ST	PHILADELPHIA	PA	19146-2332	472312	5/17/2013			Inspection	6/12/2013 9:40
13	2549	MONTROSE	ST	PHILADELPHIA	PA	19146-2332	472313	5/17/2013			Inspection	6/10/2013 9:33
13	2551	MONTROSE	ST	PHILADELPHIA	PA	19146-2332	472314	5/20/2013			Inspection	6/7/2013 9:10
19	1000 S	BOUVIER	ST	PHILADELPHIA	PA	19146-1904	472315	5/20/2013			Inspection	6/7/2013 9:16
19	1001 S	BOUVIER	ST	PHILADELPHIA	PA	19146-1903	472316	5/20/2013			Inspection	6/10/2013 9:34
167	2438 N	15TH	ST	PHILADELPHIA	PA	19132-4435	472946	5/22/2013			Inspection	6/10/2013 13:24
143	914	SHACKAMAXON	ST	PHILADELPHIA	PA	19125-4131	473039	5/28/2013			Inspection	6/10/2013 13:23
143	912	SHACKAMAXON	ST	PHILADELPHIA	PA	19125-4131	473040	5/28/2013			Inspection	6/10/2013 13:33
159	2550	SALMON	ST	PHILADELPHIA	PA	19125-4033	473196	5/23/2013			Inspection	6/10/2013 19:21
170	3915	RIDGE	AVE	PHILADELPHIA	PA	19132-1028	473674	5/24/2013			Inspection	6/10/2013 19:21
351	5025	FITLER	ST	PHILADELPHIA	PA	19114-3106	473689	5/24/2013			Inspection	6/7/2013 14:40

Appendix B

Review of Permit Application Processes

Address	Experience	Contract	Safety Plan	Schedule	Commitment	Comment
5317 Germantown Ave.	*	*	*	*	*	All requirements satisfied.
2140 Market St.	x	*	*	*	*	<i>Experience:</i> Contractor experience verified through past contracts and permits available in Hansen.
1244 W Tucker St.	*	*	x	x	x	<p>Imminently dangerous structure, poor structural condition posed an immediate threat to life safety.</p> <p><i>Safety Plan:</i> Site safety plan submitted. Additional safety controls imposed by L+I.</p> <p><i>Schedule:</i> Construction must begin within 2 days of permit issuance; contractor claimed 5 days for demolition enforced through street closure permit.</p> <p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>
3400 Lancaster Ave.	*	*	*	*	*	All requirements satisfied.

1700 W Indiana Ave.	x	*	x	x	x	<p>Imminently dangerous structure, poor structural condition posed an immediate threat to life safety.</p> <p><i>Experience:</i> Contractor pre-qualified (under contract with City to perform emergency demolitions).</p> <p><i>Safety Plan and Schedule:</i> Means and methods of demolition of this one-story detached structure imposed by City.</p> <p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>
8737 Sagamore Rd.	x	*	*	x	x	<p>Imminently dangerous structure, poor structural condition posed an immediate threat to life safety.</p> <p><i>Experience:</i> Contractor experience verified through permits available in Hansen.</p> <p><i>Schedule:</i> Code allows demolition work on imminently dangerous structures to begin within 10 days.</p> <p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>
1123 Bodine St.	*	*	*	*	*	All requirements satisfied.

811 N Capitol St.	x	n/a	*	*	x	<p><i>Experience:</i> Contractor experience verified through permits available in Hansen.</p> <p><i>Contract:</i> (n/a) No contract required for this demolition.</p> <p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>
738 N 19th St.	x	*	*	*	*	<p><i>Experience:</i> Contractor pre-qualified (under contract with City to perform emergency demolitions).</p>
69 W School House Ln.	*	*	*	*	*	All requirements satisfied.
503 S 23rd St.	x	*	x	*	*	<p><i>Experience:</i> Contractor experience verified through permits available in Hansen.</p> <p><i>Safety Plan:</i> Site safety plan submitted. Additional safety controls imposed by L+I.</p>
1808 Bainbridge St.	*	*	*	*	x	<p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>

3227-3243 Chaucer St.	x	*	x	*	x	<p>Imminently dangerous structure, poor structural condition posed an immediate threat to life safety.</p> <p><i>Experience:</i> Contractor pre-qualified (under contract with City to perform emergency demolitions).</p> <p><i>Safety Plan:</i> Site safety plan submitted. Additional controls imposed by L+I.</p> <p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>
4444 Cresson St.	x	*	*	*	x	<p>Imminently dangerous structure, poor structural condition posed an immediate threat to life safety.</p> <p><i>Experience:</i> Contractor experience verified through permits available in Hansen.</p> <p><i>Commitment:</i> Commitment to maintain permit documents on site as required by Section 302.5 of the Philadelphia Administrative Code addressed through standard permit language.</p>
<p style="text-align: center;">* = Fully Compliant x = Not Compliant (but otherwise verified)</p>						

Appendix C

Address	Initial	Underslab flr #1	Underslab flr #2	Framing/close-in	Pre-Final	Final
5317 Germantown Ave.	Done	<i>Reason for Waiver:</i> Demolition was part of a larger demolition and new construction project. Inspector gave permission to complete the demolition of this unsafe structure; permit obtained after the fact as permitted by code.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	Done
2140 Market St.	Done	<i>Reason for Waiver:</i> Partially collapsed structure, secured from entry and undergoing personal property recovery.	<i>Reason for Waiver:</i> same.	Done	<i>Reason for Waiver:</i> permit reassigned to what is now the Emergency Services Division.	Done
1244 W. Tucker St.	Done	<i>Reason for Waiver:</i> Demolition of two-story imminently dangerous structure began prior to permit issuance due to condition of property, as permitted by code. After final inspection, all previous inspections waived.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	Done
3400 Lancaster Ave.	Done	<i>Reason for Waiver:</i> Inspection not required for free-standing one-story structure	<i>Reason for Waiver:</i> same.	Done	Done	Done
1700 W. Indiana Ave.	Done	<i>Reason for Waiver:</i> Demolition of imminently dangerous building proceeded as permitted by code. Inspection not required because work had progressed beyond this point. After final inspection, all previous inspections waived.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	Done

8737 Sagamore Rd.	Done	Reason for Waiver: Demolition of unsafe, fire-damaged building proceeded as permitted by code. Inspection not required because work had progressed beyond this point. After final inspection, all previous inspections were waived.	Reason for Waiver: same.	Reason for Waiver: same.	Reason for Waiver: same.	Done
1123 N. Bodine St.	Done	Reason for Waiver: Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	Reason for Waiver: same.	Done	Reason for Waiver: same.	Done
738 N. 19th St.	Waived	Reason for Waiver: Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	Reason for Waiver: same.	Reason for Waiver: same.	Reason for Waiver: same.	Done
69 W. School House Ln.	Waived	Reason for Waiver: Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	Reason for Waiver: same.	Reason for Waiver: same.	Reason for Waiver: same.	Done
503 S. 23rd St.	Done	Done	Waived incorrectly.	Done	Done	Done
1808 Bainbridge St.	Done	Reason for Waiver: Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	Reason for Waiver: same.	Reason for Waiver: same.	Reason for Waiver: same.	Done
754-56 S. Mole St.	Done	Reason for Waiver: Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	Reason for Waiver: same.	Reason for Waiver: same.	Reason for Waiver: same.	Done

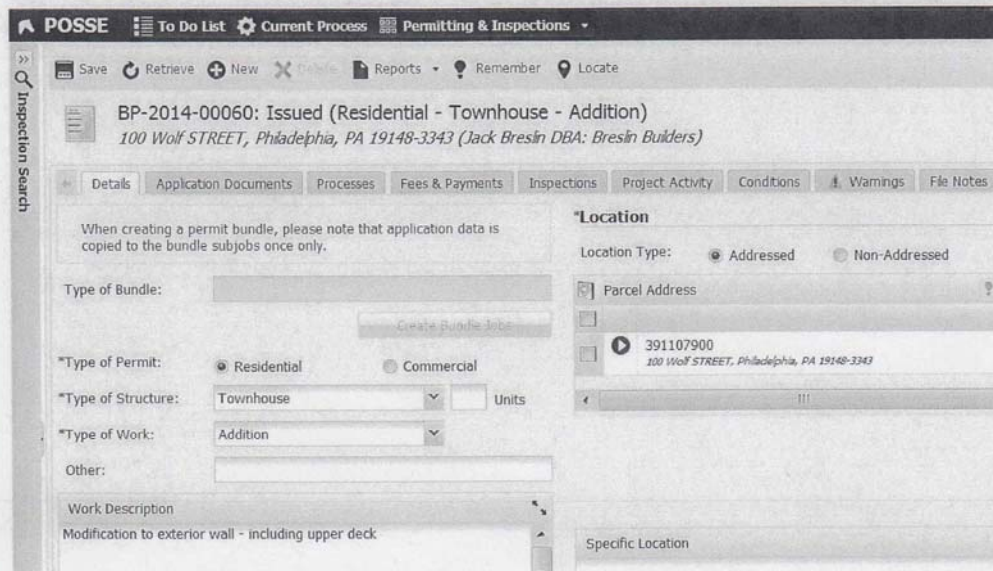
3237-43 Chaucer St.	Done	<i>Reason for Waiver:</i> Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	Done
1614 N. Sydenham St.	Done	<i>Reason for Waiver:</i> Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	Done
4444 Cresson St.	Done	<i>Reason for Waiver:</i> Inspection not required because work had progressed beyond this point. Af time of final inspection, all previous inspections were waived.	<i>Reason for Waiver:</i> same.	<i>Reason for Waiver:</i> same.	Done

Appendix D

Preview of Project eCLIPSE

The Department of Licenses + Inspections has long recognized the limitations of the current Hansen database and applications. A Request for Proposal [RFP] to replace this database was scribed over two years ago, responses were thoroughly evaluated and vetted, and **Computronix** was selected as the vendor of choice. The **eCLIPSE Project** [electronic Commercial Licensing, Inspection and Permit Services Enterprise Project] formally kicked off on January 9, 2014, with the intent to implement the browser based **Computronix POSSE Land Management System** [LMS] over the next year and a half.

Part of the eCLIPSE Project is to implement mobile devices for our inspectors, which will provide inspection checklists, require property photograph(s), and send alert(s) to supervisors for review and approval at appropriate times in the process. Here is a sample screen shot of the POSSE LMS application:



The internal application is a very full featured web-based, suite of applications that tracks and manages permitting, inspections and licensing activities, and interfaces with the City's Geographic Information System. The Department's staff will have access to the same information in the field as in the office, at the same time. Through the use of mobile devices, field staff and inspectors will have instant, seamless access to the back office information.

With a mobile device, an inspector will have up-to-date information about a property or business while on site and an Inspection Checklist for each Inspection, as depicted in this example:

Preview of Project eCLIPSE

Perform Electrical Inspection

Complete
 Claim
 Delete
 Reports

Assigned To: [Search] Description: Final (Elec)

Scheduled Start: Jan 28, 2014
 Actual Start: mmm d, yyyy hh:mm:ss

Scheduled Complete: mmm d, yyyy
 Actual Completed: mmm d, yyyy hh:mm:ss

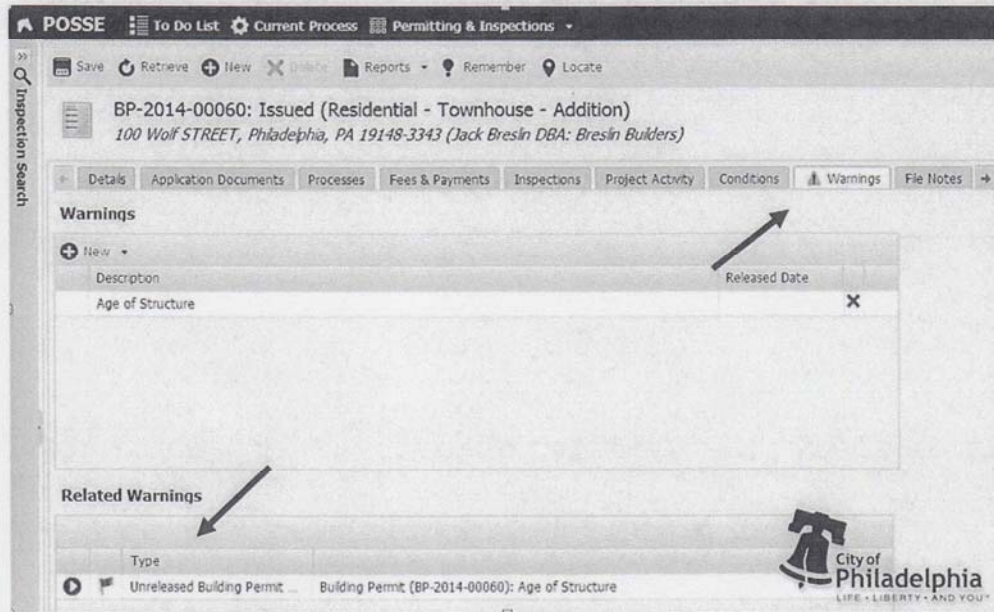
New

Group	Requirement	Pass / Fail
Final	Age of Structure - Code Violation	
Final	Job address is posted in a visible location.	
Final	NEC 110.26 Sufficient working space shall be pro...	
Final	Permit and approved plans and specifications are ...	
Final	Prior to scheduling the inspection the contractor ...	
Final	Risk Level - High (Requires Additional Follow-up I...	
Final	Risk Level - Moderate (Follow-up in 30 days)	

If an inspector has a concern about the safety of a property, he/she can instantly flag the property from a drop-down checklist, and require further action, require work to be stopped on the property, or flag the property for future, periodic inspections with the automated system.

Preview of Project eCLIPSE

In this example, you can see that the property has a warning notice, and has now been flagged. The building permit will not be released until the issue is resolved:



Here is the L+I Vision for the eCLIPSE Project:

- 24/7/365 secure public access
- One stop service model
- Paper applications for permits and licenses no longer accepted – Kiosks in Municipal Services Building Concourse and District Offices
- Building plans accepted electronically only – Large scanner available in Concourse
- Inspectors will use mobile devices & IVR to manage schedules and workloads and enter data from the field
- All public data available online

The eCLIPSE Project High Level Scope includes the following business processes:

- Trade Licensing
- Business Licensing
- Permitting

Preview of Project eCLIPSE

- Interface to Electronic Plan Review
- Complaint Management / Code Enforcement
- Appeals and Board Reviews
- Mobile Inspections and Interactive Voice Response (IVR) System
- Fully Integrated GIS Capabilities
- Zoning Archives

The eCLIPSE Project scheduled implementation time is approximately two years with the following phases:

Phase	Description	Start	End
0	Kick-Off, Subject Matter Expert Training, Initial Analysis	Jan 2014	Mar 2014
1	Business Licenses, Mobile Inspections, IVR and Core Data	Feb 2014	Dec 2014
2	Trade Licenses	Jun 2014	Feb 2015
3	Permits, Mobile Inspections, IVR [and Interface to ePlans]	Oct 2014	Sep 2015
4	Code Enforcement and Mobile Inspections	Feb 2015	Dec 2015

The Department is committed to the OIT preferred project methodology of “Buy not Build.” If at all possible, the Department will implement the ‘out of the box/off the shelf’ solution that incorporates **best practices** developed by Computronix over the past decades using their Smithsonian Award-winning POSSE infrastructure. It should be noted that the POSSE LMS application has complete logging capabilities to capture every data change made, including date/time stamp, userid, specific data field(s) changed, and before and after values.

In support of the **Project Methodology**, the following activities will be performed for each phase:

- Fit/Gap analysis, requirements generation, documentation
- Design of customizations as needed
- Configuration
- Acceptance testing
- End user training for production Go Live
- Go Live with post-implementation support
- Lessons learned

Preview of Project eCLIPSE

In support of another OIT initiative and in response to the Controller's concerns about IT governance, the POSSE LMS servers will be hosted in a 'private cloud' in the OIT datacenter, fully managed by the Computronix team, thereby separating roles and responsibilities as defined in the eCLIPSE contract, with additional details documented in the Operations Run Book [ORB], currently in draft form.

End Game and eCLIPSE Project Success Factors:

1. Provide 24/7/365 online access for submission, payment, issuance and renewal of all L+I licenses and permits.
2. Improve inspectors' productivity by keeping them in the field for 7 hours per day through the use of tablets, mobile inspection processing, and IVR.
3. Provide online access to appropriate L+I public data in support of the Mayor's Open Data Initiative.
4. Provide automatic billing for license renewals, delinquent licenses, and payment of permit and enforcement fees.
5. Expand payment options to credit and debit cards and eliminate bounced checks.
6. Provide management dashboards and robust ad hoc reporting capabilities.
7. Complete the four eCLIPSE Project phases in the two-year timeframe.
8. Completely replace Hansen.

The Department of Licenses + Inspections would welcome the participation of the Controller's Audit team to review and comment on the ORB and design documents for each phase of eCLIPSE, thereby ensuring that Best Practices are indeed being followed.

Appendix E

STATE CERTIFICATIONS

LAST NAME	FIRST NAME	Title	Work Unit	CERT #	Expiry dt	CODE A	CODE B	CODE C	CODE D	CODE E	CODE F	CODE G	CODE H	CODE I	CODE J	CODE K	CODE L	CODE M	CODE N	CODE O	CODE P	
ALEXANDER	STEPHEN	Const Codes Sp	Permits Intake	493	04/19/16	15	20	23	24	26	28	29										
ALTMAYER	GEORGE	Bldg Plns Exam Eng 2	Eng. Services	3881	01/27/15	15	20	21	23	24	26	28	29									
BALDWIN	ELIZABETH	Bldg Plns Exam Eng 2	Eng. Services	3977	05/21/16	19	25															
BARBACANE	ARTHUR	Con Codes Com Sp-El	Mech. Services	4920	05/06/13	18																
BARNES	VERA	Code Enf Insp-3		4775	09/02/15	10	15	21	23													
BILLINGIERE	FRANK	Const Codes Sp	Dist. North	5238	03/27/16	10	12	15	20	22	23	24	26	28	21							
BINGHAM	AARON	Const Codes Sp	Dist. Central	5239	01/27/17	10	14	15	20	22	23	24	26	28								
CAPUTO	GIOVANNI	Const Codes Sp	Dist. West	4514	01/14/17	10	15	20	21	22	23	24										
CHILDS	KEVIN	Const Plans Revw Sp	Dist. South																			
CLARK	BARTLETT	Const Trades Insp-Bldg	CSU	5624	03/14/17	15	20	22	23													
CLARK	ANTHONY	Const Codes Sp Tr	Dist. North	486	08/27/16	10	15	23	29													
COCCO	PERRY	Const Comp Supv	Dist. Central	492	12/11/15	10	15	20	21	22	23	24	29									
COLLIER	JOHN	Const Plans Revw Sp	Dist. East	5633		10	15	22	23	29												
COLLINS	VICTOR	Const Codes Sp Tr	CSUF																			
CURRAN	MICHAEL	Const Trades Insp-Bldg	CSU																			
DAHAN	CHELI	Civil Engineer 2	Permits Intake	3498	04/09/15	15	20	23	24	26	28	29										
DANIEL	GURTIS	Bldg Plans Exam Eng 2	Eng. Services	3482	02/24/16	10	15	20	21	22	23	24	26	28	29							
DEVLIN	EDWARD	Const Plans Revw Sp	Dist. East	5176	04/17/15	15	20	23	24	26	28											
DI PERSIO	GEORGE	Civil Engineer 1	Eng. Services	5067	04/03/16	10	15	20	21	22	23	24	26	28	29							
DIAMOND	JOHN	Const Codes Sp	Permits Intake	489	08/27/16	10	15	23	29													
DILLON	TERRENCE	Code Administrator 3	Dist. North	487	02/26/16	10	12	15	18	19	20	21	22	23	24	26	27	28	29			
DIPIETRO JR	RALPH	Director of Operations	Operations	3170	09/02/15	10	11	12	13	14	15	18	19	20	21	22	23	24	26	28	29	
DOHERTY	JOHN	Const Plans Revw Sp	Dist. Central	4076	07/19/15	19	25															
DROGALIS	RAYMOND	Con Trades Insp-Ele	Dist. Central																			
ENNIS	GEORGE	Const Plans Revw Sp	Dist. West																			
FINK	MICHAEL	Deputy Commissioner	Dev. Divn	1638	12/11/15	10	15	20	22	24	29											
FLANAGAN	JOSEPH	Const Comp Supv	Permits Intake	1639	04/10/16	10	15	23	24	29												
FOSTER	JUSTIN	Const Codes Sp	Dist. South	5301	05/15/15	10	15	20	22	23	24											
GAINES	RAY	Const Plans Revw Sp	Dist. South	3284	07/14/16	10	15	20	21	22	23	24	29									
GALLAGHER	STEPHEN	Const Comp Supv	CSU	501	09/27/15	10	15	20	21	22	23	24	29									
GIGGETTS	APRIL	Const Plans Revw Sp	Dist. Central	3277	03/12/15	10	15	20	21	22	23	24	29									
GLEDHILL JR	ROBERT	Const Plans Revw Sp	Mech. Services	3515	03/09/15	10	15	21	23	27												
GONIEWSKI	PAUL	Const Plans Revw Sp	Permits Intake	4100	07/06/16	10	15	20	21	22	23	24	29									
GUADALUPE	GLEN	Const Codes Sp	Dist. East	4085	03/02/15	10	15	20	22	23	29											
GUALTIERI	ANTHONY	Const Codes Sp	Dist. East	5367	09/24/15	15	20	22	23	24	28											
HAYNES	GARRY	Const Plans Revw Sp	Permits Intake	517	04/09/15	10	12	13	14	15	20	21	22	23	24	26	28	29				
IMREI	ROBERT	Bldg plans Exam Eng 1	Eng. Services	515	04/06/15	15	20	23	24	26	28	29										
ISSAC	PAULOSE	Bldg plans Exam Eng 1	Permits Intake	4508	02/11/16	10	12	13	14	15	20	22	23	24	26	28						
JAGACZEWSKI	CRAIG	Const Codes Sp Tr	Dist. South	5419	02/13/16	15	20	22	23	24	28											
JAMES	GERARD	Const Insp Manager	Dev. Admin	1641	07/10/16	10	15	29														
JASTRZEMBSKI	JEFFREY	Const Codes Sp	Dist. Central	5353	09/06/15	15	20	22	23	24												
JUNG	CHANWOO	Const Codes Sp	Dist. South	5127	04/30/16	10	15	20	21	22	23	24										
KAISER	SARAH	Graduate Civil Engineer	Eng. Services	5481	05/07/16	12	15	20	22	23	24	26	28									
KEENAN	THOMAS	Code Enf Insp-3	Op East	5158	08/24/14	18																
KEENAN	ROBERT	Const Codes Sp	Dist. West	5435	03/08/16	15	20	22	23	24	29											

KENISH	FRANCIS	2737	02/11/14	10	15	20	21	22	23	24	24	29	23	24	26	27	28	29
KIM	JANE	5293	04/30/16	10	12	13	14	15	20	21	22	24	23	24	26	27	28	29
KITZ	MICHAEL	5159	06/24/14	15	20	22	23											
KOPRIVICA	MILAN	514	10/29/14	15	20	23	24	26	28	29								
KRANKUSKAS	VINCE	3285	11/19/16	10	15	18	19	20	21	22	23	24	26	28	29			
KULP	ANDREW	5215	01/26/15	10	12	15	20	22	23	24	26	28						
LARKIN	CAITLIN	5211	01/20/15	10	12	15	20	22	23	24	26	28						
LECH	JOHN	5092	01/10/17	15	20	22	23											
MAENNER	MICHAEL	1642	06/27/16	10	12	15	24	29										
MAGGETTI	RICHARD	4286	02/09/15	10	15	20	21	22	23	24	29							
MARSHALL	MICHAEL	5442	03/12/16	15	20	22	23											
MARSHALL	FREDERICK	5212	01/20/15	10	12	15	20	22	23	24	26	28						
MARTIN	BRETT	526	07/24/16	10	11	12	13	15	20	21	22	23	24	26	28	29		
MASON	NORMAN	4598	03/02/15	15														
MCCARTHY	ALBERT	525	06/27/16	15	20	22	23	24										
MCCLELLAN	MITCHELL	5252	03/08/15	10	12	15	20	22	23	24	28							
MCFARLANE JR	JOHN	3541	06/30/14	10	11	12	13	14	15	20	21	22	23	24	26	27	28	29
MCFARLANE JR	SHANE	5374	10/12/15	12	13	14	15	20	21	22	23	24	26	27	28			
MCKNULTY	JOSEPH	1663	02/02/16	10	15	20	21	22	23	24								
MELHAFFEY	SCOTT	4645	04/09/15	15														
MULDERRIG	ROBERT	894	04/09/16	19	25													
PALKO JR	PRADDEP	5213	01/26/15	10	12	15	20	22	23	24	26	28						
PAREKH	ROBERT	4406	07/13/15	11	19	25												
PARISI	PAHEL	5214	01/26/15	10	12	15	20	22	23	24	26	28						
PATEL	MICHAEL	2924	01/30/16	10	15	20	21	23	24	26	27	28	29					
PETNER	EDWARD	5373	10/12/15	15	20	22	23	24										
PILLER	PAUL	4263	02/09/15	10	15	20	21	22	23	24	29							
POESSL	STEVEN	520	06/27/16	10	15	20	21	22	23	24	29							
PORRECA	GUY	4113	03/10/16	10	15	20	21	22	23	24	29							
PORTER III	RICHARD	4259	03/07/16	10	11	14	15	18	20	21	22	23	24	29				
PRESEL	CHRISTINE	4583	02/03/15	10	15	21	23											
QUIGLEY	LINDA	3590	04/09/16	15	20	21	22	23	24	26	28	29						
QUINN	RICHARD	3946	02/17/15	10	15	20	21	22	23	24	29							
QUINING	ROSS	5247	05/21/16	10	14	15	20	21	22	23	24	26	28	29				
RANSOM	MARTIN	4769	08/21/15	18														
RAUDENBUSH	JONATHAN	5270	03/07/16	10	15	18	20	22	23	24	26	28	29					
REDMOND	TRACY	5157	08/22/14	18														
RUFFIN	ANA	5216	01/26/15	10	11	12	15	20	22	23	24	26	28					
SALUSHI	JOSEPH	509	01/12/16	10	15	20	21	22	23	24	26	28	29					
SAVAGE	JOSEPH	4536	11/24/14	10	15	20	21	23										
SILBERSTEIN	GERARD	507	03/23/17	10	15	20	21	22	23	24	29							
SINAVAGE	JAVIS	4616	01/03/15	10	20	22	23											
SKARIA	GURDIS	1666	04/24/16	10	15	20	21	22	23	24								
SMITH	MARK	5372	12/31/16	15	20	22	23	24	28									
SOLTYS	JOSEPH	506	02/09/15	10	15	20	21	22	23	24	29							
SPINOSI	GABRIEL	504	09/07/14	10	15	18	20	21	22	23	24	26	28	29				
SPINOSI	THOMAS	5286	01/10/17	10	15	20	22	23	24	26	28	29						
SWEENEY	KEVIN																	
SZYCHULSKI																		

AUDITOR'S COMMENTS ON AGENCY RESPONSE

Government Auditing Standards require auditors to report instances where the auditee's comments to the auditor's findings, conclusions, or recommendations are not, in the auditor's opinion, valid or do not address the recommendations. We believe this to be the case with certain statements made in the Department of Licenses and Inspections' (L&I) response regarding the following:

- Documentation for asserted post-building collapse inspections
- Enforcement of demolition permit application requirements
- Waiving of required demolition inspections
- L&I regulations not requiring photographs for inspections
- Assertions of multiple mandatory levels of supervisory reviews
- Claims that uncertified inspectors were fully certified in June 2013

Documentation for Asserted Post-Building Collapse Inspections

In discussing L&I's documentation for the 442 properties asserted to have been inspected during the week after the building collapse, on page 37 of the report, L&I management states the HANSEN System was queried to "review the assessment result entries on each of these 442 permits," and "this review revealed that 437 of the 442 permits had an entry to record the conditions found at the site." Additionally, management concluded "this review directly refutes the Report's conclusion that 210 of the 442 permits did not have documented inspection reports," stating that these 210 permits had entries which, in many cases, were closures of the permits.

On page 8 of the report, we acknowledge that we observed HANSEN System close-out entries for almost all of the 210 permits. However, our examination of these close-out entries disclosed that generally they only showed the data entry dates and the payroll numbers of the employees who made the entries. We observed that these close-out entries contained no information on the work performed during the visits and/or conditions found at the sites. Therefore, we did not consider these close-out entries to represent documented inspection reports.

Enforcement of Demolition Permit Application Requirements

On page 38 of the report, management contends that most of the 14 permit applications reviewed by us were processed in July 2013, which they describe as "the first days of implementation of the brand-new safety controls." As discussed on page 27, we confirmed with L&I officials that June 12, 2013 was the effective date when all demolition permit applications became subject to the new post-building collapse requirements. Seven of the fourteen permit applications tested by us were processed from August 2013 through December 2013. Of those seven, we observed that five were missing at least one of the required documents.

Additionally, on page 38, management explains that five of the 14 applications were for the demolition of imminently dangerous structures and claims that our report failed to acknowledge that these applications required expedited reviews by the plan examiners (examiners). In discussing the findings from our test of permit applications on pages 10 through 13 of the report, several times we mention the department's explanation that certain documentation requirements were waived because imminently dangerous permit applications required expedited processing. Furthermore, management states that permit applications for imminently dangerous properties "are necessarily processed using different standards and issued with different requirements." However, L&I had not formally established a

separate set of standards and requirements for the processing of imminently dangerous permit applications. In fact, on page 13 of the report, we recommended that L&I create minimum acceptable standards for this application type.

Lastly, on page 38, L&I officials assert that plan reviews for all 14 applications were complete and proper and waivers of certain documentation requirements were “done as conditions warranted and as specifically permitted by Section 305.1.1 of the Philadelphia Administrative Code.” However, we observed no documentation in the permit application records to explain why certain required documents were missing for 10 of 14 applications reviewed. Therefore, on page 13 of the report, we recommended that examiners fully document the reasons for all waivers in the permit application records. On page 38 of its response, management acknowledged “that deviations from typical processing standards were not documented in a manner that can be easily deciphered by the public” and stated they have addressed this issue by “developing a comprehensive review checklist for inclusion in the permit record.”

Waiving of Required Demolition Inspections

In discussing the demolitions reviewed as part of our audit, on page 39, L&I management refers to our “sample” of 18 demolition permits. To provide clarification on the demolitions we reviewed, as described on page 27 of the report, we identified all demolition projects applied for after June 12, 2013 (i.e. effective date of new inspection standards) and completed (i.e. those with a final inspection report) as of January 30, 2014. Per our analysis of L&I’s records, there were 18 completed demolition projects meeting these criteria. To test compliance with the new demolition inspection requirements, we focused on demolitions that had been through the entire inspection process.

In responding to our finding that required inspections were not performed for 15 of the 18 demolitions, on page 39, L&I management claims that inspectors “completed all six required inspections on all but one of the 15 permits – meaning that of the 90 total inspections for these permits, 89, or 98.88%, were properly completed and documented.” As depicted on Table 4 of the report, our review of HANSEN System records – which represent L&I’s official inspection documentation – showed that 53 of the 90 required inspections (59 percent) were waived in HANSEN with no documented explanation or supervisory approval.

In explaining waived inspections, on page 40, management contends that, in certain cases, two or more inspections are combined during one visit to the jobsite so the inspectors mark one of the inspections as completed and the rest as waived. L&I management first offered this explanation to us at the exit conference and again in their written response. We interviewed the inspectors and supervisors responsible for the 15 demolitions with waived inspections, and they all informed us that the waived inspections were not applicable. None of these inspectors or supervisors indicated to us that they waived certain inspections because they had combined multiple inspections into one visit.

Furthermore, management makes certain assertions about HANSEN System limitations. On page 39, they contend that, when an inspector must waive an inspection because it is not applicable to the permit, HANSEN “does not permit the user to enter that type of explanation.” Our review of HANSEN records found this statement to be inaccurate. Although we observed no explanations for the waived inspections summarized on Table 4 of the report, our examination of HANSEN inspection records found several instances of other waived inspections for which the inspector had inserted a statement in the open text comments field. Also, on page 40, management claims “HANSEN does not allow inspectors to enter results of multiple inspections on a single site visit, even if the inspector inspects two or more

aspects of the job on one visit, as this would lead to inaccurate performance measures.” However, for 2 of the 18 demolitions, we observed that multiple inspections were recorded on the same date in HANSEN. For example, the HANSEN inspection record for one demolition showed that the first under-slab/floor, prefinal/wallboard, and final inspections were all recorded on the same date and time. Therefore, management’s assertion appears to be incorrect.

L&I Regulations Not Requiring Photographs for Inspections

On page 40 of the report, L&I management states that “the Department currently does not require inspectors to take photographs at demolition inspections because HANSEN does not allow for photograph storage and because photographs are not required by code or regulation.” This statement contradicts the requirements of L&I’s own written procedures, specifically Work Instruction CS-1314: Demolition Permit Inspections (effective June 12, 2013). As discussed on page 5 of the report, Work Instruction CS-1314, which provided guidance to inspectors on post-building collapse standards, required that inspectors take dated photographs at all demolition inspections. The procedure instructed inspectors to store these dated photographs on the department’s local area network drive with the files identified by street name, then number. We confirmed demolition inspection documentation requirements, including photographs, with the responsible L&I deputy commissioner on January 31, 2014. At that time, the deputy commissioner did not indicate to us that the Work Instruction CS-1314’s requirement for dated photographs had been rescinded.

Assertions of Multiple Mandatory Levels of Supervisory Reviews

In its response on pages 40 and 41, management contends that L&I “currently has multiple mandatory levels of supervisory review, including built-in checks in HANSEN that require supervisory review before any permit can be closed or any violation is issued and a system for daily review of inspectors’ electronically-submitted route sheets.” However, as detailed on page 19 of the report, both before and after the building collapse supervisors frequently failed to perform the required approval entries to document their review and close out of the HANSEN permit record. Also, we noted several cases where the HANSEN supervisory approval entry was made by the inspector who performed the site visit instead of an independent supervisor. Furthermore, the system for daily review of inspectors’ route sheets did not appear to be operating effectively. As explained on page 20 of the report, for 15 of the 18 demolitions examined, there was no evidence that the supervisor reviewed the inspectors’ route sheets, which we noted were a mixture of both electronic and manually prepared reports.

Claims That Uncertified Inspectors Were Fully Certified in June 2013

In its response to the finding regarding the two inspectors who lacked required state certifications on page 41, management claims that the two uncertified inspectors “were fully certified at the time they completed the site safety assessments in June 2013.” Also, they assert that one of these uncertified inspectors - the Contractual Services Unit (Contractual Services) employee whose Civil Service position did not require the state certifications – subsequently allowed his certifications to lapse. L&I has not provided us with any documentation to substantiate these claims. In fact, when we questioned L&I management in April 2014 regarding the Contractual Services inspector’s failure to possess the required state certifications, they never indicated to us that he had been fully certified as of June 2013.

CONTROLLER'S OFFICE CONTACT AND STAFF ACKNOWLEDGEMENTS

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Staff Acknowledgements

In addition to the individual named above, Gerald Micciulla, Post Audit Deputy Controller, Kathleen Duggan (Audit Director), Philip Bridgeman (Senior Auditor), Joseph Kobsar (Senior IT Auditor), Garth Scott (IT Auditor), and Michael Regan, Daniel Lee, and Jenny Ly (Staff Auditors) made key contributions to this report.

Graphic designs: Brian Dries, Director of Communications

City Controller's Office Mission Statement

The City Controller's Office is the independent watchdog agency of the City of Philadelphia that strives to promote honest, efficient, effective, and fully accountable city government. We address this mission by: providing timely and objective analysis on the availability of funds for all city contracts; preventing inappropriate spending of public funds; and providing objective, timely, and relevant information to city officials, the public, and other interested parties about financial operations of the city, and on ways to improve city operations and the use of public resources.

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Contact information

Web site: <http://www.philadelphiacontroller.org/report-city-fraud-waste-corruption.asp>

Telephone: (215) 686-8888 or (215) 686-3804 (automated line)

Download the FREE Fraud Reporting app for iPhone, iPad, iPod Touch and Android devices.