



PRINCE WILLIAM COUNTY

Prince William County, Virginia Internal Audit Report – Fire Marshal’s Office Inspections

December 2, 2020



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TRANSMITTAL LETTER



December 2, 2020

The Board Audit Committee of
Prince William County, Virginia
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Pursuant to the internal audit plan for calendar year ending (“CY”) 2020 for Prince William County, Virginia (“County” / “PWC”), approved by the Board of County Supervisors (“BOCS”), we hereby present the internal audit of inspection processes specific to the County’s Fire Marshal’s Office (“FMO”). We will be presenting this report to the Board Audit Committee of Prince William County at the next scheduled meeting on December 15, 2020.

Our report is organized into the following sections:

Executive Summary	This provides a high-level overview and summary of the observations noted in this internal audit, as well as the respective risk ratings.
Background	This provides an overview of the function within the process, as well as pertinent operational control points and related compliance requirements.
Objectives and Approach	The objectives of this internal audit are expanded upon in this section, as well as the various phases of our approach.
Observations Matrix	This section gives a description of the observations noted during this internal audit and recommended actions, as well as Management’s response including the responsible party, and estimated completion date.
Process Maps	This section provides a visual depiction of the workflow of key processes as currently performed.

We would like to thank the staff and all those involved in assisting our firm with this internal audit.

Respectfully Submitted,

RSM US LLP

Internal Audit



EXECUTIVE SUMMARY

Background

The Prince William County (“PWC”) Fire Marshal’s Office (“FMO”) provides services that contribute to the safety and well-being of the community. With the overall mission to prevent fire inception and hazardous environments, the FMO is involved in all fire safety activity related to regulation, investigation, prosecutions, plan review, permitting, and inspections.

The FMO is comprised of 23 uniform and non-uniform personnel that are responsible for the enforcement of fire prevention regulations including the Statewide Fire Prevention Code (“SFPC”) and the Virginia Uniform Statewide Building Code (“USBC”). Uniformed Fire Marshal personnel also respond to, and investigate, fire-related incidents and code compliance issues on a 24/7 basis.

Beginning in July 2019, the FMO became responsible for over 4,000 code compliance inspections that were previously performed by fire station personnel. These inspections are performed by four FTEs. These inspections were considered to be for “target hazard” locations (i.e. high risk for loss of life or property, critical infrastructure, Department of Social Services (“DSS”) licensing). The FMO began reassigning their personnel on March 16, 2020 for COVID-19 response efforts, and as a result, this proactive inspection program initiative has not yet returned to full strength.

The FMO is also responsible for performing fire prevention and protection reviews of building development construction plans as part of the construction permitting process. These reviews focus on fire safety related components such as sprinkler systems, chemical extinguishing systems, and fire alarms.

Fieldwork was performed during August through October 2020.

Overall Summary / Highlights

The observations identified during our assessment are detailed within the pages that follow. We have assigned relative risk or value factors to each observation identified. Risk ratings are the evaluation of the severity of the concern and the potential impact on the operations of each item. There are many areas of risk to consider in determining the relative risk rating of an observation, including financial, operational, and/or compliance, as well as public perception or ‘brand’ risk.

Objectives and Scope

The primary objective of this internal audit was to assess the efficiency and effectiveness of the FMO inspection processes related to plan reviews and site inspections.

As part of our internal audit we performed the following:

- Gained an understanding of the FMO’s inspection processes and internal control structure;
- Gained an understanding of the system(s) utilized throughout the FMO inspection processes;
- Performed interviews of process stakeholders to gain further understanding of processes;
- Reviewed and assessed inspection process, including design and documentation, performed during interpretation of inspection codes;
- Reviewed a sample of inspections performed during the audit period in an effort to build a timeline and verify compliance;
- Reviewed performance measurement processes performed by management to assess the efficiency and effectiveness of fire inspections;
- Performed comparative analysis to similar jurisdictions regarding inspection collaboration (FMO, Building Department, Site) and staffing/scheduling strategies;
- Evaluated appropriateness of inspections staffing and scheduling;
- Performed data analytics to assess conformance to key processes / controls; and
- Provided recommendations for process improvements.

Where applicable, the testing period utilized was July 1, 2019 through June 30, 2020.

Summary of Observation Ratings

(See page 3 for risk rating definitions)

	High	Moderate	Low
FMO Inspections	-	2	3

We would like to thank all County team members who assisted us throughout this audit.



EXECUTIVE SUMMARY – CONTINUED

Observations Summary

The following is a summary of the observations noted in the areas reviewed. Each detailed observation is included in the observation matrix section of the report. Improvement opportunities have been provided following the detailed observations section. Definitions of the rating scale are included below.

Summary of Observations	
Observation	Rating
1. Fire Operational Permit Fee Collection – Evidence of Deposit Drop-off	Moderate
2. Records Request Cost/Payment Capture	Moderate
3. Professional Certifications	Low
4. Policies & Procedures	Low
5. Rejected Inspection Documentation	Low

Provided below is the observation risk rating definitions for the detailed observations.

Observation Risk Rating Definitions	
Rating	Explanation
Low	Observation presents a low risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of low importance to business success/achievement of goals.
Moderate	Observation presents a moderate risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of moderate importance to business success/achievement of goals. Action should be in the near term.
High	Observation presents a high risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of high importance to business success/achievement of goals. Action should be taken immediately.



BACKGROUND

Overview

The Prince William County (“PWC”, “County”) Fire Marshal’s Office (“FMO”) provides a wide array of services that contribute to the safety and well-being of the community. With the overall mission to prevent fire inception and hazardous environments, the FMO is involved in all fire safety activity related to regulation, investigation, prosecutions, plan review, permitting, and inspections.

The FMO is comprised of 23 uniform and non-uniform personnel that contribute to the enforcement of a variety of fire prevention regulations including the Statewide Fire Prevention Code (“SFPC”) and National Fire Protection Association (“NFPA”) code. On-duty, uniformed FMO personnel respond to and investigate fire-related incidents and code compliance on a 24/7 basis.

Prince William County includes approximately 10,000 business properties that require code compliance inspections. Beginning in July 2019, the FMO became responsible for over 4,000 code compliance inspections that were previously performed by fire station personnel. These inspections are performed by four FTEs. These inspections were considered to be for “target hazard” locations (i.e. high risk for loss of life or property, critical infrastructure, Department of Social Services (“DSS”) licensing). The FMO began reassigning their personnel on March 16, 2020 for COVID-19 response efforts, and as a result, this proactive inspection program initiative has not yet returned to full strength.

The FMO is also responsible for performing fire prevention and protection reviews of building development construction plans as part of the construction permitting process. These reviews focus on fire safety related components such as sprinkler systems, chemical extinguishing systems, and fire alarms.

Financial Overview

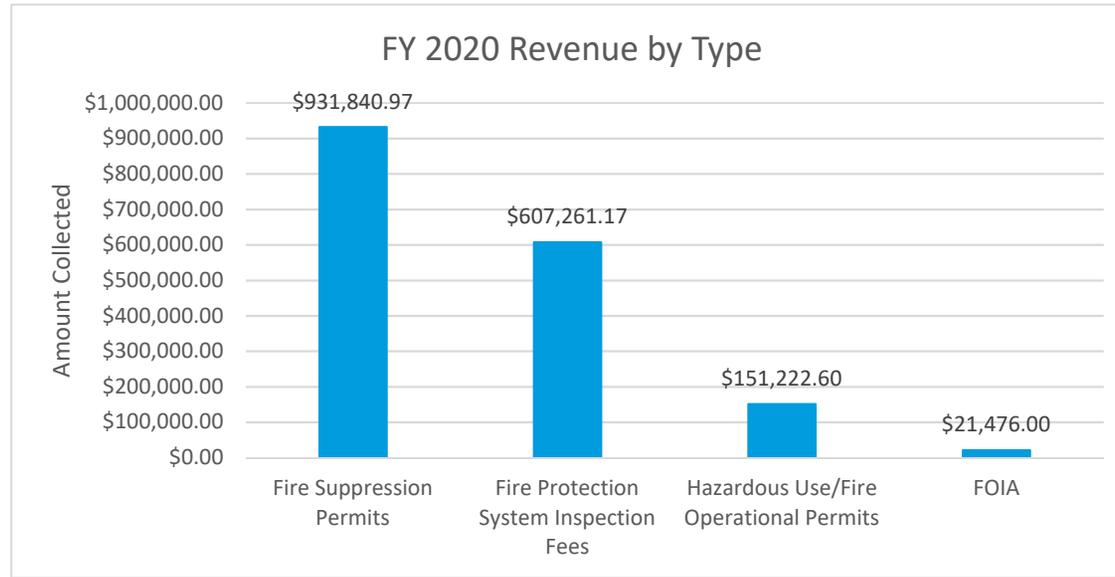
PWC’s fiscal year (“FY”) end June 30, 2021 budget identifies that the FMO costs to facilitate program activities including inspections conducted by code compliance inspectors, issuance of operational permits, and investigations has increased by approximately 10% from FY 2020 to FY 2021 (\$4M to \$4.4M). From a broader perspective, the program under which FMO operates, Community Safety, has been allocated a higher expenditure budget for FY 2021 at an increase of 7.35% (\$5.2M to \$5.6M) to accommodate the projected increase in inspection workload.

Program Activities & Workload Measures	FY 2017 Actuals	FY 2018 Actuals	FY 2019 Actuals	FY 2020 Actuals	FY 2021 Adopted
Fire Marshal’s Office Budget Allocation (in thousands)	\$3,652	\$3,900	\$4,078	\$4,196	\$4,424
Inspections conducted by code compliance inspectors	1,971	6,734	6,298	5,107	6,250
Operational use permits issued	557	608	533	435	550
Investigations (includes fire, hazmat, environmental, and explosives)	180	220	334	161	220



BACKGROUND – CONTINUED

Financial Overview – continued



The above graph includes the FY 2020 fee amounts collected related to fire operational permit (FOP) fees, records requests, and fire protection system plan reviews and inspections.

Fee Collection

Fees paid in person are collected at the FMO administration office. Payments received are entered into EnerGov under the assigned case number. An invoice/payment receipt is generated for each payment including the following information: cashier name, payment amount, date, and chart of accounts (“COA”) coding. Deposits of \$1,000 or more are made within two (2) business days, and deposits of \$999.99 or less are made within five (5) business days. All printed receipts are attached to the payment received, and kept securely in the safe until the deposit is provided to DFR Accounting.

The FMO Admin employees individually close their cash tills in EnerGov each Friday (or last workday) of every week for a grand total for the deposit period. On Friday of every week (or last workday of the week), the FMO Admin employee working that day will generate the weekly Daily Cash Receipt Report. This report populates totals for checks and cash per FMO employee, and includes a page to reconcile the cash and checks collected to the totals captured in EnerGov. The reconciliation page is filled-out by the FMO Admin employee to record any over/short (if applicable) and the reason, as well as the employee’s signature. If there is a discrepancy that needs verification, both Admin employees must sign-off in addition to the FMO Business Office Manager.



BACKGROUND – CONTINUED

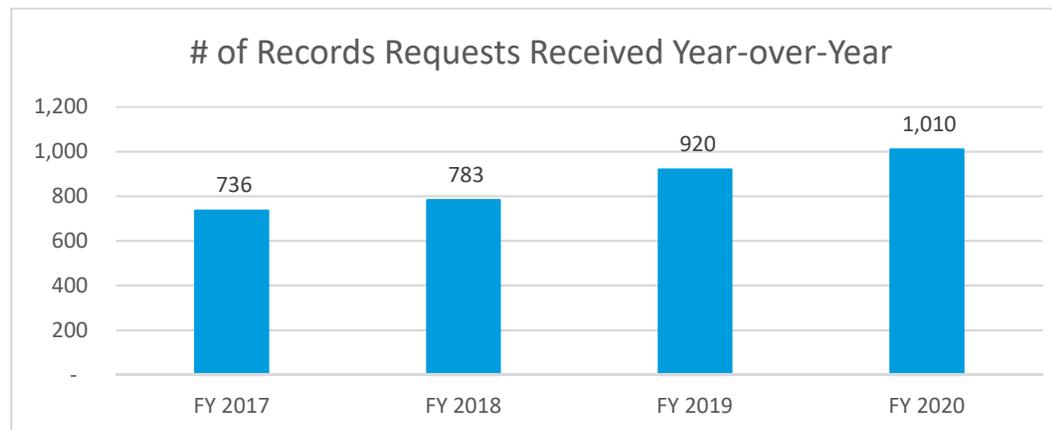
Fee Collection – continued

The deposit for the previous week is taken over to DFR Accounting on Monday or Tuesday of the following week by the FMO Business Office Manager. The FMO fills out the “deposit verification log sheet” to record the Daily Cash Receipt Report total, date, bag number, and FMO carrier signature. The DFR Accounting employee receiving the deposit verifies the amount and signs-off on the log sheet as well. DFR Accounting is responsible for depositing the receipts with the bank, and also reconciles bank deposits to EnerGov reporting provided by FMO on a monthly basis

FMO Records Requests

The FMO receives and processes records requests specific to their department. The FMO uses its own department-specific fee schedule to determine the amount due for filling the request, based on the request type: \$50 for Environmental Assessments (hazardous materials, incident reports, all tank inquiries, etc.), \$30 for Due Diligence (fire code violations), \$30 for Other (unspecified Fire Marshal related request), \$8 for Fire Marshal Report for cause and origin, \$8 for Fire Incident Reports, and \$5 for photos. Customers may submit records requests online, in-person, by fax, e-mail, or mail. If the customer submits their request online via the fillable form created by the FMO, the customer enters the types and quantities of records requested and the form automatically calculates the estimated total payment due.

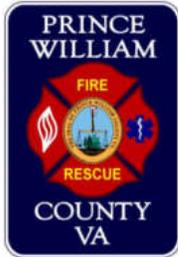
The FMO fulfills the request without payment at the time of submission, unless the FMO estimates that the charges are likely to exceed \$200, in which case the customer must pay prior to FMO processing the request. For those requests that have been processed and awaiting payment, the FMO records the status as “Processed – Pending PYMT” in EnerGov. Once the payment has been received, the status is changed to “Closed – Paid in Full.” If a requestor has not yet paid for a prior request and submits another request, the FMO reminds the customer of the past due payment and does not process any further requests until payment is received. The EnerGov record of request status, “Processed – Pending PYMT,” is leveraged to contact those customers who have not yet paid. Reminder letters are sent out semi-annually (January and July) for all payments that have not been received. Once the customer pays or if no response was received, the FMO changes the EnerGov status of the request to “Closed – Paid in Full” or “Closed – No Payment.” For those that are recognized as closed with no payment, the FMO never heard back from and had to write-off collecting money. Note that for the time period of 7/1/2019 – 10/31/2020, only nine fulfilled requests without payment were written-off.



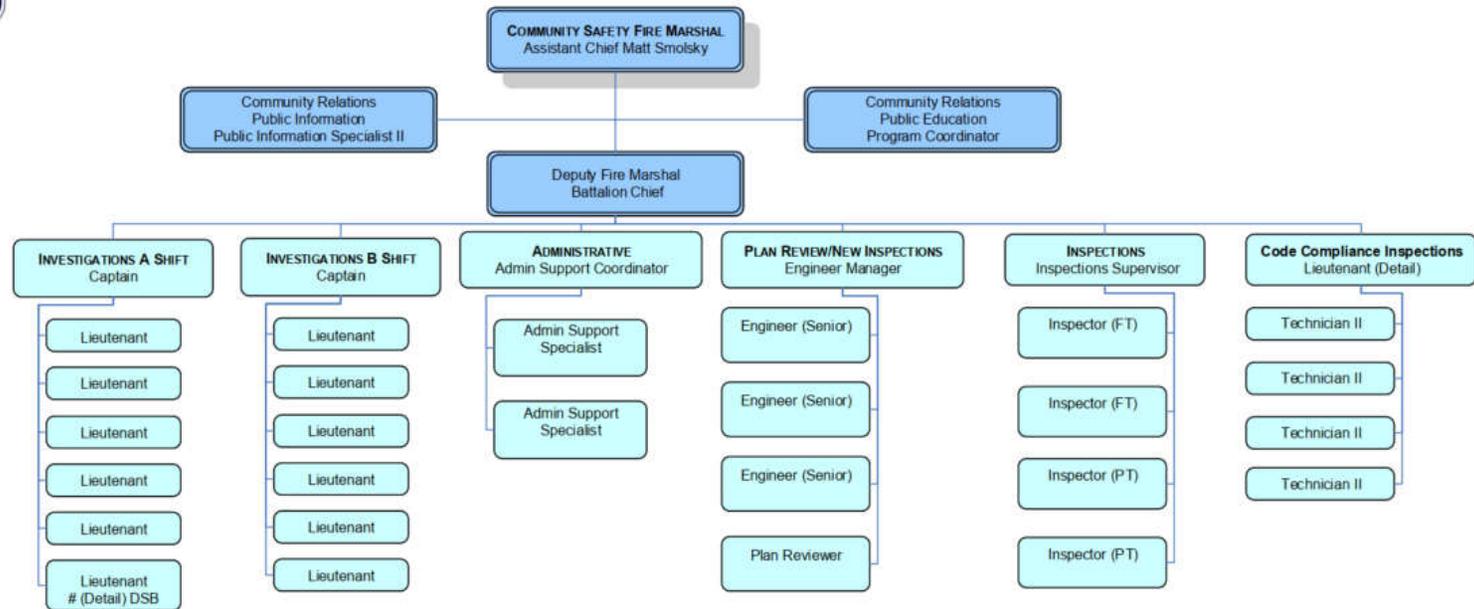


BACKGROUND – CONTINUED

Organization Chart



PWC DEPT. OF FIRE & RESCUE
 COMMUNITY SAFETY SECTION
FIRE MARSHAL'S OFFICE
 DECEMBER 2020



Personnel

As reflected in the organizational chart above, there are five Technician II employees that primarily perform code compliance (“Station”) inspections, five civilian inspectors that primarily perform fire protection permit (“FPP”) inspections, and 14 lieutenants (law enforcement officers) that perform inspections when necessary during evening or weekend shifts. Note that the FMO leverages employees across various inspection types to allow flexibility and efficiency. Technician II and civilian inspector employees are required to hold both the Fire Prevention Inspector and Fire Protection Inspector certifications. Lieutenants are required to hold the Fire Prevention Inspector certification. There are five FMO plan reviewers that must hold both the Fire Prevention Inspector and Fire Protection Inspector certifications, as well as the Fire Protection Plans Examiner certification.



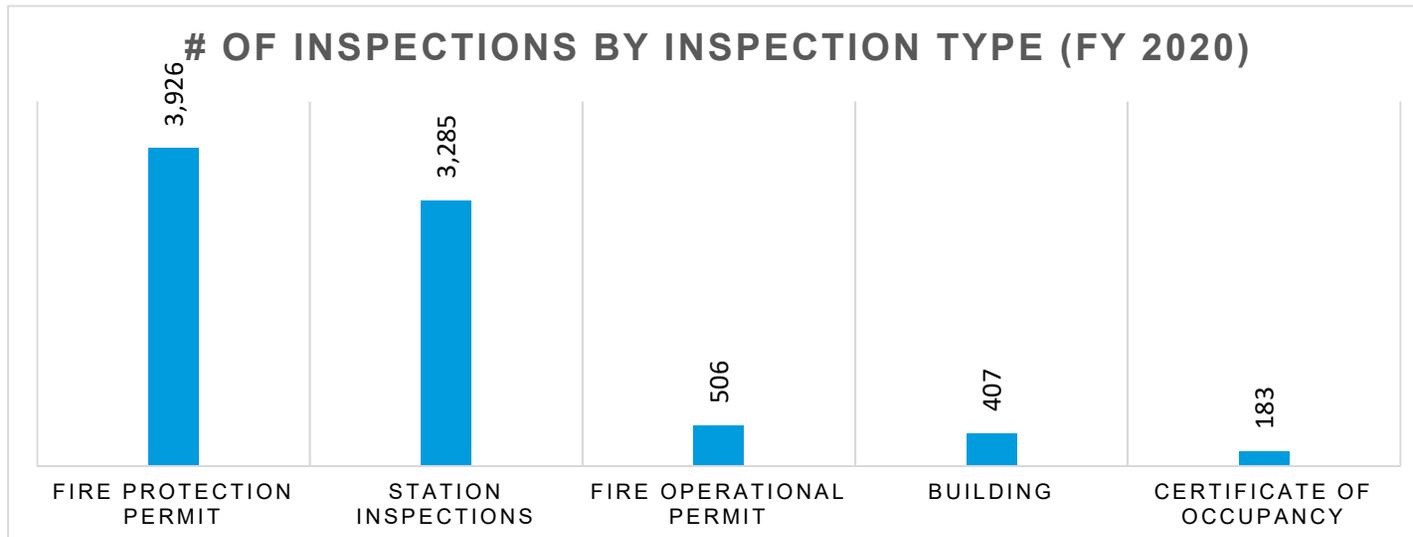
BACKGROUND – CONTINUED

Inspection Types

The FMO is responsible for performing the following types of inspections:

Inspection Type	Inspected
Fire Protection Permit Inspections	Fire protection system (e.g.: fire alarm, sprinkler, kitchen hood, etc.)
Station (Code Compliance) Inspections	Existing occupancy properties
Fire Operational Permit Inspections	Process or storage (e.g.: blasting, open burning, fireworks display, etc.)
Building Inspections (following Building Permit issuance)	Construction and/or renovation of a structure
Certificate of Occupancy Inspections (leading up to the “CO” issuance)	Final inspection prior to structure occupancy

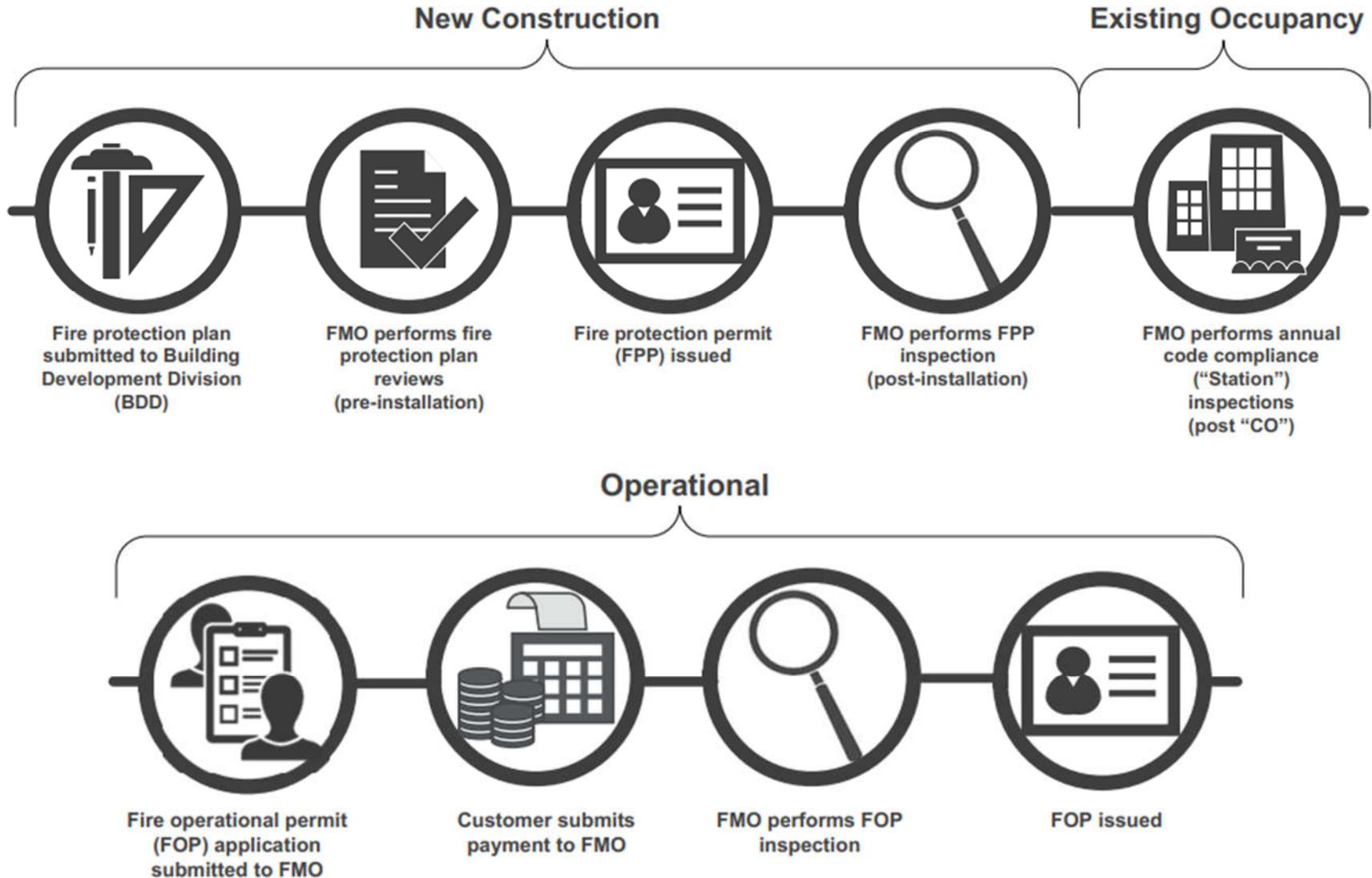
Note that Building and Certificate of Occupancy inspections fall under the Building Development Division (BDD) workflow for new construction, and fire protection systems are permitted as part of the BDD process.





BACKGROUND – CONTINUED

FMO Plan Review, Permitting, & Inspections Processes

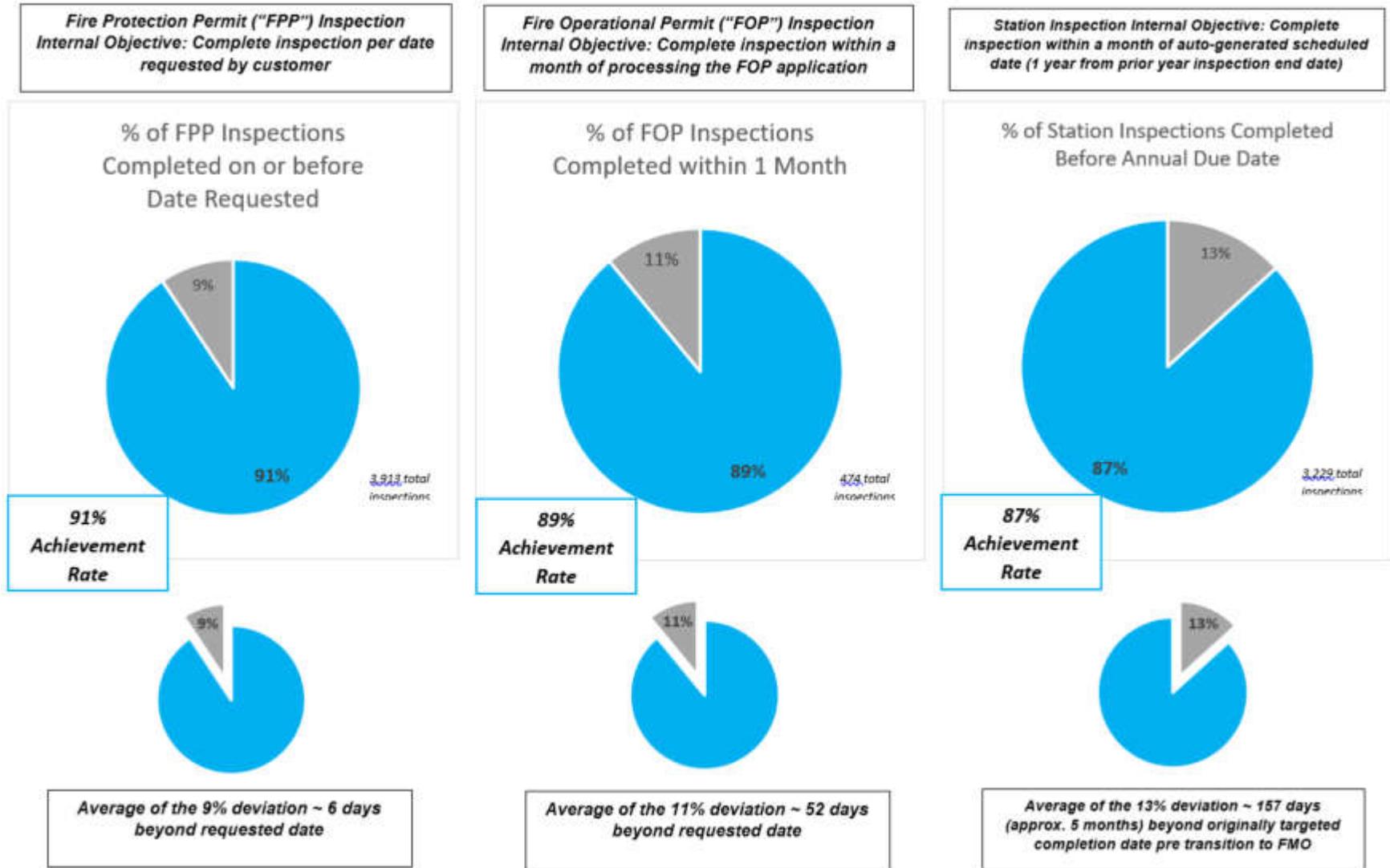




BACKGROUND – CONTINUED

FY 2020 FMO Inspection Data

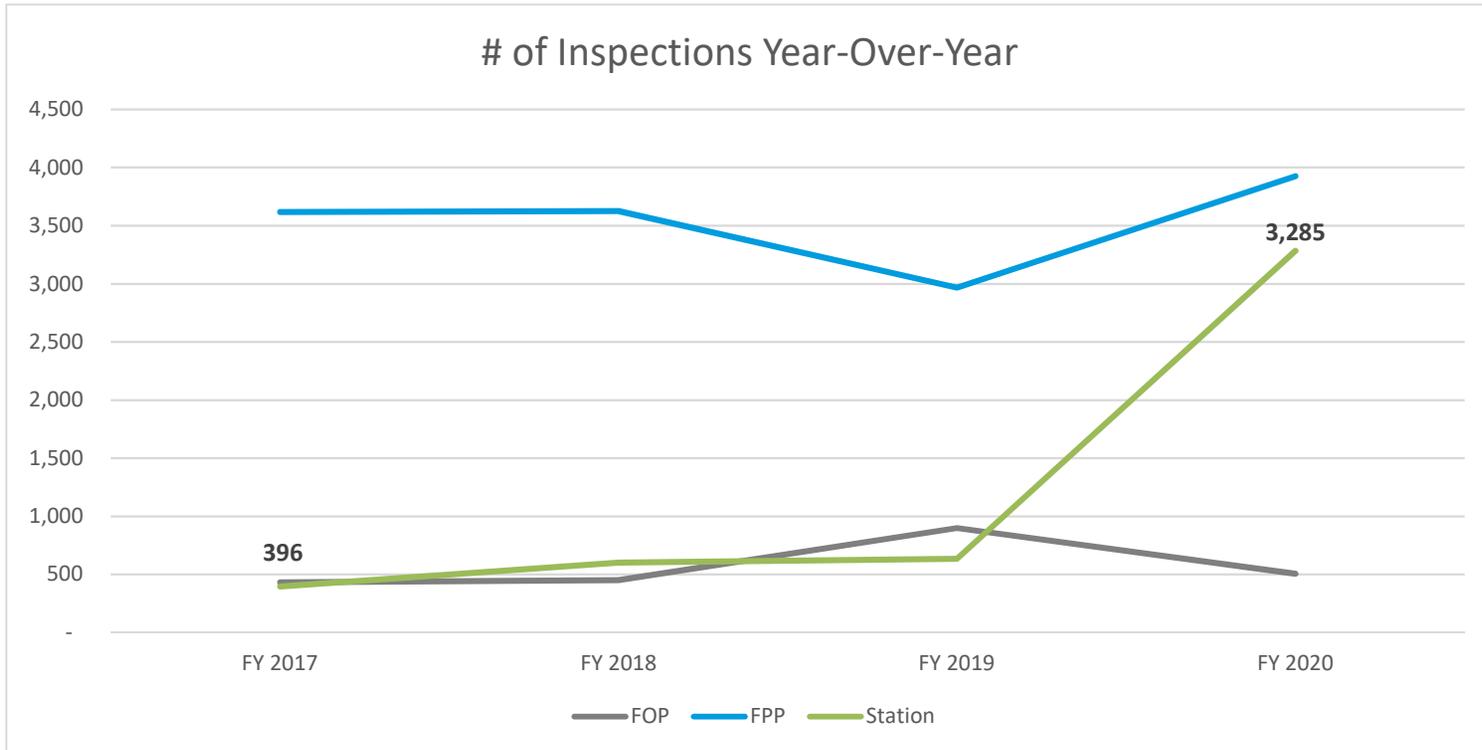
The following graphics illustrate the FMO's performance compared to their internal goals for FY 2020:





BACKGROUND – CONTINUED

Prior Year FMO Inspection Data



As acknowledged in PWC's fiscal year end June 30, 2021 budget, the Fire Marshal is leading the new proactive approach to performing annual fire safety ("Station"/code compliance) inspections. There has been an enhanced level of inspections, and this increase in workload is expected to continue. Per the Community Safety Chief Fire Marshal, the FMO is currently planning for "Phase 2" of inheriting additional code compliance inspections from fire station personnel.



BACKGROUND – CONTINUED

FMO Collaboration with Other County Departments

The FMO is involved in the Department of Development Services Building Development and Land Development Division’s workflows. Note that while the FMO is engaged early in the new construction process and maintains a relationship with Building Development throughout the process, the Fire Marshal’s authority doesn’t commence until the Building Official issues the Certificate of Occupancy (“CO”) and the building is occupied.

Notable FMO Involvement Efforts	
Building Development Division (“BDD”)	<ul style="list-style-type: none"> • Performs inspections under the BDD workflow, to include: Building inspections, CO inspections, and FPP Inspections • FMO Fire Protection Engineer engages in pre and post plan submission meetings to provide feedback on the building aspects of the plan in relation to fire safety • Leveraged as “technical experts” to the Building Official during the new construction inspection process, given the FMO’s responsibility as code compliance inspectors after the building is occupied
Land Development Division (“LDD”)	<ul style="list-style-type: none"> • Performs review of site plans in relation to Prince William County’s Design and Construction Standards Manual “Fire Safety Systems” section (section 300)

EnerGov System

The EnerGov system is commercially-available system leveraged by the FMO to log and track plan reviews and inspections. Used on a daily basis, EnerGov provides the ability for the FMO plan reviewers and inspectors to document their approval or rejection decisions. Before the system was implemented, residents and businesses had to work separately with one or more agencies (i.e. BDD, FMO, Environmental Services, LDD, etc.). Now, EnerGov allows business and residential customers to have 24/7 access to view all information related to projects or addresses. Customers have the ability to see real-time information related to the status of their inspection or plan review (i.e. plan review comments, project progress, etc.).

The FMO also documents information pertaining to records requests within EnerGov. While there are system limitations that prevent the FMO from capturing the actual total cost per request, the system maintains information including, but not limited to: the records request case number, case address, case status, due date, completed date, and the assigned FMO employee.



BACKGROUND – CONTINUED

Comparative Analysis

As part of our review, we spoke with representatives from the Fire Marshal's offices of two Northern Virginia localities. The purpose of the discussions was to learn about their FMO operations, specific to scheduling inspections, their allocation of staffing for each type of inspection, and other processes that were included in the scope of our review. Through these conversations we learned the following:

- The FMOs in each of the localities with which we spoke utilized a version of pooled inspectors, grouped in a way that allowed inspectors to conduct multiple types of inspections, as well as investigations: one group that consists of law enforcement officers that perform permit inspections, along with investigations, and another group of civilian inspectors that manage the system inspections. We found that this is largely consistent with how the County FMO organizes inspectors.
- We noted one instance that the FMO that we spoke with organizes inspections into an annual calendar that focuses on one inspection type per month. For example, all hazmat inspections are conducted in April, all hotel/motel inspections are conducted in May, etc. The rationale is that this organization allows the FMO to better understand and manage their workload each month. We discussed this methodology with the County Fire Marshal and found that this is an option that the FMO has been considering as a potential approach for inspections scheduling.
- One difference that we noted was around plan reviews. We learned that one locality FMO only performs site plan reviews – external features like fire lanes and hydrant locations. All building construction plans, including fire prevention and protection system designs, are performed by building officials who have a Fire Captain available for consultation and assistance. The County FMO performs plan reviews that include both external site plans, and the fire prevention and protection elements of building construction plans.

Stakeholder Interviews

In addition to interviewing personnel from other Northern Virginia localities, we also met with project managers from three property development and construction contractor customers that frequently utilize FMO permitting and inspection services. The purpose of these discussions was to learn about their interactions with the FMO – both positive and negative – to try and identify common experiences that we could share with the FMO, and consider throughout our review procedures. The shared feedback that we received included the following:

- The project managers we spoke with noted that FMO was very good to work with and that they've shown a willingness to change and improve processes over the years. They further stated that FMO personnel were very professional, prepared, did a good job, and were fair in their inspections. They also noted that the timeliness of inspections has improved over the years.
- The project managers also noted that one area they felt could be improved to increase efficiency pertained to small deviations between plans and installed features. An example provided was if a panel had to be moved a couple of feet to accommodate other equipment. Inspectors require a 100% match and small differences (even if code compliant and didn't impact safety) would still cause the inspection to fail and require plan re-submission and re-inspection. They suggested there could be a process where the inspection could pass with a temporary occupancy permit and allow for "field revisions" and the subsequent submission of updated as-built plans.



BACKGROUND – CONTINUED

Stakeholder Interviews – continued

- Another opportunity noted by the project managers was around the information that is available to the developers. They noted that if information such as inspection “windows” were visible, they could better coordinate having the right personnel on-site during the inspection window, they could save on the cost of having personnel remain on-site throughout the day of inspection. The project managers indicated that other localities provide functionality to log into a system that shows when the inspection will occur. Specifically, it was noted that for sprinkler and alarm field inspections, they have to pay sub-contractor personnel to be on-site and wait for the inspector to arrive. Finally, they noted that this functionality could include information for the status of plan reviews that were in-progress, so the project managers could log in and see where in the process the plan review was.



OBJECTIVES AND APPROACH

Objectives

The purpose of the internal audit was to assess the alignment of the FMO's inspection processes. The scope of this internal audit encompassed current Fire Marshall Office operations, including inspections performed from July 1, 2019 through June 30, 2020.

Approach

Our audit approach consisted of the following three phases:

Understanding and Documentation of the Process

We conducted interviews with the appropriate representatives from the FMO to discuss the scope and objectives of the audit work, obtain preliminary data, and established working arrangements. We obtained and reviewed 1) copies of financial information; 2) applicable Code of Virginia and County policies related to this internal audit and 3) other documents deemed necessary; and performed walkthroughs of the processes and key controls to gain an understanding of the function and assess the design of the process/key controls.

Evaluation of the Process and Controls Design and Testing of Operating Effectiveness

The purpose of this phase was to assess the efficiency and effectiveness of FMO inspection processes. Testing was conducted utilizing sampling and other auditing techniques to meet our audit objectives. Procedures included the following:

- Gained an understanding of the FMO's inspection processes and internal control structure;
- Gained an understanding of the system(s) utilized throughout the FMO inspection processes;
- Performed interviews of process stakeholders to gain further understanding of processes;
- Reviewed and assessed inspection process, including design and documentation, performed during interpretation of inspection codes;
- Reviewed a sample of inspections performed during the audit period in an effort to build a timeline and verify compliance;
- Reviewed performance measurement processes performed by management to assess the efficiency and effectiveness of fire inspections;
- Performed comparative analysis to similar jurisdictions regarding inspection collaboration (FMO, Building Department, Site) and staffing/scheduling strategies;
- Evaluated appropriateness of inspections staffing and scheduling;
- Performed data analytics to assess conformance key processes / controls; and
- Provided recommendations for process improvements.

Reporting

At the conclusion of this audit, we summarized our findings into this report. We conducted an exit meeting with the appropriate Management personnel, and have incorporated Management's response into this report.



OBSERVATIONS MATRIX

Observation	1. Fire Operational Permit Fee Collection – Evidence of Deposit Drop-off
Moderate	<p>Fire operational permit fees are processed by the FMO. When payments are made, a receipt is entered in EnerGov to show payment while the actual payment is brought to Department of Fire and Rescue (“DFR”) Accounting for processing.</p>
	<p>The FMO process consists of physically taking deposits in a locked bag to the DFR Accounting office twice per week. A “deposit delivery verification log sheet” is utilized to evidence deposit drop-off by the FMO to DFR Accounting. The log sheet captures the date, bag number, the FMO carrier’s signature, and DFR Accounting’s signature.</p> <p>Based on our testing of fee collections for five fire operational permits, we identified the following instances in which there was a lack of documented evidence to confirm deposit drop-off between the FMO and DFR Accounting:</p> <ul style="list-style-type: none"> • Four fire operational permit fees in which there was no signed “deposit delivery verification log sheet” <ul style="list-style-type: none"> ○ We independently verified the amounts of the deposits to source documents, without exception; and • The log sheet used to evidence the receipt of the FMO deposit by DFR Accounting does not capture the amount of the deposit being received. <p>Without consistent documented evidence of deposit drop-off by the FMO to DFR Accounting, along with documentation evidencing the amount of the deposit being delivered, there is a risk that the total deposit is not received, which could result in the misappropriation of funds.</p>
Recommendation	<p>We recommend that the FMO use the “deposit delivery verification log sheet” on a consistent basis, ensuring that an individual from DFR Accounting always signs-off for each deposit drop-off. Further, we recommend that the FMO add a field for deposit amount to be included on the log sheet.</p>
Management Action Plan	<p>Response: The FMO has implemented a “deposit delivery verification log sheet” that will be used on all transactions that require DFR Accounting to always sign-off for each deposit drop-off. A field for the deposit amount is also included on the log sheet. All of this is stated in a new FMO Policy.</p> <p>Responsible Party: Fire Marshal</p> <p>Estimated Completion Date: Completed as of November 20, 2020</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	2. Records Request Cost/Payment Capture
Moderate	<p>The FMO received 1,010 records requests in FY 2020 and dedicates approximately 0.5 FTE of administrative work time on managing requests. As that the FMO does not charge requestors when the estimated or actual total cost is \$50 or less, the FMO found it worthwhile to keep their previously established fees in order to bring in at least some revenue.</p> <p>Per inquiry with the FMO Business Office Manager, there is no report capable of being pulled from EnerGov that captures financial information due to the field limitations of the system and the reporting structure. The report pulled out of EnerGov do not show the total actual amount per request. The FMO developed a records request form specific to their department, which allows the customer to enter the types and quantities of records requested, and the document will automatically generate the total that the customer must pay. This is saved as an attachment to the case in EnerGov, but this attachment may not be present for those requests received in-person, via e-mail, or over the phone. Additionally, EnerGov does not retain the original receipts that are automatically generated for the customer upon payment.</p> <p>Without a system record of the records request fees assessed by FMO and paid by customers, the County is at risk of fulfilling records requests without receiving the required fees.</p>
Recommendation	<p>We recommend that the FMO consider options for identifying and utilizing fields in EnerGov where the fees assessed and paid can be captured, along with reporting that can be created that identifies customer records requests for which assessed fees are not paid.</p>
Management Action Plan	<p>Response: The FMO has improved the functionality of the existing fields in EnerGov. During the audit period, the fields in EnerGov were predefined and we could not distinguish the status of the request. New drop down options have been created to allow the FMO to know the status of the request process and if payment has been received. The new drop downs include Closed – Paid in Full, Processing – Payment Pending, and Closed – Payment not received. Each year, we pull a report from EnerGov for all records requests in pending status. Letters are sent out to collect all past due monies. If monies are not received, the request is closed and no new requests are processed for the customer/business until payment is received. When checking with DoIT, a report cannot be created to track the dollar amount due to it not being a main field to gather data. This situation has been asked to be improved on future builds in EnerGov.</p> <p>Responsible Party: Fire Marshal</p> <p>Estimated Completion Date: Completed as of November 20, 2020</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	3. Professional Certifications
Low	<p>Technician IIs (station inspection inspectors) and civilian inspectors must hold both the Fire Prevention Inspector certification and Fire Protection Inspector certification. There are 10 civilian and technician II inspector FTEs. Plan reviewers must hold both the Fire Prevention Inspector and Fire Protection Inspector certifications, as well as the Fire Protection Plans Examiner certification. There are five plan reviewer FTEs. Law enforcement officers/lieutenants (“LEOs”) must hold the Fire Prevention Inspector certification. There are 14 LEO FTEs. Certifications are required within 18 months of employment.</p> <p>Regardless of the number of certifications held, inspectors and plan reviewers are required to have 16 hours of continuing education units every two years per the Virginia Department of Housing and Community Development (“DHCD”). Per inquiry with the FMO, it is up to the employee to maintain the certifications. If an employee does not meet the required hours, he or she is notified of the deficiency from the DHCD or Virginia Department of Fire Programs. At the time of the employee’s annual evaluation, their supervisor reviews completed training with the employee. If the employee has not completed all required training, they are prevented by the FMO from doing any inspections until requirements are met.</p> <p>We selected a sample of 15 inspectors and plan reviewers and independently verified certifications and continuing education statuses with the DHCD. Based on our testing, we noted the following instances in which required certification was lacking or was found to be past due for continuing education requirements:</p> <ul style="list-style-type: none"> • Four inspectors with past due continuing education requirements; and • Four inspectors that do not hold the Fire Prevention Inspector certification. <p>Note that the four inspectors that do not hold the Fire Prevention Inspector certification performed the following number of inspections during FY 2020:</p> <ul style="list-style-type: none"> • Inspector 1: Performed nine inspections; • Inspector 2: Performed 881 inspections; • Inspector 3: Performed 768 inspections; and • Inspector 4: Performed five inspections. <p>Without the proper certifications or continuing education requirements, the FMO could be leveraging unqualified individuals to perform inspections and plan reviews. Without adequate knowledge and understanding, inspections or plan reviews could fail to identify potential risks to County citizens.</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	3. Professional Certifications – continued
Recommendation	We recommend that the FMO establish a process to internally track all required certifications and continuing education requirements, and verify that only those inspectors and plan reviewers with a current certified status are performing inspections and plan reviews. On at least an annual basis, FMO management should confirm with the DHCD to reconcile inspector certifications and CPE compliance to department records.
Management Action Plan	<p>Response: All staff members hold the correct underlying certifications. A source of confusion due to the dichotomy/disconnect DHCD and VDFP recertification periods and timely reporting to DHCD was the primary issue. Of the inspections noted that were possibly impacted many could have been properly covered by an inspector's 3B certifications.</p> <p>Responsible Party: Fire Marshal</p> <p>Estimated Completion Date: As of November 20, 2020, tighter controls and supervisor oversight on our certification/recertification program have been implemented to ensure timely reporting is conducted. This process will be reviewed semi-annually in January and July.</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	4. Policies & Procedures
Low	<p>The FMO maintains numerous documents that were found by RSM to provide policy and procedure guidance to the FMO employees, including inspection checklists, manuals, and various guidelines. The FMO evaluates all policy and procedure documents on an annual basis. If changes are necessary at any point during the year, the FMO will make updates and save with new version dates.</p> <p>Based on our review of 29 policy and procedure documents provided by the FMO, we noted the following instances in which the last update/review date was unknown or found to be over a year ago:</p> <ul style="list-style-type: none"> • 20 documents in which the last update/review date was unknown; and • Seven documents in which the last update/review date documented was found to be over a year ago. <p>Further, it was noted through inquiry that the FMO does not currently have a formalized policy as guidance to determine necessary frequency of code compliance inspections. Code compliance (i.e. station) inspections are able to occur on a one, two, or three-year basis depending on the type and risk-level of properties. While it is understood that “target hazard” properties (i.e. those properties with high risk for loss of life or property, DSS licensing, or critical infrastructure) must be inspected for code compliance on an annual basis, the intervals for properties with lower risk are not as defined. It was noted that the FMO had begun leveraging data to formalize a policy, but it has not yet been finalized.</p> <p>Without consistent, periodic review of policies and procedures, there is a risk that appropriate guidance is not provided to team members to ensure their job responsibilities are in line with management and regulatory expectations.</p>
Recommendation	<p>We recommend that the FMO formally document their annual review of policy and procedure documents. We further recommend that a field is added to each document to capture the reviewer and review date. Additionally, we recommend that the FMO document a policy specifying the frequencies of code compliance inspections, and the requirements for each assigned frequency, to allow for consistently applied inspection requirements across all County properties.</p>
Management Action Plan	<p>Response: All policy and procedure documents produced by the FMO have been updated. A new policy has been established that all policy and procedure documents will be reviewed on an annual basis in the month of January. The documents will be marked with the review date and the person reviewing/updating. Policies and procedures will also be updated during the year when they are actually updated or implemented.</p> <p>Responsible Party: Fire Marshal</p> <p>Estimated Completion Date: As of November 20, 2020, all policy and procedure documents have been updated. During the next review (January 2021), the reviewer’s initials will also be indicated on all policies and procedures.</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	5. Rejected Inspection Documentation
Low	<p>The EnerGov system is leveraged by the FMO inspectors to capture all inspection-related information including the inspection number, inspection type, requested date, scheduled date, completed date, status, and assigned inspector. Per the FMO inspection documentation procedures as outlined in the EnerGov “How to Manage My Inspections” guidelines, comments are to be added when an inspection is rejected.</p> <p>Based on our testing of 25 inspections, we identified the following instances in which there was incomplete documented support of inspection rejection status:</p> <ul style="list-style-type: none"> • Two inspections in which no comments were entered into EnerGov to support/explain the rejection <ul style="list-style-type: none"> ○ Note that these instances consisted of one (1) fire protection permit inspection and one station inspection; and • One station inspection in which the comments entered into EnerGov did not align with the “passed” results. <p>Without an adequate audit trail of inspection results to support the decision of rejection, customers may lack thorough understanding to make the required corrections. Further, the FMO may not be able to provide a comprehensive explanation to customers if subsequently questioned for reasoning behind rejection.</p>
Recommendation	<p>We recommend that inspectors should include sufficient comments to explain the rejection reason(s). We further recommend that the FMO perform a formal review by management of all inspections entered into EnerGov on a weekly basis, with a specific focus on ensuring completeness – including the inclusion of sufficient comments to support any rejected inspections.</p>
Management Action Plan	<p>Response: Additional training has been provided to the inspectors to ensure properly completed inspection reports (i.e. sufficient comments to support rejected inspections). Increased supervisory reviews of inspections have been implemented.</p> <p>Responsible Party: Fire Marshal</p> <p>Estimated Completion Date: Completed as of November 20, 2020</p>



OBSERVATIONS MATRIX – CONTINUED

Process Improvement Opportunity

1. Formal Review of Refunds and Fee Adjustments

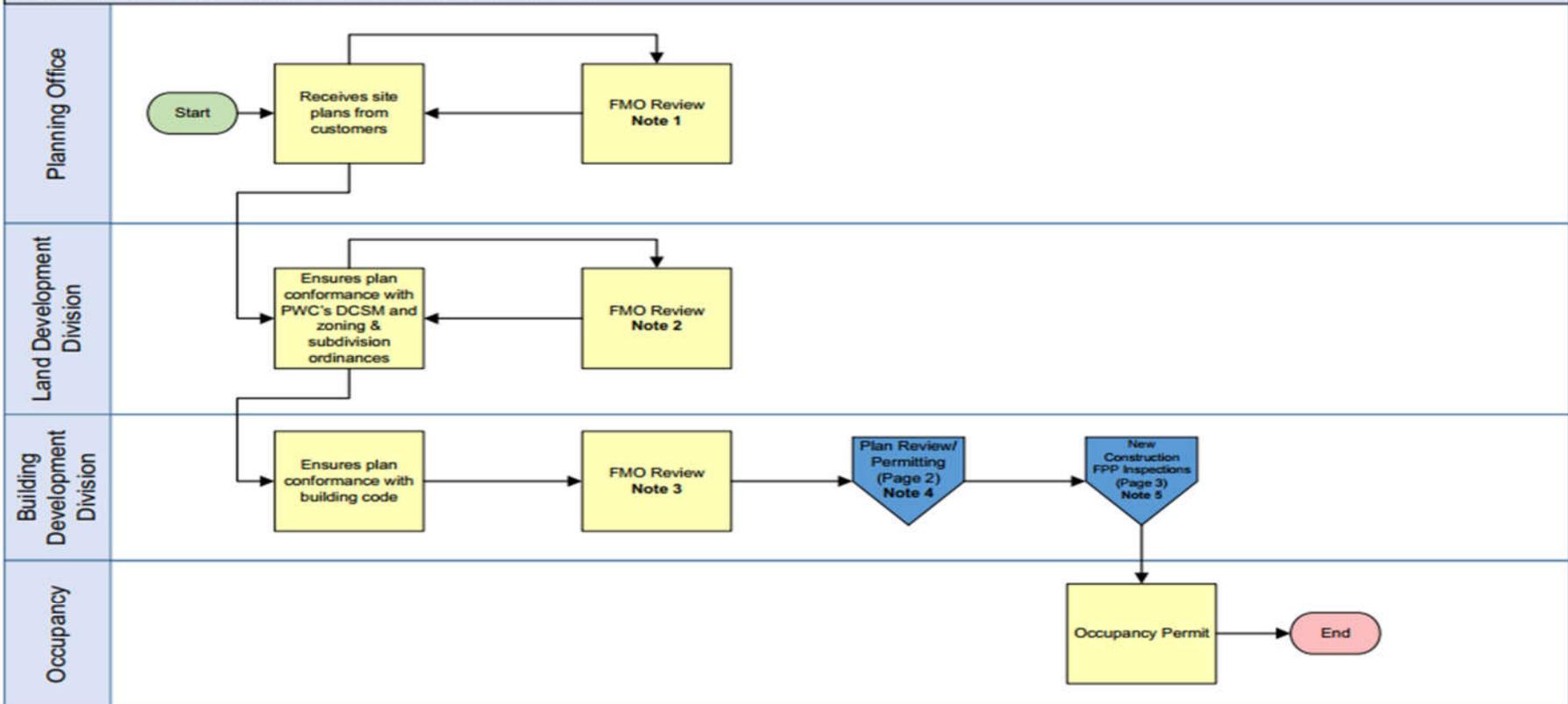
All FMO EnerGov roles (except for inspectors and code enforcement) can collect fees, refund fees, and adjust fees. There is a system limitation that payments cannot be accepted for an account, and refunds or adjustments applied, on the same day. EnerGov tracks audit history for all changes made user, date, and time. While there are reports available to examine these changes, they are not currently run or checked on a regular basis (only in the event that there is an issue or inquiry). DoIT conducts an annual review of user access for the EnerGov system to confirm access appropriateness. Agencies, including the FMO, are asked to review and approve their corresponding user permission matrix for accuracy. While there are compensating controls in place, efficiency can be gained through a proactive review process. We recommend that the FMO implements a formal review of refunds and fee adjustments on a defined periodic basis (i.e. quarterly) to mitigate the risk that inappropriate actions are taken in the fee collection process.



PROCESS MAPS

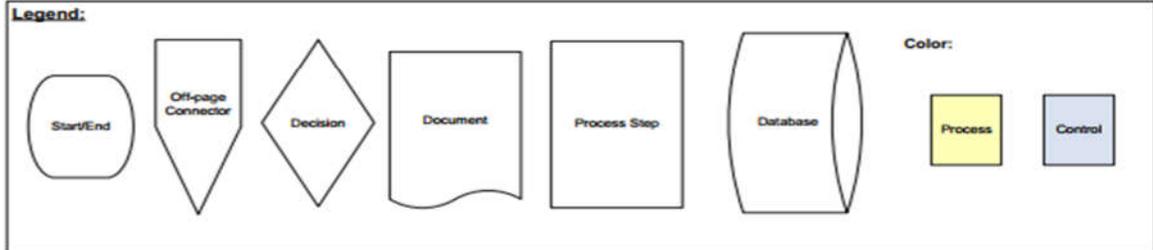
Prince William County – FMO Permitting & Inspections

Overview of FMO, BDD, & LDD Collaboration Process



Notes:

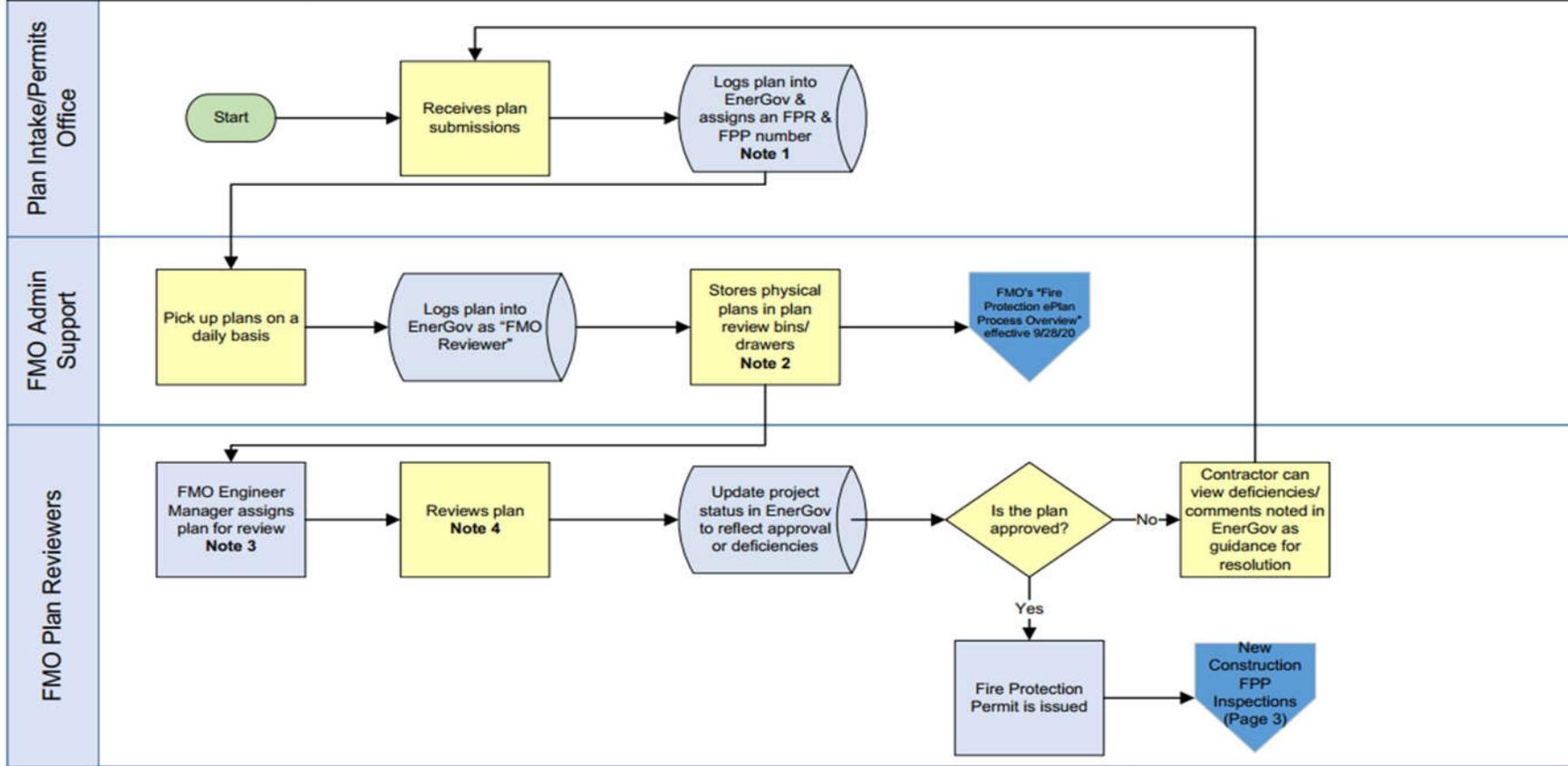
1. The FMO meets with the Planning Office on a monthly basis to discuss any fire-related issues with plans.
2. The FMO reviews site plan in relation to PWC's Design & Construction Standards Manual (DCSM) Section 300.
3. The Fire Protection Engineer is involved in the plan's building-related meetings and provides feedback/comments throughout the process.
4. This process refers to pre-construction/installation fire protection system plan review/permitting.
5. This process refers to post-construction/installation fire protection system inspections. The FMO performs building and CO inspections before the occupancy permit is issued (in addition to FPP inspections outlined on page 3) under the Building Development Division workflow for new construction.



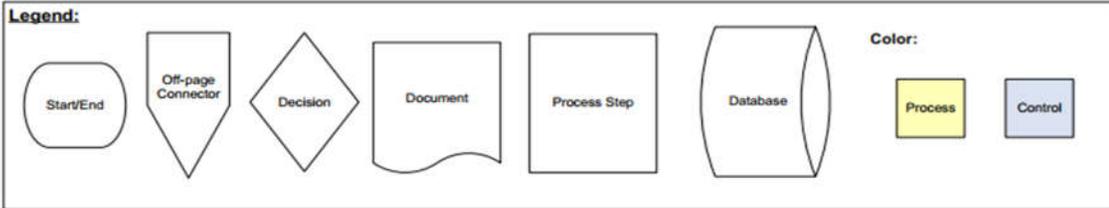


PROCESS MAPS – CONTINUED

Fire Plan Review/Permitting Process

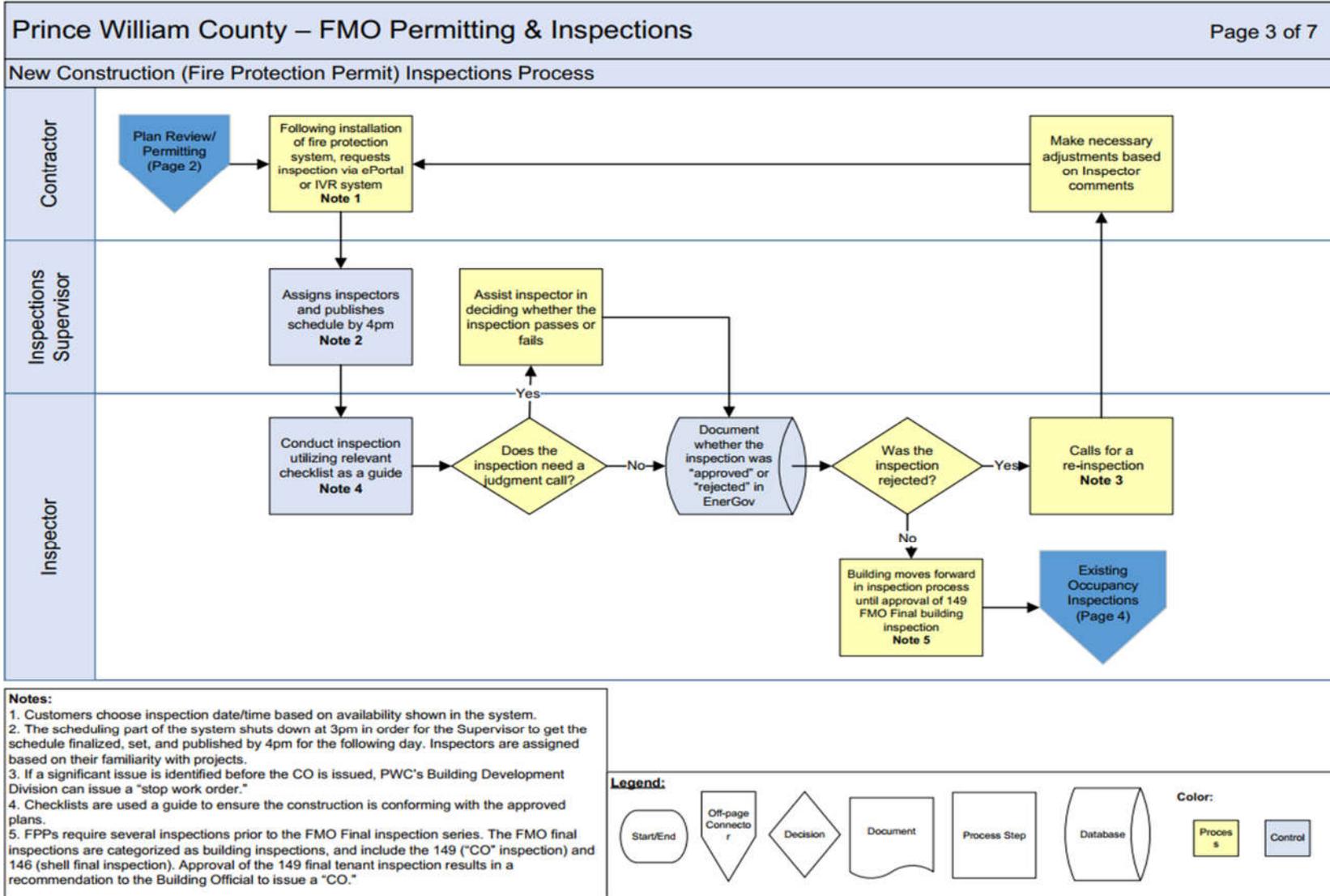


Notes:
 1. FPPs (fire protection permits) and FPRs (fire plan reviews) have two different numbers to allow for tracking in EnerGov.
 2. The FMO is transitioning to an ePlan review process in which all plans will be electronic, rather than in paper form. See ePlan workflow.
 3. Plans are assigned for review based on availability and appropriateness in terms of type of project.
 4. The due date for initial submittals and re-submittals is 30 days. The FMO's internal agency goals consist of 30 days for initial, and 15 days for re-submittals.





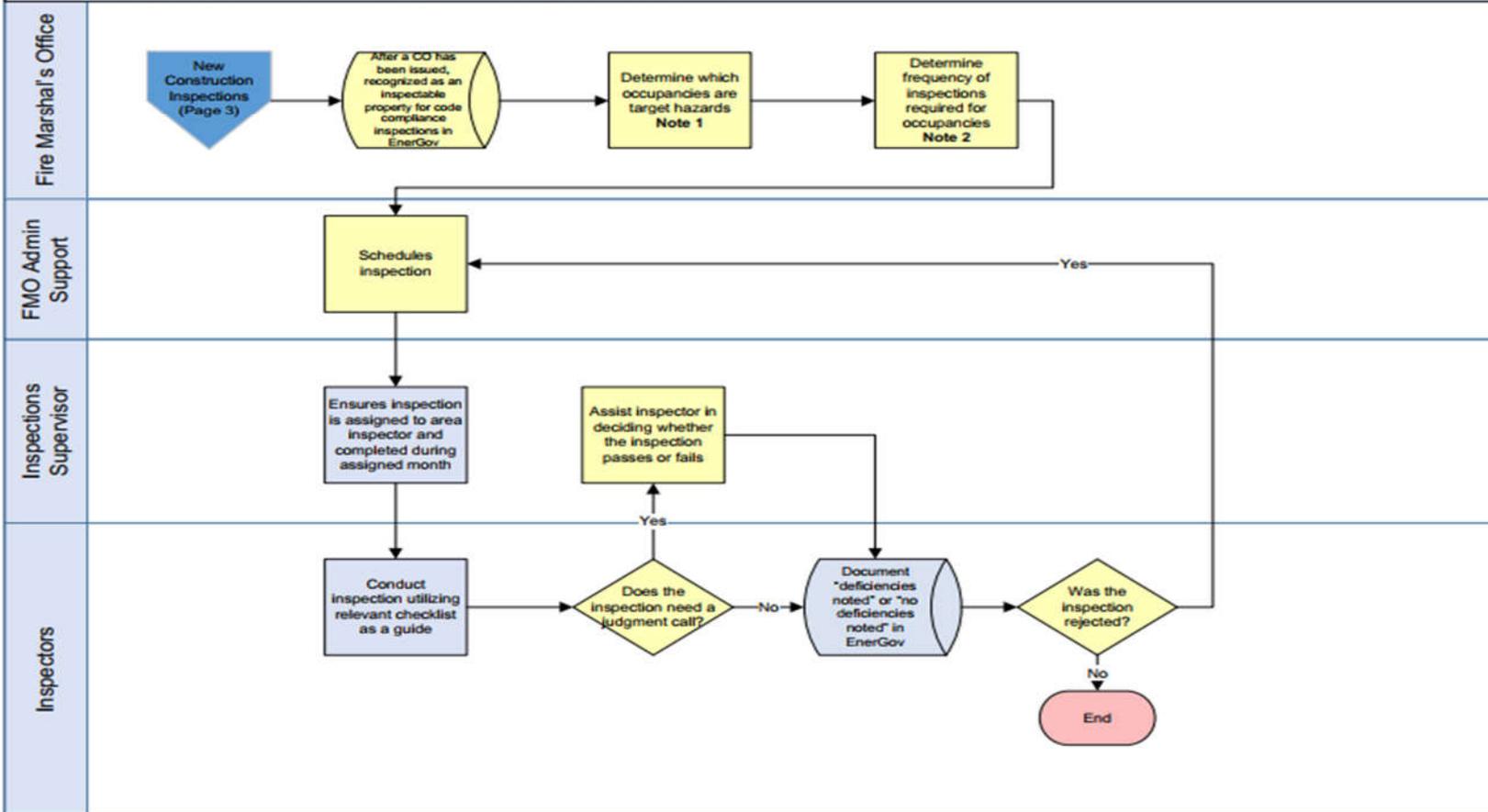
PROCESS MAPS – CONTINUED





PROCESS MAPS – CONTINUED

Existing Occupancy/Station/"Code Compliance" Inspections Process



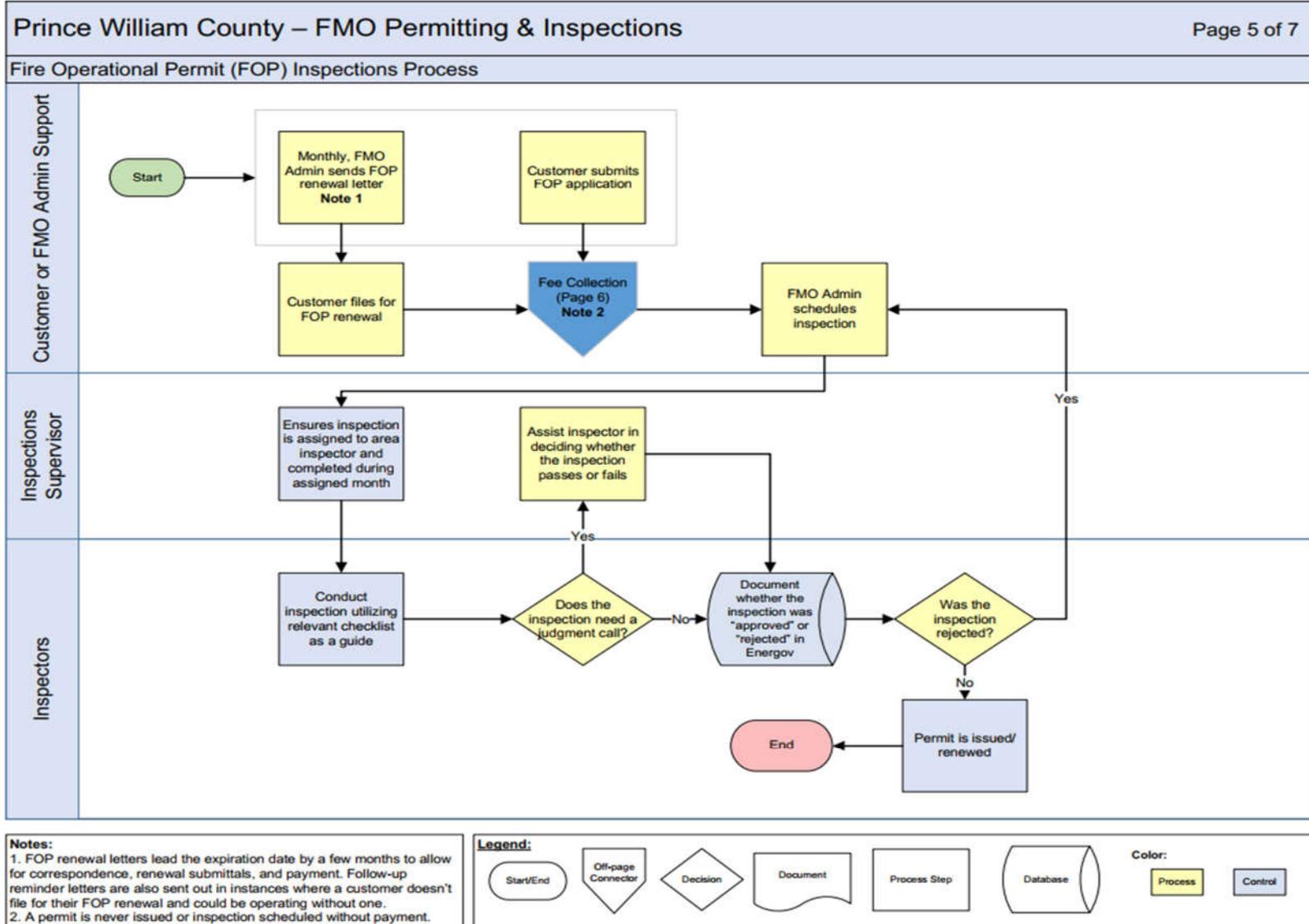
Notes:
 1. Target hazards are regarded as occupancies with high risk for loss of life or property, DSS licensing, and/or critical infrastructure.
 2. Code allows properties to be inspected every 1, 2, or 3 years. The code defines certain properties that require an annual inspection (i.e. higher risk occupancies), but FMO uses professional judgement and data analysis to determine frequency of code compliance inspections where it is not defined. Beginning on July 1, 2019, FMO look on about 4,000 target hazard inspections. Note that existing occupancy inspections (EC/SIP) do not have related fees.

Legend:

						Color:
						Process Control

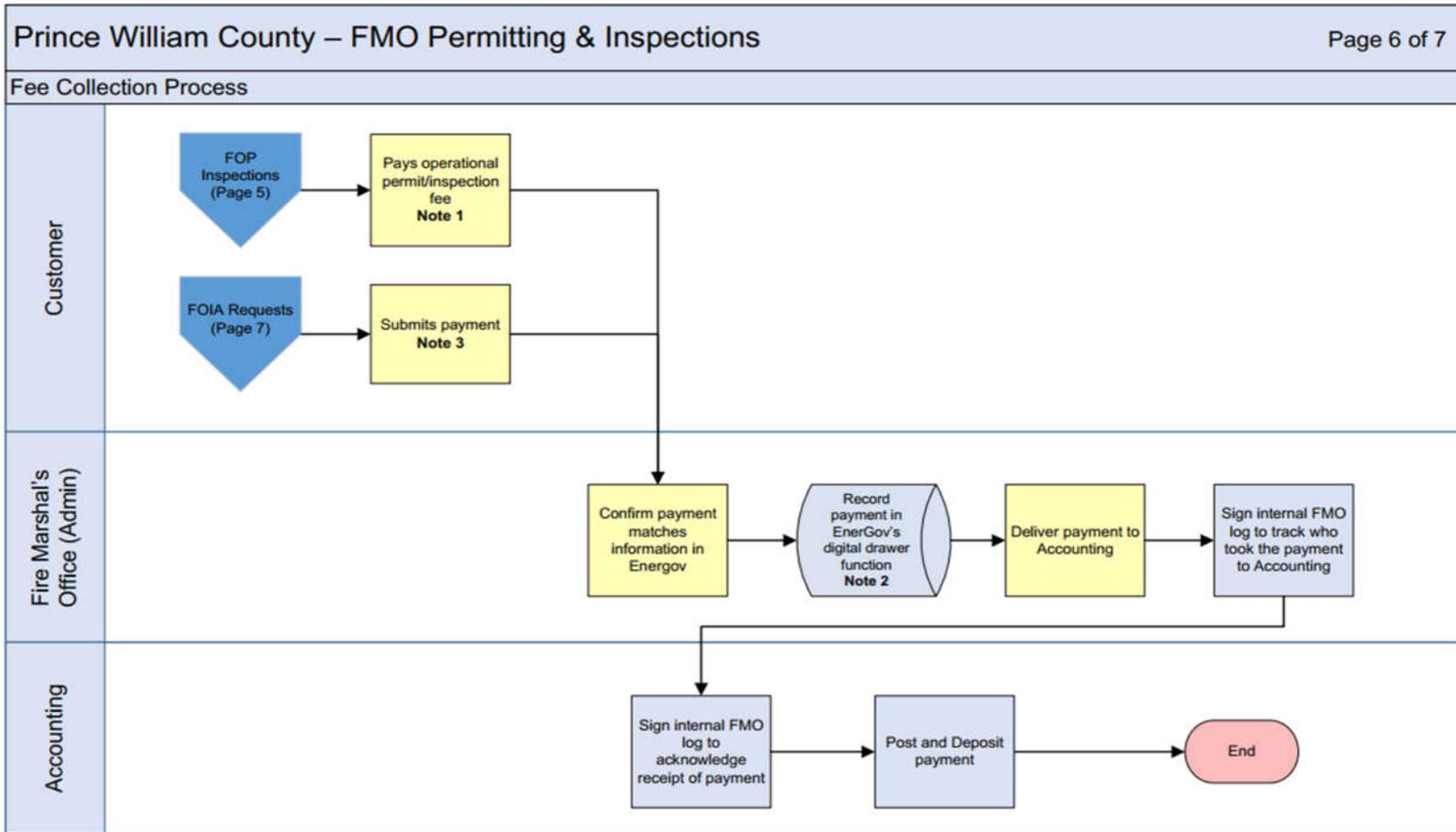


PROCESS MAPS – CONTINUED



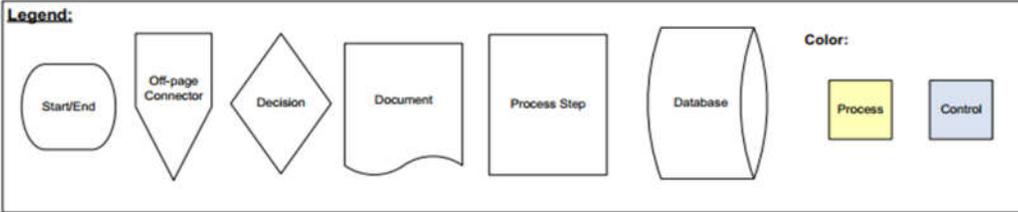


PROCESS MAPS – CONTINUED



Notes:

1. FOPs are not issued unless payment has been received. Customers send a check with their submittal package, or pay by credit card over the phone or in-person. The FMO Admin can manually add in the fees based on the FMO fee schedule for the request.
2. FMO uses Energov's digital drawer function to capture all payments made for easy tracking and reference. Accounting is responsible for the actual posting of the payments.
3. For FOIAs, the initial request by a customer has to be fulfilled without payment at the time of submission unless over \$200, per PWC Policy.



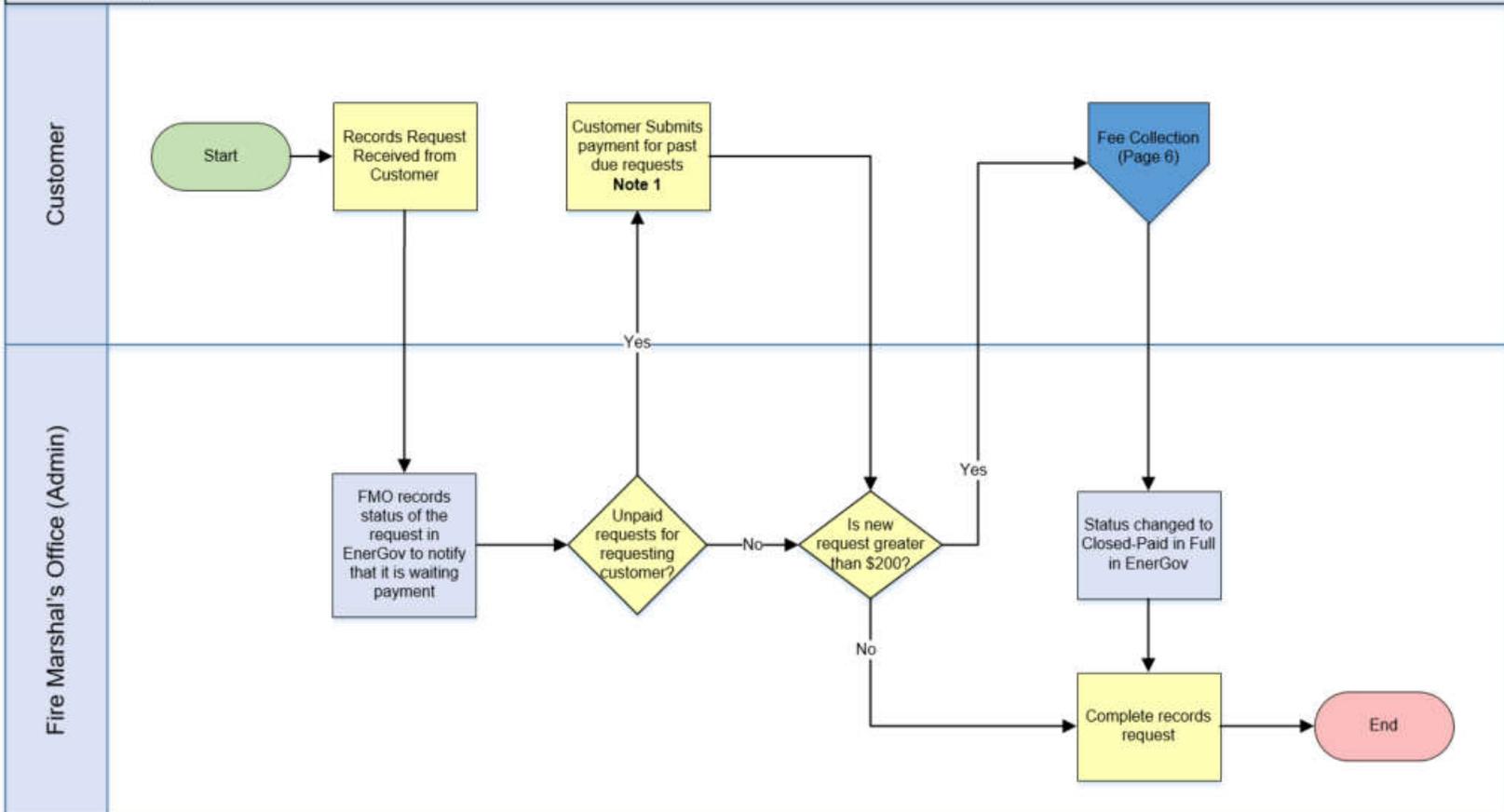


PROCESS MAPS – CONTINUED

Prince William County – FMO Permitting & Inspections

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Records Request Process



Notes:

1. If a requester that has not paid for a prior records request and submits a new request, FMO will notify the customer of past due payments and will not process any further requests until payment is received.

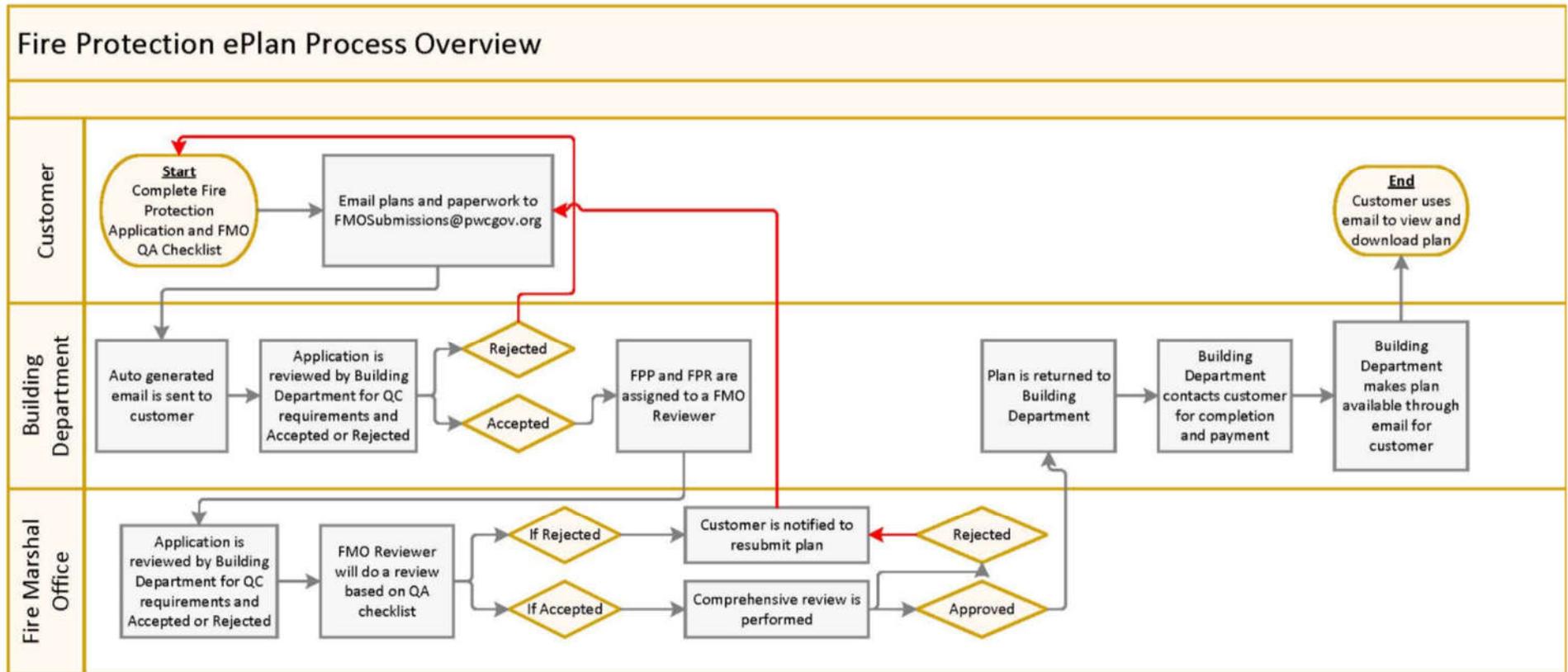
Legend:





PROCESS MAPS – CONTINUED

Note: The below flowchart was provided by the Fire Marshal's Office





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