

July 6, 2023

Timothy C. Hardy, Deputy Director
Code Compliance Administration
DeKalb County, GA

RE: Follow up on the Status of Management Actions - Code Compliance Administration Audit - Report No. 2019-010-CE

Dear Mr. Hardy:

As required by DeKalb County, Georgia – Code of Ordinances/Organizational Act Section 10A- Independent Internal Audit (I), I have attached the Office of Independent Internal Audit’s report on the status of management actions taken to address the findings contained in the referenced audit report. The conclusions in this follow-up report are limited to the status of the implementation and not the effectiveness of the completed action plans, which may be assessed in a future audit.

Code Compliance Administration (CCA) is continuing to work through the process of completing all the corrective action plans. Five of the findings were assessed as “Open”, which means that they are in progress. The other two findings were assessed as “partially complete” which means some actions have been completed, while other related actions are in progress. Management has indicated that all action plans will be completed by Q3 of 2023. We will follow up after that date to verify the completion.

Finding No.	Report Finding	Status of Management Action Plans
1	Standard Operating Procedures and Administrative Procedures Have Not Been Updated.	Open
2	Performance Measures for Complaint Case Activities Need to be Established and Implemented.	Partially Complete
3	Priority Levels Assigned to Cases Did Not Align with Standard Operating Procedures.	Open
4	Inspections Were Not Performed Within the Required Timelines.	Open
5	Documentation to Support Field Investigations Was Missing from the Hansen Application Files.	Open
6	Systems and Processes for Sharing Case Data Between the Courts and CCA Need Improvement.	Open
7	Website Access and Accuracy for Code Compliance Administration Needs Improvement.	Partially Complete

Please contact me if you require additional information.

Sincerely,



Lavois Campbell, CIA, CFE, CISA, CGA

Chief Audit Executive

Attachment: Audit Findings Status Update Form

cc: Michael L. Thurmond, Chief Executive Officer
Robert Patrick, Board of Commissioners District 1
Michelle Long-Spears, Board of Commissioners District 2
Larry Johnson, Board of Commissioners District 3
Steve Bradshaw, Board of Commissioners District 4
Mereda Davis Johnson, Board of Commissioners District 5
Ted Terry, Board of Commissioners District 6
Lorraine Cochran-Johnson, Board of Commissioners District 7
Lisa Earls, Chairperson, Audit Oversight Committee
Gloria Gray, Vice-Chairperson, Audit Oversight Committee
Tanja Christine Boyd-Witherspoon, Chairperson Pro-Tem, Audit Oversight Committee
Adrienne T. McMillion, Audit Oversight Committee
Harold Smith, Jr., Audit Oversight Committee

Information Distribution:

Zachary L. Williams, Chief Operating Officer/ Executive Assistant
Vivian Ernstes, County Attorney
La'Keitha D. Carlos, CEO's Chief of Staff
Kwasi K. Obeng, Chief of Staff, Board of Commissioners

Dekalb County Government

Office of Independent Internal Audit

Date: July 5, 2023 **Prepared by:** A. Pogue

Audit Findings Status Update Form

Report #		Report Title	
2019-010-CE		Code Compliance Administration Audit	
Contact Person	Title	Phone No.	Email Address
Timothy C. Hardy	Deputy Director	404-687-3469	tchardy@dekalbcountyga.gov
Activity	Accountability	Schedule	
Code Compliance Administration	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Code Compliance Administration	Yes	3rd Quarter 2023
Finding		Finding Detail	
No.	1		
Date	3/11/22		
Finding Title		STANDARD OPERATING PROCEDURES AND ADMINISTRATIVE PROCEDURES HAVE NOT BEEN	
Recommendations		We recommend that Code Complainece Adminstration (CCA) management review CCA's standard operating procedures (SOP)'s and administrative policies and procedures prior to the implementation of the application upgrades to ensure issues noted in the prior audit and this audit will be included in the updates. We also recommend that management consider alternative measures to ensure needed policies, procedures, and guidance for staff are in place if the upgrade of the Hansen application is not implemented within the next	
Management Response		Agree. The CCA has been operating inadequate legacy systems for over a decade, which has restricted their ability to adopt revised SOPs. The CCA is currently collaborating with DoIT and all key stakeholders to modernize the software platform and integrate three systems into one. The SOPs will incorporate revised business processes and the technology that enables them. The current draft SOPs will be revised and adopted after the new system has been implemented.	
OIIA Assessment of Status		Management Provided Status Update	
<input checked="" type="checkbox"/>	Open	We continue to work on the SOPs and feel confident they will be completed once we know the limitations of the new field inspection tool and the level of information sharing between CCA and the DeKalb Magistrate Court. Once the integration is completed, field inspection policies and protocols will be updated. However in order to receive a large enough sample size, it will take about 60 days after go-live takes place to determine the system's efficiency.	
<input type="checkbox"/>	Management/Agency Assumes Risk		
<input type="checkbox"/>	Partially Complete		
<input type="checkbox"/>	Complete Pending Verification by OIIA		
<input type="checkbox"/>	Closed		

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Code Compliance Administration		Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
		Code Compliance Administration	No	3rd Quarter 2023
Finding		Finding Detail		
No.	2			
Date	3/11/22			
Finding Title		PERFORMANCE MEASURES FOR COMPLAINT CASE ACTIVITIES NEED TO BE ESTABLISHED AND IMPLEMENTED.		
Recommendations		<p>We recommend that prior to the implementation of the Hansen application upgrades CCA management review their processes and operations to:</p> <ul style="list-style-type: none"> • Implement a process to clean up older cases within the application prior to implementing application upgrades. • Develop specific performance measures for code enforcement activities as well as specific individual performance expectations for each of the officers to help assess operational efficiency and achievement of divisional goals and objectives. • Develop procedures for monitoring and reviewing performance results so that operational deficiencies can be identified in a timely manner and action plans can be developed to address the problems noted. 		
Management Response		<p>Agree. The CCA, in collaboration with the Law Department and other stakeholders, is reviewing and documenting the process to ensure that the case system is accurate when the new system has been implemented. The SOPs that are adopted after the new system is implemented will incorporate performance measures that are based on industry best practices and in alignment with the county, department, and division goals and objectives. These will also be tied into the annual employee evaluation process to ensure performance expectations are identified and managed.</p>		
OIIA Assessment of Status		Management Provided Status Update		
<input type="checkbox"/>	Open	<p>It was determined by the Law Department that for misdemeanors and code violations, the statute of limitations period is two years. To comply with the statute of limitations, the Code Compliance Administration must issue a citation within two years of the date the County becomes aware of the violation . Unfortunately, no citation was issued for the old cases within the two year limit, therefore the DeKalb County Solicitor General’s office cannot successfully obtain a conviction for the violation and the cases had to be closed out. Test scripts and required parameters were developed on 04/20/23 to close cases that exceeded the statute limitation period. The file clean up was scheduled for April 26, 2023. A significant number of cases have since been cleaned up/closed in the current system. CCA also plans to implement Key Performance Measures (KPIs) and other specific performance measures later this year, with the implementation of the new system.</p>		
<input type="checkbox"/>	Management/Agency Assumes Risk			
<input checked="" type="checkbox"/>	Partially Complete			
<input type="checkbox"/>	Complete Pending Verification by OIIA			
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Code Compliance Administration	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Code Compliance Administration	No	3rd Quarter 2023
Finding		Finding Detail	
No.	3		
Date	3/11/22		
Finding Title		PRIORITY LEVELS ASSIGNED TO CASES DID NOT ALIGN WITH STANDARD OPERATING PROCEDURES.	
Recommendations		We recommend that CCA management review the business model and SOP's, and the priority levels provided in the Hansen application to ensure that they are aligned with expectations and division goals.	
Management Response		Agree. One of the deficiencies of the legacy system that the CCA is using is its inability to align priority levels. The vendor has advised that these issues will be resolved with the system upgrade that is in progress. Once the system is implemented, the CCA leadership will be able to manage and monitor alignment with SOPs.	
OIIA Assessment of Status		Management Provided Status Update	
<input checked="" type="checkbox"/>	Open	This has been one of the top 3-4 priorities in the application development. Because we have been so deliberate about aligning the priority levels the IPS developer has been re-directed on more than one occasion because he did not understand our requirements. These discrepancies are in part responsible for the slight delay in the implementation process. The Hansen/IPS system does not have the capabilities to assign priority levels, but management anticipates that the new system will be able to. Once the implementation occurs, Survey 123 will be eventually phased out and CCA will have a more realistic date to finalize testing.	
<input type="checkbox"/>	Management/Agency Assumes Risk		
<input type="checkbox"/>	Partially Complete		
<input type="checkbox"/>	Complete Pending Verification by OIIA		
<input type="checkbox"/>	Closed		

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Code Compliance Administration	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Code Compliance Administration	Yes	3rd Quarter 2023
Finding		Finding Detail	
No.	4		
Date	3/11/22		
Finding Title		INSPECTIONS WERE NOT PERFORMED WITHIN THE REQUIRED TIMELINES.	
Recommendations		<p>We recommend that CCA management:</p> <ul style="list-style-type: none"> Review timelines outlined in SOP's and administrative policies and procedures and update procedures to ensure response times align with performance measures. Implement monitoring procedures to help ensure inspection activity occurs as required by SOP's and to help resolve issues related to the timeliness of inspections when they arise. 	
Management Response		<p>Agree. After the system is upgraded and the SOPs have been revised and adopted, the CCA leadership will have the tools in place to ensure that response times and other inspection and code compliance functions are tied to key performance indicators (KPIs). This will ensure that the CCA can manage people and processes in alignment with administrative policies and procedures.</p>	
OIIA Assessment of Status		Management Provided Status Update	
X	Open	<p>The time lines are currently in draft form and will be re-evaluated 60 days after go live date to allow for a large enough sample size of data related to time to inspect. CCA plans to utilize a report to track an average response time for initial inspections with a goal for each inspector to average a 3-5 day turnaround timeframe. Once the new system is implemented, Survey 123 will be phased out and it will become a real-time inspection timeframe when reports are submitted into IPS.</p>	
	Management/Agency Assumes Risk		
	Partially Complete		
	Complete Pending Verification by OIIA		
	Closed		

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		Code Compliance Administration	No	3rd Quarter 2023
Finding		Finding Detail		
No.	5			
Date	3/11/22			
Finding Title		DOCUMENTATION TO SUPPORT FIELD INVESTIGATIONS WAS MISSING FROM THE HANSEN APPLICATION FILES.		
Recommendations		<p>We recommend that CCA management:</p> <ul style="list-style-type: none"> • Implement monitoring and supervisory oversight procedures to ensure appropriate evidence is maintained to support case closures. • Provide training to staff members regarding the preparation and retention of documentation needed to evidence case activities and statuses. <p>Enhance the existing case management system to ensure enforcement activities and documentation are captured within a single system to minimize discrepancies.</p>		
Management Response		<p>Agree. The legacy system did not have automated or integrated field investigation capabilities to effectively support associated processes. As the CCA moves forward this will be resolved by providing CCA staff with the ability to upload documents, photos and electronically submit e-citations in real time utilizing the new system. The revised SOPs will be developed with supporting oversight procedures to ensure that evidence and documentation supports case closure.</p> <p>Staff training has been included in the software upgrade implementation plan, and ongoing training will be provided to staff as needs dictate. The new system being implemented will have all appropriate integrations, eliminating manual entries and discrepancies. Residents will benefit by having greater transparency and access to their case. They will be able to submit complaints and track the case status with relevant documentation and photos that can be submitted online in real-time.</p>		
OIIA Assessment of Status		Management Provided Status Update		
<input checked="" type="checkbox"/>	Open	A 15 day supervisory monitoring system and a 25 day management/director's escalation procedure will be directed once the single system case management system is in place. There will be a three part training process: Train the trainer, Back Office training for preparation and retention, and training of front line field staff by our super users. Supervisors will run reports every 15-days and officers will provide a status report/explanation. The purpose of the reports will be to look at any gaps between the inspection, re-inspection and the resolution in order to take action.		
<input type="checkbox"/>	Management/Agency Assumes Risk			
<input type="checkbox"/>	Partially Complete			
<input type="checkbox"/>	Complete Pending Verification by OIIA			
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	Code Compliance Administration	No	3rd Quarter 2023
Finding		Finding Detail	
No.	6		
Date	3/11/22		
Finding Title		SYSTEMS AND PROCESSES FOR SHARING CASE DATA BETWEEN THE COURTS AND CCA NEED IMPROVEMENT.	
Recommendations		We recommend that CCA management continue to work with the Courts to improve the integration of electronic systems and implement procedures to help ensure timely sharing and follow-up on case information. This will help ensure CCA case records are current.	
Management Response		Agree. The CCA has an excellent working relationship with the court system. However, as stated above, the challenge is the lack of electronic systems integration and the manual processes that are required in order to transmit/share data. The legacy system does not allow for automated collaboration between the courts and the CCA. Currently, citations are delivered by hand to the Magistrate Court. The new system will allow for a two-way integration that allows for automatic transmittal of citations to the court and the passing back of case dispositions to the CCA electronically as well.	
OIIA Assessment of Status		Management Provided Status Update	
<input checked="" type="checkbox"/>	Open	The court (PTSG- Bench Mark) system interfaces with IPS (Hansen) is the other priorities we are focused on to complete the application roll-out. No later than end of 3rd quarter 2023. Once CCA verifies that the system is fully operational, they will provide a go-live date.	
<input type="checkbox"/>	Management/Agency Assumes Risk		
<input type="checkbox"/>	Partially Complete		
<input type="checkbox"/>	Complete Pending Verification by OIIA		
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Code Compliance Administration		Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
		Code Compliance Administration	Yes	2nd Quarter 2023
Finding		Finding Detail		
No.	7			
Date	3/11/22			
Finding Title		WEBSITE ACCESS AND ACCURACY FOR CODE COMPLIANCE ADMINISTRATION NEEDS IMPROVEMENT.		
Recommendations		<p>We recommend that CCA management update the website to ensure the following:</p> <ul style="list-style-type: none"> • There is a direct and consistent link to reach CCA information • Information on the website is accurate, reliable, and complete. • The status of service requests and cases is easy to determine. 		
Management Response		<p>Agree. The CCA has hired a consultant to update the website. This effort is a collaboration among the CCA, the CEO's Office of Communications, and DoIT. Information on this website will be accurate, reliable, and complete, and will be designed to highlight the new citizen portal that will provide real-time access to create a service request, add relevant documentation and photographs, update the request, and monitor the request through closure.</p>		
OIIA Assessment of Status		Management Provided Status Update		
<input type="checkbox"/>	Open	<p>We have completed approximately 50% of the website content but have been delayed because additional information is now required to cover additional enforcement responsibilities. Specifically the newly passed VSS ordinance. We have also been informed that the link between our web site and the Rhythm for Civics portal for case status updates will be delayed because of system limitations. Once their recommendations are approved, the website will be updated with additional enhancements. All other web site updates are to be completed by the end of 2nd quarter 2023.</p>		
<input type="checkbox"/>	Management/Agency Assumes Risk			
<input checked="" type="checkbox"/>	Partially Complete			
<input type="checkbox"/>	Complete Pending Verification by OIIA			
<input type="checkbox"/>	Closed			