

The Bureau of Fire Prevention Must Strengthen Ethical Policies, Controls Over Inspection, and Data Capabilities

San Francisco Fire Department



Why it Matters

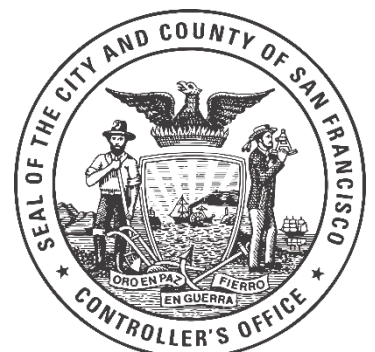
The Bureau of Fire Prevention has ethical and operational weaknesses, including the absence of formal ethics policies, the fear of retaliation among inspectors, and data management issues. A strong ethical culture cannot be assumed; it requires clear leadership, policies, and training. Missed or delayed fire inspections threaten public safety. Improving data quality and processes is essential to ensure timely inspections and address operational barriers.



Prepared by

**OFFICE OF THE CONTROLLER
CITY SERVICES AUDITOR**

December 18, 2024



About the Controller's Office

The Controller is the chief financial officer and auditor for the City and County of San Francisco. We produce regular reports on the City's financial condition, economic condition, and the performance of City government. We strive to be a model for good government and to make the City a better place to live and work.

About the Audits Division

The City Services Auditor (CSA) was created in the Office of the Controller through an amendment to the Charter of the City and County of San Francisco (City) that voters approved in 2003. Within CSA, the Audits Division ensures the City's financial integrity and promotes efficient, effective, and accountable government by:

- Conducting performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of service delivery and business processes.
- Investigating reports received through its whistleblower hotline of fraud, waste, and abuse of city resources.
- Providing actionable recommendations to city leaders to promote and enhance accountability and improve the overall performance and efficiency of city government.

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AUDIT AUTHORITY

This audit was conducted under the authority of the San Francisco Charter, Section 3.105 and Appendix F, which requires that CSA conduct periodic, comprehensive financial and performance audits of city departments, services, and activities.

STATEMENT OF AUDITING STANDARDS

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). 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 the findings and conclusions based on our audit objectives. The Audits Division is independent per GAGAS requirements for internal auditors.



OFFICE OF THE CONTROLLER

CITY AND COUNTY OF SAN FRANCISCO

Greg Wagner
Controller
ChiaYu Ma
Deputy Controller

December 18, 2024

San Francisco Fire Commission
San Francisco Fire Department
698 Second Street
San Francisco, CA 94107

Chief Sandra Tong
San Francisco Fire Department
698 Second Street
San Francisco, CA 94107

Dear Commissioners and Chief Tong:

The Office of the Controller (Controller), City Services Auditor (CSA), Audits Division, presents our report on our audit of the San Francisco Fire Department's Bureau of Fire Prevention (Bureau). The audit's objective was to determine whether the Bureau performed its inspections in accordance with state and city law and best practices regarding ethical standards, in a timely manner, and with proper documentation, and whether the inspections were equitably distributed. This audit was initiated in May 2019, before the mayor's COVID-19 emergency proclamation, and focused on inspections performed between fiscal years 2016-17 through 2018-19.¹

The audit concluded that the Bureau:

- Has an ethical culture with weaknesses that increase the opportunity for unethical behavior by inspectors and the likelihood of any ethical violations going undetected.
- Does not have a complete list of all schools in San Francisco, resulting in missed school inspections.
- In fiscal year 2017-18 did not complete all annual school inspections included in the Bureau's inspections system and required by the California Health and Safety Code.
- Does not capture minor corrections observed during inspections because inspectors do not document their verbal warnings, resulting in the corrections not being tracked.
- Does not effectively collect inspections data that would allow division leadership to understand division performance and make data-driven decisions.

The report includes 10 recommendations for the San Francisco Fire Department to improve the Bureau's inspection-related controls and practices and the ethical culture in the Bureau. Your department's response is attached as Appendix D. We will work with your department to follow up every six months on the status of the open recommendations made in this report.

¹ The selected audit period provides a more accurate representation of Bureau's inspection practices because the COVID-19 emergency and proclamations greatly affected the Bureau's inspections when buildings, schools, and businesses were fully or partially closed for most of 2020 and 2021.

CSA appreciates the assistance and cooperation of all staff involved in this audit. For questions about the report, please contact me at mark.p.delarosa@sfgov.org or 415-554-7574 or CSA at 415-554-7469.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mark de la Rosa', with a long horizontal flourish extending to the right.

Mark de la Rosa
Director of Audits

cc: Board of Supervisors
Budget Analyst
Citizens Audit Review Board
City Attorney
Civil Grand Jury
Mayor
Public Library

Executive Summary

The audit assessed whether the San Francisco Fire Department (Fire Department) and its Bureau of Fire Prevention (Bureau) has an effective ethical culture and performed building fire safety inspections completely and timely.

Why It Matters

A strong ethical culture cannot be assumed to exist in a fire safety inspection organization. Rather, it requires leadership to prioritize and clearly communicate its ethical expectations of staff through policy and training. Fire inspections are a necessary safety measure and missed or severely delayed inspections threaten life and safety of people who live and work in San Francisco. Ensuring inspections happen relies on strong processes for balancing workload across inspectors, identifying barriers to completing inspections on time such as inefficient routing and repeat violations even for minor problems. However, the Fire Department needs to improve the quality of its data before it can identify and address such barriers.

| Strengthen ethical culture. | Improve data quality. |
|--|---|
| <div data-bbox="151 982 282 1115"> </div> <p>44% of surveyed inspectors fear retaliation from the Bureau or department leadership if they report unethical behavior.</p> <div data-bbox="151 1297 370 1455"> </div> <p>The department's <i>Statement of Incompatible Activities</i> allows broad exceptions to give preferential treatment to employees' extended families.</p> <p>Best practices call for written policy to set ethics expectations and ongoing ethics training. The Bureau has neither.</p> | <p>Better quality data would prevent missed inspections and allow for data-driven improvements for improving processes and identifying barriers to completing all inspections on time.</p> <div data-bbox="841 1182 959 1276"> </div> <p>The Bureau's list of schools was incomplete and <i>missing 26</i> schools.</p> <p>Scheduled inspection dates are deleted from the Bureau's database and reason(s) for inspection delays cannot be easily identified to make data-driven decisions.</p> <div data-bbox="1304 1310 1438 1455"> </div> |
| Missed and delayed inspections. | |
| <div data-bbox="167 1577 423 1843"> </div> <p>95 missed 164 complete</p> <p>The Bureau did not conduct 95 required annual school inspections in fiscal year 2017-18.</p> | <p>Delayed follow-up inspections for operational permits. 31 (76 percent) of the 41 permit inspections reviewed were completed within the department's stated 18 months goal and the remaining 10 (24 percent) took 19-22 months to complete. These follow-up inspections are to ensure ongoing safe operations for businesses with specific hazards like flammable liquids.</p> |

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Glossary

| | |
|--------------------|--|
| Bureau | Bureau of Fire Prevention of the San Francisco Fire Department |
| City | City and County of San Francisco |
| Controller | Office of the Controller |
| CFSTES | California Fire Service Training and Education System, a Division of the California Office of the State Fire Marshal |
| CSA | City Services Auditor, Audits Division |
| Fire Code | San Francisco Fire Code |
| Fire Commission | San Francisco Fire Commission |
| Fire Department | San Francisco Fire Department |
| FPS | Fire Prevention Tracking System |
| IAFC | International Association of Fire Chiefs |
| ICC | International Code Council |
| NFPA | National Fire Protection Association |
| OSHA | Occupational Safety and Health Administration |
| SFO | San Francisco International Airport |
| SIA | Statement of Incompatible Activities |
| State Fire Marshal | California Office of the State Fire Marshal |

Introduction

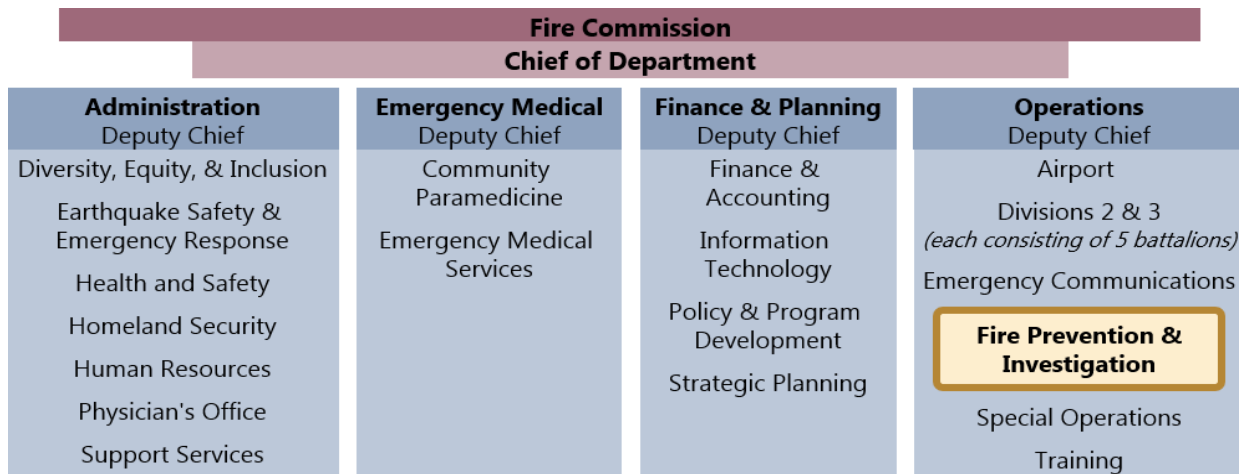
BACKGROUND

The San Francisco Fire Department (Fire Department) was established in 1866. Its mission is to:

- Protect lives and property from hazards requiring a rapid and skilled response including fires, natural disasters, accidents, and hazardous materials incidents.
- Serve the needs of its most vulnerable residents through community paramedicine and save lives with emergency medical services.
- Prevent harm through education programs by hosting Community Safety Fairs throughout the year and providing safety resources and information to the public to maximize awareness to prevent and, if necessary, survive major fires.
- Provide a work environment to its employees that is free from harassment and discrimination and that values health, wellness, cultural diversity, and equity.

The San Francisco Fire Commission (Fire Commission) oversees the Fire Department and is responsible for ensuring it effectively implements its mission. The department has a budget of \$494.9 million for fiscal year 2023-24, \$25.8 million of which is allocated to the Fire Prevention and Investigation Division. The chief heads the department and is supported by four deputies overseeing different areas of operations, as shown in Exhibit 1.

Exhibit 1: This audit’s scope is the Bureau of Fire Prevention, which is in the department’s Division of Fire Prevention and Investigation



Source: Fire Department organizational chart

Division of Fire Prevention and Investigation

The Division of Fire Prevention and Investigation enforces state and local fire codes through building inspections and plan reviews, investigates the origin and cause of all fire incidents and explosions, and provides community outreach to increase fire safety awareness.

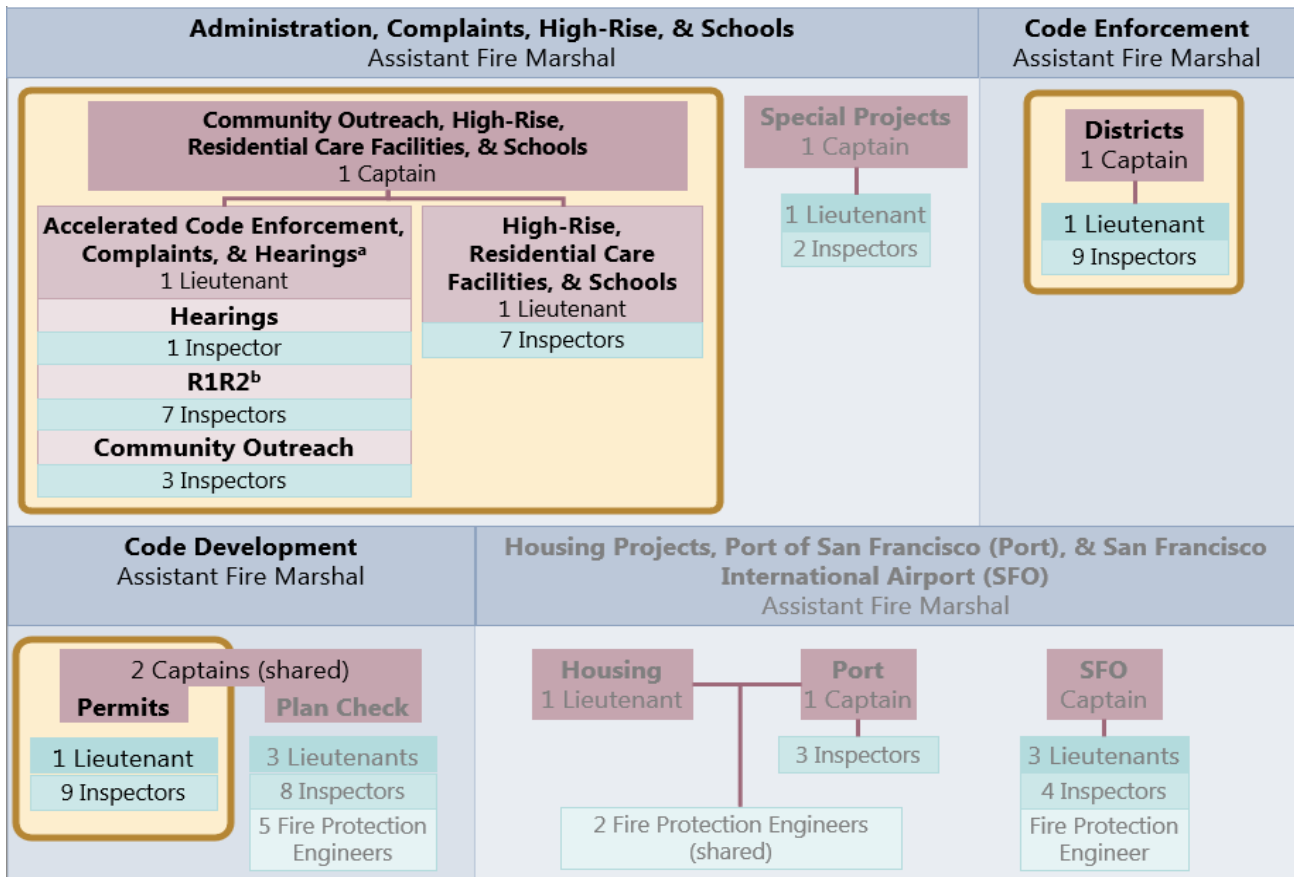
The division consists of the Bureau of Fire Prevention and Bureau of Fire Investigation.

| Bureau of Fire Prevention | Bureau of Fire Investigation |
|--|--|
| Enforces fire codes through building inspection and plan review. | Investigates and testifies on the cause of fire incidents and explosions. |
| <u>Budget (fiscal year):</u> 2018-19 - \$19.5 million 2023-24 - \$22.6 million | <u>Budget (fiscal year):</u> 2018-19 - \$2.4 million 2023-24 - \$3.2 million |

Exhibit 2 shows the organizational structure of the Division of Fire Prevention and Investigation which is separated into four operating groups, each headed by an assistant fire marshal. The Bureau of Fire Investigation is within the Code Enforcement operating group. This audit focuses on the sections of the Bureau of Fire Prevention (Bureau) that conduct inspections, as shown in yellow boxes in Exhibit 2. According to bureau leadership, these three sections conduct fire safety inspections of a wide variety of facilities and events including:

- Certain business operations and special events that require permits
- Fire complaints and violations
- High-rise buildings
- New construction and remodels
- Places of assembly
- Residential care facilities
- Schools

Exhibit 2: The audit focuses on three sections in the Bureau of Fire Prevention that perform fire inspections



Notes: Sections in bold, yellow boxes are within audit scope. Chart excludes administrative positions and one vacant position.

^a Hearings, R1R2, and Community Outreach also handle complaints.

^b R1 are residential occupancies containing sleeping units where occupants are primarily transient in nature. R2 are residential occupancies containing sleeping units or more than two dwelling units where the occupants are primarily permanent in nature.

Source: Fire Department fiscal year 2022-23 organizational chart

Business Operational and Special Event Permit Inspections

According to the Bureau, it issues two types of permits:

- **Operational permit** - Allows permit holder to conduct activities in a building, such as vehicle repair garages and places of assembly.
- **Temporary permit** - Allows permit holder to hold special events, such as weddings or street fairs.

The Bureau states it aims to inspect operational permits at least every 18 months, whereas temporary permits are time-sensitive and generally require the venue to be inspected the day before or the day of an event. Certain aspects of testing fire equipment at a business

such as fire alarms requires the inspector to work outside of regular business hours to test fire alarms. Before approving a permit, the Bureau must inspect and approve any premises (buildings and/or areas), storage spaces, vehicles, and devices the permit applicant will use.

Fire Complaints and Violations

| Violation Categories | |
|-------------------------------------|------------------------------------|
| Priority | Standard |
| Immediate threat to life and safety | No immediate threat |
| 1 to 3, up to 7, days to correct | 1 to 14, up to 30, days to correct |

According to the Bureau, besides regular inspections, it also responds to complaints received through phone calls, emails, 311 referrals, and those referred by other divisions of the department. Also, inspectors review all complaints received and, when appropriate, issue notices of violation.

The San Francisco Fire Code (Fire Code) categorizes violations as either standard or priority. Standard violations are for conditions that do not present an immediate threat to life or safety and usually must be corrected within 14 days, but the period can be extended to a maximum of 30 days on a case-by-case basis. In contrast, priority violations, such as those related to fire alarms, exit clearances, blocked exits, or sprinklers, require immediate attention. According to the Bureau, the property owner must repair or begin to repair the identified issue(s) within 72 hours of the issuance of the Notice of Violation for priority violations, but the period can be extended to 7 days on a case-by-case basis.

High-Rise Inspections

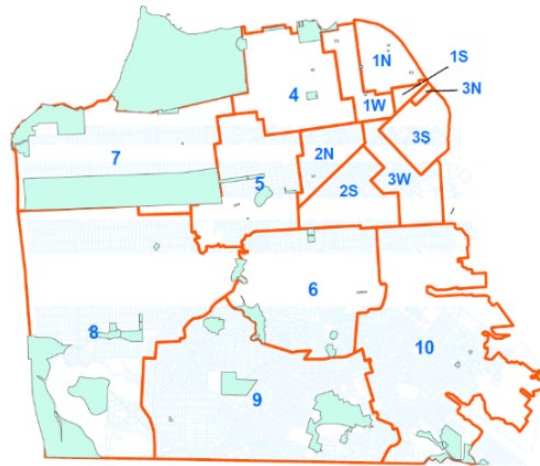
A high-rise structure has an occupiable 75 feet or more above ground level. Under state law, either the California Office of the State Fire Marshal (State Fire Marshal) or a local fire department must inspect high-rise structures annually.² The Bureau inspects 630 high-rise buildings in San Francisco each year on behalf of the State Fire Marshal. For providing this service, the state reimburses the department at the rate of \$13.93 per 1,000 square feet of floor area inspected. The budgeted revenue for this service is \$2.2 million for fiscal year 2023-24.

New Construction and Remodel Inspections

District inspectors are assigned to specific districts, as shown in Exhibit 3. They inspect new and continuing construction that requires a fire permit as part of the permit process.

² California Health and Safety Code, Section 13217.

Exhibit 3: Bureau of Fire Prevention district inspector assignment map



Note: Districts 1 and 3 are divided into North, South, and West (denoted by N, S, and W) and District 2 is divided into North and South (denoted by N and S).

Source: Fire Department

Place of Assembly Inspections

According to the Bureau, district inspectors are also responsible for annual “place of assembly” inspections, such as restaurants or bars with capacity for 50 or more people, and other sites that may be used as event venues.

Residential Care Facility and School Inspections

The Bureau inspects community care, residential, and childcare facilities as part of the licensing process.³ The California Building Code categorizes childcare facilities as Group E when the buildings or structures or portions thereof are occupied by more than six children 36 months of age and older who receive educational, supervision, or personal care services for fewer than 24 hours per day. The Fire Code defines Group E as schools and requires them to register with the Bureau before occupancy. State law also requires the Bureau to annually inspect every building used as a public or private school.⁴

³ California Health and Safety Code, Section 1502, defines a community care facility as any facility, place, or building that is maintained and operated to provide nonmedical residential care, day treatment, adult daycare, or foster family agency services for children, adults, or children and adults, including, but not limited to physically handicapped, mentally impaired, incompetent persons, and abused or neglected children. It defines a residential facility as any family home, group care facility, or similar facility determined by the California Department of Social Services, for 24-hour nonmedical care of persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual. Section 1596.750 defines a childcare facility as one that provides nonmedical care to children under 18 years of age in need of personal services, supervision, or assistance for sustaining activities of daily living or protection of the individual on less than a 24-hour per day basis.

⁴ California Health and Safety Code, Section 13146.3.

OBJECTIVE

The audit's objectives were to assess the effectiveness of the controls, practices, and ethical culture of the Bureau in conducting inspections. Specifically, the audit evaluated whether inspections are:

- Performed in accordance with state and city law and best practices regarding the **ethical standards** that should be applied to public employees who perform safety inspections.
- Performed **in a timely manner**, properly documented, and coordinated with any other relevant city department(s).
- **Equitably distributed** to ensure that no area of San Francisco is underserved.

SCOPE AND METHODOLOGY

The audit focused on inspections performed by three sections of the Bureau during fiscal years 2016-17 through 2018-19 and laws, rules, and policies and procedures that applied during this period. The three sections inspect the following five areas:

- Complaints
- District Inspectors (construction and places of assembly)
- High-Rise
- Permits (operational and temporary)
- Schools

The audit was initiated in May 2019, before the mayor's COVID-19 emergency proclamation on February 25, 2020. The audit's completion was delayed as the entire City and County of San Francisco (City) shifted to emergency response activities. According to the Bureau, the COVID-19 emergency greatly affected the department's inspections, as delays and pauses were appropriate when many buildings, schools, and businesses were fully or partially closed for much of 2020 and 2021 and inspectors were assigned other disaster response duties. In April 2024 we met with the Bureau to assess its current control environment and confirmed that the findings and recommendations in this report are still relevant.

To conduct the audit, we:

- Reviewed relevant laws and regulations, policies and procedures, prior audit reports, best practices from other jurisdictions, fire inspector certification requirements from 30 San Francisco Bay Area fire prevention agencies, the Fire

Code, and National Fire Protection Association (NFPA) standards.

- Interviewed staff of the Ethics Commission and Bureau in the Complaints, Districts, High-Rise, Permits, and Schools sections.
- Conducted ride-alongs with inspectors from the Districts, Permits, and High-Rise sections to observe inspections firsthand.
- Received inspections data maintained by the Bureau from January 1, 2009 through December 27, 2019, and analyzed inspections between January 1, 2017 through December 27, 2019, to determine whether inspections were performed on time and equitably throughout the City.⁵
 - ◆ We randomly sampled 41 of the 689 number of permits with annual permit inspections⁶ in calendar year 2017 and 2019, but not in 2018.
 - ◆ Tested 77 schools with annual school inspections in fiscal year 2016-17 and 2018-19, but not in fiscal year 2017-18.
 - ◆ Compared school addresses in California Department of Education's 2019 School Directory to addresses in the Bureau's inspection system with annual school inspections to verify completeness of Bureau data.
 - ◆ Compared the number of annual high-rise inspections in fiscal years 2016-17 through 2018-19 to determine whether all inspections were completed.
- Conducted an ethical climate survey sent to all captains, lieutenants, and inspectors in the Bureau to assess its ethical policies and procedures, ethical culture, and ethics training.
- Surveyed 18 other fire departments in the United States with a fire prevention or inspection division regarding their ethical policies, procedures, and training requirements.

⁵ We did not perform analysis for fire complaints, new construction, and remodels because, according to the Bureau, complaints have no deadlines or annual inspections and schedule of new construction and remodel inspections are dependent on contractors.

⁶ Data falls under the "annual permit inspection" category, including places of assembly, but according to bureau leadership, there is no legal requirement for the Bureau to inspect permits annually and its internal goal is at least every 18 months.

Chapter 1 - Assuming Inspectors Behave Ethically, the Fire Department Has Not Adopted Best Practices for Nurturing a Strong Ethical Culture

The Bureau of Fire Prevention (Bureau) has no written policies or procedures that define ethical behavior, expectations for inspector conduct, or how to report unethical behavior. Despite best practices requiring written policy in these areas, the Bureau's leaders believe the Bureau has a strong ethical culture. However, some inspectors do not feel leadership values or rewards ethical behavior and fears retaliation for reporting unethical behavior. In the absence of any other written ethics policy, the Fire Department's Statement of Incompatible Activities (SIA) is the Bureau's main guidance regarding conflicts of interest, and the Bureau reports that it relies on the SIA. However, the SIA contains exceptions for Bureau employees and their family members, which weakens its aim to prevent conflicts of interest that could compromise a fire safety inspection. Bureau leadership states it communicates ethics expectations verbally, but the Bureau has no ethics training requirements for its inspectors.

Finding 1 - The Bureau's ethical culture has weaknesses that increase the opportunity for unethical behavior and the likelihood of any ethical violations going undetected.

Ethical Conduct

includes being honest, doing "what's right," and performing to the best of one's ability.

Codes of Ethics

establish criteria that encourage fire service personnel to promote a culture of ethical integrity and high standards of professionalism. A code of ethics typically includes a list of activities or behaviors that define and detail the expectations of ethical conduct.

Establishing a strong ethical culture is an essential part of good governance. According to the National Association of State Boards of Accountancy Center for the Public Trust, "ethical culture" is a concept that integrates two distinct systems, ethical culture and ethical climate. Ethical culture is how an organization demonstrates and teaches the extent to which it regards its values. Ethical climate is concerned with the "collective personality" of the organization and particularly focuses on ethics-related attitudes, perceptions, and decision-making process in an organization.

Federal standards state that, to strengthen an organization's ethical culture, management should demonstrate a commitment to integrity and ethical values by setting the tone at the top, implementing standards of conduct, and ensuring adherence to standards of conduct. "Tone at the top" refers to the ethical atmosphere that is created in the workplace by the organization's leadership.

The Bureau of Fire Prevention’s tone at the top does not demonstrate that leadership values ethics or responds to reports of ethical violations.

Based on interviews with bureau leadership and inspectors, there seems to be a strong ethical culture in the division due primarily to the nature of the work performed by all fire personnel, which focuses on protecting life and safety. Bureau leadership stated that they expect inspectors to know what is considered a conflict of interest and disclosure of such conflicts are on a voluntary basis. However, bureau leadership’s reliance on the personal integrity of its inspectors to intrinsically know and apply ethical principles has caused a less-than-ideal ethical culture that is evident in the fear of retaliation reported by a significant proportion of inspectors who responded to our survey. Bureau leadership state they expect and encourage their inspectors to follow the chain of command to report if they witness any fraudulent or allegations of fraudulent activities, including unethical behavior. However, 40 percent of inspectors surveyed expressed concerns about retaliation from peers and 44 percent about retaliation from leadership and 50 percent do not feel leadership values or rewards ethical behavior, as shown in Exhibit 4.

Exhibit 4: Some inspectors fear retaliation if they were to report unethical behavior

Although 69 percent of Bureau of Fire Prevention inspectors think leaders encourage ethical behavior, 44 percent thought retaliation was possible if they report unethical behavior.



Source: CSA analysis of survey of San Francisco Fire Department Bureau of Fire Prevention employees. See [Appendix A](#) for full survey results.

Despite a strong belief that their work is important to life and safety, firefighters and inspectors can still demonstrate unethical behavior.

Disturbing headlines from around the country in the last decade report that some fire inspectors perform their job duties unethically. In 2016 a fire marshal in Phoenix, Arizona, *accepted a check* for \$100,000 from a business owner who had failed an inspection 11 months earlier.⁷ The check was a donation to a nonprofit organization the fire marshal volunteered for, his wife worked for, and his son received a scholarship from. In the same year, a deputy chief with the City of Los Angeles Fire Department claimed he was pushed out in *retaliation* for exposing fraud, extortion, and overtime schemes among the units charged with enforcing fire safety codes at apartment buildings, schools, hospitals, and film shoots.⁸ In 2020 the Washington State Auditor found that a City of Everett fire inspector had *stolen* pay for hundreds of hours reported as work but that were spent on vacation or for which there was no record of attendance.⁹ In 2024 two Fire Department of New York chiefs were put on modified assignment after they were accused of *taking bribes* to fast-track safety inspections.¹⁰

The detrimental impact of unethical behavior by inspectors reflects not just on those individuals but on their departments as a whole.

A damaged reputation might cause property owners and permit holders not to take their fire inspections, and the necessary corrections they expose, seriously. Inspectors that claim to work, but do not, like the Washington fire inspector discussed above, may fake their work hours by signing off on inspections they did not conduct, increasing the chance that life-threatening fire code violations will go unaddressed. Inspectors may intentionally overlook violations in exchange for bribes, which puts not just building owners and permit holders at risk, but also those with homes and businesses nearby. By establishing a strong ethical culture, the Bureau can reduce the risk of such incidents occurring, while also protecting the reputation of the department if such instances were to occur. A strong ethical culture cannot be assumed to exist in a fire safety inspection

⁷ Halloran, Wendy. (2016, June 14). *Phoenix fire marshal demoted for violating ethics policy*. Phoenix Channel 12 News. www.12news.com.

⁸ Welsh, Ben. (2016, Sep. 27). *Ousted L.A. fire marshal claims corruption among city fire inspectors*. Los Angeles Times. www.latimes.com.

⁹ Office of the Washington State Auditor. *Fraud Investigation Report City of Everett*. Olympia, Washington, 2020. Report No. 1027153.

¹⁰ Rashbaum, William K., and Rothfeld, Michael. (2024, Feb. 15). *F.B.I. Searches Homes of Fire Dept. Chiefs in Corruption Investigation*. New York Times. www.nytimes.com.

organization. Rather, it requires leadership to prioritize such a culture and clearly communicate its ethical expectations of staff, including that unethical behavior is unacceptable and, if proven to have occurred, can result in employee discipline or termination.

To create a strong ethical culture in the Bureau of Fire Prevention, best practices require established standards and ongoing training.

Federal guidance for ethical frameworks states that an organization should establish policies to assess and detect unethical behavior and wrongdoing. After establishing ethical standards, leadership must clearly communicate a commitment to integrity and ethical values. By setting a code of ethics, leadership demonstrates to the organization the importance of ethical culture.

Further, reporting and addressing ethical gaps is needed to establish a strong ethical culture. This can be accomplished by establishing policies and procedures to prevent and detect unethical behavior. The organization's leadership must communicate such policies and procedures to employees and provide ongoing (not one-time) training to help ensure employees know how to identify and report unethical behavior. According to the United States Office of Government Ethics, ethics education is an essential tool in helping agencies and employees manage and minimize the risk of ethical failure. Also, an agency's ethics education program increases employees' awareness of their ethical obligations, helps them identify ethics issues that may arise in the work they perform, and provides employees guidance and support for making ethical decisions.

To strengthen the Bureau's ethical culture, the Fire Department must address the following issues:

- Establish written standards for ethical behavior.
- Close loopholes in what is considered acceptable behaviors.
- Establish ongoing ethics training requirements.

The Bureau of Fire Prevention needs written policies or a code of ethics that defines ethical behavior, expectations for inspector conduct, and how to report unethical behavior.

Based on interviews with bureau leadership, there are no written policies or code of conduct that defines ethical behavior or outlines the expectations for fire inspector conduct. According to bureau leadership, they expect inspectors to know what is considered conflicts of interest and reporting such conflict is on a voluntary basis. However, these are unwritten expectations, not official policy, so

inspectors cannot refer to them—or even be expected to be aware of them—and division command staff cannot enforce them.

Rather than having written guidance, according to bureau leadership, section captains and lieutenants verbally communicate ethics expectations, although we could not verify whether this occurs. Verbal instructions without an underlying official policy can result in varying definitions and degrees of enforcement of ethical behavior across sections. Further, based on interviews with bureau leadership and inspectors, the process for reporting unethical behavior seems to be based on each inspector’s best judgement rather than a uniform process.

We benchmarked six fire departments with fire prevention or inspection divisions to understand their ethical policies and procedures and training requirements. Two-thirds stated they had written ethical guidance, clearly defined unethical behavior, and require their inspectors to take ethics training, as shown in Exhibit 5.¹¹

Exhibit 5: Survey responses from six other fire departments indicate that most have written ethics guidance and an ethics training requirement

| | Dallas, TX | Long Beach, CA | Miami, FL | Sacramento, CA | Seattle, WA | Washington, DC |
|--|------------|----------------|-----------|----------------|-------------|----------------|
| Does your department have written ethical guidance regarding fire inspections? | ✓ | ✗ | ✗ | ✓ | ✓ | ✓ |
| Has your department clearly defined what constitutes ethical and unethical behavior? | ✓ | ✓ | ✓ | ✗ | ✓ | ✗ |
| Does your department require fire inspectors to take ethics and standards training as part of their job requirement? | ✓ | ✗ | ✓ | ✓ | ✗ | ✓ |

Source: Dallas Inspection and Life Safety Education Division; Long Beach Fire Prevention Bureau; Miami Fire Prevention Bureau; Sacramento Fire Prevention Division; Seattle Fire Prevention; Washington, DC, Fire Prevention Division; CSA analysis

The National Fire Protection Association (NFPA) Standard for Fire Officers points to the code of ethics adopted by the International Association of Fire Chiefs (IAFC) in 2016 as an example of the general and professional codes of conduct available for reference by the nation’s fire and emergency service personnel. The goal of this Code of Ethics is to prevent incidents that may result in embarrassment and

¹¹ We deployed the benchmarking survey to 13 fire departments in the United States and received 6 responses. For detailed response data, see Appendix B.

waning public support for emergency services. The code includes the following guidelines.

- Avoid situations that would adversely affect credibility or public perception.
- Be truthful at all times and report instances of cheating or other unethical acts that compromise integrity.
- Avoid financial investments, outside employment, outside business interests or activities that conflict with or are enhanced by their official positions or have the potential to create the perception of impropriety.
- Never propose or accept personal rewards, special privileges, benefits, advancement, honors, or gifts that may create a conflict of interest, or the appearance thereof.

Such clear, written policies or codes of conduct are an essential part of any organization’s implementation of a professional ethics structure. When such policies set clear standards for fire safety inspectors to follow, this can help them identify unethical behavior as well as ensure they are carrying out their jobs as ethically as possible based on an agreed-upon set of standards that are clearly defined and supported by bureau leadership. As stated previously, leadership must also ensure that the process for reporting unethical behavior is clearly outlined in this policy to help ensure the continued adherence to ethical standards. Clear, written standards also convey the department’s support of strong professional ethics and encouragement of reporting unethical behavior.

The Fire Department must align its definition of incompatible activities with city standards and close loopholes that may sabotage department expectations for ethical behavior and its reputation with San Francisco residents.

In the absence of a written policy, according to bureau leadership, the Statement of Incompatible Activities (SIA) is the only guiding document for ethical conduct by their inspectors. However, the SIA explicitly permits behaviors that current city standards would deem inappropriate. Although repealing the 2008 SIA is in process, as the only written guidance inspectors have on ethics expectations, it hinders building a strong ethical culture.

According to bureau leadership, all bureau employees must acknowledge they have read the Fire Department’s SIA annually. The Fire Department’s SIA,¹² dated September 11, 2008, lists activities that

Under the Fire Department’s *Statement of Incompatible Activities*, bureau employees can get or expedite a permit for property owned by them or a family member, which includes an employee’s:

- spouse **or** registered domestic partner
- parent
- grandparent
- child
- grandchild
- sibling
- niece or nephew
- aunt or uncle
- cousin
- or the parent, grandparent, child, grandchild, sibling, niece or nephew, aunt or uncle, or cousin of the employee’s spouse or registered domestic partner

Source: Fire Department SIA

¹² Adopted in accordance with San Francisco Campaign and Governmental Conduct Code, Section 3.218-1.

are inconsistent or incompatible with the duties of department employees. Departments are required to distribute the SIA to its officers and employees by April 1st of each year,¹³ and according to bureau leadership, all division personnel must acknowledge they have read the department's SIA annually.

Although the SIA includes restrictions that apply specifically to bureau employees, it contains exceptions that increase the possibility of conflicts of interest. That is, the SIA states that employees assigned to the Bureau of Fire Prevention can, with or without payment, even for their or their family's property:

- Give advice on building or fire codes
- Conduct plan reviews for plans that need to be approved by the City
- Obtain fire permits
- Expedite permits

It also allows employees to receive payments from family members who have a permit, violation, or other matter under review by the Fire Department. Further, the SIA's definition of family member includes a wide range of allowable relatives.

According to the San Francisco Ethics Commission, these exceptions in the Fire Department's SIA increase the potential for a conflict of interest and likely would not have been allowed by the Ethics Commission had the Fire Department submitted its SIA to the commission for approval in 2024.

In contrast, one jurisdiction strictly prohibits fire department personnel from having—or appearing to have—a conflict of interest regarding inspecting or enforcing codes. The New Jersey Administrative Code¹⁴ explicitly prohibits inspectors from conducting any inspection or enforcement procedure related to any property or business in which they or a member of their immediate family has an economic interest.

The New Jersey law further prohibits fire inspectors getting paid for connections to any business providing labor or services related in any way to fire safety in any municipality in which they are employed.

¹³ San Francisco Government Ethics Ordinance Regulation 3.218-2.

¹⁴ Complete New Jersey Administrative Code, Section 5:71-2.9, listed at N.J.A.C. 5:71-2.9.



Positive Progress

Proposition D, passed in March 2024, bans city employees from being involved with projects that (a) they have a financial interest in and (b) are regulated by their employing department. Also, city employees cannot be paid by anyone other than the City for performing their city jobs.

San Francisco law was recently strengthened to foster more consistent application of its ethics provisions across city departments.

San Francisco law¹⁵ has long required city employees to be independent, impartial, responsible and to make decisions that are, and *appear* to be, made fairly and impartially.

Proposition D, approved by San Francisco voters in March 2024, aims to centralize essential ethics provisions of city law to foster more consistent application and enforcement of ethics standards across city departments. This includes standardizing and codifying the rules commonly found in departmental SIAs and repealing the unique SIAs maintained by each department. Proposition D prohibits city employees from engaging in activities in which they have a financial interest related to projects regulated by their department and from accepting payment from anyone other than the City for performing actions related to their city job duties.

According to the Ethics Commission, one of the aims of Proposition D is to prevent exceptions like those found in the Fire Department's SIA, which reduce its effectiveness by permitting conflicts of interest in fact or appearance.

The Bureau needs ongoing training requirements to ensure inspectors understand the expectations for ethical behavior.

The Bureau does not have training requirements for its fire inspectors beyond a mandatory annual hazardous materials training. According to bureau leadership, the division offers training on changes to the Fire Code every two years, but training attendance, while recommended, is not required. Without training requirements, inspectors may not be up to date on the most recent fire and/or building codes and may not have a uniform understanding of ethics-related best practices for inspections.

Unlike San Francisco, many nearby fire departments require their inspectors to hold certifications that have an ethics component. We reviewed the training and certification requirements for fire inspectors in 30 fire departments in the greater San Francisco Bay Area that have a fire prevention division.¹⁶ Of the 30 departments, 19 (63 percent) require fire inspectors to obtain a fire inspector certification or complete fire inspector courses offered by the California Fire Service

¹⁵ San Francisco Charter, Section 15.103, and San Francisco Administrative Code, Section 3.200.

¹⁶ Our analysis excludes jurisdictions who use firefighters as fire inspectors because firefighters and fire inspectors have different training and certification requirements.

Training and Education System (CFSTES),¹⁷ International Code Council (ICC), NFPA, and/or equivalent as part of their job requirement. Most departments that require certification and/or course completion require one with an ethics component. Requiring inspectors to maintain certifications or complete training with an ethics component enables other jurisdictions to ensure a uniform understanding of ethical conduct in their inspections units. So, even without a certification or training requirement, best practices seen in other jurisdictions indicate a preference for annual ethics training and specialized training for those who may face unique ethics situations.

Of 30 departments reviewed, the 19 (63 percent) listed in Exhibit 6 require inspectors’ course completion with ethics or certification.

Exhibit 6: 16 San Francisco Bay Area fire departments require fire inspectors to take courses that include an ethics component and/or obtain a certification that does not include an ethics component

| Fire Department | Acquire-By Date | Course Completion With Ethics ^a | And/Or ^b | Certification Without Ethics |
|-----------------------------|---|--|---------------------|------------------------------|
| Benicia | Before hire/start | CFSTES | | |
| <i>Berkeley^c</i> | <i>End of probation</i> | <i>CFSTES</i> | <i>Or</i> | <i>ICC, NFPA</i> |
| Central County ^d | Before hire/start | CFSTES | | |
| Central Marin | Within first 12 months | CFSTES | | |
| Contra Costa County | Within first 12 months | CFSTES | And | ICC |
| Daly City | Before hire/start | CFSTES | | |
| <i>Fremont^c</i> | <i>Within first 12 months</i> | <i>CFSTES</i> | <i>Or</i> | <i>ICC</i> |
| Menlo Park | Within first 24 months | CFSTES | | |
| Milpitas | Within first 12 months | CFSTES | | |
| Moraga-Orinda | Within first 12 months | CFSTES | And | ICC |
| Novato | Before hire/start | CFSTES | | |
| <i>Oakland^c</i> | <i>End of probation</i> | -- | | <i>ICC</i> |
| Rohnert Park | End of probation | CFSTES | | |
| San Jose | Before hire/start | CFSTES | | |
| Santa Clara (City) | Within first 12 months | CFSTES | | |
| Santa Clara County | Within first 6 months for ICC; Within first 12 months for CFSTES | CFSTES | And | ICC |
| Santa Rosa | End of probation for ICC; Before hire/start for CFSTES | CFSTES | And | ICC |
| Southern Marin | Before hire/start | CFSTES | | |
| Sunnyvale | Within first 12 months | CFSTES | | |

Notes:

^a CFSTES, the California Fire Service Training and Education System, includes ethics components in its training courses. Certifications from the ICC and NFPA do not include an ethics component for certification.

^b And/Or indicates whether the jurisdiction requires all certifications and course completions listed (and) or just one (or).

^c Ethics component may not be required as part of fire inspector certification and/or course completion.

^d Located in San Mateo County.

Source: Fire departments indicated; CSA analysis of certification requirements

¹⁷ California Fire Service Training and Education System is a division of the California Office of the State Fire Marshal.

RECOMMENDATIONS

San Francisco Fire Department should:

1. Implement written policies and procedures for the Bureau of Fire Prevention that define ethical behavior, expectations for fire inspectors, and the process for reporting conflicts of interest and unethical conduct.
2. Consult and work with the Ethics Commission to develop ethics-related policies that complement the City's ethics rules and set strong expectations for ethics specifically related to the Bureau of Fire Prevention's responsibilities.
3. Require annual training, including ethics training, for fire inspectors and ensure inspectors meet that requirement.

Chapter 2 - The Bureau of Fire Prevention Did Not Perform Many Required Annual School Inspections and Needs to Better Track and Schedule Inspections

The Bureau of Fire Prevention missed many required annual school inspections between 2009 and 2019 because it did not have a complete record of all schools in San Francisco when compared to the California Department of Education's school directory. Further, in fiscal year 2017-18 the Bureau failed to inspect at least 77 schools (33 percent of the total) that were included in the inspections database and that had been inspected in the preceding and following year. Additionally, the Bureau does not meet its goal to reinspect certain businesses at least every 18 months and does not have a systematic way to assign temporary permit inspections.

The Bureau's inspection system has two significant problems: 1) its configuration causes it to delete important data, such as scheduled inspection dates, which hinders the Bureau's ability to effectively monitor and manage inspections, and 2) it does not record the verbal warnings inspectors may give during inspections, making it impossible to accurately determine how many warnings a business has received.

Finding 2.1 - Because its list of schools was incomplete, the Bureau of Fire Prevention did not inspect at least 26 schools between 2009 and 2019.

The Bureau did not do many annual school inspections, which are required by state law,¹⁸ because its list of schools in San Francisco was incomplete. The California Department of Education maintains a directory of California public and private schools with six or more students. We compared the state directory¹⁹ to the schools the Bureau inspected between 2009 and 2019 and found at least 26 schools in San Francisco were missing from the Bureau's database.

The Fire Code²⁰ requires schools in San Francisco to register with the Bureau of Fire Prevention before a school building can be occupied. Also, according to the Bureau, it adds schools to its database through the permitting process or referrals from other departments.

¹⁸ California Health and Safety Code, Section 13146.3. This law applies to both public and private schools.

¹⁹ Data up to November 18, 2019.

²⁰ San Francisco Fire Code, Section 102.3.1.



Positive Progress

Of the 26 schools, 12 (46 percent) are active as of June 6, 2024. Of the 12 schools, the Bureau inspected 11* (92 percent) after CSA brought the missing schools to the department’s attention.

* Data as of May 20, 2024.

The 26 schools missing from the inspection scheduling system have been operating for years, some since as long ago as 2004.²¹ The Bureau did not inspect any of these 26 schools between 2009 and 2019 (or longer), demonstrating that the Bureau cannot solely rely on school administrators or permitting and referral process to report school openings to the Fire Department.

The Bureau is likely to continue to have schools missing from its database if it does not periodically reconcile its data to the state school directory. Of course, the Bureau cannot inspect schools if it is unaware they exist. Besides being contrary to state law, failing to inspect any school annually prevents the Bureau from addressing potential life and safety risks to students, teachers, and other employees, such as blocked fire exits and broken fire sprinklers.

Finding 2.2 - In fiscal year 2017-18, the Bureau of Fire Prevention did not perform required annual inspections of 95 San Francisco schools.

Exhibit 7: The Bureau of Fire Prevention missed 95 school inspections in 2017-18



Source: CSA analysis of Fire Department inspection data and California Department of Education directory

The Bureau missed over one-third of the annual school inspections it was required to do in fiscal year 2017-18. We identified 77 schools that were not inspected in fiscal year 2017-18, but were in the previous and following year. Also, 18 of the 26 schools missing from the data (as discussed in Finding 2.1) were open in fiscal year 2017-18, bringing the total number of schools we confirmed were not inspected to 95.

According to the Bureau, one inspector is responsible for inspecting all schools (259 in fiscal year 2017-18) plus any necessary re-inspections. If that workload is too great for a single inspector to accomplish, bureau leadership should have spread the work across more than one inspector. Performing these inspections annually is not optional. Not performing annual school inspections in a timely manner increases the likelihood of not detecting a danger to life and safety in the event of a fire, and it violates state law.

Bureau leadership stated that, beginning in 2021 the annual school inspections were divided among five inspectors, with additional assistance provided by other inspectors as needed. According to bureau leadership, of the five inspectors, one is exclusively assigned to schools year-round, focusing on violation and re-inspection follow-ups.

²¹ Of the 26 schools, 8 do not have an opening date in the directory because the California Department of Education lacks this information. Thus, these schools may have been operating since before 2004.

Finding 2.3 - Although not required by the Fire Code or state law, the Bureau of Fire Prevention aims to reinspect certain businesses at least every 18 months but falls short of this goal.

The Fire Code requires operational permits for certain types of businesses such as those with place of assembly, combustible materials or activities, and flammable or combustible liquids.²² The Bureau's Permits Section reviews applications for operational and temporary permits and conducts necessary inspections before permit issuance.²³ After permit issuance, according to the Bureau, it performs follow-up inspections of the permit holder.

According to the Bureau, it is not legally required to perform annual operational permit inspections, but it is the Bureau's goal to inspect operational permit holders at least every 18 months. This frequency is less demanding than what we found in some other California fire prevention jurisdictions, where annual operational permit inspections are the norm. Jurisdictions with annual inspection programs for operational permits include El Centro, Sacramento, San Jose, South San Francisco, and Woodland.

Some of these jurisdictions stated that annual fire inspections help mitigate potential fire and safety hazards, promote safe practices by raising occupants' awareness, and ensure that a reasonable degree of fire safety exists. Also, the federal Occupational Safety and Health Administration (OSHA) requires annual inspections of all workplaces, including office operations, to assure safe and healthful working conditions for federal employees.²⁴ OSHA requires more frequent inspections of workplaces where there is an increased risk of accident, injury, or illness due to the nature of the work performed.

According to the Bureau, it automates the scheduling of these inspections for 12 months after the last one. Despite this annual schedule, bureau leadership stated that it strives to complete follow-up inspections no more than 18 months apart and that 24 months would be the longest a business should be operating without an inspection. However, according to the Bureau, none of these goals exist as written policy, and based on our review of the Bureau's monthly report to the Fire Commission, it only reports inspection completion rates to date, not the duration between inspections.

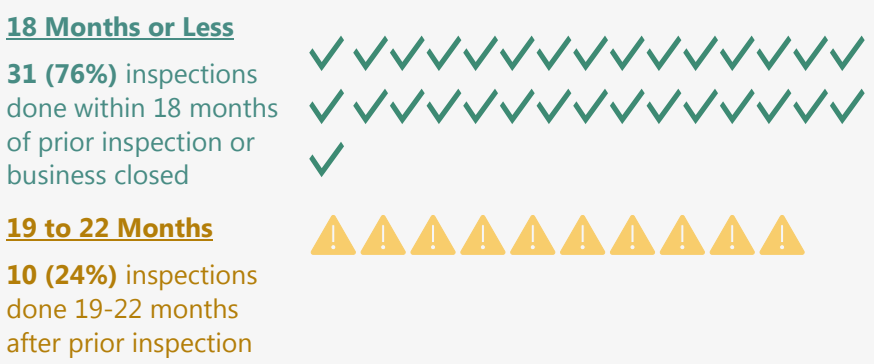
²² According to the Bureau, unlike temporary permits, operational permits do not expire unless the permit holder fails to pay a related fee or the Fire Department revokes the permit.

²³ A complete list of operational permits is in Appendix C.

²⁴ [Code of Federal Regulations, Part 1960.25\(c\)](#).

We identified 689 businesses in San Francisco at which the Bureau conducted operational permit inspections in 2017 and 2019 but did not inspect in 2018. Of these 689, we randomly selected a sample of 41 (6 percent) to see how well the department complied with its unwritten policy.²⁵ We found the Bureau inspected all 41 businesses in our sample within 24 months, with 10 (24 percent) performed between 19 and 22 months since the previous inspection, as shown in Exhibit 8.

Exhibit 8: Of 41 follow-up operational permit inspections reviewed, the Bureau of Fire Prevention inspected 31 (76 percent) within its 18-month goal



Note: Operational permit requirements are set by the Fire Code and cover businesses with specific fire safety risks, such as restaurants and gas stations.

Source: CSA review of 41 follow-up operational permit inspections from 689 businesses that received such inspections from Fire Department in 2017 and 2019, but not in 2018

The longer a business operates without an inspection, the higher the likelihood that life and safety risks may develop and cause fires or exacerbate the effect of fires that could harm people or property. According to the Bureau, workload backlogs due to a staffing shortage were partly to blame for inspection delays in 2018.

According to the Bureau, it has since added two fire inspector positions to the 13 assigned to high-rise, schools, and permit inspections.²⁶ Beyond adding staff, the department can take other steps to better monitor and improve performance. Formalizing its policy on conducting follow-up permit inspections and better tracking operational permit data may help bureau leadership increase the proportion of businesses being inspected within the 18-month goal.

²⁵ Our analysis is based on the number of annual permit inspections performed in 2017 and 2019, but not in 2018, indicating the permit was active from 2017 through 2019 and the permit holder was not inspected in 2018. As discussed later in the report, the FPS data can only confirm the number of inspections completed during a specific period, not the population of inspections scheduled for completion.

²⁶ Position was added in fiscal year 2019-20.

Finding 2.4 - The Bureau chose to configure its inspection scheduling system such that it deletes data needed to effectively monitor and manage inspections.

The Bureau cannot effectively track or measure trends in inspection completion data because it does not retain the scheduled dates of inspections in its scheduling system. Instead, according to the Bureau, the system overwrites the scheduled date with the date the inspection was performed.

The dates of scheduled and completed inspections are recorded, but in the case of scheduled dates, are overwritten.

According to the Bureau, after a permit, school, or high-rise is approved or otherwise added to FPS (Fire Prevention Tracking System),²⁷ the Bureau's information technology department generates annual inspections, which are assigned to inspectors with a scheduled date—essentially, an appointment. The scheduled inspections appear on inspectors' FPS homepages when they log into the scheduling system. Annual inspections are scheduled for approximately 12 months after the previous inspection.

According to the Bureau, a scheduled inspection remains open in the system and on the assigned inspector's homepage until it is conducted. The Bureau stated that scheduled dates indicate to inspectors which inspections must be completed in that year. Inspections may not occur precisely when scheduled because the building is closed or the person who is supposed to admit the inspector to the building is unavailable, according to the Bureau.

Although the Bureau collects permit, school, and high-rise annual inspection data²⁸ to report to the Fire Commission, according to the Bureau, once the scheduled inspection is performed and the inspection completion date is recorded, the original scheduled date is not retained. According to the Bureau, the inspection completion date overwrites and deletes the original scheduled date, making it no longer available in the system. This means that for any annual inspection, FPS data only contains the most current scheduled date and the dates of previously completed inspections. The system *does not* contain a record of the previous scheduled dates, hindering the Bureau's ability to easily identify trends in inspection timeliness and

²⁷ The Bureau's fire inspection tracking system that tracks all inspections, such as complaints, permits, referrals, and violations.

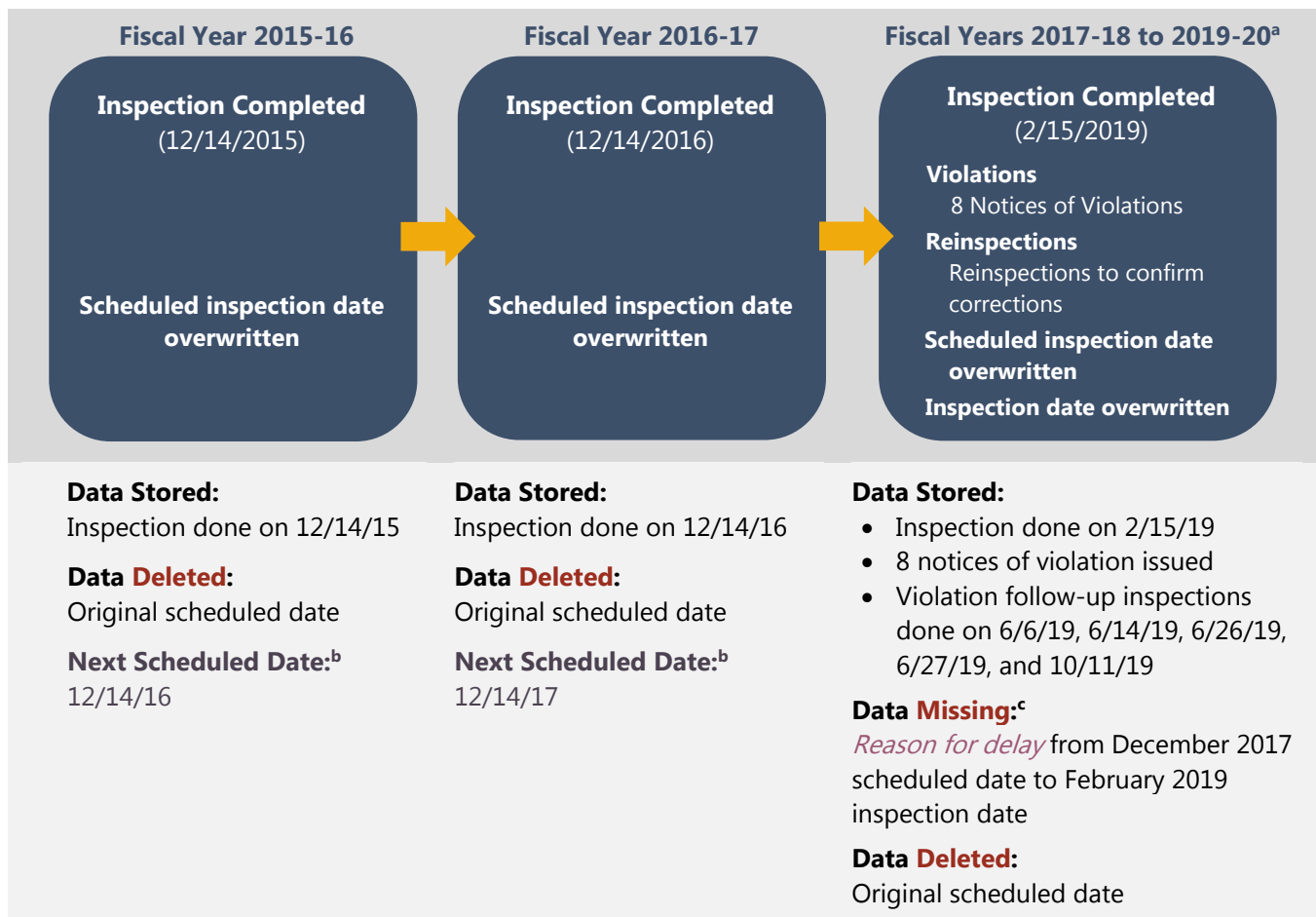
²⁸ Data reported contains total number of permit, school, and high-rise annual inspections and associated completed, open, and pending totals and percentages of completion and target completion.

determine the population of scheduled inspections for a given fiscal year.

Exhibit 9 is an example of an annual school inspection and what timeline data is available in the department’s system resulting from FPS overwriting scheduled dates following inspection completion, which may be later—in some cases, months later—than the originally scheduled date.

Exhibit 9: The Bureau of Fire Prevention’s scheduling system does not track data important to monitoring and managing inspections

Below is an example of annual school inspections and information retained by the Bureau for one school for fiscal years 2015-16 to 2019-20^a. The system cannot track the length of time between a scheduled inspection and when an inspection was performed because the scheduled date is replaced with completion date.



Notes:

^a Data up to December 27, 2019.

^b Estimated date based on inspection completion date (system generated for one year following the previous inspection completion date).

^c Some records include the reason for a delay in the notes field, but there is no field intended for the recording of delays and staff is not required to note delays.

Source: CSA analysis of Fire Department inspection data

Retaining scheduled inspection dates would help the Fire Department make data-driven improvements to their processes.

As detailed in Exhibit 9, the overwriting of scheduled dates makes it difficult for the Bureau to use its inspections data to identify trends in inspections delays because original scheduled dates no longer exist in FPS after an inspection is completed or if the inspection is rescheduled. If FPS could capture *and retain* all relevant inspection data, including scheduled dates, it could be a reliable data source for leadership to use to assess any need for more inspectors and to make better-informed, data-driven decisions on how to assign the Bureau's workload. Retaining data on the reasons inspections get rescheduled may also help the department identify and address problems with specific building managers.

State law requires the Bureau to inspect schools and high-rises annually to enforce and ensure compliance with building standards and regulations. However, because the department configured FPS to overwrite scheduled inspection dates with completion dates, it is difficult for the Bureau to monitor its compliance with this law or address the risks of noncompliance with this law.²⁹

Finding 2.5 - The Bureau of Fire Prevention does not track verbal warnings.

According to the Bureau, inspectors do not use FPS to capture minor corrections, those communicated as verbal warnings, resulting in them not being tracked. Each inspector has discretion and can choose to give verbal warnings for minor corrections that do not warrant a Notice of Violation. Because these are not documented in FPS, the system has no data on the number, frequency, recipients, or types of minor corrections occurring.

Documenting minor corrections would help promote accountability and fairness.

Documenting minor corrections promotes transparency, fairness, and accountability, facilitating a thorough follow-up during the next inspection, which may be conducted by a different inspector. Not documenting minor corrections increases the likelihood that the corrections will not be resolved or will not *remain* resolved.

For example, during a high-rise inspection we attended, the inspector observed a minor correction caused by a tenant's employee having

²⁹ *Standards for Internal Control in the Federal Government* states management should design an entity's information system and related control activities to achieve objectives and respond to risks, <https://www.gao.gov/assets/gao-14-704g.pdf>.

placed a dog bed in a doorway, blocking a fire exit. The inspector instructed the employee to remove the dog bed and instructed the building engineers to check later to ensure it was not in the doorway. Because the inspector verbally instructed the employee to remove the dog bed, there was no written documentation.

Fire code officials must keep a record of each inspection made, including notices and orders issued, showing the findings and dispositions.³⁰ By not documenting verbal warnings, the Bureau cannot hold accountable those who may have repeatedly ignored such warnings. If the same minor correction is found year after year during inspections and draws only a verbal warning, the inspector has no way to determine how long the condition has existed other than, possibly, their memory. When an inspector leaves the division or is reassigned, that inspector's successor has no record of prior verbal warnings. Also, not documenting these minor corrections makes it impossible for the Fire Department to identify trends or a need to allocate resources to educate building owners, tenants, or permit holders on recommended fire prevention practices. Also, the Bureau is missing an opportunity to analyze this data to help it monitor whether inspectors treat permit holders consistently and fairly.

Finding 2.6 - The Bureau of Fire Prevention does not have a systematic way to assign temporary permit inspections, making tracking of pending temporary permit inspections difficult and increasing the risk that the corresponding overtime may not be allocated fairly among inspectors.

The Bureau of Fire Prevention does not assign temporary permit inspections systematically. According to bureau leadership, temporary permit inspections are placed on a whiteboard and only entered into FPS after the inspection is complete. Thus, if an inspection were not completed, there would be no entry in FPS, and the department could not reliably and efficiently produce a list of temporary permit holders that did not receive an inspection. According to the Bureau, temporary permits are time-sensitive, often requiring an inspection on the day before or day of an event and may need to be conducted outside of regular business hours.

Unlike operational permits, which FPS automatically assigns to inspectors, needed temporary permit inspections are written on a whiteboard and, according to bureau leadership, inspectors perform inspections based on their availability or preferences. The Fire Code requires any person who engages in an activity that requires a fire

³⁰ California Fire Code, Section 104.6.2.

permit to obtain it from the Fire Department, which requires an inspection by the Bureau before approval and issuance. According to the Bureau, events like street fairs, weddings, caterers using open flame or propane, or tents may require temporary permits and inspections. The open sign-up process also increases the risk that one inspector or a few inspectors will receive most or all temporary permit inspections, and any associated overtime pay.³¹ The Fire Code allows the Fire Department to charge a fee of \$150 per hour for inspections outside of regular business hours with a minimum of four hours, or a fee of \$600.³² According to the Bureau, one example is if a temporary inspection has a billable inspection rate of three hours, but the inspector completes it within 30 minutes, the inspector is paid for three hours of overtime. Thus, these inspections could be considered a coveted perk of the job. Also, if the overtime associated with temporary permit inspections were worked by one inspector or just a few inspectors, this could cause them to work excessive hours, which could decrease their ability to focus and competently perform their important jobs.

According to the Bureau, it monitors the status of temporary inspections on a whiteboard and monitors its inspectors' overtime hours. Nonetheless, using FPS to assign temporary permit inspections would allow the Bureau to facilitate its control over this process and increase the accountability of inspectors. Using FPS would help the Bureau to track upcoming inspections and to distribute overtime systematically and equitably.

RECOMMENDATIONS

San Francisco Fire Department should:

4. Develop operating procedures for its Bureau of Fire Prevention to identify, track, and prioritize annual inspections to facilitate timely inspection completion as required by California Health and Safety Code and San Francisco Fire Code.
5. Ensure staffing of the Bureau of Fire Prevention's Inspection Section is adequate to enable the performance of all annual inspections within the required timeframe.
6. Annually check the California Department of Education's School Directory to ensure the Fire Prevention Tracking System captures a complete roster of all active San Francisco schools.

³¹ We did not analyze the distribution of overtime used to perform these inspections.

³² The hourly rate was \$154 (or \$616 for four hours) as of September 1, 2023.

7. Update the information in the inspection date fields of the Fire Prevention Tracking System to capture and retain the scheduled dates of past inspections.
8. Identify data fields needed to reconfigure its existing inspection system to allow the Bureau of Fire Prevention to collect, use, and analyze such data, including any internal and external factors, to improve data-driven decision-making on staffing, scheduling, and performance tracking of inspections.
9. Require inspectors to document verbal warnings they issue in a field in the Fire Prevention Tracking System. This will enable the Bureau to analyze and monitor such data effectively and efficiently.
10. Use the Fire Prevention Tracking System to assign and track temporary permit inspections.

Appendix A – Bureau of Fire Prevention Employee Ethics Survey Results

We deployed a survey to 84 inspections personnel, which includes captains, lieutenants, and inspectors, in the Bureau of Fire Prevention and received 48 responses. CSA allowed survey respondents to skip questions. Questions have a total number of 48 respondents (n=48) unless otherwise specified. Questions, answers, and responses are summarized in the table below. Percentages may not sum to 100 percent due to rounding or, for questions with the option to select “all that apply,” because the respondent selected more than one answer.

| Question | Answer | Response* |
|--|----------------------|-----------|
| Does the Bureau have written ethical guidelines available to staff (i.e., code of conduct, Statement of Incompatible Activities, or guidelines)? | Yes | 67% |
| | No | 6% |
| | Don't Know | 27% |
| The Bureau has clearly communicated to me what constitutes ethical and unethical behavior. | Strongly Agree | 21% |
| | Agree | 60% |
| | Disagree | 15% |
| | Strongly Disagree | 0% |
| | Don't Know | 4% |
| I understand how ethics applies to me and the role I perform. | Strongly Agree | 58% |
| | Agree | 40% |
| | Disagree | 2% |
| | Strongly Disagree | 0% |
| I know how to report any suspected unethical behavior or fraud by department employees. | Strongly Agree | 15% |
| | Agree | 71% |
| | Disagree | 13% |
| | Strongly Disagree | 2% |
| Does the Bureau provide or recommend training to help employees understand the ethics and standards they must follow to do their jobs properly? | Yes | 54% |
| | No | 25% |
| | Don't Know | 21% |
| The last time I received ethics training was (please give your best estimate if you are unsure exactly when): | Less than 1 year ago | 48% |
| | 1 – 2 years ago | 21% |
| | 2 – 3 years ago | 4% |
| | 3+ years ago | 6% |
| | Never | 21% |
| In my experience, leadership communicates when inspectors are re-assigned to a different team and the reasons for the change. | Strongly Agree | 4% |
| | Agree | 27% |
| | Disagree | 33% |
| | Strongly Disagree | 35% |

| Question | Answer | Response* |
|---|---|-----------|
| It seems to me that department leadership values and rewards ethical conduct. | Strongly Agree | 6% |
| | Agree | 44% |
| | Disagree | 29% |
| | Strongly Disagree | 21% |
| Leadership encourages ethical behavior amongst all personnel. | Strongly Agree | 17% |
| | Agree | 52% |
| | Disagree | 25% |
| | Strongly Disagree | 6% |
| I'm confident that if I report unethical behavior, my peers will not retaliate against me. | Strongly Agree | 13% |
| | Agree | 48% |
| | Disagree | 21% |
| | Strongly Disagree | 19% |
| I'm confident that if I report unethical behavior, Bureau or department leadership will not retaliate against me. | Strongly Agree | 13% |
| | Agree | 44% |
| | Disagree | 25% |
| | Strongly Disagree | 19% |
| What would make you feel more comfortable than you do now if you needed to report a suspected ethics violation to Bureau management? (Check all that apply) | A clear, written process for reporting suspected ethics violation; one doesn't exist now | 29% |
| | Believing I won't be retaliated against; I'm not sure this is true now | 33% |
| | Believing the department will keep my report confidential; I'm not sure this is true now | 44% |
| | A completely anonymous method to report suspected ethics violations; I'm not sure the current method is truly anonymous | 52% |
| | Believing that management will appropriately address the unethical behavior; I'm not sure this is true now | 33% |
| | None of the above; nothing more is needed | 27% |
| | Other (Please Specify) | 6% |
| If employee ethics concerns are reported to the Fire Department, its leadership takes appropriate action to resolve them. | Strongly Agree | 6% |
| | Agree | 44% |
| | Disagree | 19% |
| | Strongly Disagree | 10% |
| | Don't Know | 21% |

| Question | Answer | Response* |
|---|-------------------------------|-----------|
| I believe that bureau leadership models ethical behavior. | Strongly Agree | 13% |
| | Agree | 54% |
| | Disagree | 27% |
| | Strongly Disagree | 6% |
| Bureau employees at all levels are held accountable for adhering to ethical standards. | Strongly Agree | 6% |
| | Agree | 42% |
| | Disagree | 25% |
| | Strongly Disagree | 13% |
| | Don't Know | 15% |
| I feel comfortable raising questions about ethics or potentially unethical behavior with my supervisor. | Strongly Agree | 17% |
| | Agree | 56% |
| | Disagree | 21% |
| | Strongly Disagree | 6% |
| Bureau management treats all staff fairly. There is no favoritism. | Strongly Agree | 8% |
| | Agree | 31% |
| | Disagree | 17% |
| | Strongly Disagree | 31% |
| | Don't Know | 13% |
| I am comfortable issuing a Notice of Violation to a property owner or permit holder when I believe it is warranted. | Strongly Agree | 48% |
| | Agree | 52% |
| | Disagree | 0% |
| | Strongly Disagree | 0% |
| I think it's important to issue a Notice of Violation even if the issue is minor or easily can be abated. | Strongly Agree | 10% |
| | Agree | 44% |
| | Disagree | 31% |
| | Strongly Disagree | 4% |
| | Don't Know | 10% |
| My workload allows me to conduct all inspections as thoroughly as needed. | Strongly Agree | 4% |
| | Agree | 75% |
| | Disagree | 15% |
| | Strongly Disagree | 6% |
| My workload allows me to conduct all inspections within the required period set by the Fire Code and the Bureau. | Strongly Agree | 8% |
| | Agree | 67% |
| | Disagree | 21% |
| | Strongly Disagree | 4% |
| Do you know of any unethical behavior by Bureau employees that happened since you began working there. | Yes, in the last 12 months. | 27% |
| | Yes, more than 12 months ago. | 10% |
| | No | 63% |

| Question | Answer | Response* |
|---|---|-----------|
| Which, if any, of the following unethical behavior are you aware of at the Bureau? (Check all that apply) | Accepted a gift related to a fire safety inspection, plan review, or help they gave to a permit applicant. | 8% |
| | Provided services in exchange for compensation to an individual or entity, such as an architect or engineer, with an application or matter under the Department's review. | 2% |
| | Benefited financially from confidential information obtained through their Bureau job. | 2% |
| | Fire safety inspector misused government property, time, or resources. | 8% |
| | Didn't issue a Notice of Violation for all violations observed | 6% |
| | Not aware of any unethical behavior | 60% |
| | Other (please specify) | 25% |
| Have you felt pressured to compromise the Bureau's standards of ethical conduct? | Never | 73% |
| | Rarely | 13% |
| | Sometimes | 13% |
| | Often | 2% |
| | Very Frequently | 0% |
| How often did you feel pressure to compromise the Bureau's standards of ethical conduct? (n=11) | Never | 18% |
| | Rarely | 36% |
| | Sometimes | 9% |
| | Often | 9% |
| | Very Frequently | 0% |
| | Other | 27% |
| Which of the following, if any, were the main pressures on you to act unethically? (Select all that apply) (n=11) | Unrealistic inspection objectives or deadlines | 18% |
| | Supervisor's direction or order | 27% |
| | Pressure to be a team player or not get a coworker in trouble | 18% |
| | Meeting Bureau or personal performance goals | 18% |
| | Concerns of losing my job or assignment | 9% |
| | Offer of money or something else of value | 0% |
| | Personal friendship or relationship with a permit or property owner | 0% |
| | Other (Please specify) | 73% |

* Note: Amount may not sum to 100 percent due to rounding.
 Source: CSA analysis of Bureau of Fire Prevention employee ethics survey

Appendix B – Benchmarking Survey Results

We deployed a survey to 13 fire departments in the United States with a fire prevention or inspection division to understand their ethical policies and procedures and training requirements and received 6 responses from:

- Dallas, TX
- Sacramento, CA
- Long Beach, CA
- Seattle, WA
- Miami, FL
- Washington, D. C.

Questions, answers, and responses are summarized in the table below. We omitted questions that contained identifying information of the respondents. Total may exceed six for open-ended questions and questions with a “select all that apply” instruction.

| Question | Answer | Response |
|---|--|----------|
| Does your department have written guidance regarding fire inspections (code of conduct, code of ethics, policies, and procedures, etc.)? | Yes | 4 |
| | No | 2 |
| <i>If there is no written ethical guidance, how are ethical standards communicated to inspectors?</i> | Case by case and through department core values. | 1 |
| | Our city has ethics policies, but nothing specific to fire inspectors. | 1 |
| <i>How often are ethical guidance document(s) updated?</i> | As Needed | 3 |
| | Less than a year | - |
| | 1-2 years | 1 |
| | 3-4 years | - |
| | 5+ years | - |
| Has your department clearly defined what constitutes ethical and unethical behavior? | Yes | 4 |
| | No | 2 |
| <i>How are ethical and unethical behaviors communicated?</i> | Verbal | 3 |
| | Written | 4 |
| Please describe how your department ensures compliance with ethical guidance/policies. (open-ended) | Required training | 2 |
| | Corrective action and coaching | 2 |
| | Policy and guidelines | 1 |
| | Did not answer | 3 |
| Does your department have policies and procedures for fire inspectors to report conflict of interests on their independence or objectivity in performing inspections? | Yes | 2 |
| | No | 4 |
| <i>If No, how does your department manage or address conflicts of interest?</i> | Case-by-case basis | 2 |
| | Through chain of command | 1 |
| | Did not answer | 1 |

| Question | Answer | Response |
|--|---|----------|
| Does your department require fire inspectors to take ethics and standards training as part of their job requirement? | Yes | 4 |
| | No | 2 |
| <i>How frequently must the trainings be completed?</i> | Less than a year | - |
| | 1-2 years | 2 |
| | 3-4 years | - |
| | 5+ years | - |
| | As Needed | - |
| | (Other) Once - When first hired or certified | 2 |
| What certifications are required (if any) for fire inspectors to perform their job in your jurisdiction? | State certification program | 5 |
| | NFPA or ICC | 1 |
| What types of buildings or facilities are inspected by your department? (Select all that apply) | Daycares | 5 |
| | Schools | 5 |
| | Residential | 5 |
| | Commercial buildings | 5 |
| | High-rise | 5 |
| | New construction | 5 |
| | (Other) Transit centers (ports, airports) | 2 |
| | (Other) Hazardous materials | 1 |
| (Other) Special events and tents | 1 | |
| Does your department rotate fire inspector assignments? | Yes | 1 |
| | No | 5 |
| <i>What is the purpose for assignment rotations?</i> | In operations we want to make sure station personnel have awareness of all buildings in their district. | |
| <i>How often are assignments made?</i> | Every February. | |
| <i>How often are rotations made?</i> | Rotated by shift and area. | |
| Is there a data tracking system to identify buildings/facilities that are due for inspection or reinspection? | Yes | 5 |
| | No | 1 |
| <i>What type of data tracking system is used?</i> | Mobile Eyes | 1 |
| | ESO RMS system | 1 |
| | FDM | 1 |
| | Streamline Automation Systems | 1 |
| | First Due | 1 |
| <i>Does the data tracking system have fields to record when each building/facility inspection is completed?</i> | Yes | 5 |
| | No | - |

| Question | Answer | Response |
|--|---|----------|
| <i>Does your system have the capability to maintain a historical record of inspections to track the following? (Select all that apply)</i> | Timeliness of inspections | 5 |
| | Completion of inspections | 5 |
| | Accuracy of inspections | - |
| | None of the above | - |
| <i>How does your department use inspections data? (open ended)</i> | Tracking calls for service | 1 |
| | Tracking and scheduling inspections | 2 |
| | Performance measures and trends | 2 |
| | Media inquiries, public disclosure requests | 2 |

Source: Dallas Fire-Rescue, Fire Prevention; Long Beach Fire Prevention Bureau; Miami Fire Prevention Bureau; Sacramento Fire Department; Seattle Fire Department; Washington, D.C. Fire Prevention Division; CSA analysis

Appendix C - Types of Operational Permits

The table below lists all operational permits issued by the Bureau of Fire Prevention.

| Types of Operational Permits | |
|--|---|
| Additive Manufacturing | Liquid- or Gas-Fueled Vehicles or Equipment in Assembly Buildings |
| Aerosol Products, Regulated Activities | Liquefied Petroleum Gases (LPG), Regulated Activities |
| Amusement Buildings, Operation | Lithium Batteries |
| Aviation Facilities, Regulated Activities | Live Audience, Production Facility, Studio, Sound Stage |
| Aviation Facilities, Aircraft Refueling Vehicle | Lumberyards and Woodworking Plants |
| Battery System, Operation | Magnesium Processing |
| Carnivals and Fairs, Operation | Miscellaneous Combustible Storage |
| Cellulose Nitrate Film, Regulated Activities | Mobile Food Vendor Carts |
| Combustible Dust-Producing Operations | Mobile Food Preparation Vehicles |
| Combustible Fiber, Regulated Activities | Mobile Fueling-Dispensing |
| Compressed Gas, Regulated Activities | Mobile Fueling Location (Each) |
| Conditional Use | Mobile Fueling of Hydrogen-Fueled Vehicles |
| Covered Mall Buildings, Operation | Motor Fuel-Dispensing Facilities |
| Cryogenic Fluids, Regulated Activities | Open Burning |
| Cutting and Welding, Operation | Open Flame and Candles in Assembly Areas |
| Dry Cleaning Plant, Operation | Open Flame and Torches – Wildfire Risk Area |
| Energy Storage Systems | Organic Coating, Manufacturing |
| Exhibits and Trade Shows, Operation | Outdoor Assembly Event |
| Explosives, Regulated Activities (Includes Fireworks) | Place of Assembly |
| Fire Hydrants and Valves | Place of Assembly – Permanent Occupancy for Non-Profit Group |
| Firefighter Air Systems, Maintenance | Plant Extraction Systems |
| Floor Finishing | Private Fire Hydrant - Remove, Use, or Operate |
| Flammable or Combustible Liquids, Regulated Activities | Pyrotechnic Special Effects Material |
| Fruit and Crop Ripening | Pyroxylin Plastics |
| Fumigation and Thermal Insecticidal Fogging | Refrigeration Equipment |
| Hazardous Materials, Regulated Activities | Repair Garages and Motor Fuel Dispensing Facilities |
| Hazardous Production Material (HPM) Facilities | Rooftop Heliports |
| High-Piled Storage | Spraying or Dipping - Operational |
| Hot Work Operations, Regulated Activities | Temporary Membrane Structures and Tents |
| Indoor Cannabis Cultivation | Tire Rebuilding Plants |
| Industrial Ovens | Waste Handling, Regulated Activities |

Source: San Francisco Fire Code, 2022

Appendix D - Department Response

SANDRA TONG
CHIEF OF DEPARTMENT



LONDON N. BREED
MAYOR

SAN FRANCISCO FIRE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO

November 26, 2024

Mark de la Rosa
Director of Audits
City Hall, Room 476
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Mr. de la Rosa,

As instructed in your email dated November 14, 2024, titled *Draft Memorandum for Your Response: The Bureau of Fire Prevention Must Strengthen Ethical Policies, Controls Over Inspection, and Data Capabilities*, enclosed please find the San Francisco Fire Department's completed Recommendation and Response form.

If you have any questions or concerns, please contact Fire Marshall Ken Cofflin at ken.cofflin@sfgov.org or at (415) 558-3320.

Sincerely,


Sandra Tong
Chief of Department

Enclosure

Recommendations and Responses

For each recommendation, the responsible agency should indicate in the column labeled Agency Response whether it concurs, does not concur, or partially concurs and provide a brief explanation. If it concurs with the recommendation, it should indicate the expected implementation date and implementation plan. If the responsible agency does not concur or partially concurs, it should provide an explanation and an alternate plan of action to address the identified issue.

| Recommendation | Agency Response | CSA Use Only Status Determination* |
|--|--|---|
| San Francisco Fire Department should: | | |
| 1. Implement written policies and procedures for the Bureau of Fire Prevention that define ethical behavior, expectations for fire inspectors, and the process for reporting conflicts of interest and unethical conduct. | <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur Adopted revised "Ethical Code of Conduct" in September 2023. Will incorporate future SIA changes when standardized by Ethics Commission after passage of Proposition D. | <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested |
| 2. Consult and work with the Ethics Commission to develop ethics-related policies that complement the City's ethics rules and set strong expectations for ethics specifically related to the Bureau of Fire Prevention's responsibilities. | <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur Agree that this would benefit the Bureau of Fire Prevention and the public. | <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested |
| 3. Require annual training, including ethics training, for fire inspectors and ensure inspectors meet that requirement. | <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur Working with San Francisco Human Resources for preferred and available ethics training for staff and supervisors. | <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested |
| 4. Develop operating procedures for its Bureau of Fire Prevention to identify, track, and prioritize annual inspections to facilitate timely inspection completion as required by California Health and Safety Code and San Francisco Fire Code. | <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur The Bureau of Fire Prevention will develop a written policy to identify, track, and prioritize annual inspections. | <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested |
| 5. Ensure staffing of the Bureau of Fire Prevention's Inspection Section is adequate to enable the performance of all annual inspections within the required timeframe. | <input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur The Bureau of Fire Prevention will continue to develop alternate staffing models and strategies to maintain compliance if staffing shortages continue. | <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested |

* Status Determination based on audit team's review of the agency's response and proposed corrective action.

| Recommendation | Agency Response | CSA Use Only Status Determination* |
|--|--|--|
| <p>6. Annually check the California Department of Education’s School Directory to ensure the Fire Prevention Tracking System captures a complete roster of all active San Francisco schools.</p> | <p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>The Bureau immediately sought to remedy this problem when it was brought to their attention. An Assistant Fire Marshal is assigned to confirm the school list and ensure completion of inspections by multiple inspectors.</p> | <p><input type="checkbox"/> Open <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Contested</p> |
| <p>7. Update the information in the inspection date fields of the Fire Prevention Tracking System to capture and retain the completion dates of past inspections.</p> | <p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>Will amend fields to capture relevant data in Fire Prevention Tracking System.</p> | <p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p> |
| <p>8. Identify data fields needed to reconfigure its existing inspection system to allow the Bureau of Fire Prevention to collect, use, and analyze such data, including any internal and external factors, to improve data-driven decision-making on staffing, scheduling, and performance tracking of inspections.</p> | <p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>Data fields have already been identified. These need to be transferred to an automated system to generate the recommended tracking form. Planned implementation of a new reporting system by the Fire Department will include these data fields.</p> | <p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p> |
| <p>9. Require inspectors to document verbal warnings they issue in a field in the Fire Prevention Tracking System. This will enable the Bureau to analyze and monitor such data effectively and efficiently.</p> | <p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>Agreed. All violations should be noted and recorded. The Bureau of Fire Prevention will develop written guidance and provide training on the same.</p> | <p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p> |
| <p>10. Use the Fire Prevention Tracking System to assign and track temporary permit inspections.</p> | <p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>The existing system provides a functional framework, but the Fire Department agrees that the process of temporary permit inspection would benefit from greater automation through integration into the existing inspections system.</p> | <p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p> |

* Status Determination based on audit team’s review of the agency’s response and proposed corrective action.