



A Report to the  
Jackson County  
Board of Commissioners

**Commissioners**

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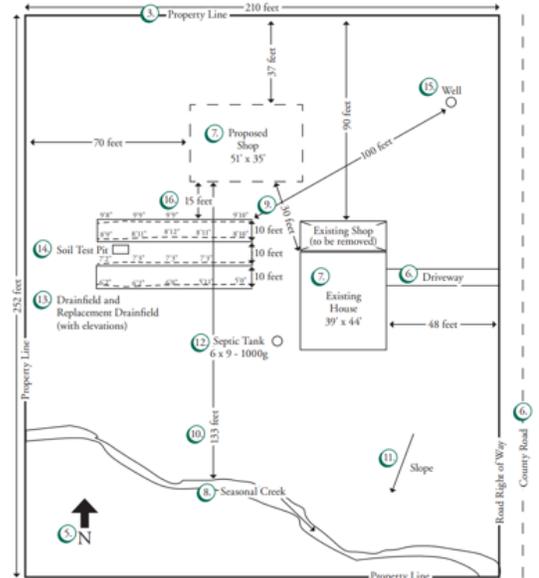
**County Administrator**

Danny Jordan

Current Planning

February 21, 2020

*Sample Plot Plan*



**Internal Audit Program**

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**To: Board of Commissioners**  
**Re: Audit of Current Planning**  
**Date: February 21, 2020**

The enclosed report presents the results of an audit over the Development Services Current Planning Program. The audit was conducted at the request of the Development Services Director.

The objectives, which were developed in collaboration with Development Services management, were to determine if management reports and performance measurement data are accurate, fees cover the costs of providing services, approval or denial decisions are made in a timely manner, and if any steps could be taken to decrease the number of incomplete applications submitted.

We identified one weakness in a management report that could cause it to be incomplete. Additionally, we were unable to determine if fees cover the full costs of providing service because it appears that staff have not reported the full amount of their time working on assigned cases, as compared to other duties. We did find that application approval and denials are generally made in compliance with statutory timelines. In addition, we identified a couple of recommendations that may help reduce the number of incomplete applications submitted.

At the request of Planning management, Audit will be conducting an additional study to assist Planning in determining whether the County would likely benefit by making changes to its performance measurement system and assignment of responsibilities among staff levels. We discuss this in Findings 3 and 6.

Please feel free to contact me at your convenience if you have any questions or would like additional information not contained in the report.

**C:** Audit Committee  
Moss Adams, LLP



# Current Planning IN A NUTSHELL

## Audit Objectives

Our objectives were to determine if management reports and performance measurement data are accurate, fees cover the costs of providing services, approval or denial decisions are made in a timely manner, and if any steps could be taken to decrease the number of incomplete applications submitted.

## What We Found

Due to concerns regarding the completeness of self-reported data, we could not determine if fees cover the full cost of providing services.

The Program is processing Type 1 applications faster than what is reported in the annual budget document.

The Program is not meeting its internal processing goal for Type 2 and 3 applications, but the applications are being processed within statutorily required timeframes.

The Program has proactively implemented changes to decrease the number of customer applications that are determined to be incomplete, and is continuously looking for other ways to improve. The audit suggests a couple ideas that may prove useful in this regard.

There is a risk that management's monitoring reports are not entirely complete.

An agreed upon understanding of staff roles and responsibilities is needed.

## What We Recommend

The report makes recommendations regarding:

- Improving the tracking of staff time so that management can confirm fees cover the cost of providing services.
- Revising applications to clarify what information is needed to reduce the number of incomplete applications submitted.
- Requiring some fields to be populated in the Program's Accela software to improve the accuracy of management reports.
- Meeting with Human Resources to discuss roles, responsibilities, and organization of the Program to improve operations.

## Introduction

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***Audit Authority***

We conducted our audit in accordance with Codified Ordinance 218 pertaining to the County Auditor. This audit was included in our fiscal year 2019-20 Internal Audit Plan.

***Compliance with Government Auditing Standards***

We conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

***Confidential or Sensitive Information***

We did not withhold information that would be considered sensitive or confidential.

***Audit Scope & Methodology***

Our audit focused on data from the 2018-19 fiscal year unless otherwise stated. Audit procedures included reviewing:

- Jackson County's Land Development Ordinance.
- Timeliness of application processing.
- Common causes of incomplete applications.
- Management reports.
- The fee setting process; and
- Meeting with staff to discuss duties and processes.

## Background

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The Current Planning Program<sup>1</sup> is responsible for facilitating development on residential, commercial, and industrial lands while ensuring protection of resource lands in accordance with State and Federally mandated programs and compliance with Jackson County’s Land Development Ordinance (LDO). Staff render decisions on four categories of permits, which are described below:

***Type 1 applications require little interpretation or professional judgement***

- Type 1 Land Use Authorizations, Permits and Zoning Information Sheets: Type 1 authorizations are not land use decisions as defined by ORS. Type 1 uses are authorized by right and require minimal or no interpretation or the exercise of policy or legal judgement. The review is limited to determining whether the application demonstrates compliance with the standards of the LDO. As such, application reviews are categorized as being ‘non-discretionary.’

Type 1 permits are divided into two sub-categories. The first sub-category is referred to as Type 1 Counter Permits or Zoning Information Sheets (ZIS). The approval criteria are straightforward and non-discretionary. For example, either an applicant meets the required setback distance or it doesn’t, or a lot that a person wants to build a house on is zoned residential or it isn’t. These are referred to as counter permits because a person brings the necessary paperwork to the counter, a Planner I reviews the paperwork on the spot, and a person can walk away with approval.

The other sub-category is referred to as Type 1 permits (without the word ‘counter’) or Land Use Interpretation (LUI) permits. These applications require some interpretation when making an approval decision. Planner II or III staff perform these reviews.

***Type 2, 3, and 4 applications require staff interpretation and professional judgement***

- Type 2 Land Use Permits: These are subject to administrative review. Staff must review submitted materials and determine whether the permit application complies with applicable requirements. They require a notice of decision and opportunity for hearing.

The Program has also divided Type 2 into 2 categories: Type II and Type II Complex. There is no statutory differences between the two. The only difference is that the Program’s internal goal is to complete Type II permits within 50 days and Type II Complex within 65 days. Our understanding is that

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<sup>1</sup> At Jackson County, “Program” is used to reference the “Current Planning Program,” or “Building Program,” etc. The State uses “Program” to reference the “Electrical Program” or “Plumbing Program” etc., which at Jackson County are components of the Building Program.

the “Complex” category was established in recognition that some applications are more complex than others and would therefore take longer to review.

- Type 3 Land Use Permits: These allow the development of uses that may be suitable only in specific locations or if the site is regulated in a particular manner. Uses that require a Type 3 Permit may be allowed subject to findings of compliance with applicable criteria and development standards, and submission of a site development plan when physical development is proposed as part of the permit. Type 3 decisions require a notice of decision and opportunity for hearing.
- Type 4 Land Use Permits: These require review by the Planning Commission and the Board of Commissioners, as applicable, to ensure the proper integration of uses that may be suitable only in specific locations. Legislative updates to the LDO and Comprehensive Plan are also processed as Type 4 permits.

#### **Statutory Requirements**

***The Program has 30 days to determine if all necessary information has been submitted with the application***

Per ORS 215.427, if a submitted application does not include all necessary information, the county must notify the applicant in writing of what is missing within 30 days of receipt. Per LDO 2.6.3.E, if Planning fails to notify the applicant within 30 days of the day the application was filed that information is missing, the application will be deemed complete (as defined as including all required and necessary information) by default on the 31<sup>st</sup> day. However, this does not prevent the Program, in its review of the application, from determining that the application does not meet all applicable requirements and then denying the application.

***The Program has either 120 or 150 days from the point the application was deemed complete to make a decision***

ORS 215.427 also states that Planning has 120 days from the day an application for land within an urban growth boundary or an application for mineral aggregate extraction was deemed complete to make a decision to approve or deny the application. Planning has 150 days from the day all other applications were deemed complete to make a decision.

An applicant may grant a time extension to the Program. It is not uncommon for this to happen in conjunction with a request by the Program that the applicant submit additional information.

There are no statutory timeline requirements for Type 1 applications.

#### **Financial Condition**

In FY 18-19 the Current Planning Program was funded 41% by fees charged to customers, 58% by the Community Development fee, and 1% by document

sales. In years past, the Program received funding from the General Fund; however, the Budget Committee directed the Program to reduce reliance on the General Fund and consequently the Community Development Fee was adopted.

The Community Development Fee is a percentage of certain types of commercial and residential building permit fees. The fee is intended to offset the cost of staff time spent answering questions at the front counter, emails, phone calls, etc. that are not associated with an application and therefore not funded by a customer charge. Appendix A provides a complete listing of the Program's fees.

The Program is operating with a FY 19-20 budget of \$1,824,248, with personnel costs accounting for 73% of the budget. Central Service Chargebacks (14%), the cost of contracted hearing officers (4%), and insurance (2%), are the next three largest budget line item expenses.

### **Staffing**

***The Program is budgeted with 9.3 Planners, but currently has vacancies in a Planner I and two Planner II positions***

The Program is budgeted with 13.6 FTE for FY 19-20. The FTE count consists of allocated portions of the office administrative staff and the Department Director's time in addition to the Planners and Planning Program Manager. The FY 19-20 budget includes 9.3 Planners, though the program is currently operating with 6.4. The Program is currently recruiting to fill both a Planner I and two Planner II positions. The Planners are classified as follows:

#### **Budgeted and Current Planning FTE**

	Budgeted FTE	Current FTE
Planner I	3	2
Planner II	4	2
Planner III <sup>2</sup>	2.3	2.4

The Planner I position is the entry level position. Responsibilities focus on answering customer questions at the counter, answering phone calls and emails, processing incoming mail, taking in applications, and performing plan checks. Plan checks involve the review of building permits that are waiting for approval from Planning. The Planner I staff review the permits, follow up on outstanding items, and release the permit if appropriate.

Planner IIs work on Type 1, 2, and sometimes Type 3 applications. They also back-up the front counter staff and meet with customers who need more help than the Planner Is can provide at the counter. As time allows, they also work

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<sup>2</sup> One Planner III's time is split between Current Planning and the Comprehensive Planning Program.

on improving the applications and checklists to help customers submit complete applications, and other projects as assigned.

Planner IIIs are assigned the most complicated applications in addition to other duties. These other duties include responsibilities such as reviewing the work of the Planner IIs, meeting with customers, serving as the Flood Plain coordinator, serving as the team leaders, etc. As team leaders they provide technical assistance and guidance to staff and address any concerns or issues that arise at the front counter.

***A Program Manager position was recently added to oversee Current Planning***

In March 2019 a Program Manager was hired. The decision to hire a Program Manager was precipitated by changes within the Development Services Department. The prior Department Director had a background in Planning and provided general oversight of the Program, while relying heavily on the experience and expertise of the Planner IIIs. During this period, the County’s Building Official oversaw the Building and Code Enforcement programs.

When the Department Director resigned in March 2018, the County Building Official was made Acting Director and after a recruitment period, was selected to become the new Director. Rather than hire a new manager to oversee the Building Inspection program, it was decided that he would continue to oversee that program and a manager would be hired to direct the day to day activities of Planning.

We discuss the current organization of the Program in Finding 6.

**Workload**

***Legalization of marijuana and hemp has impacted the Program’s workload***

The Program’s workload is influenced by overall changes in the economy. Additionally, state legalization of marijuana and federal legalization of hemp have impacted the program’s workload in recent years. The chart below provides a historical view of annual variances in workload.

**Number of Applications by Type and Fiscal Year**

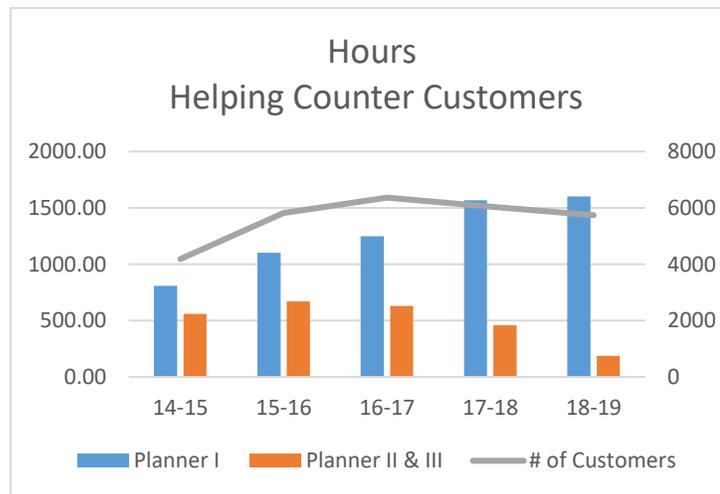
<b>Type of Application</b>	<b>2015-16</b>	<b>2016-17</b>	<b>2017-18</b>	<b>2018-19</b>
Type 1	647	677	563	344
Type 1 Permit	1,556	1,696	1,718	1,742
Type 2	184	261	221	245
Type 3	17	19	17	12
Type 4	4	4	4	1
<b>Total</b>	<b>2,408</b>	<b>2,657</b>	<b>2,523</b>	<b>2,344</b>

***In FY 18-19 the average customer waited 22 minutes to meet with a Planner***

5,738 in-person customer visits were logged in FY 18-19. On average, customers waited 22 minutes to meet with a Planner at the front counter and then spent 19 minutes with the Planner. The table below presents the average number of customer contacts that occurred on an average work day during calendar year 2018.

Type of Customer	Number per work day
Counter Customers	23
Phone Calls	15
e-mails	2
USPS mail	3

The Planner Is are responsible for assisting customers at the counter. Planner IIs and IIIs also assist in this task, but as shown below this has decreased in recent years. In FY 17-18 a third Planner I was hired. In prior years there had been only two.



Current Planning uses the State’s Accela software system. Accela tracks applications and status, critical dates, staff time and activities, documents, and payments. The system is also used to track customers and the amount of time they spend in the office. Jackson County’s Information Technology staff have created reports to pull performance measure data and information used by management for monitoring activities out of the Accela system.

## **Objectives**

We performed this audit, which was requested by the department director, with the following objectives:

1. To determine if fees accurately reflect the cost of providing services;
2. To determine if reported performance measurement data is accurate;
3. To determine if Type 1, 2, and 3 staff decisions are made in a timely manner;
4. To determine if any proactive steps could be taken to decrease the number of customer applications that are determined to be incomplete;
5. To determine if system reports provide management with accurate, useful information that aid in decision making and management of the program; and
6. To identify and communicate any issues or opportunities not discussed in conjunction with the aforementioned objectives that could assist the Program in improving operations

## Findings

**Finding 1: Due to concerns regarding the completeness of self-reported data, we could not determine whether fees cover the full cost of providing services.**

Staff are expected to enter the time spent on each application into the Accela system. That data is then used to determine average processing times, which in turn are used to calculate fees.

***It does not appear that all staff time on cases is recorded in Accela***

Analysis of case time indicates that not all time spent on assigned cases may be accounted for in Accela. It is expected that time spent on cases will be less than the total time worked due to meetings, trainings, and other ‘non-billable’ work. However, the variance between hours attributed to cases and total hours worked was more than could be reasonably explained by meetings, trainings, and other activities.

The table below shows the total case time entered by full time Planner II and III staff for FY 18-19. It does not include time spent on other assignments or general work that is not associated with specific cases. For example, Planner II and III staff spent 187 hours helping customers at the front counter in FY 18-19. As mentioned earlier, the Community Development Fee was developed to offset the cost of providing some of these general services.

Staff	Total Paid Hours	Paid Time Off	Worked Hours (Total – Paid Time Off)	18-19 Hours in Accela	Remaining Time
Planner III	2080	229.91	1850.09	691.15	1158.94
Planner III	2080	384.75	1695.25	604.17	1091.08
Planner II	2080	435.5	1644.5	426.2	1218.3
Planner II	2080	261.25	1818.75	480.12	1338.63
Planner II	2080	250.91	1829.09	865.37	963.72
Planner II	2080	408.75	1671.25	518.56	1152.69

Because the time reports may not accurately reflect time worked on cases, the fees charged for each type of review may not be recouping the full cost of providing those specific types of reviews.

Staff report that interruptions and the multiple steps (clicks) required to log time in Accela are the biggest challenge to accurate time keeping. The nature of the job does not provide for uninterrupted blocks of time to work on assigned cases. Disruptions from backing up the front counter, answering customer questions, and assisting other staff members make it difficult to track time precisely.

### Recommendation

We recommend that Planning management use time tracking tools to hold staff responsible for entering reasonably accurate time into Accela. Management should also consider tracking time spent on other assigned projects so that a more accurate accounting of staff's total time can be collected and utilized by management. To accomplish this:

- Management should consider having staff use a calendar or spreadsheet to track time spent on non-case specific activities, which are not recorded in Accela. This would result in an environment in which all time is accounted for.
- Management should also consider meeting individually with each Planner at frequent intervals to review employee's use of time. This would also help in the identification of areas in which more training or guidance is needed.
- Management should also consider discussing the Program's total time recorded for the prior period at staff meetings to reinforce the importance of accurate time tracking.
- Management should also consider addressing employee time tracking as part of the annual review.

### **Finding 2: The Program is processing Type 1 applications faster than reported in the annual budget document.**

***The Performance Measurement calculation for Type 1 applications uses the date the application was received***

The Program's internal goal is to process Type 1 applications within 20 days. In the FY 19-20 budget, the percent of Type 1 applications completed within this timeframe was reported at 50% for FY 15-16, 23% for FY 16-17, and 13% for FY 17-18. However, the Planning Department Director noticed that these percentages were calculated using the date received rather than the date deemed complete. If an application is deemed to be incomplete, the number of days it takes to complete the processing is dependent on how timely the applicant is in turning in the requested documents. This results in fewer applications meeting the internal goal. A more accurate reflection of the Planning Staff's performance would be to use the date deemed complete. Performance measurement data for Type 2, Type 2 Complex, and Type 3 Applications are already based on the date deemed complete.

At the request of the Department Director, the formula for Type 1 applications has been updated to use the date deemed complete. The chart below provides the previously reported and the revised percent of Type 1 Applications completed in 20 days for each of the last 5 years.

**Percent of Type 1 Applications Completed Within 20 Days**

Fiscal Year	Using Date Received	Using Date Deemed Complete
14-15	55%	97%
15-16	50%	95%
16-17	23%	90%
17-18	13%	87%
18-19	Not available	92%

Moreover, our review of the 269 Type 1 Applications received in FY 18-19 found that decisions were made for 75% of the applications within 6 days, with the quickest 50% being completed within 1 day.

**Finding 3: The Program is not meeting its internal processing goal for Type 2 and 3 applications, but the applications are being processed within statutorily required timeframes.**

***The Program has not met all internal processing goals, but does meet statutory requirements***

The Program has established internal goals of completing reviews within 50 days for Type 2 applications, within 65 days for Type 2 Complex applications, and within 95 days for Type 3 applications. Statutorily, the Program must determine if an application is complete within 30 days of submittal and then render an approval decision within 120 or 150 days, depending on the type of application.

The chart below provides detailed information regarding the time taken in FY 18-19 to process applications. Please note the statistics for Type 3 applications may be misleading because they are based on only 8 applications.

**Applications Received and Completed in FY 18-19**

	Type 1 (2)	Type 2	Type 2 Complex	Type 3
# of Applications (1)	269	32	119	8
Goal Days	20	50	65	95
Avg Days	6.35	55.9	59.51	99.25
25% were reviewed within	Same day	32 days	33 days	77 days
Half the apps were reviewed within	Next day	52 days	64 days	108 days
75% were reviewed within	6 days	82 days	81 days	118 days
The longest review period took	109 days	134 days	220 days	140 days

1. The report includes applications with an open date in 2018-19 and a decision date as of the report run date
2. Based on the date deemed complete

We reviewed all 258<sup>3</sup> Type 2, 3, or 4 applications received in FY 18-19 to determine if they were processed in compliance with the statutory requirements.

We found 19 of the 258 were not reviewed for completeness within the allotted 30 days. Ultimately, staff were able to render a decision in the required 120/150 day timeframe or approved extension period for 12 of the 19 cases.

<sup>3</sup> The 258 applications include those that were later withdrawn

Regarding the other 7 cases, 6 of the applicants withdrew their applications and the remaining one will either be voided or converted to a Land Use Interpretation Type I. Applications that are withdrawn are not included in the performance measure calculations. As stated previously the 120/150 day requirements would not apply to the remaining application if it were converted to a Type 1.

Of the 239 that were reviewed within the 30-day period, we found one possible exception to the 120/150 day requirement. The applicant granted an extension to the required timeline, but it appears the decision was not rendered within the extended timeframe. Additional research would be needed to determine if this is truly an exception.

***There does not appear to be a uniform system of categorizing permits throughout the state***

We had intended to compare Jackson County's processing times to those of other counties as one way of measuring timeliness. However, after contacting a few other counties we found that the Type 1, Type 1 Counter, Type 2, Type 2 Complex, Type 3 system of categorizing permits is not uniformly used throughout the state. Similarly, not all counties use processing time as their reported performance measures. For example, one county reported that their goals are to complete applications not requiring notice to the neighbors in an average of 21 days, and those requiring notice in an average of 45 days. Another county uses number of customers, phone calls, permits, and appeals as their performance measures.

Internal Audit, at the request of Planning management, will obtain information from other counties regarding the various staffing and measuring systems throughout the state. Internal Audit will provide this information to Planning and assist Planning in evaluating the feasibility and benefit of adopting any of the systems used elsewhere in Oregon. Because this work will be outside the original scope of this audit and so as not to delay completion of this audit, this work will be performed and reported separately.

***In FY 18-19 staff had to request additional information for 39% of the applications received***

**Finding 4: The program has proactively implemented changes to decrease the number of customer applications that are determined to be incomplete, and is continuously looking for other ways to improve. We identified a couple ideas that may prove useful in this regard.**

In FY 18-19, about 39% (237 of 602) of Type 1, 2, 3, and 4 applications submitted (excluding Type 1 Counter Permits which do not require review), were found to be incomplete.

**Incomplete Applications Submitted in FY 18-19 by Type**

<b>Application Type</b>	<b>Total</b>	<b>Incomplete</b>	<b>Percent</b>
Type 1	344	112	33%
Type 2	245	124	51%
Type 3	12	1	8%
Type 4	1	0	0%
Total	602	237	39%
Type 2 through 4 only	258	125	48%

***The Program has created many forms and checklists to reduce the number of incomplete applications***

When an application is submitted and later found to be incomplete, it slows the process by which a decision is reached, creates additional work for staff who now must handle the file more than once, and can be frustrating for the applicant.

We commend the program for having taken many steps to decrease the likelihood that a submitted application will be determined to be incomplete and for continuing to look for additional ways to further reduce this number. The Program has initiated the following practices in an attempt to ensure customers submit complete applications:

- For some of the common applications the Program has created Supporting Information Documents that ask questions intended to lead the applicant to provide the information needed to address requirements of the applicable LDO or ORS.
- The Program has created Customer Checklists for common submissions to ensure all required documents are submitted.
- The Program created Intake Checklists for some applications, which the front counter staff can use to make sure the customer has included everything they are supposed to include.
- Additionally, as time allows, staff are working on creating additional Supporting Information Documents and check lists for other submission types.

We reviewed a sample of 21 files from FY 18-19 that had been deemed incomplete at some point. We conducted this review to determine if there were any common themes as to why applicants were submitting incomplete applications and with the hope of identifying opportunities that would reduce the likelihood that an application would be deemed incomplete.

We found the following:

1. Some questions are worded in a way that may not be interpreted by the applicant in the manner intended by the Program. Specifically, applicants are

asked to “describe” how their application complies with the applicable criteria; however, the wording of some of these questions may result in an applicant thinking that a “yes” or “no” answer is sufficient.

For example, in one application we reviewed the applicant answered ‘yes’ to the following three questions that appear on the Supporting Information Document for a Relative Farm Help Dwelling application:

- i. The dwelling will be occupied by a relative of the farm operator or the farm operator’s spouse, which means a child, parent, stepparent, grandchild, grandparent, step grandparent, sibling, step sibling, niece, nephew or first cousin of either; ANSWER: \_\_\_\_\_
- ii. The farm operator does or will require the assistance of the relative in the management of the existing commercial farming operation; ANSWER: \_\_\_\_\_
- iii. The farm operator shall continue to play the predominant role in the management and farm use of the farm. A farm operator is a person who operates a farm, doing the work and making the day-to-day decisions about such things as planting, harvesting, feeding, and marketing. ANSWER: \_\_\_\_\_

***Wording questions so that a ‘yes’ or ‘no’ answer would not be appropriate may help***

Perhaps if the questions were worded in a manner in which a ‘yes’ or ‘no’ answer would not make sense, applicants would be more likely to provide the necessary information. For example, questions could be worded as follows:

- i. Please state who will occupy the dwelling and the person’s family relationship to the farm operator (e.g. child, parent, sibling, cousin, etc.).
  - ii. Please describe why the farm operator needs the occupant to assist in the management of the existing commercial farming operation.
  - iii. Please describe the role the farm operator will continue to play in the operation and management of the farm.
2. Similarly, customers may not be aware of the need to provide an attestation that they will not be using lights or security cameras at a marijuana production site. When using lights and cameras, a detailed explanation is required to demonstrate how the use will be compliant with applicable restrictions.

The marijuana Production Checklist states that the applicant will need to give details on *how* they intend to comply with the applicable listed requirements in a written statement. Additionally, page 2 reminds the customer that details are needed in addition to the initials required next to each listed compliance

requirement. However, we understand that confusion may arise if an applicant is not planning on using lights or security cameras at a grow site and therefore interprets the requirement as not applicable and doesn't realize the need to specify that lights or cameras won't be used.

***The most common reason for an application to be incomplete is an inadequate plot plan***

3. In 12 of the 21 files, the Planner requested a revised site plan. The Program has made available a Plot Plan Instruction Sheet. The Program may want to make known the number of applications that have been deemed incomplete due to an inadequate site plan as this may impress upon applicants the importance of appropriately completing a site plan in conformance with the Plot Plan Instruction Sheet.
4. Our review also generated the following observations:
  - A staff member shared the observation that there can be redundancies between the Supporting Information Documents and related checklists. We confirmed that the Type 2 Property Line Adjustment Supporting Information document and Type 2 Property Line Adjustment – Resource Land checklist ask many of the same questions.
  - The 'your application was incomplete' letter sent to applicants states that the applicant can withdraw the application and apply for a refund. However, the refund only applies to Type 2 or 3 applications. In our sample, 2 applicants who submitted Type 1 applications applied for a refund, as per the instructions, and then received a letter stating the refund request was denied because the Planning Department does not issue refunds for Type 1 applications that are withdrawn. We informed Planning and Planning quickly developed a separate letter to be used in conjunction with incomplete Type 1 applications.

Recommendations

1. Word questions on applications, Supporting Information Documents, and Check lists to require more than a "yes" or "no" response.
2. Review instructions to determine if wording could be improved to help customers be aware of when attestations are needed in regards to compliance requirements.
3. Eliminate redundancies between the Supporting Information Documents and Check Lists.

**Finding 5: There is a risk that management’s monitoring reports are not entirely complete.**

The Staff Case Assignment report lists each case that has been assigned to each staff member, the current status of the case, and critical dates such as date received, 30<sup>th</sup> day, and decision deadline date. Staff and management use this report to monitor applications that are nearing critical dates.

***Blank fields may cause a case to not appear on management reports***

We performed a test to determine whether the report lists all cases. We found that if the Primary Owner field was blank in Accela, then the case would not be included in the report. Per staff, if other fields containing pertinent information have been left blank then these cases will also not be included in the report. The report only pulls cases in which all pertinent fields have been populated.

We also found that the Customer Tracking Report may underreport the number of customers and therefore the Weekly Customer Count Report, which also tracks the number of customers, should be used by management for purposes of tracking the number of customers. The Customer Tracking Report, which also tracks wait time and time the Planner spends with a customer, is designed to exclude cases in which it seems likely that a Planner forgot to input data. Specifically, the report will exclude any case in which it appears the client waited more than 2 hours or spent 2 hours with a client as the unusually long-time span is likely due to an error in inputting the information. The report excludes 3.7% of cases for these reasons.

The Weekly Customer Count report had excluded customers that met with staff that were no longer employed by the County. IT has since corrected the report to include all customers regardless of the staff member’s employment status. Therefore, the Weekly Customer Count will provide a more accurate count than the Customer Tracking Report.

Recommendation

The fields that must be populated for the case to be included on the Staff Case Assignment Report should be required fields, so that the system will not allow staff to exit the case without providing the information.

**Finding 6: We identified four opportunities which could improve operations.**

**1. An agreed upon understanding of staff roles and responsibilities is needed.**

***Staff roles and responsibilities need to be clarified***

As discussed in the Background section, the Program had operated under the general oversight of the Department Director, but without a manager, with the two Planner IIIs providing day-to-day guidance to other staff. For example, incoming applications are routed to a Planner III who then assigns them to the

Planner II and III staff. Similarly, the Planner IIIs review Planner II work as they feel necessary based on their opinions of the level of expertise a Planner II has for the particular type of application being reviewed. These practices have continued while the new manager has patiently awaited the results of our audit before introducing any structural changes to the Program.

***There appears to be differing philosophies and approaches among staff***

Based on our conversations with staff, we believe that there are differing understandings as to what the roles, responsibilities, and expectations of each staff position are. Additionally, there appears to be differing philosophies and approaches to the processing of applications, which contributes to the lack of an agreed upon understanding.

This is not an unusual condition. All organizations face this challenge. Two factors have exasperated this condition. As mentioned, the Program had been operating without a manager. Secondly, there was significant turnover prior to the hiring of a Program Manager.

In FY 16-17, 2 of the Planner IIs left the organization. The vacancies resulted in 2 Planner Is being promoted into Planner 2 positions.<sup>4</sup> Additionally, in October 2019, a Planner I with 2 years of experience resigned to take a position outside of Jackson County.

As a result of the turnover, the amount of experience of individuals in the Planner 1 position has decreased significantly, as shown in the table below.

***There has been significant turnover among the Planner Is***

	14-15	15-16	16-17	17-18	18-19
Average Planner I Years' Experience	8.20	4.87	5.27	3.30	0.85

Staff do not have the same level of experience that had been present in the Program in prior years and therefore more direction, guidance, and oversight is needed. Additionally, the insertion of a manager into the program leads to a natural re-evaluation of how the department operates (e.g., what type of decisions should be made at each level of the organization, how should quality control be ensured, etc.).

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<sup>4</sup> By 'promotion' we refer to Webster's definition of "the act of moving up in position or rank." As required by Jackson County Home Rule Charter section 25(1), "All appointments and promotions in the classified service shall be made without regard to sex, race, religion or political affiliation and shall be based on merit and fitness." All Planner Is who became Planner IIs did so by applying for an advertised open Planner II position and then being selected for that position through an open, competitive hiring process.

Recommendation

We recommend that the program work with the County's Human Resources Office to conduct a teamwide review of the submittal/review/decision process for the purpose of coming to an agreed upon understanding of the guiding vision, mission, and decision-making process that guides all staff activity. This review should include a detailed look at 'who does what' to ensure that work is appropriately assigned based on the skill level associated with each level of the Planning positions and then a rewriting of job descriptions so that they reflect any changes made to the duties and responsibilities of each position.

**2. Training of entry level staff can be improved.**

*Historically  
Planner Is have  
been trained by  
Planner IIIs*

As discussed above, the Program has experienced turnover at the Planner I position. This position is an entry level position and new hires are not expected to have experience. As such, they need to be trained.

When the Program was without a manager, the Planner IIIs provided training, with each Planner III providing training in different technical areas and both providing training on Program policies. However, interviews with staff suggest that the training has not effectively prepared the new staff for their roles in the organization.

Recommendation

After any structural changes resulting from this audit and HR's guidance are made, and in conjunction with the to-be-conducted analysis of how other jurisdictions are structured, we recommend management update planner classifications and job duties, and then develop appropriate training based on the updated roles, responsibilities, and processes.

**3. Quality control should be standardized and implemented as a management function.**

*Planner III work is  
not reviewed  
unless it is a  
denial*

As stated above, Planner IIIs are responsible for reviewing the work of Planner IIs. However, the process is not standardized and our understanding is that Planner IIIs subjectively determine which work to review, based on their judgement as to the difficulty of a case and the level of expertise of the Planner II. In addition, the work of Planner IIIs is currently only reviewed by management when the work results in denial of an application. This process came about because of necessity due to time constraints and the lack of a Planning Manager to perform the reviews. Management agrees that additional reviews need to occur, but has been awaiting the completion of this audit to implement any changes.

Recommendation

Management should consider reviewing work of both the Planner IIs and IIIs, regardless of the decision, to ensure there is consistency within the Program.

**4. Performance measures should be included as part of staff's yearly evaluation.**

***Staff success in meeting internal performance goals has not been part of annual reviews***

Though staff are evaluated annually, the review process does not directly address production or quality. As discussed above, Planner IIIs review the work of Planner IIs. Given that the Program now has a manager, it would be appropriate for the manager to perform a more detailed evaluation of each employee's work product and contribution to the Program. We note that not all applications involve the same level of detail or requirements and therefore it will take longer to review some applications than others. Additionally, staff have other duties. These factors need to be taken into consideration but nonetheless, some effort is needed to ensure staff are performing at or near par with their coworkers.

Recommendation

Management should include staff's success in meeting internal performance measure timelines as part of the annual review process.

Appendix A  
Current Planning Fees

**DEVELOPMENT SERVICES APPROVED FEES - JULY 2019:**

FEE TITLE	Fee
PLANNING - TYPE I	
TYPE I COUNTER PERMIT	\$116.00
TYPE I FIRE SAFETY INSPECTIONS	\$40.00
TYPE I FLOODPLAIN REVIEW	\$436.00
TYPE I FUEL BREAK REDUCTION	\$61.00
TYPE I REISSUE DECISION AND/OR NOTICE (REQUIRES DEPOSIT OF AVG COST)	COST + OH
TYPE I REVIEW USE PERMIT	\$401.00
TYPE I SITE DEVELOPMENT PLAN REVIEW	\$1,065.00
PLANNING - TYPE II	
TYPE II PERMITS	\$1,614.00
TYPE II REISSUE DECISION AND/OR NOTICE (REQUIRES DEPOSIT OF AVG COST)	COST + OH
TYPE II NON RESIDENTIAL SITE DEVELOPMENT PLAN REVIEW	\$2,371.00
TYPE II FLOODPLAIN REVIEW	\$792.00
PLANNING - TYPE III	
TYPE III PERMITS	\$3,092.00
TYPE III REISSUE DECISION AND/OR NOTICE (REQUIRES DEPOSIT OF AVG COST)	COST + OH
TYPE III VARIANCE PERMIT (REQUIRES DEPOSIT OF AVG COST)	COST + OH
PLANNING - TYPE IV	
TYPE IV PERMITS	\$4,896.00
TYPE IV REISSUE DECISION AND/OR NOTICE (REQUIRES DEPOSIT OF AVG COST)	COST + OH
TYPE IV ZONE/COMP PLAN MAP AMENDMENT (REQUIRES DEPOSIT OF AVG COST)	COST + OH
TYPE IV ZONE/COMP PLAN MAP AMEND W/IGA OR STATE TRANSPORT (REQUIRES DEPOSIT OF AVG COST)	COST + OH
TYPE IV ZONE MAP AMENDMENT	\$7,078.00
ADDRESS ASSIGNMENT	\$102.00
AERIAL MYLAR COPY	\$26.00
APPEAL OF TENTATIVE DECISION ( <b>Limit set by ORS 215.416 (11)(b)</b> )	\$250.00
APPEAL OF QUASI-JUDICIAL DECISION (REQUIRES DEPOSIT OF AVG COST)	COST + OH
APPLICATION AMENDMENT AND ADJUSTMENT (REQUIRES DEPOSIT OF AVG COST)	COST + OH
CUSTOM MAPPING (REQUIRES DEPOSIT OF MINIMUM COST)	COST + OH
EXTENSION OF TIME	\$28.00
FINAL PLATS	\$74.00
ITEMS REMANDED BY LUBA (REQUIRES DEPOSIT OF AVG COST)	COST + OH
PLANNING CONDITION REVIEW - FEE PER EACH CONDITION	\$69.00
PLANNING INSPECTION REVIEW	\$164.00
PRE-APPLICATION CONFERENCES	
GENERAL	\$639.00
COMPREHENSIVE PLAN AMENDMENT	\$847.00
RESEARCH AND CONSULTATION APPOINTMENT (HOURLY RATE)	
CONSULTATION APPOINTMENT (REQUIRES DEPOSIT OF AVG COST)	COST + OH
RESEARCH (REQUIRES DEPOSIT OF AVG COST)	COST + OH
ROAD RENAMING (REQUIRES DEPOSIT OF AVG COST)	COST + OH

## Summary of Recommendations

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We recommend that Planning management:

1. Use time tracking tools to hold staff responsible for entering reasonably accurate time into Accela. Management should also consider tracking time spent on other assigned projects so that a more accurate accounting of staff's total time can be collected and utilized by management. To accomplish this:
  - Management should consider having staff use a calendar or spreadsheet to track time spent on non-case specific activities, which are not recorded in Accela. This would result in an environment in which all time is accounted for.
  - Management should also consider meeting individually with each Planner at frequent intervals to review employee's use of time. This would also help in the identification of areas in which more training or guidance is needed.
  - Management should also consider discussing the Program's total time recorded for the prior period at staff meetings to reinforce the importance of accurate time tracking.
  - Management should also consider addressing employee time tracking as part of the annual review.
2. Word questions on applications, Supporting Information Documents, and Check lists to require more than a "yes" or "no" response.
3. Review instructions to determine if wording could be improved to help customers be aware of when attestations are needed in regards to compliance requirements.
4. Eliminate redundancies between the Supporting Information Documents and Check Lists.
5. The fields that must be populated for the case to be included on the Staff Case Assignment Report should be required fields, so that the system will not allow staff to exit the case without providing the information.
6. Work with the County's Human Resources Office to conduct a teamwide review of the submittal/review/decision process for the purpose of coming to an agreed upon understanding of the guiding vision, mission, and decision-making process that guides all staff activity. This review should include a detailed look at 'who does what' to ensure that work is appropriately assigned based on the skill level associated with each level of the Planning positions and then a rewriting of job descriptions so that they reflect any changes made to the duties and responsibilities of each position.

7. After any structural changes resulting from this audit and HR's guidance are made, and in conjunction with the to-be-conducted analysis of how other jurisdictions are structured, we recommend management update planner classifications and job duties, and then develop appropriate training based on the updated roles, responsibilities, and processes.
8. Consider reviewing work of both the Planner IIs and IIIs, regardless of the decision, to ensure there is consistency within the Program.
9. Include staff's success in meeting internal performance measure timelines as part of the annual review process.

## Management Response

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This letter confirms that we have received and reviewed the audit report of the Planning Program. We support the findings and recommendations included in the report and would like to express our appreciation to the Audit Department for its work on this audit.

In response to the recommendations, we have developed the action plan detailed below.

### **Recommendation #1:**

*Use time tracking tools to hold staff responsible for entering reasonably accurate time into Accela. Management should also consider tracking time spent on other assigned projects so that a more accurate accounting of staff's total time can be collected and utilized by management. To accomplish this:*

- *Management should consider having staff use a calendar or spreadsheet to track time spent on non-case specific activities, which are not recorded in Accela. This would result in an environment in which all time is accounted for.*
  - *Management should also consider meeting individually with each Planner at frequent intervals to review employee's use of time. This would also help in the identification of areas in which more training or guidance is needed.*
  - *Management should also consider discussing the Program's total time recorded for the prior period at staff meetings to reinforce the importance of accurate time tracking.*
  - *Management should also consider addressing employee time tracking as part of the annual review.*
1. Management will discuss this item at the regularly scheduled Planning staff meeting on March 11, 2020.
  2. A spreadsheet will be developed for staff to use as an aid in tracking the intermittent time not always captured during periods of multi-tasking.
  3. The Staff Assignment Report will be used as a method to regularly query staff on time inputs.
  4. Time tracking will be used as a metric in the employee's annual evaluations.

### **Recommendation #2**

*Word questions on applications, Supporting Information Documents, and Check lists to require more than a "yes" or "no" response.*

This has already occurred. The updated applications will be circulated along with an overview of the changes and reasons why changes were made the week of February 24<sup>th</sup>, 2020.

### **Recommendation #3:**

*Review instructions to determine if wording could be improved to help customers be aware of when attestations are needed in regards to compliance requirements.*

Will review instructions at Senior Staff meeting on February 18<sup>th</sup>, 2020.

**Recommendation #4:**

*Eliminate redundancies between the Supporting Information Documents and Check Lists. Complete. New applications and checklists will be circulated the week of February 24<sup>th</sup>.*

**Recommendation #5**

*The fields that must be populated for the case to be included on the Staff Case Assignment Report should be required fields, so that the system will not allow staff to exit the case without providing the information.*

Will consult with IT Accela liaison week of March 2, 2020.

**Recommendation #6**

*Work with the County's Human Resources Office to conduct a teamwide review of the submittal/review/decision process for the purpose of coming to an agreed upon understanding of the guiding vision, mission, and decision-making process that guides all staff activity. This review should include a detailed look at 'who does what' to ensure that work is appropriately assigned based on the skill level associated with each level of the Planning positions and then a rewriting of job descriptions so that they reflect any changes made to the duties and responsibilities of each position.*

After being informed this recommendation would be included in the report, we held a meeting with HR and Audit to discuss the audit and strategize on how best to implement the recommendation. Going forward, it is anticipated that changes in the organizational structure of the Division will change to reflect the presence of a full-time Manager. A new expectations memo, written in concert with HR will be circulated to planning staff on February 26, 2020.

**Recommendation #7**

*After any structural changes resulting from this audit and HR's guidance are made, and in conjunction with the to-be-conducted analysis of how other jurisdictions are structured, we recommend management update planner classifications and job duties, and then develop appropriate training based on the updated roles, responsibilities, and processes.*

Job duties and roles will be amended to reflect the presence of a full time Planning Manager. The first step will be the delivery of the new expectations memo on February 26th, 2020.

**Recommendation #8**

*Consider reviewing work of both the Planner IIs and IIIs, regardless of the decision, to ensure there is consistency within the Program.*

The Planning Manager will implement this recommendation based on time availability. An internal goal of reviewing no less than 150 files a year has been established.

**Recommendation #9**

*Include staff's success in meeting internal performance measure timelines as part of the annual review process.*

Will implement in upcoming review cycles.

**Jackson County**

**Internal Audit Program**

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