



OFFICE OF THE COMMISSION AUDITOR

Agenda Item No. 1(I)(4)
November 15, 2022

MEMORANDUM

TO: Honorable Chairman Jose "Pepe" Diaz
and Members, Board of County Commissioners

FROM: Adeyinka Majekodunmi, CPA
Commission Auditor

A handwritten signature in blue ink, appearing to read "Adeyinka Majekodunmi", is written over the "FROM:" line.

DATE: November 14, 2022

SUBJECT: Review of the County's Building Permit Application Process

The Office of the Commission Auditor (OCA), in response to a request by Chairman Jose "Pepe" Diaz, District 12, and Commissioner Eileen Higgins, District 5, conducted a review and assessment of the County's building permit application process, inclusive of properties eligible for the expedited plan reviews for affordable housing, to determine whether the process bears any anomalies. This report also includes documented OCA observations related to process challenges that impact the ability to provide a comprehensive view of the timeline experienced by applicants in obtaining an approved or issued Permit.

This report will be placed on the next available BCC meeting agenda. Should you have any questions or need additional information, please contact me at (305) 375-4354.

cc: Honorable Mayor Daniella Levine Cava
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Gerald K. Sanchez, First Assistant County Attorney
Jess McCarty, Executive Assistant County Attorney
Edward Marquez, Chief Financial Officer
Jimmy Morales, Chief Operations Officer
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MDC001



OFFICE OF THE COMMISSION AUDITOR



MIAMI-DADE COUNTY BUILDING PERMIT PROCESS REPORT

NOVEMBER 14, 2022

MDC002

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Commission Auditor

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The Office of the Commission Auditor

The Office of the Commission Auditor was established in 2002 by the voters of Miami-Dade County after their approval of the Home Rule Charter Amendment to create the position of Commission Auditor to provide independent financial, legislative, research analyses and audits to assist the Board of County Commissioners' decision-making process by helping to ensure governmental accountability, transparency, and the best use of public resources. The Commission Auditor's duties include reporting to the Board of County Commissioners on the fiscal operations of County departments, as well as whether the fiscal and legislative policy directions of the Commission are being efficiently and effectively implemented.

This report, prepared in collaboration with the Miami-Dade County departments as subject matter experts, is substantially less detailed in scope than an audit in accordance with the Generally Accepted Auditing Standards (GAAS). The OCA plans and performs the review to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on its objectives; accordingly, the OCA does not express an opinion on the data gathered by the subject matter expert(s).

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I. INTRODUCTION

A. PURPOSE

The Office of the Commission Auditor (OCA), in response to requests made by the Miami-Dade Board of County Commissioners' (BCC) Chairman Jose "Pepe" Diaz, District 12, and Commissioner Eileen Higgins, District 5, was instructed to examine the Department of Regulatory and Economic Resources' building permit process and provide an assessment of the timeliness of the approval processes. The report also aimed to assess the timeliness of Miami-Dade County's (County) building permit process in contrast to other comparable jurisdictions and review the effectiveness of the Expedited Building Permit Process for Affordable Housing projects.

B. SCOPE

The scope of research for this report encompassed the following:

- A review and assessment of the County's building permit process, inclusive of properties eligible for the expedited plan reviews for affordable housing, and identifying whether the process bears any anomalies with the available data gathered
 - An analysis of permit issuance data and an assessment of RER's compliance with Administrative Order (A.O.) 4-115 "Governing the Building Permit Process"
 - A benchmark analysis that compares the County's permit process to other local, regional, and national jurisdictions in similar metropolitan areas, including the other entities' permit software system of record
 - A case study of a municipal Maintenance of Traffic (MOT) permit obtained by a County contractor
-

C. METHODOLOGY

OCA collaborated with the Department of Regulatory and Economic Resources (RER) and the Information Technology Department (ITD) to obtain access to Building Department permit procedures and processes, as well as data and documentation available through GoldKEY and the Mainframe. This review incorporated multiple data sources, including 1) open portal data for issued permits, 2) database extract for open Applications, 3) extract from GoldKEY for Task data, and 4) comparable jurisdictions permit data files.

1. Analysis and Research

- a) Reviewed A.O. 4-115 to identify the maximum number of days allowed to complete the Tasks related to a permit application approval. In addition, OCA reviewed the A.O. against the current permit process.
- b) Reviewed open portal data for issued residential and commercial permits for the period January 1, 2019 to December 31, 2021.
- c) Analyzed open permit application data on August 17, 2021 by creating an aging analysis and identifying issues and anomalies.

- d) Verified the emails sent by RER to customers through GoldKEY to notify customers of permit review related information and concerns pending a customer response or action. OCA's review focused on Tasks related to a sample of issued Permits within the review period.
- e) Distributed a survey to 481 applicants selected from issued permits during 2020 and 2021 to assess customer satisfaction with the permit process and services provided by RER's Building Department.
- f) Reviewed the expedited building permit process of affordable housing projects by analyzing (1) permit applications within the July 2022 GoldKEY Data Extract, (2) RER files that were provided to OCA on April 13, 2022, (3) public parcel data extract from the Property Appraiser's Office as of May 2022, (4) the public facing information from GoldKEY,¹ (4) the Property Appraiser's Office website Property Search Application,² (5) the Housing Affordability Tracker,³ and (6) OCA's May 2022 Miami-Dade County Property Conveyance Report.⁴

2. Comparative Analysis with other Municipalities

OCA conducted benchmarking of building permit processes by contacting several large jurisdictions regionally and nationally via telephone and email. Of those contacted, four responded to our request:

- Orange County, Florida
- Hillsborough County, Florida
- City of Jacksonville, Florida and
- City of Atlanta, Georgia

OCA's methodology consisted of surveying comparable jurisdictions to obtain data pertaining to residential and commercial permits and the respective building and permitting agencies' turn-around time from application submittal to final permit issuance. However, a comparative analysis could not be conducted due to the inconsistent permit types and non-homogeneous data provided by the selected jurisdictions.

3. Data Limitations

- a) OCA's research on permit review times is limited to the timestamps provided in GoldKEY for the review periods. For this research report, OCA defines the total time it takes for RER to approve a permit as the total time between the permit application date and the permit issuance date encompassing any required ancillary permit and all posted Tasks.

The dataset gives no underlying granularity for a given permit at the review Task level. This dataset neither distinguishes the time for reviews performed by the County (County time) nor time spent by the applicant (applicant time) to advance the Application.

- b) The external review times for ancillary permits, which are permits reviewed by non-RER permitting entities, and currently **not integrated into GoldKEY**, are not identifiable in the Task dataset and could not be quantified. The research shows that the Storage Task is a general Task

¹ Plan Status & Application Submittal Portal, <https://www.miamidade.gov/Apps/RER>.

² Miami-Dade County Office of the Property Appraiser, https://www.miamidade.gov/pa/property_search.

³ Housing Affordability Tracker, <https://www.miamidade.gov/global/housing/housing-affordability-tracker>.

⁴ OCA Miami-Dade County Property Conveyance Report, May 26, 2022, <https://www.miamidade.gov/auditor>.

for collecting all review times outside of GoldKEY and the amount of time it takes an applicant to either make corrections to documents or resubmit to RER and run ancillary permits through the approval process with outside permitting entities.

- c) OCA's records review of properties was limited to the public information available and disclosed across public agencies. Pursuant to Section 119.071(4)(d), Florida Statutes, certain occupations in Florida are exempt from the public disclosure of home addresses and telephone numbers, including those of the respective spouses and children of individuals under qualified occupational groups.⁵

The subject occupational groups who qualify for such exemptions include: active or former law enforcement personnel; active or former correctional and correctional probation officers; active or former personnel of the Department of Children and Families; active or current personnel from the Department of Health whose responsibilities support investigating child abuse; certified firefighters; circuit court or county court judges; and general and special magistrates, among others.⁶

D. BACKGROUND

The Department of Regulatory and Economic Resources (RER) was created in 2012 through the consolidation of the Planning, Land Development, and Building and Construction permitting divisions, all previously housed throughout eight (8) County departments and offices. As such, it delivers a wide range of services to businesses and property owners in the community. This includes reviewing and approving land development Applications, construction permits, and business licenses and their related code enforcement activities, formulation and implementation of land use, environmental and community planning policy, and economic research.

According to RER, the County moved to a concurrent review process in February 2008 for projects under \$100,000, with the option for larger projects to participate.⁷ The concurrent review refers to the multidisciplinary plan review process whereby more than one agency, department, or area of expertise has access to review the plans simultaneously and can approve or disapprove specific Tasks within the permit process independently of each other. In July 2019, the GoldKEY system went live. The GoldKEY System works with an Oracle database called EPSPRD, used to process and store GoldKEY data; and the Mainframe System, "which is the sole source of building permit data."⁸ As a result of the pandemic, beginning in March 2020, the County Permitting and Inspection Center (PIC) moved to a virtual service model allowing all plans to be submitted and routed electronically online. All customer services were offered virtually for a period of time during 2020 and early 2021, since the PIC was periodically closed to the public. The PIC is currently open for all services.⁹

⁵ Florida Statute 119.071, <http://www.leg.state.fl.us/statutes>.

⁶ Florida's Chief Financial Officer, <https://www.myfloridacfo.com/division>.

⁷ Email Correspondence with RER, February 11, 2021.

⁸ Email Correspondence with ITD, November 4, 2022.

⁹ RER Presentation: Technological, Innovations and Transformations, September 15, 2022.

E. DATA SUMMARY

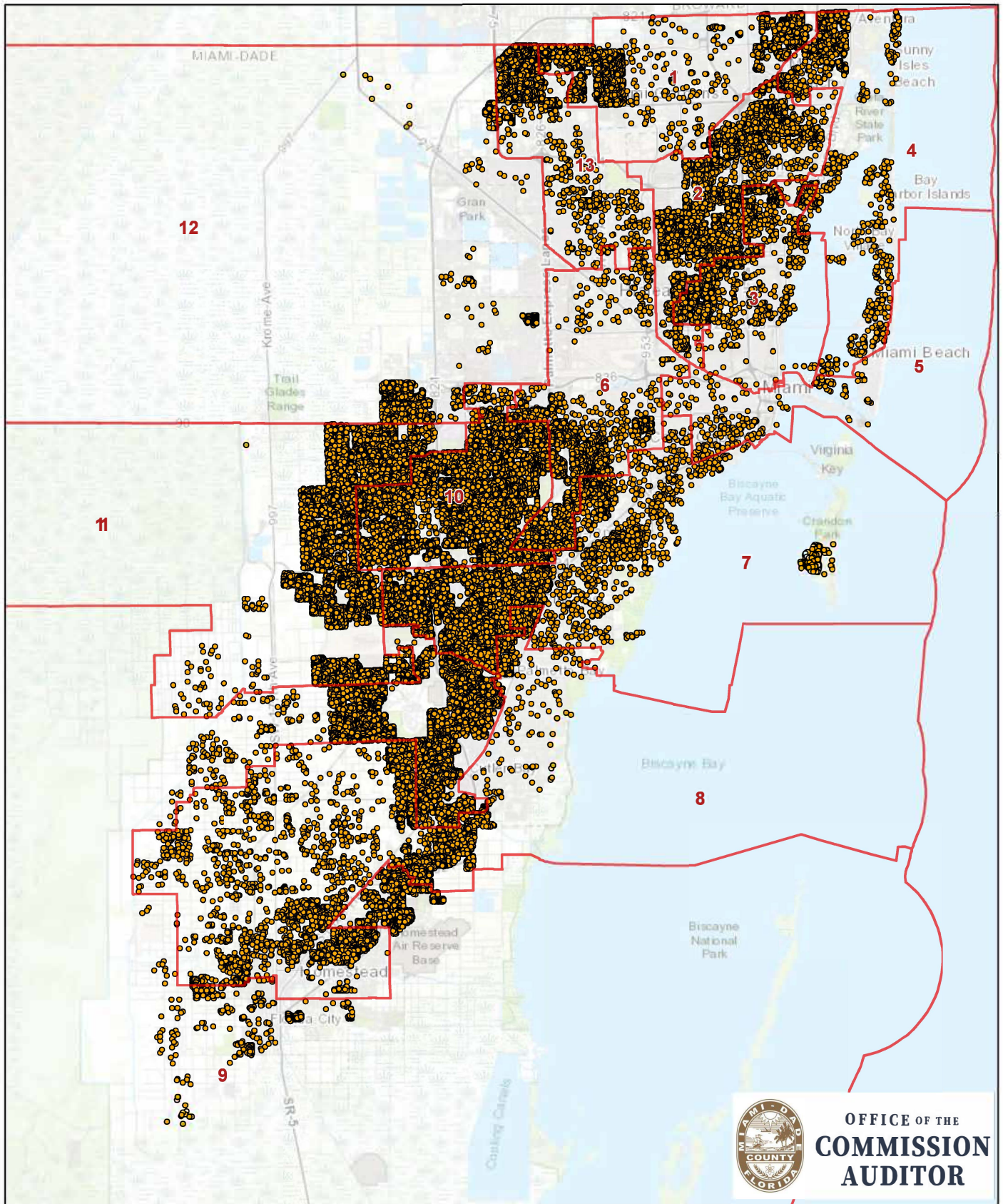
OCA quantified the volume of permits issued County-wide by Commission District, as displayed in **Table 1** below, categorized by residential and commercial permits. **Figure 1** and **Figure 2** illustrate 95,988 folio numbers where permits were issued, categorized by residential and commercial site addresses. OCA notes that folio numbers can have multiple permits issued.

**Table 1: Count of Building Permits by Commission District
(January 1, 2019 to December 31, 2021)**

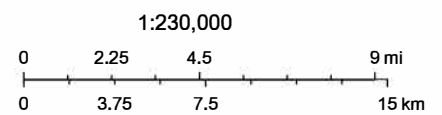
COMMISSION DISTRICT	COMMERCIAL PERMIT COUNT	RESIDENTIAL PERMIT COUNT	TOTAL PERMIT COUNT	PERCENT TO TOTAL
District 1	3,772	6,717	10,489	5%
District 2	5,461	10,676	16,137	8%
District 3	3,950	4,834	8,784	4%
District 4	7,688	3,733	11,421	5%
District 5	4,036	240	4,276	2%
District 6	7,934	7,065	14,999	7%
District 7	7,099	13,848	20,947	10%
District 8	3,629	22,709	26,338	12%
District 9	7,211	22,895	30,106	14%
District 10	7,699	20,882	28,581	14%
District 11	5,392	19,164	24,556	12%
District 12	5,920	2,843	8,763	4%
District 13	1,738	4,109	5,847	3%
Total	71,529	139,715	211,244	100%

Source: Miami-Dade Open Data Hub Portal

Figure 1: Miami-Dade County Residential Permits Issued by Folio (January 1, 2019 to December 31, 2021)

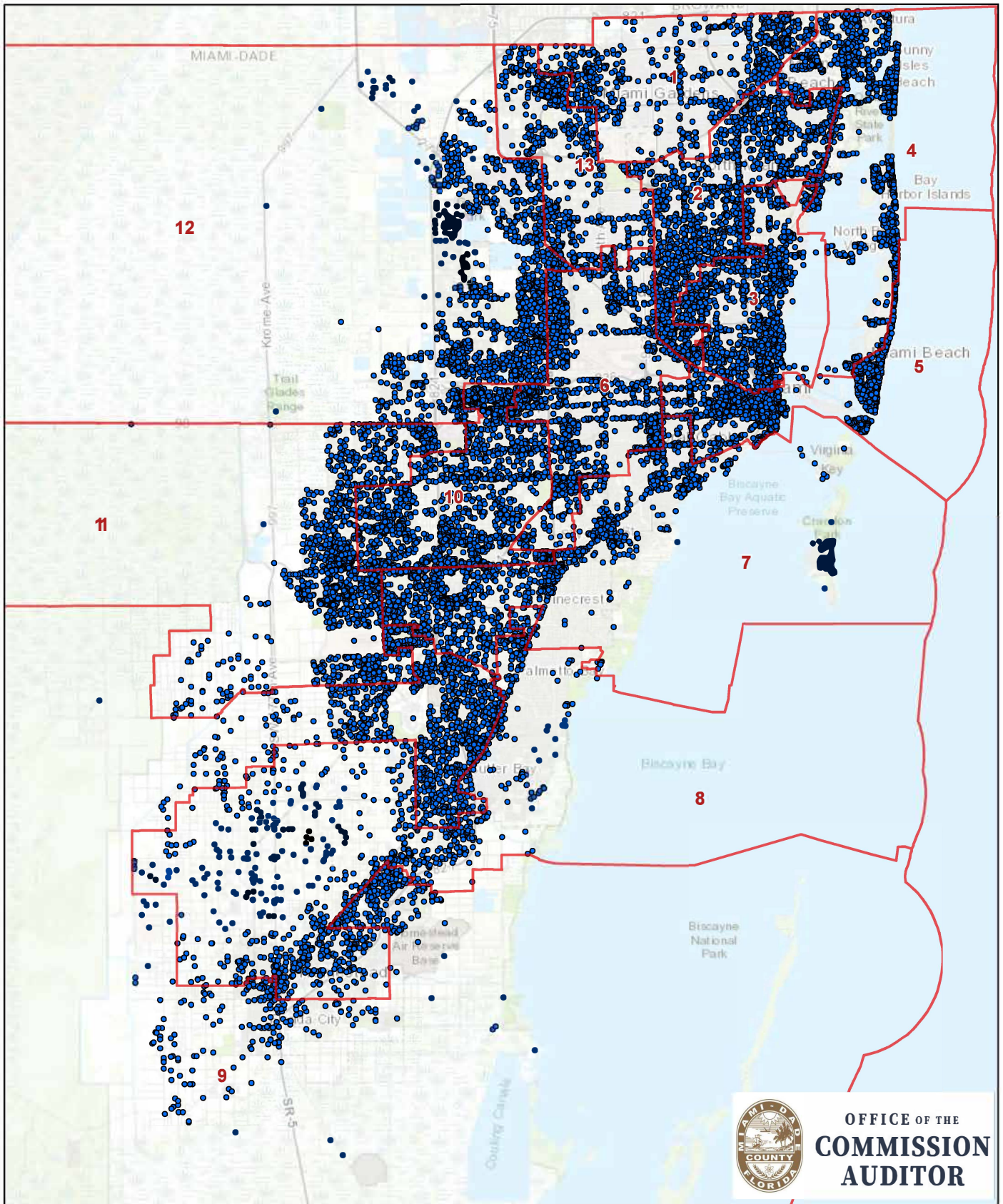


- Commission District Boundary
- Residential Site Address

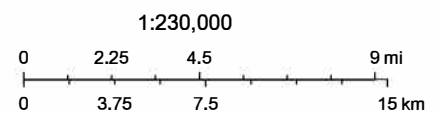


Miami-Dade County, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

Figure 2: Miami-Dade County Commercial Permits Issued by Folio (January 1, 2019 to December 31, 2021)



- Commission District Boundary
- Commercial Site Address



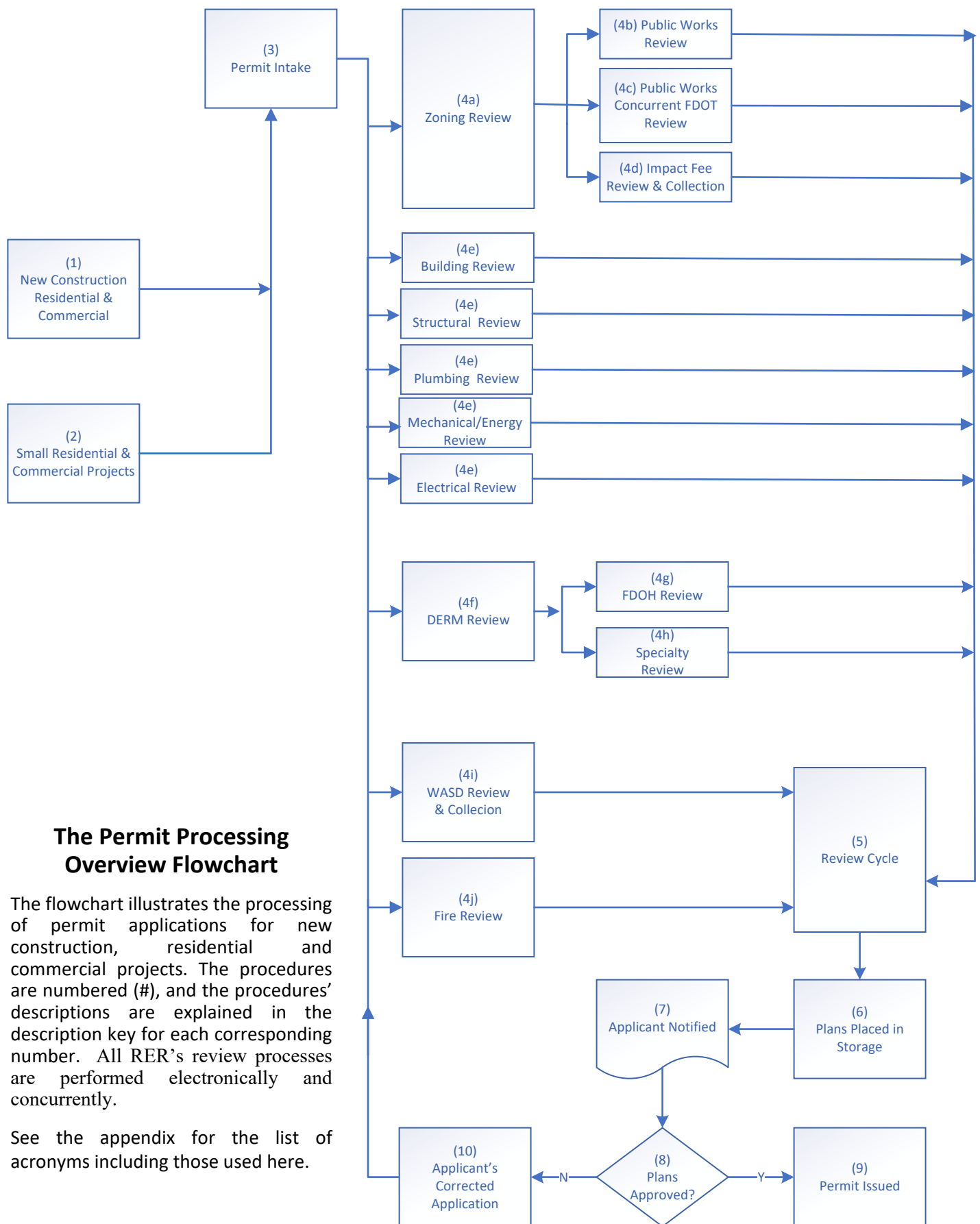
Miami-Dade County, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

F. INFORMATION GATHERING

OCA held several informational interviews with the RER Permitting process owners to thoroughly understand the building permit review cycle and several Q&A sessions with the ITD database administrators to document how the data is created within GoldKEY.

Figure 3, *Permit Process Flowchart*, details RER's permit approval process, with the relevant descriptions of each process step provided in **Table 2**, Permit Process Flowchart Description Key. Knowledge of RER's Workflow is vital to understand the timeliness of the approval process and potential inefficiencies in the system. (**Figure 3 and Table 2 on the following pages below**)

Figure 3: Permit Process Flowchart



Source: Figure designed by OCA based on information provided by RER, 2021

Table 2: Permit Process Flowchart Description Key

#	PROCESS	PROCESS DESCRIPTION
(1)	New Construction Residential & Commercial	New construction of residential and commercial structures as well as commercial alterations over \$100,000 in estimated value.
(2)	Small Residential & Commercial Projects	Residential repairs, alterations, and additions less than 1,000 SQ FT. and commercial alterations or repairs less than \$100,000 in estimated value.
(3)	Permit Intake	Applications received for building permits are reviewed for completeness, and a processing number is assigned to the Application. Upfront fees must be paid before an application is placed in the discipline review queue(s). The Permit type and category determine the required type(s) of discipline reviews. The system of record automatically routes applications to the relevant discipline based on algorithms embedded in the systems. Depending on the scope of work or specific site conditions, specific disciplines may be added during a review, such as DERM Specialties or the Florida Department of Health (FDOH). Since March 2020, all applications have been reviewed concurrently in electronic format. All applications are reviewed for compliance with the Florida Building Code (FBC) and all local, state, and federal codes. Once the applicant has complied with all requirements and paid all fees, the permit is issued. Applicants can view and track the status of their plans online via the department's website, including the estimated completion date, the plan reviewer assigned, and the disposition in real-time.
(4a)	Zoning Review	<i>Zoning, planning, and landscaping reviews.</i> For example, zoning setbacks, parking, and the required landscaping per Code.
(4b)	Public Works Review	Review for private property paving and drainage compliance with public works standards, traffic circulation within private property and impacts to County roads, and other applicable regulations, which may be triggered by a zoning application, platting action, or a roadway plan accompanying a building permit application. In some instances, the zoning reviewer may mark this review not applicable if the scope of work does not meet the criteria.
(4c)	Public Works Concurrent FDOT Review	Review for traffic concurrency. Public Works Department reviews available traffic capacity and the impact on the level of service resulting from new development.
(4d)	Impact Fee Review & Collection	Building permit applications are reviewed to assess the imposition of any zoning impact fees that will need to be paid prior to the issuance of any building permit for applicable development activity. Not all building permit applications will require impact fees.

#	PROCESS	PROCESS DESCRIPTION
(4e)	Building Discipline Reviews	These are building, plumbing, electrical, structural, and mechanical/energy reviews for compliance with the FBC and occur concurrently.
(4f)	DERM Review	Reviews building permit applications for compliance with environmental regulations such as flood, water supply, wastewater supply, and wellfield protection and identifies and activates specialty reviews based on the scope of work or specific site conditions.
(4g)	FDOH Review	Based on the details of an application, specifically, if the property has a septic tank or well, a DERM reviewer activates the FDOH review.
(4h)	Specialty Review	Based on the scope of work and specific site conditions, a determination is made by a DERM reviewer on whether it requires specialty review(s). DERM Specialty reviews may include: Air, Flood, Tree, Coastal, Tanks, Water Treatment, Solid Waste, Pollution, Asbestos, Grease, Wetland, Industrial, and Industrial Pre-Treatment.
(4i)	WASD Review & Collection	WASD reviews the availability of water and sewer services and assesses the required connection fees. Water and sewer main extensions may be required if not available.
(4j)	Fire Review	Miami-Dade Fire Rescue reviews include life safety, fire department access, site setup, and sprinkler systems. Fire review is activated for commercial and multi-family residential properties only.
(5)	Review Cycle	Upon completion of the review cycle by all required disciplines, the plans are placed in Storage.
(6)	Plans Placed in Storage	
(7)	Applicant Notified	After each review cycle, applicants are notified via email if their plans have been disapproved or approved. GoldKEY automatically generates the email, and a record of the email notification is stored within the system. After an application is disapproved, it remains in Storage until the corrected Application is resubmitted or the grace period for resubmission expires.
(8)	Plans Approved?	The applicant pays fees and obtains a permit if all reviews are approved.
(9)	Permit Issued	The applicant pays the remaining fees, the permit is issued, and the applicant is notified via email to download approved plans.
(10)	Applicant's Corrected Application	The disapproved Application requiring correction(s) is with the applicant, and no further RER action is taken until the corrected Application is resubmitted to the relevant reviewing department or section. A permit application is valid for 180 days and may be extended in 90-day increments thereafter, as long as no code change has occurred.

Source: Table designed by OCA, based on information provided by RER, 2021

II. OBSERVATIONS

A. OBSERVATION SUMMARY

1. **Open Permit Applications:** OCA noted that inherent limitations were present which prevented a comprehensive analysis of the timeliness of permit applications. Aging open permit applications in our assessment contain permit types with no regulating expiration language at the state and county levels, allowing the permit type to remain open indefinitely. Due to the absence of regulating expiration language, OCA could not determine which indefinite permits have expired or were outstanding due to inefficiencies pending a response from the applicant.

OCA identified approximately 19,087 permit applications on August 17, 2021, that were open for 365+ days and consist mainly of permit types without an expiration timeframe of 180 days, mandated by [FBC Section 105.3.2](#).¹⁰

2. **Interfacing of Other Permit Processing Systems:** OCA confirmed that GoldKEY reports only permit review Tasks performed by RER and does not account for the processing time when interacting with entities that use other permit processing systems during the application filing, processing, and approval process. The length of time the Application is with the applicant and other reviewing entities cannot be determined in GoldKEY.
3. **Current Policy and Procedural Changes:** A.O. 4-115 was adopted in 1999 and it provided guidance for the plan review time limits across all building permits but has not been updated to capture the evolution of the County's permit process over the last 20 years.
4. **Customer Communication and Satisfaction:** In a review of 80 Permit Tasks sampled to assess customer contact by a permit reviewer, OCA observed that the process was effective with only one communication exception where communication to the customer was not present within the RER customer communication log. Communications logged in the GoldKEY data are created by the reviewer in GoldKEY. The system automatically generates and sends an email to the applicant containing the reviewer's comment, department contact information, Tracking Number, and Process Number.
5. **Risk of Overpayment on Maintenance of Traffic (MOT) Permits:** County contractors obtain MOT permits as necessary from municipalities and seek reimbursement from the County. OCA conducted a case study on a County contractor that obtained a MOT permit from a municipality and found that the initial permit charge was over \$850,000. The fee was later reduced to \$5,600 after the contractor disputed and adjusted the Application. Although the County reviews the permit cost and payment before reimbursing, it does not typically review the accuracy of the permit application. Accordingly, if a contractor's permit application was inaccurate, leading to an exorbitant permit cost, that cost could be passed on to the County.

¹⁰ Email Correspondence with RER, August 17, 2021.

6. **Consistency of Street Address Formats:** Street address data included within the data sources utilized for this report include inconsistent formatting with United States Postal Service (USPS). This limits the ability to analyze and report on Commission Districts efficiently.
 7. **Inconsistent Application of the Affordable Housing Project Tag:** In examining GoldKEY Data, OCA noted that the Affordable Housing Project tag was not used consistently within and across affordable housing permit applications. Regarding County conveyed properties, over 93% of all related Permit Process Applications connected to affordable housing folios for the conveyed review period noted were not treated as expedite Permit Process Applications. This process gap may have impacted the County's initiatives and projects.
-

B. OBSERVATION DETAILS

1. Open Permit Applications

[FBC Section 105.3.2](#) of the Florida Building Code₂ mandates the expiration of certain permit types after 180 days unless an extension is granted. The Building official is authorized to grant one or more extensions not exceeding 90 days each. Per RER, the categories of permits that the FBC does not regulate consist of Zoning Improvement Permits (ZIP) - now Land Improvement Permits (LIMP), Fire Sprinkler Permits (FIRE), and Municipal Permits.¹¹ RER further explained that municipal permit applications that require the County's approval form part of the building permit process, but are not building permits issued by Miami-Dade County, because they are issued by the municipality.¹² OCA notes that these applications still require review by County agencies.

Once permit applications expire, the expired Process Number review is activated. However, permit types exist that do not expire after 180 days. As these permits do not have an application time frame, they remain open indefinitely, hereafter referred to as Indefinite Permits. As a result, OCA did not conduct a comprehensive review on the timeliness of permit applications since the aging of open permit applications cannot be determined due to the absence of an *Indefinite Permit* classification in GoldKEY, such as 'expired' or 'Outstanding.'

The 365+ Days column in **Table 3** below shows OCA's aging analysis of open permit applications on August 17, 2021, which identified 19,087 of 29,225 permit applications as open. Of these 19,087 permit applications, 18,430 are permit types not regulated by the FBC Section 105.3.2. OCA further notes that municipal permits which fall outside the County's jurisdiction still require County approval and account for 66% (12,110) of permits without an expiration time frame. The remaining 34% (6,320) of permits without an expiration time frame categorized in the 365+ aging were ZIPs, LIMP, and FIRE. In addition, the 19,087 permit applications within the 365+ aging category also comprise of 657 (3%) permit applications regulated by the FBC, which are Building (BLDG), Electrical (ELEC), Liquified Petroleum Gas (LPGX), Mechanical (MECH), and Plumbing (PLUM).

¹¹ Email Correspondence with RER, August 17, 2021.

¹² Email Correspondence with RER, September 15, 2021.

Table 3: Miami-Dade County Open Permit Applications Aging (August 17, 2021)

PERMIT TYPE	1-30 DAYS	31-60 DAYS	61-90 DAYS	91-120 DAYS	121-180 DAYS	181-364 DAYS	365+ DAYS	GRAND TOTAL
MBLD*	527	394	339	220	308	726	10,614	13,128
BLDG	1,651	980	882	634	1,024	575	412	6,158
ZIPS	70	50	52	56	77	105	3,797	4,207
FIRE	46	22	12	9	12	44	1,280	1,425
LIMP	0	0	0	0	0	0	1,243	1,243
MELE*	45	29	16	16	17	45	956	1,124
ELEC	262	181	125	101	138	37	143	987
MPLU*	23	14	12	7	15	41	267	379
MMEC*	7	8	1	2	7	5	273	303
MECH	20	13	11	8	9	4	59	124
PLUM	17	14	6	18	4	5	31	95
CCUT	2	6	0	2	9	12	0	31
LPGX	1	3	4	1	0	0	12	21
Grand Total	2,671	1,714	1,460	1,074	1,620	1,599	19,087	29,225

* Municipal permit types requiring County approval

Source: Information provided by RER

2. Interfacing of Other Permit Processing Systems

Permits processed outside of the GoldKEY System by external permitting entities are considered ancillary permits by RER. Outside permitting entities may include an incorporated municipality, the Department of Environmental Resources Management (DERM), the Water and Sewer Department (WASD), Zoning, Planning, Public Works, or the Fire Department (Fire). Ancillary permits may appear in GoldKEY with limited or no information on the outcome of the review conducted by an external permitting entity. GoldKEY will capture review details performed by an RER reviewer. In instances where an ancillary Permit is required, and the external review documents are uploaded into GoldKEY, a GoldKEY Task is generated and assigned within the approval process to capture only the time for the RER verification and acceptance of the ancillary Permit issued by the external permitting entity. GoldKEY does not capture the review times of external entities on ancillary permits.

County permitting entities use various permit processing systems, even within RER, such as Energov, e-Builder, PWPermits, and the County municipal eReview system. OCA observed that the County's municipal eReview system is the only permit processing system that interfaces with GoldKEY, allowing the reviews from outside entities to be reflected electronically in GoldKEY.¹³ RER presented at the September 15, 2022 County Infrastructure, Operations and

¹³ Email Correspondence with RER, October 27, 2022.

Innovations Committee that the department inherited a significant number of legacy systems, some of which will be replaced with GoldKEY.¹⁴ RER has reported to OCA that e-Builder and PWPermits, both used by other County permitting entities, are not currently interfacing with GoldKEY, though, Energov is expected to interface with GoldKEY in 2023.¹⁵

3. Current Policy and Procedural Changes

OCA reviewed A.O. 4-115, adopted in 1999, which mandates a specified number of County workdays for specified Tasks related to Permit Application approval. OCA notes that the legislation has not been updated in over 20 years to account for changes in the County's permit process such as the implementation of the electronic application process and concurrent review. Per A.O. 4-115, each County department is required to approve or reject Applications within a predetermined working day limitation, as displayed below in **Table 4**.

Table 4: Miami-Dade County Permit Processing Times

COUNTY DEPARTMENT	A.O. 4-115 OCTOBER 15, 1999		STUDY OF PERMITTING PROCESS REPORT (RER, 2020)	
	RESIDENTIAL (WORKDAYS)	COMMERCIAL (WORKDAYS)	RESIDENTIAL (WORKDAYS)	COMMERCIAL (WORKDAYS)
Fire	N/A	9	N/A	9
Building	20	24	4	6
Zoning	2	3	2	3
Planning	2	2	2	2
DERM ¹⁶	4	8	4	8
Public Works	2	4	2	4
WASD ¹⁷	5	5	5	5
Maximum Days to process a Permit¹⁸	30	50	5	10

Source: Information in columns two and three taken from A.O. 4-115, October 15, 1999; information in columns four and five taken from the Study of the Permitting Process written by the RER Director to the BCC (File No. [202094](#) October 20, 2020).

4. Customer Communication and Satisfaction

OCA reviewed the consistency of RER's customer communication to determine whether the communication was sent in a timely manner in instances where customer action was required to move the permit review process forward. OCA selected a sample of ten (10) permits for

¹⁴ RER Presentation: Technological, Innovations and Transformations, September 15, 2022.

¹⁵ Email Correspondence with RER, October 27, 2022.

¹⁶ Based on the type of construction and site conditions, other environmental reviews and permits may be required including, but not limited to trees, flood, and natural forest communities.

¹⁷ When infrastructure upgrades are required, WASD water main and sewer extensions are required. That time is not within the 5-day review.

¹⁸ Public Works review begins after DERM and Zoning reviews are completed.

review which consisted of 648 Tasks, of which 80 instances of RER Storage Tasks required communication from the reviewer to the applicant. Based on the sample, RER is substantially consistent in notifying its customers through GoldKEY. Of the 80 instances reviewed, there were 79 with a documented communication logged on the same day the RER reviewer completed the County Task. OCA observed only one (1) instance in the June 16, 2020 sample where the RER Storage Task had no logged communication to the applicant.

In 2021, OCA developed and distributed a survey to a subset of permit applicants, the survey sample, to understand RER customer satisfaction with the permit process. OCA distributed the survey by email in April of 2021 to 481 permit applicants. Observing a low response rate before the survey closing date, OCA made attempts to remind selected survey applications by phone to complete the survey. At the survey's closing, the response rate remained below OCA's confidence threshold to be able to draw any conclusion. RER communicated that their departmental customer satisfaction survey for permitting has been implemented subsequent to the initial OCA survey. OCA will include the results of the RER conducted surveys in its Miami-Dade County annual Performance Measures Report.

5. Risk of Overpayment on Maintenance of Traffic (MOT) Permits

OCA conducted a case study on a Maintenance of Traffic (MOT) Fee that a County contractor obtained from a municipality to gather further insight into how cities implement permit fees and the County's reimbursement process for contractors. MOT fees are required for work that obstructs or closes a street or sidewalk or impedes traffic.¹⁹

When the County hires a contractor to perform work that requires an MOT permit from a municipality, the contractor generally handles the entire permit process, from Application to payment.²⁰ Upon payment, the contractor is eligible for reimbursement by the County. The contractor must submit supporting documentation, such as a copy of the permit, an invoice from the respective municipality, and proof of payment.²¹

As OCA did not observe a County policy to regulate a contractor's municipal permit application process, there may be no mechanism in place to prevent the County from reimbursing a contractor who paid an excessive amount for a municipal permit for a County project. For example, OCA reviewed a permitting case where a contractor substantially reduced an initial MOT permit fee estimate from a municipality. Further detailed in **Table 5** below, the contractor applying for the MOT permit with the municipality was initially charged over \$850,000 for the permit. The amount was eventually reduced to just \$5,600 as the contractor disputed and reduced the length of lane closures and the estimated time a lane would need to be closed to complete the work. The above transaction shows the presence of overpayment risks where the County may overpay for a municipal permit when the County subcontracts projects.

¹⁹ Code of Ordinances, City of Doral, § 38-3. Maintenance of traffic (M.O.T.) <http://doral.elaws.us/code>.

²⁰ Meeting with WASD, July 29, 2022.

²¹ Email Correspondence with WASD, August 5, 2022.

Table 5: Municipal Fees Example

DATE	FEES	CALCULATION USED	JUSTIFICATION
May 18, 2021	Initial fee of \$852,110	4,700 ft x \$0.35 per foot x 518 days = \$852,110	The contractor's Application represented that 4,700 LF of land would be closed for 518 days.
May 19, 2021	Fee reduced to \$279,650	4,700 ft x \$0.35 per foot x 170 days = \$279,650	The contractor clarified with the municipality that lane closures would only occur for 170 days.
July 6, 2021	Final reduction of the fee to \$5,600	200 ft x \$0.35 per foot x 80 days = \$5,600	The contractor further explained that only approximately 200 feet of one lane would be closed at a time for 80 days.

Source: WASD; Communications with Municipality

6. Consistency of Street Address Formats

Street address data across County data sources are not consistent on how address information is captured, and there is limited adherence to standardized address information and formatting as per the USPS postal addressing standards.²² A valid USPS address should contain the following components:

- All capital letters
- Company name, apartment number, or suite number when applicable
- City and state names
- A valid ZIP +4 code
- No commas or periods
- USPS recognized acronyms and abbreviations

Jointly developed by USPS and the mailing industry, standardized address information enhances mail processing and delivery, reduces undeliverable-as-addressed mail, and provides mutual cost reduction opportunities through improved efficiency. The standards include uniform methods for matching addresses with the information in Address Information System (AIS) products and formats for outputting addresses on mail pieces.²³ Moreover, within the various County systems and applications that include address data fields, a uniform format has not been adopted for the data sources examined for this report. This limitation will reduce the availability of geographic information and make Commission District reporting difficult.

²² Postal Explorer: Delivery Address, <https://pe.usps.com/businessmail>.

²³ Postal Explorer: Introduction, Background, and Purpose, <https://pe.usps.com/businessmail>.

7. Review of Affordable Housing Project Permits

OCA observed inconsistent tracking of expedited status primarily caused by the current RER application procedures, including the applicant's self-identification of expedited project type for each permit application approval process.

Within GoldKEY, each permit number is connected to an overall folio number. Developers submit permit applications, and each Application has a Permit Process Application number assigned by RER. Each Permit Process Application number is connected to a tracking number auto-generated by GoldKEY. The tracking number is used to reference plans undergoing review. The process number is used to reference the permit. OCA observed that each permit application submitted was assigned a newly generated process number by RER for the newly submitted Application in GoldKEY.

Multiple process numbers (i.e., permits) may reference the same set of plans by using the same tracking number. For example, a customer may submit the plans to install shutters on an apartment building with 20 units resulting in one tracking number and twenty process numbers. The plans are reviewed and approved once at the tracking number level. As the customer pays permit fees for each process number, a permit is generated for each process number. Permit fees do not have to be paid at the same time for all permits.²⁴

When a Permit Process Application is submitted, it is the responsibility of the permit applicant to self-identify expedited status. Often, this is done through the Contact Information Sheet for each permit application form, shown below in **Figure 10**. On the Contact Information Sheet, the permit applicant must self-identify any expedited status for each Permit Process Application that their project may have. This process causes some Permit Process Applications to be expedited under a permit number and some not to be expedited, making the timeliness of the permit processing for affordable housing projects challenging to use, as further elaborated below.²⁵

a. Inconsistent GoldKEY Affordable Housing Project Tags

OCA was provided with a GoldKEY dataset and definitions for 36 data fields, the columns that correspond to the data file. Included within this dataset is a data field for identifying the various types or expedited status, including for affordable housing. OCA used this data field to generate an initial count of folios and permits tagged as "Affordable Housing Projects" within the GoldKEY system.

GoldKEY allows RER reviewers to tag permit applications with an expedited tag which provides a mechanism to track the permit process for Affordable Housing Projects and facilitate the expedited directive. OCA began its analysis of the expedited process by filtering the GoldKEY data for the expedited Affordable Housing Project tag at the process application level. During the analysis, OCA identified permits tagged inconsistently with an expedited tag within

²⁴ Email Correspondence with ITD, October 19, 2022.

²⁵ Meeting with RER, August 31, 2022.

GoldKEY, resulting in inconsistent expedited statuses throughout the permit's approval process for permit applications associated with a single folio.

According to RER, the Application maintains the expedited tag until all approvals on that specific Application are received. Any subsequent permit application will be processed according to the newly selected expedited plan review option for the newly uploaded Contact Sheet after the initial permit is issued or subsidiary permits are issued.²⁶

OCA's analysis of GoldKEY shows that a new Contact Sheet is required each time the applicant uploads additional documents for review, regardless of whether a Contact Sheet was previously uploaded into GoldKEY for the same Application. The applicant's responsibility is to self-identify on each newly uploaded Contact Sheet that the permit application qualifies for an expedited plan review. The customer may choose from several options, including *Affordable Housing Project* or *Government Project*, on the Contact Sheet. See an example of the County's current Contact Sheet in **Figure 10**.

Additionally, OCA observed that the GoldKEY System could have Permit Process Applications under the same permit with an expedited tag on one Application and without an expedited tag on another application.²⁷ This non-uniformity effectively demonstrates how a permit can have non-expedited and expedited review cycles as part of its complete approval process. For example, in **Figure 4**, the referenced permit appears in the GoldKEY System as *No Expedite* on the application landing page and *Affordable Housing Project* on another for the same permit.

Figure 4: Permit 2021050118: Permit Details - EPS

3022154544		Correction markups	Import Errors	NO EXPEDITE
Contact Name:		Submittal Type:	Electronic	
Submittal Status:	Rework	Last Notified:	9/2/2022 12:22 PM / Email	
Municipality:	UNINCORPORATED MIAMI-DADE	Plan Revision:	Y	
Tracking Date:	7/22/2022 7:34 AM	Storage Location:	None	

²⁶ Email Correspondence with RER, October 27, 2022.

²⁷ Email Correspondence with RER, April 13, 2022.

✎ Correction markups
✖ Import Errors
📌 AFFORDABLE HOUSING PROJECT

Contact Name:		Submittal Type:	Electronic
Submittal Status:	Rework	Last Notified:	6/2/2021 3:10 PM / Email
Municipality:	UNINCORPORATED MIAMI-DADE	Plan Revision:	
Tracking Date:	2/28/2020 8:18 AM	Storage Location:	None

Note: The information shown in the images above are from September 2022. Information in GoldKEY may have changed as GoldKEY is a live platform.

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY).

Figure 5 shows permit number 2022014785. This permit has (5) five related process applications with No Expedite tags and Affordable Housing Project tags, with no uniformity, across all linked permit applications. The earliest Application is tagged as No Expedite, the subsequent (2) two Applications are tagged as Affordable Housing Project, and the remaining (2) two process applications are tagged as No Expedite. Images in **Figure 6** through **Figure 8** show how each Application related to this permit appears in GoldKEY. The variation in the assignment of tags to process applications in the GoldKEY dataset makes the analysis of the overall timeliness of applications for Affordable Housing Projects difficult to complete while maintaining sufficient data integrity.

Figure 5: Permit 2022014785: Permit Details - EPS

Permit: **2022014785**

Status: Issued	Permit Type:	Categories: 0001-GENERAL (COUNTY)
Issued Date: 12/06/2021	Created Date: 09/30/2020	

Revision History

Filter permits ▼

Tracking ↑↓	Application ↑↓	Application Date	Submittal Status ↑↓	Issue Date ↑↓	Tracking Comments
3022165221	C2022165221	8/11/2022	Permitted	8/23/2022	SHDR-EXT.DOOR
3022165086	C2022165086	8/11/2022	Permitted	9/26/2022	SHOP DRAWING RAILINGS/LADDER
3022126019	C2022126019	6/9/2022	Permitted	6/21/2022	PLUM REVISION
3022052049	C2022052049	1/19/2022	Permitted	3/15/2022	REV
3020170735	C2020170735	9/30/2020	Permitted	12/6/2021	LOT 10-DEMO CURRENT TOWNHOUSE AND CONSTRUCT NEW TRIPLEX

Showing 1 to 5 of 5 entries

Note: The information shown in the images above are from September 2022. Information in GoldKEY may have changed as GoldKEY is a live platform.

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

Figure 6: Application C2020170735 for Permit 2022014785

3020170735 Q Correction markups Import Errors NO EXPEDITE

Contact Name: 	Submittal Type: Electronic
Submittal Status: Rework	Last Notified: 12/6/2021 4:06 PM / Email
Municipality: UNINCORPORATED MIAMI-DADE	Plan Revision:
Tracking Date: 9/30/2020 8:06 PM	Storage Location: None

Applications

Process	Job Copy	Details
C2020170735	2022014785	Details

Notes: 1) The information shown in the image above is from September 2022. Information in GoldKEY may have changed as GoldKEY is a live platform. 2) The initial permit application submitted in 2020 is tagged as "No Expedite."

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

Figure 7: Application C2022052049 and Application C2022126019; Permit 2022014785

3022052049		Correction markups	Import Errors	AFFORDABLE HOUSING PROJECT
Contact Name:	[REDACTED]	Submittal Type:	Electronic	
Submittal Status:	Rework	Last Notified:	3/15/2022 1:54 PM / Email	
Municipality:	UNINCORPORATED MIAMI-DADE	Plan Revision:	Y	
Tracking Date:	1/19/2022 3:33 PM	Storage Location:	None	

Applications		
Process	Job Copy	Details
C2022052049	2022014785	Details

3022126019		Correction markups	Import Errors	AFFORDABLE HOUSING PROJECT
Contact Name:	[REDACTED]	Submittal Type:	Electronic	
Submittal Status:	Rework	Last Notified:	6/21/2022 1:58 PM / Email	
Municipality:	UNINCORPORATED MIAMI-DADE	Plan Revision:	Y	
Tracking Date:	6/9/2022 8:33 AM	Storage Location:	None	

Applications		
Process	Job Copy	Details
C2022126019	2022014785	Details

Notes: 1) The information shown in the images above are from September 2022. Information in GoldKEY may have changed as GoldKEY is a live platform. 2) The second and third process applications associated with this permit are connected to a tracking number that is tagged as Affordable Housing Project, both issued in the middle of 2022.

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

Figure 8: Application C2022165086 and Application C2022165221; Permit 2022014785

3022165086		Correction markups	Import Errors	NO EXPEDITE
Contact Name:	[REDACTED]	Submittal Type:	Electronic	
Submittal Status:	Rework	Last Notified:	9/26/2022 1:45 PM / Email	
Municipality:	UNINCORPORATED MIAMI-DADE	Plan Revision:	Y	
Tracking Date:	8/11/2022 12:09 PM	Storage Location:	None	

Applications		
Process	Job Copy	Details
C2022165086	2022014785	Details

3022165221		Correction markups	Import Errors	NO EXPEDITE
Contact Name:	[REDACTED]	Submittal Type:	Electronic	
Submittal Status:	Rework	Last Notified:	8/23/2022 5:49 PM / Email	
Municipality:	UNINCORPORATED MIAMI-DADE	Plan Revision:	Y	
Tracking Date:	8/11/2022 1:44 PM	Storage Location:	None	

Applications		
Process	Job Copy	Details
C2022165221	2022014785	Details

Notes: 1) The information shown in the images above are from September 2022. Information in GoldKEY may have changed as GoldKEY is a live platform. 2) The fourth and fifth process applications associated with this permit are tagged as "No Expedite," both were issued in late 2022.

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

As noted by RER in an email response from April 2022, "there may have been affordable or workforce housing projects that identified themselves as government and therefore were

expedited through the Government Project plan review tag."²⁸ OCA's analysis confirmed that Permit Process Applications associated with a particular permit, see **Figure 9**, include applications classified as both Affordable Housing Project and Government Project, further complicating the assessment of Affordable Housing Projects. RER confirmed that the department does not have a training manual or procedure in place to verify expedited status.²⁹ However, the department stated that if RER becomes aware of an applicant that has falsely identified or misrepresented their project, then the department will require the applicant to pay for the expedited service that has occurred.³⁰

Figure 9: Application C2016115200 and Application C2016184771; Permit 2016059844

The figure displays two screenshots of the GoldKEY application portal. The top screenshot shows application C2016115200 for an Affordable Housing Project. The application details include: Contact Name (redacted), Submittal Type: Electronic, Submittal Status: Rework, Municipality: UNINCORPORATED MIAMI-DADE, Tracking Date: 5/16/2016 1:40 PM, Last Notified: 8/9/2016 9:14 AM / Email, Plan Revision: N, and Storage Location: None. The bottom screenshot shows application C2016184771 for a Government Project. The application details include: Contact Name (redacted), Submittal Type: Electronic, Submittal Status: Initial, Municipality: UNINCORPORATED MIAMI-DADE, Tracking Date: 9/15/2016 4:09 PM, Last Notified: 9/20/2016 11:44 AM / Email, Plan Revision: Y, and Storage Location: None. A sidebar on the right lists the applications under the permit 2016059844, showing C2016115200 and C2016184771.

Note: The information shown in the images above are from September 2022. Information in GoldKEY may have changed as GoldKEY is a live platform.

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

OCA reached out to RER to confirm OCA's understanding of the process after observing the inconsistent tagging of permit applications in GoldKEY. RER explained that the responsibility is on the applicant to ensure that the Contact Sheet for each Application is marked correctly. Otherwise, the Application will not be expedited, even if the Contact Sheet for the initial permit or an earlier Application under the permit was tagged as an Affordable Housing Project.³¹ According to RER, an applicant can also submit Contact Sheet information directly online, as opposed to manually filling out and uploading a Contact Sheet into GoldKEY, and therefore the Office Use section of the Contact Sheet may not be filled out on all Contact Sheets saved into GoldKEY. This variance occurs because the electronic input of information into the portal electronically captures the application date, permit process number, clerk name, and information electronically generated by the system.³²

²⁸ Email Correspondence with RER, April 13, 2022.

²⁹ Meeting with RER, November 8, 2022.

³⁰ Email Correspondence with RER, October 27, 2022.

³¹ Meeting with RER, August 31, 2022.

³² Meeting with RER, November 8, 2022.

However, the OCA November 8, 2022 interview with RER revealed other exceptions where an application can be granted expedited status. For instance, if the property owner is listed as Miami-Dade County or one of the other county agencies, the RER intake staff has received training to treat and tag the project as Government Expedite. If RER staff, through an in-person meeting with the developer, is made aware that the project is applicable for the expedited process, then staff can personally tag the project as an Affordable Housing Project in GoldKEY.³³

Figure 10: Permit Application Contact Sheet Excerpt

Miami-Dade Department of Regulatory and Economic Resources CONTACT INFORMATION FOR PERMIT APPLICATION		
FIRST NAME (print clearly)		LAST NAME (print clearly)
MOBILE PHONE		OFFICE/HOME PHONE
EMAIL (required so you can be notified on the status of your plans)		
COMMENTS (If you are submitting a municipal plan, please provide the municipal process number(s) and ensure the municipal application is in the office set of plans.)		
PLANS (check all that apply)		
Please indicate if plans qualify for the following expedited plan reviews:		
☐ GOVT PROJECT/DEPT	☐ GREEN BLDG* (new construction only)	☐ PACE PROJECT*
☒ AFFORDABLE WORKFORCE HOUSING*	☐ ECONOMIC SIGNIFICANCE*	☐ CONCIERGE
(*Pursuant to Ordinance 99-140; Ordinance 05-115; and Ordinance 08-51. Project may have additional requirements.)		

Note: A 2016 version of the Contact Sheet provides five (5) self-identifying options for developers of affordable housing: Gov't Project/DEPT, Green Bldg (New Construction Only), Pace Project, Affordable Workforce Housing, and Economic Significance.

Source: RER Website

OCA assesses that since RER relies on the developer to correctly fill out the Contact Sheet and mark the appropriate expedited tag, this self-identification can contribute to a process failure where Affordable Housing Projects are not expedited in accordance with County policy.

Additionally, some Affordable Housing Projects may have identified themselves as *Government Project*, which would have been processed through the expedited Government Projects plan

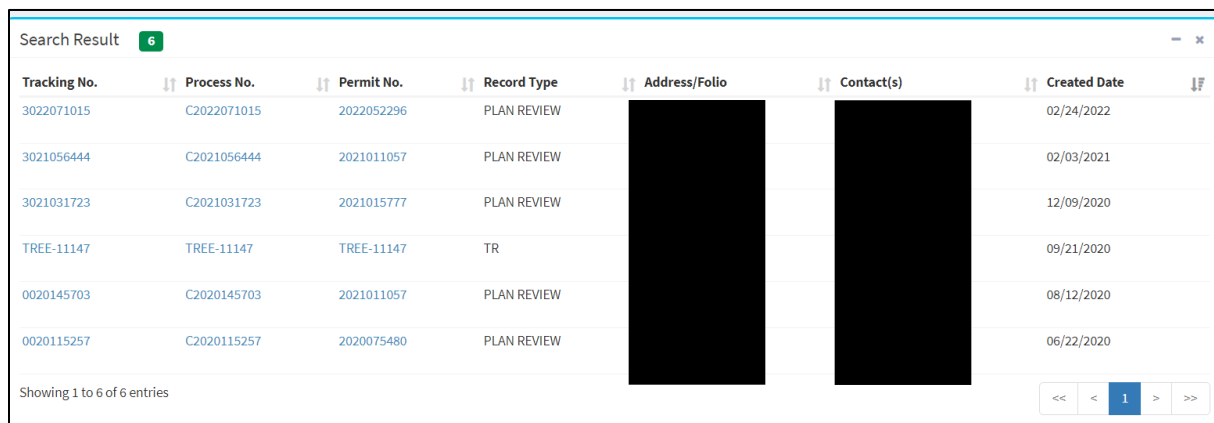
³³ Meeting with RER, November 8, 2022.

review but would not be tagged as Affordable Housing Project.³⁴ Accordingly, a developer may incorrectly mark their project as a Government Project rather than an Affordable Housing Project. According to RER, the developer would still receive an expedited process, but the project may not include the Affordable Housing Project tag in GoldKEY, thereby affecting the analysis of the expedited plan review. In summation, there are Affordable Housing Projects that are not marked with the Affordable Housing Project tag in GoldKEY.

i. Example of Developer Inconsistencies: Habitat for Humanity (Folio 30-3112-023-0180)³⁵

In October 2019, Miami-Dade County conveyed Folio 30-3112-023-0180 to Habitat for Humanity of Greater Miami, Inc in accordance with the requirements of the Infill Housing Initiative Program.³⁶ Beginning on June 22, 2020, Permit Process Applications connected to the referenced folio were created within GoldKEY. Five (5) Permit Process Applications were created, connected to four (4) different permits that were later issued by the County, between June 2020 and February 2021. In August 2021, ownership of the property transferred from Habitat for Humanity to an individual homeowner. In February 2022, a new Permit Process Application was created and issued in May 2022, under the fence permit category, for a total of six (6) Permit Process Applications. **Figure 11** below shows how the six (6) Permit Process Applications are reflected in GoldKEY.

Figure 11: Overview of Folio 30-3112-023-0180



The screenshot shows a search result window titled 'Search Result' with a green badge indicating 6 results. The results are displayed in a table with the following columns: Tracking No., Process No., Permit No., Record Type, Address/Folio, Contact(s), and Created Date. The Address/Folio and Contact(s) columns are redacted with black boxes. The table contains 6 rows of data, with the last row having a 'Created Date' of 06/22/2020. At the bottom, it says 'Showing 1 to 6 of 6 entries' and has pagination controls showing page 1 of 1.

Tracking No.	Process No.	Permit No.	Record Type	Address/Folio	Contact(s)	Created Date
3022071015	C2022071015	2022052296	PLAN REVIEW	[REDACTED]	[REDACTED]	02/24/2022
3021056444	C2021056444	2021011057	PLAN REVIEW	[REDACTED]	[REDACTED]	02/03/2021
3021031723	C2021031723	2021015777	PLAN REVIEW	[REDACTED]	[REDACTED]	12/09/2020
TREE-11147	TREE-11147	TREE-11147	TR	[REDACTED]	[REDACTED]	09/21/2020
0020145703	C2020145703	2021011057	PLAN REVIEW	[REDACTED]	[REDACTED]	08/12/2020
0020115257	C2020115257	2020075480	PLAN REVIEW	[REDACTED]	[REDACTED]	06/22/2020

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

The following items describe the application process for the six (6) Permit Process Applications.

³⁴ Email Correspondence with RER, April 13, 2022.

³⁵ The analysis on folio 30-3112-023-0180 and associated Permit Process Applications was conducted in November 2022. Because GoldKEY is a live platform, updates and changes to the information presented in this section may have changed since the date the research was conducted.

³⁶ County Record's Official Record Search, <https://onlineservices.miami-dadeclerk.com/OfficialRecords>.

1. Application C2020115257, No Expedited Status Granted

The original Permit Process Application submitted by Habitat for Humanity for this folio was created on June 22, 2020 within GoldKEY, and its associated permit, 2020075480, was issued on September 28, 2020. **Figure 12** below shows a copy of the Contact Sheet related to the first Application.

Figure 12: Contact Sheet Application C2020115257 (June 2, 2020)

Miami-Dade Department of Regulatory and Economic Resources CONTACT INFORMATION FOR PERMIT APPLICATION		
FIRST NAME (print clearly)	LAST NAME (print clearly)	
MOBILE PHONE	OFFICE/HOME PHONE	
EMAIL (required so you can be notified on the status of your plans) @miamihabitat.org		
COMMENTS (if you are submitting a municipal plan, please provide the municipal process number(s) and ensure the municipal application is in the office set of plans.) HFH 598-1 NEW SUBMISSION (CCFP) APPROVED CCNFP # 2020048985		
PLANS (check all that apply)		
Please indicate if plans qualify for the following expedited plan reviews:		
☐ GOV'T PROJECT/DEPT	☐ GREEN BLDG* (new construction only)	☐ PACE PROJECT*
☐ AFFORDABLE/WORKFORCE HOUSING*	☐ ECONOMIC SIGNIFICANCE*	☐ CONCERGE
(*Pursuant to Ordinance 99-140; Ordinance 05-115; and Ordinance 08-51. Project may have additional requirements.)		
REQUESTED PLAN REVIEWS (check all that apply for rework only)		
☐ ALL	☒ BLDG/HCAP	☒ ELEC
☒ LANDSCAPING	☒ MECH	☒ PLUM
☒ STRU	☒ ZNPR	☒ WASH
☒ DERM CORE	☐ DERM AIR	☐ DERM AIRPORT
☐ DERM GREASE	☐ DERM INDUSTRIAL	☐ DERM PAVING & DRAINAGE
☐ DERM TANKS	☐ DERM TREES	☐ DERM WATER TREATMENT
☐ ENRG	☐ FIRE	☐ ROOF
☐ PWKS	☐ PWCC	☐ SIGN
☐ PWIF	☐ LPGX	☐ SHOP DRAWING
☐ DERM ASBESTOS	☐ DERM COASTAL	☐ DERM FLOOD
☐ DERM POLLUTION	☐ DERM PRE-TREATMENT	☐ DERM SOLID WASTE
☐ DERM WETLANDS	☐ PERMIT BY AFFIDAVIT CHECK	☐ SHORT TERM EVENT AFFIDAVIT CHECK
OPTIONAL PLAN REVIEWS (check all that apply)		
☐ BLDG	☐ ELEC	☐ MECH
☐ PLUM	☐ STRU	
OPR DERM INITIAL REVIEWS (check all that apply)		
☐ DERM CORE	☐ DERM SPECIALTY (You will be notified after core review is complete for additional fees)	
OPR DERM REWORK (OPR for specialty only available at PIC)		
☐ TREE	☐ GREASE	☐ ASBESTOS
☐ TANKS	☐ INDUSTRIAL	☐ WETLAND
☐ COASTAL	☐ AIR	☐ PAVING & DRAINAGE
☐ PRE-TREATMENT	☐ CORE	☐ FLOOD
FOR OFFICE USE ONLY		
To be completed by Permit and Occupancy Representative or Plans Processing Specialist		
APPLICATION DATE	CLERK NAME	ARRIVAL TIME
PROCESS NUMBER	PROCESS NUMBER	PROCESS NUMBER
☐ RE-ISSUE	☐ PLAN REVISION	☐ REWORK
☐ SHOP DRAWING		
Herbert S. Saffir Permitting and Inspection Center, 11805 SW 26th Street, Miami, Florida 33175-2474 T 786-315-2100 miamidade.gov/permits		

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (Retrieved through GoldKEY Login Access)

Seventeen different Contact Sheets were submitted for the Permit Process Application related to this application number. All of them include the Permit Process Application number, except for the original Permit Process Application. None of the Contact Sheets indicate that this Application was for an Affordable Housing Project or any other expedited category, and no

expedited status was conferred on the Permit Process Application in GoldKEY, even though the property was conveyed by the County to Habitat for Humanity for affordable housing. Five (5) of the Contact Sheets appeared identical and were all uploaded to GoldKEY on the same day, September 24, 2020. The five (5) versions of the single Contact Sheet correspond to five (5) different versions of the same plumbing plans uploaded by the developer.

2. Application C2020145703: Expedited Status Granted

The second Permit Process Application for this folio within GoldKEY was created on August 12, 2020 and its associated permit, 2021011057, was issued on November 18, 2020.

This is the only Application associated with the folio to be an Affordable Housing Project. It has 78 affiliated documents, including eight (8) Contact Sheets, all uploaded between August 12, 2020, and November 2, 2020. Despite being tagged in GoldKEY as an Affordable Housing Project, none of the eight Contact Sheets indicate that this Application is for an Affordable Housing Project (see an example of the uploaded Contact Sheets in **Figure 13** below). There are several ways that this can occur. RER staff may notice that a developer is a non-profit organization that builds affordable housing, such as Habitat for Humanity, and grants expedited status even though the developer's Contact Sheet does not indicate as such.³⁷

The first Contact Sheet associated with this application process number is blank. One of the Contact Sheets under this Permit Process Application is labeled with the permit process number from the first Permit Process Application, C202011527. RER indicated that since developers can now self-service and directly upload documents into GoldKEY, the applicant may have uploaded the wrong Contact Sheet.³⁸ The Contact Sheet uploaded on September 14, 2020 references Application Process Number C2020115257, not the application process number written on the first one (1) of eight (8) Contact Sheets for this second Application. The Contact Sheet uploaded on November 3, 2020 includes the Application Process Number but was inputted in the date field of the Contact Sheet.

The fifth Permit Process Application on this folio, further detailed below, also relates to the same permit number under Application Process Number C2021056444.

³⁷ Meeting with RER, November 8, 2022.

³⁸ Id.

Figure 13: Contact Sheet Application C2020145703 (August 12, 2020)

Miami-Dade Department of Regulatory and Economic Resources CONTACT INFORMATION FOR PERMIT APPLICATION		
FIRST NAME (print clearly)		LAST NAME (print clearly)
MOBILE PHONE		OFFICE/HOME PHONE
EMAIL (required so you can be notified on the status of your plans) @MIAMIHABITAT.ORG		
COMMENTS (If you are submitting a municipal plan, please provide the municipal process number(s) and ensure the municipal application is in the office set of plans.) NEW PERMIT APP 416 NW 83 ST 30-3112-023-0180 PROCESS #C2020064933 ON THE PLANS WAS THE PROCESS # FOR THE NOW APPROVED CCNFP - CCNFP APPROVED PERMIT NUMBER IS REFERENCED ON THE PERMIT APP		
PLANS (check all that apply)		
Please indicate if plans qualify for the following expedited plan reviews:		
☐ GOV'T PROJECT/DEPT	☐ GREEN BLDG* (new construction only)	☐ PACE PROJECT*
☐ AFFORDABLE/WORKFORCE HOUSING*	☐ ECONOMIC SIGNIFICANCE*	☐ CONCERGE
(*Pursuant to Ordinance 99-140; Ordinance 05-115; and Ordinance 08-51. Project may have additional requirements.)		
REQUESTED PLAN REVIEWS (check all that apply for rework only)		
☐ ALL	☒ BLDG/HCAP	☒ ELEC
☒ LANDSCAPING	☒ MECH	☒ PLUM
☒ STRU	☒ ZNPR	☒ WSD
☒ DERM CORE	☐ DERM AIR	☐ DERM AIRPORT
☐ DERM GREASE	☐ DERM INDUSTRIAL	☐ DERM PAVING & DRAINAGE
☐ DERM TANKS	☐ DERM TREES	☐ DERM WATER TREATMENT
☐ ENRG	☐ FIRE	☐ ROOF
☒ PWKS	☐ PWCC	☐ SIGN
☒ PWIF	☐ LPGX	☒ SHOP DRAWING
☐ DERM ASBESTOS	☐ DERM COASTAL	☐ DERM FLOOD
☐ DERM POLLUTION	☐ DERM PRE-TREATMENT	☐ DERM SOLID WASTE
☐ DERM WETLANDS	☐ PERMIT BY AFFIDAVIT CHECK	☐ SHORT TERM EVENT AFFIDAVIT CHECK
OPTIONAL PLAN REVIEWS (check all that apply)		
☐ BLDG	☐ ELEC	☐ MECH
☐ PLUM	☐ STRU	
OPR DERM <u>INITIAL</u> REVIEWS (check all that apply)		
☐ DERM CORE	☐ DERM SPECIALTY (You will be notified after core review is complete for additional fees)	
OPR DERM <u>REWORK</u> (OPR for specialty only available at PIC)		
☐ TREE	☐ GREASE	☐ ASBESTOS
☐ TANKS	☐ INDUSTRIAL	☐ WETLAND
☐ COASTAL	☐ PRE-TREATMENT	☐ CORE
☐ AIR	☐ PAVING & DRAINAGE	☐ FLOOD
FOR OFFICE USE ONLY		
To be completed by Permit and Occupancy Representative or Plans Processing Specialist		
APPLICATION DATE	CLERK NAME	ARRIVAL TIME
PROCESS NUMBER	PROCESS NUMBER	PROCESS NUMBER
☐ RE-ISSUE	☐ PLAN REVISION	☐ REWORK
		☒ SHOP DRAWING
Herbert S. Saffir Permitting and Inspection Center, 11805 SW 26th Street, Miami, Florida 33175-2474 T 786-315-2100 miamidade.gov/permits		

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (GoldKEY)

3. Application TREE-11147

The third Permit Process Application is for Tree Removal/Relocation or TR. Documents related to this approval process were not viewable within GoldKEY.

4. Application C2021021723: No Expedited Status Granted

The fourth Permit Process Application for this folio within GoldKEY was created on December 9, 2020 and its associated permit, 2021015777, was issued on December 11, 2020. There is one Contact Sheet for this process application related to roofing permitting. No application process number, expedited status, or application date is included on the Contact Sheet.

5. Application C2021056444: No Expedited Status Granted

The fifth Permit Process Application for this folio within GoldKEY was created on February 3, 2021 and its associated permit, 2021011057, was issued on November 18, 2020 (note: this date references documents submitted under application C2020145703). Since this Permit Process Application is for a permit already issued, a new Tracking Number and application process number should have been generated.³⁹ The Permit Process Application primarily contains information on the approval of Shop Drawings. Three Contact Sheets are connected to the Permit Process Application, none of which indicate expedited status.

6. Application C2022071015: No Expedited Status Granted

This sixth Permit Process Application for this folio on GoldKEY was created on February 24, 2022 and its associated permit, 2022052296, was issued on May 20, 2022.

Unlike the previous five Permit Process Applications associated with this folio, this application references the new homeowner at the time of application submission, not Habitat for Humanity. Two (2) Contact Sheets are associated with this Application, with no expedited status indicated on the forms. See **Figure 14** below.

³⁹ Meeting with RER, November 8, 2022.

Figure 14: Contact Sheet Application C2022071015 (March 22, 2022 and May 16, 2022)

CONTACT INFORMATION FOR PERMIT APPLICATION

MIAMI-DADE DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES

FIRST NAME (print clearly): [REDACTED] LAST NAME (print clearly): [REDACTED]

MOBILE PHONE: [REDACTED] OFFICE PHONE: [REDACTED]

EMAIL (required so you can be notified on the status of your plans): [REDACTED]

COMMENTS (if you are submitting a municipal plan, please provide the municipal process number(s) and ensure the municipal application is in the office set of plans.):

PLANS (check all that apply)

Please indicate if plans qualify for the following expedited plan reviews:

☐ GOVT PROJECT/DEPT ☐ GREEN BLDG* (new construction only) ☐ FACE PROJECT* ☐ AFFORDABLE/WORKFORCE HOUSING* ☐ ECONOMIC SIGNIFICANCE* ☐ CONCERGE

(*Pursuant to Ordinance 99-146; Ordinance 05-115; and Ordinance 08-51. Project may have additional requirements.)

REQUESTED PLAN REVIEWS (check all that apply for review only)

☒ ALL ☐ BLDG/HCAP ☐ ELEC ☐ ENRG ☐ FIRE ☐ ROOF ☐ LANDSCAPING ☐ MECH ☐ PLUM ☐ PWCC ☐ SIGN ☐ SHOP DRAWING ☐ STRU ☐ WASH ☐ PWIF ☐ LPGX ☐ DERM CORE ☐ DERM AIR ☐ DERM AIRPORT ☐ DERM ASBESTOS ☐ DERM COASTAL ☐ DERM FLOOD ☐ DERM GREASE ☐ DERM INDUSTRIAL ☐ DERM PAVING & DRAINAGE ☐ DERM POLLUTION ☐ DERM PRE-TREATMENT ☐ DERM SOLID WASTE ☐ DERM TANKS ☐ DERM TREES ☐ DERM WATER TREATMENT ☐ DERM WETLANDS ☐ PERMIT BY AFFIDAVIT ☐ SHORT TERM EVENT ☐ AFFIDAVIT CHECK

OPTIONAL PLAN REVIEWS (check all that apply)

☐ BLDG ☐ ELEC ☐ MECH ☐ PLUM ☐ STRU

OPR DERM INITIAL REVIEWS (check all that apply)

☐ DERM CORE ☐ DERM SPECIALTY (You will be notified after core review is complete for additional fees)

OPR DERM REWORK (OPR for specialty only available at PIC)

☐ TREE ☐ GREASE ☐ ASBESTOS ☐ COASTAL ☐ AIR ☐ PAVING & DRAINAGE ☐ TANKS ☐ INDUSTRIAL ☐ WETLAND ☐ PRE-TREATMENT ☐ CORE ☐ FLOOD

FOR OFFICE USE ONLY

To be completed by Permit and Occupancy Representative or Plans Processing Specialist

APPLICATION DATE: 03/20/22 CLERK NAME: GO ARRIVAL TIME: 8:40

PROCESS NUMBER: C2022071015 PROCESS NUMBER: PROCESS NUMBER:

☐ RE-ISSUE ☐ PLAN REVISION ☒ REWORK ☐ SHOP DRAWING

Herbert S. Saffie Permitting and Inspection Center, 11805 SW 26th Street, Miami, Florida 33175-2474 T 786-315-2100 miamidade.gov/permits

CONTACT INFORMATION FOR PERMIT APPLICATION

MIAMI-DADE DEPARTMENT OF REGULATORY AND ECONOMIC RESOURCES

FIRST NAME (print clearly): [REDACTED] LAST NAME (print clearly): [REDACTED]

MOBILE PHONE: [REDACTED] OFFICE PHONE: [REDACTED]

EMAIL (required so you can be notified on the status of your plans): [REDACTED]

COMMENTS (if you are submitting a municipal plan, please provide the municipal process number(s) and ensure the municipal application is in the office set of plans.):

PLANS (check all that apply)

Please indicate if plans qualify for the following expedited plan reviews:

☐ GOVT PROJECT/DEPT ☐ GREEN BLDG* (new construction only) ☐ FACE PROJECT* ☐ AFFORDABLE/WORKFORCE HOUSING* ☐ ECONOMIC SIGNIFICANCE* ☐ CONCERGE

(*Pursuant to Ordinance 99-146; Ordinance 05-115; and Ordinance 08-51. Project may have additional requirements.)

REQUESTED PLAN REVIEWS (check all that apply for review only)

☒ ALL ☐ BLDG/HCAP ☐ ELEC ☐ ENRG ☐ FIRE ☐ ROOF ☐ LANDSCAPING ☐ MECH ☐ PLUM ☒ PWCC ☐ SIGN ☐ SHOP DRAWING ☐ STRU ☒ WASH ☐ PWIF ☐ LPGX ☐ DERM CORE ☐ DERM AIR ☐ DERM AIRPORT ☐ DERM ASBESTOS ☐ DERM COASTAL ☐ DERM FLOOD ☐ DERM GREASE ☐ DERM INDUSTRIAL ☐ DERM PAVING & DRAINAGE ☐ DERM POLLUTION ☐ DERM PRE-TREATMENT ☐ DERM SOLID WASTE ☐ DERM TANKS ☐ DERM TREES ☐ DERM WATER TREATMENT ☐ DERM WETLANDS ☐ PERMIT BY AFFIDAVIT ☐ SHORT TERM EVENT ☐ AFFIDAVIT CHECK

OPTIONAL PLAN REVIEWS (check all that apply)

☐ BLDG ☐ ELEC ☐ MECH ☐ PLUM ☐ STRU

OPR DERM INITIAL REVIEWS (check all that apply)

☐ DERM CORE ☐ DERM SPECIALTY (You will be notified after core review is complete for additional fees)

OPR DERM REWORK (OPR for specialty only available at PIC)

☐ TREE ☐ GREASE ☐ ASBESTOS ☐ COASTAL ☐ AIR ☐ PAVING & DRAINAGE ☐ TANKS ☐ INDUSTRIAL ☐ WETLAND ☐ PRE-TREATMENT ☐ CORE ☐ FLOOD

FOR OFFICE USE ONLY

To be completed by Permit and Occupancy Representative or Plans Processing Specialist

APPLICATION DATE: 5/16/22 CLERK NAME: MJ ARRIVAL TIME: 11:15

PROCESS NUMBER: C2022071015 PROCESS NUMBER: PROCESS NUMBER:

☐ RE-ISSUE ☐ PLAN REVISION ☒ REWORK ☐ SHOP DRAWING

Herbert S. Saffie Permitting and Inspection Center, 11805 SW 26th Street, Miami, Florida 33175-2474 T 786-315-2100 miamidade.gov/permits

Source: Miami-Dade Department of Regulatory & Economic Resources Plan Status and Application Submission Portal (Retrieved through GoldKEY Login Access)

b. Comparison to the Miami-Dade Housing Affordability Tracker

After noting the inconsistencies within the GoldKEY System for tracking projects for affordable housing, OCA searched for alternatives to track Affordable Housing Projects in the County. The Department of Public Housing and Community Development (PHCD) and The University of Miami Office of Civic and Community Engagement partnered to create the [Housing Affordability Tracker](#), a tool designed to monitor progress towards the Mayor's goal of 18,000 new and rehabilitated affordable or workforce housing units. Current tracking data includes affordable and workforce housing units initiated or proposed after November 2020, with previous projects listed on an older version of the tracker.⁴⁰

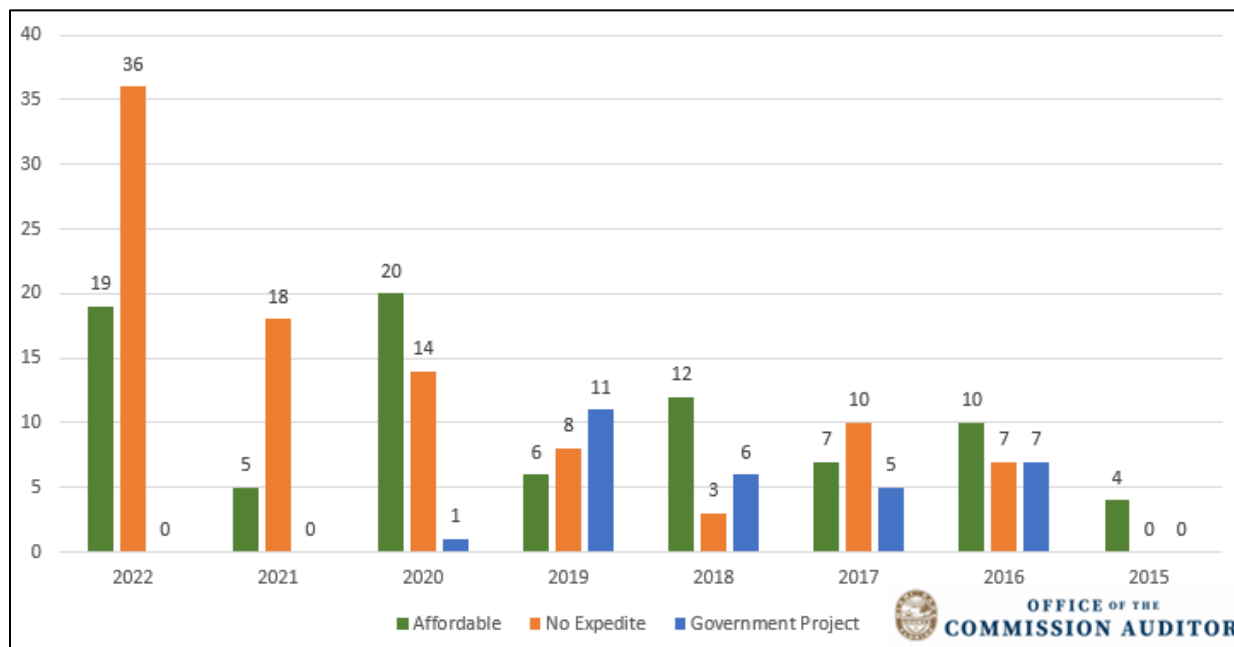
Due to the inconsistent use of the Affordable Housing Project tag, as explained above, within the GoldKEY System, OCA cannot determine if the list of Affordable Housing folios generated from GoldKEY is the complete list of all Affordable Housing Projects within the County during

⁴⁰ The Housing Affordability Tracker is part of the County's Building Blocks Housing Summit efforts created through the partnership between the Department of Public Housing and Community Development and The University of Miami Office of Civic and Community Engagement.

the selected timeframe. To further its analysis, OCA compared the GoldKEY Data to the public facing GoldKEY System and the Housing Affordability Tracker, which lists current affordable and workforce housing folios throughout the County to assess the similarities in folio classifications between the three.

Most permits listed in the GoldKEY Data as Affordable Housing Project are not listed as Affordable Housing Project on the public facing GoldKEY System, which reflects the most recent Application. There are 155 folios listed as Affordable Housing Projects and 209 corresponding Permits, meaning that most affordable folios include only one corresponding permit.⁴¹ **Figure 15** below shows the magnitude of the discrepancy across GoldKEY's tracking of Affordable Housing Projects, based on the GoldKEY Data, organized by year. Of the 209 permits for Affordable Housing Projects identified from the GoldKEY Data, only 83 had their most recent associated Permit Process Application tagged as Affordable Housing Project in the GoldKEY System as of August 2022.

Figure 15: GoldKEY Representation of Affordable Housing Projects (As of August 2022)



Source: Figure produced by OCA through Public Facing GoldKEY Platform

After downloading the data from the Housing Affordability Tracker and removing duplicate and unlisted folios, OCA found 130 unique folios listed in the Housing Affordability Tracker as of August 2022. To assess the commonality in categorizing the folios listed in the GoldKEY Data and the Housing Affordability Tracker, OCA first checked to see how many of the Housing

⁴¹ Eighteen of the folios have since been canceled as of August 2022, one of which cannot be found on the Property Appraiser's website. OCA's analysis found the majority of canceled folios vacant land conversions to multi-family development projects.

Affordability Tracker folios were also listed in the GoldKEY Data. Then, OCA analyzed the number of those folios marked as expedited and, finally, how many of the expedited folios were marked as an Affordable Housing Project.

Out of the 130 unique folios, 61% of them, or 79, were also found in the GoldKEY Data. However, out of the 79 unique folios listed as an Affordable Housing Project or workforce housing on the Housing Affordability Tracker, only 16 had at least one Application associated with a project with an expedited tag within the GoldKEY Data, and only nine (9) of which were marked as an Affordable Housing Project category on at least one associated Application. Therefore, between the two (2) lists of affordable housing folios, only nine (9) include affordable housing labeling in both data sets, further illustrating the absence of centralized and consistent methods to monitor and track affordable housing units within the permit process. Since the Housing Affordability Tracker and the GoldKEY Data views the data at different points in time, combined with the fact that the Housing Affordability Tracker coordinates with many more research sources, 100% similarity in listed folios is not expected. However, the different data collections do not explain the inconsistency in expedited and affordable housing categorization between the two sources.

Table 6: Folios Captured in both the GoldKEY Data and Housing Affordability Tracker (As of August 2022)

CATEGORY	NUMBER OF FOLIOS	PERCENT OF TOTAL HOUSING AFFORDABILITY TRACKER FOLIOS
Total unique folios in the Housing Affordability Tracker	130	100%
Listed in GoldKEY Data	79	61%
Listed as Expedited in GoldKEY Data	16	12%
Listed as Affordable in GoldKEY Data	9	7%

Source: OCA comparison between the GoldKEY Data and Housing Affordability Tracker

The absence of congruency in identifying Affordable Housing Projects between these sources is indicative of an absence of consistent categorization between systems within the County. As the absence of a clearly defined dataset inhibits OCA's ability to assess the average project timelines of Affordable Housing Projects, it is unclear what impact the inconsistent classification of Affordable Housing Projects has on the ability to receive expedited status or how RER measures the effectiveness of their operation.

c. Conveyed Folios for Affordable Housing Within GoldKEY

On May 26, 2022, OCA published the Miami-Dade County Property Conveyance Report (Conveyance Report), presenting the results of OCA's review of all BCC-approved conveyances under County affordable housing programs, primarily the Infill and Workforce Housing

program.⁴² The Conveyance Report documents the total number of parcels transferred and the related folios, including the names of awarded developers, property addresses, conveyance dates, timeframes for development, projected reverter dates, and the values per parcel. Additionally, the Conveyance Report provides a Property Conveyances Folio List (Folio List), which is a listing of all properties conveyed by the County to a non-County entity, such as a developer, to develop infill, affordable, or workforce housing. The sample of folios represents a view of the different stages of the development process.

OCA isolated a subset of 18 affordable housing folios from the Folio List that were conveyed after July 10, 2019 and fully developed by May 2022 as a sample to cross-reference with the GoldKEY Data and noted the following:

- In the GoldKEY Data, information on 45 permits and 77 Permit Process Applications are associated with the 18 folios identified.
- Out of the 77 process applications, five (5) of them have expedited status. Each of the five (5) Permit Process Applications was associated with different folios and permit numbers.
- Four (4) of the expedited Permit Process Applications were listed as Government Projects in the July 2022 GoldKEY Data Extract, and one (1) was listed as an Affordable Housing Project.
- Therefore, over 93% of all related Permit Process Applications connected to affordable housing folios in our sample were treated as No Expedite Permit Process Applications.

Since GoldKEY determines expedited status on a Permit Process Application basis rather than on a permit or folio basis, it is possible to expedite some Permit Process Applications under a folio and not others. For example, consider one of the 18 folios from the sample, folio 30-3112-023-0180. Five (5) Permit Process Applications are associated with this folio in the GoldKEY Data, and only one (1) is tagged as an Affordable Housing Project. The other four (4) process applications connected to this folio do not have any expedited status. **Table 7** summarizes the results.

Table 7: Sample of Affordable Folios Conveyed (July 2019 – May 2022)

CATEGORY	COUNT
Total Affordable Folios Conveyed after R-752-19 and Fully Developed as of May 2022	18
Number of Sampled Folios in GoldKEY Data	18
Number of Sampled Folios with at least one Expedited Application	5
Number of Sampled Folios with at least one "Government Project" Application	4
Number of Sampled Folios with at least one Affordable Housing Project Application	1

Source: OCA research conducted on the GoldKEY Data and OCA's Miami-Dade County Property Conveyance Report

⁴² OCA Miami-Dade County Property Conveyance Report, May 26, 2022, <https://www.miamidade.gov/auditor>.

III. BENCHMARKING

As part of the benchmarking conducted for this report, OCA requested building permit data across selected jurisdictions regionally and nationally. Four (4) of the 12 jurisdictions contacted provided the requested information regarding their permit processes, including data used to analyze turn-around permit issuance intervals and their designated systems of record. However, a comparative analysis could not be conducted due to the inconsistent permit types and non-homogeneous data provided by the selected jurisdictions. Listed below are the building permit jurisdictional summaries.

a) City of Atlanta, Georgia (Pop. 496,461)⁴³

The City of Atlanta conducts plan reviews concurrently with other reviews. Atlanta's system of record is a software called Accela.⁴⁴ The Accela system is a business solution software that automatically and electronically tracks and manages permit applications from application intake to permit issuance.⁴⁵

b) City of Jacksonville, Florida (Pop. 954,614)⁴⁶

The City of Jacksonville serves as a one-stop-shop to process plans and issue building permits for most of Duval County, as 90% of the county is incorporated within the City of Jacksonville. The other four cities within Duval County – Atlantic Beach, Baldwin, Neptune Beach, and Jacksonville Beach – have their own separate building divisions and are not part of the data provided to OCA for this review. Regarding the jurisdiction's software system of record, Jacksonville's I.T. Department designed a customized building permit program.⁴⁷

c) Hillsborough County, Florida (Pop. 1,478,194)⁴⁸

Officials from the Hillsborough Development Services Department informed OCA that Hillsborough has been adapting and changing its permit process to adjust to the restrictive environment of COVID-19, thereby adopting a digital permit process. As such, the adjustment has taken time for staff and customers to acclimate as Hillsborough encountered a high volume of applications for review even through the pandemic. Such applications ranged from home renovations to pool renovations – with a spike in the number of customers seeking permits during COVID-19. Hillsborough's new online permitting system, HillsGovHub, replaced the Accela software system and went live on January 19, 2021. According to staff, the new system is assisting the department to gradually automate, improve review times, and increase transparency in all permit processes.⁴⁹

⁴³ QuickFacts Population Estimates, July 1, 2021, <https://www.census.gov/quickfacts> .

⁴⁴ Email Communication with Atlanta, Ga, February 15, 2021.

⁴⁵ Accela Government Software, <https://www.accela.com/solutions>.

⁴⁶ QuickFacts Population Estimates, July 1, 2021, <https://www.census.gov/quickfacts>.

⁴⁷ Email Communication with City of Jacksonville, FL, February 8, 2021.

⁴⁸ QuickFacts Population Estimates, July 1, 2021, <https://www.census.gov/quickfacts>.

⁴⁹ Email Communication with Hillsborough County, FL, February 4, 2021.

d) Orange County, Florida (Pop. 1,422,746)⁵⁰

According to Orange County Building officials, the jurisdiction utilizes Amanda and ProjectDox as the agency's building permit software systems of record.⁵¹ The Amanda software contains permitting, inspections, and code compliance capabilities.⁵² The ProjectDox system allows users to submit construction plans electronically.⁵³

⁵⁰ QuickFacts Population Estimates, July 1, 2021, <https://www.census.gov/quickfacts>.

⁵¹ Email Communication with Orange County, FL, February 16, 2021.

⁵² Amanda, Enterprise Platform for Smarter Government, <https://granicus.com/solution>.

⁵³ ProjectDox Electronic Plan Submission: Applicant User Guide, <https://dcra.dc.gov/sites>.

IV. CONCLUSION

A. RECOMMENDATIONS

The long-term efficiency and effectiveness of the permitting lifecycle can be improved by implementing enhanced reporting capabilities to the overall permitting ecosystem within the County. In addition, an enhancement to GoldKEY by integrating Application Programming Interfaces (APIs) from the ancillary departments into a consolidated reporting Application will assist in understanding which tasks within the permitting workflow require modifications. Essentially, these enhancements will provide a comprehensive view of the time and effort invested by applicants in obtaining an approved or issued Permit. A design and implementation of a reporting system that is capable of collecting data from an electronic application, consolidating processes, systems, and tracking the totality of the Building Permit review cycle to provide benefits such as:

- ***Accurate measurement of the time spent processing Permit applications:*** Integrated reporting would allow compliance verification with the stipulated maximum working days dictated in A.O. 4-115, effective since October 15 1999.
- ***Accurate allocation of working days spent in processing the ancillary Permits:*** Currently, the GoldKEY System uses the generic Task "Storage" to capture time spent by the applicant obtaining ancillary Permits, despite the applicant having to engage with multiple County departments, incorporated municipalities, or State departments.
- ***Enhanced visibility, disclosure, and accountability:*** Such enhancements will benefit the County Administration, the BCC, and the County Constituents engaged in investing capital in building and improving real estate properties, including Affordable Housing Projects.
- ***Additional Data Fields to increase accuracy and the availability of performance measures:*** Enhancements to GoldKEY data fields will provide additional opportunities for data analysis through the addition of data fields to address key points as follows:
 - an enhanced street address,
 - Commission District identifier,
 - task review cycle number, and
 - open permit classification.
- ***Update local legislation to reflect the current FBC and the Permit processing infrastructure that allows for concurrent processing.*** As the permit process has evolved since the guiding legislation was adopted, OCA recommends reviewing and updating applicable legislation to have a timeliness standard for Building Permit issuance.
- ***Eliminate the current inconsistencies for applicants under the self-identification process for Affordable Housing Projects.*** Process and procedural recommendations include the following:
 - Create a procedure to automatically tag and grant the appropriate expedited status to all affordable housing conveyed projects.
 - Create a streamlined tagging process for developers who frequently build affordable housing, such as Habitat for Humanity, enabling expedited status under the "Affordable Housing Project" tag without requiring the developer to self-identify repeatedly.

- Update the Contact Sheet to better integrate with electronic system improvements and prevent unnecessary developer resubmissions, allowing a more cohesive expedited process.
- Develop a procedure to verify self-identification of affordable housing expedited status by applicants.

V. APPENDIX

A. DATA SUMMARY OF PERMITS BY APPLICATION TYPE (JANUARY 1, 2019 TO DECEMBER 31, 2021)

COUNT OF PERMITS ISSUED			
APPLICATION TYPE DESCRIPTION ⁵⁴	COMMERCIAL	RESIDENTIAL	GRAND TOTAL
New	8,403	30,612	39,015
Alter - Interior	28,373	7,967	36,340
Re-Roof/Repair	4,033	32,105	36,138
Alter - Exterior	13,711	22,006	35,717
Ent Replacement	2,378	16,033	18,411
Repair	6,060	4,749	10,809
Addition - Attached	3,524	5,802	9,326
Addition - Detached	386	8,637	9,023
Fence Nomasonry	435	5,713	6,148
Demolish	977	1,847	2,824
Roof Mounted Instal	53	2,639	2,692
Prof Cert Inspection	1,006	328	1,334
Permit By Affidavit	1,016	39	1,055
Shell Only	713	6	719
Concrete Masonry	71	583	654
Repair - Fire Damage	129	301	430
Enclose	44	274	318
Miscellaneous	87	1	88
Relocate	57	6	63
Foundation Only	51	12	63
Enclose/Hurricane	11	32	43
Re-Roof/Rep/Hurricane	7	7	14
Ground Mounted Insta	0	11	11
Alt Int/Hurricane	4	1	5
Repair/Hurricane	0	4	4
Grand Total	71,529	139,715	211,244

Source: Miami-Dade Open Data Hub Portal; OCA Analysis

⁵⁴ Definitions for the application types are in accordance with the <https://codes.iccsafe.org/content/FLB>.

**B. DATA SUMMARY OF PERMITS BY PROPOSED USE
(JANUARY 1, 2019 TO DECEMBER 31, 2021)**

COUNT OF PERMITS ISSUED			
PROPOSED USE DESCRIPTION ⁵⁵	COMMERCIAL	RESIDENTIAL	GRAND TOTAL
Single Fam Res-Clust-Zero Lot-Town House	0	134,801	134,801
5 Units Or More - Residential	25,665	0	25,665
Retail Sales	10,535	0	10,535
Office - Professional Buildings	6,497	0	6,497
Duplex	0	4,419	4,419
Government Facilities	4,404	0	4,404
Warehouse	4,380	0	4,380
Apt Building 3-4 Units	3,306	0	3,306
Warehouse/Storage	1,732	0	1,732
Utilities	1,517	0	1,517
Hospitals	1,471	0	1,471
Restaurant-Cafeteria	1,286	0	1,286
Paving/Open Lots	1,145	0	1,145
Clinic/Sanitariums/Health Centers	843	0	843
Gas/Serv Station/Auto Repair/Car Wash	840	0	840
Churches-Religious Buildings	814	0	814
Restaurant/Cafet/Bar/Lounge/Night Club	774	0	774
Hotel	722	0	722
School Buildings	679	0	679
Cabana/Chickee/Gazebo/Club House/Rec Bdg	677	0	677
Industrial Uses	558	0	558
Trailer Tie Downs	0	495	495
Agricultural	431	0	431
Body And Mechanical Repair Shops-Vehicles	419	0	419
Parking Garage/Open Deck	264	0	264
Office Use Only	234	0	234
Rest Homes/Convaless/Aclf/Orphanage	206	0	206
Beauty Salon-Barber Shop	180	0	180
Gym/Exercise Club	161	0	161
Car Dealership - New	158	0	158
Banks - Automatic Teller	150	0	150
Manufacturing	133	0	133

⁵⁵ Definitions for the proposed use descriptions are in accordance with the <https://codes.iccsafe.org/content/FLB>.

COUNT OF PERMITS ISSUED			
PROPOSED USE DESCRIPTION ⁵⁵	COMMERCIAL	RESIDENTIAL	GRAND TOTAL
Daycare - Kindergarten	116	0	116
Airport-Seaport - Truck Terminals	115	0	115
Entr/Feat-Gatehouse/Watchman Trailer	96	0	96
College - University	80	0	80
Office - Sales	75	0	75
Convenience Store	67	0	67
Auditorium-Theatre-Radio-T.V. Studios	66	0	66
Recreational Courts - Club House	61	0	61
Truck Terminal	60	0	60
Car Dealership - Use	60	0	60
Bakery Plant	56	0	56
Cementary	55	0	55
Animal Hospital	49	0	49
Motel	49	0	49
Bar-Lounge-Night Club	39	0	39
Marina	37	0	37
Bar/Cocktail Lounge/Restaurants	37	0	37
Libraries - Museums - Science - Zoo	30	0	30
Nursery - Garden Center	27	0	27
Sewer/Wtr Treatm. Plants & Pump Stations	17	0	17
Construction Trailer/Handicapped Ramp	16	0	16
Hangar	13	0	13
Funeral Home	11	0	11
Dog Kennel	11	0	11
Barn/Stable/Farm Bldg	10	0	10
Research Center - Laboratory	10	0	10
Pawn Shop	9	0	9
Truck-Boat-Rv Dealership	8	0	8
Libraries/Museums/Observ/Zoo Bldgs	8	0	8
Banquet Hall	8	0	8
Coin Laundry-Dry Cleaning	8	0	8
Guest House Servants Quarters	7	0	7
Fruit Stand	7	0	7
Atm/Banks/Savings & Loan	6	0	6
Trade Schools	5	0	5
Dormitory-Frat House-Rooming House	5	0	5
Package Store	4	0	4
Bowling Alley/Skating Rink	3	0	3
Postcard Permit	2	0	2

COUNT OF PERMITS ISSUED			
PROPOSED USE DESCRIPTION ⁵⁵	COMMERCIAL	RESIDENTIAL	GRAND TOTAL
Firing Range	2	0	2
Packing House Food Processing	1	0	1
Tennis/Racquetball Clubs	1	0	1
Jail/Stockade	1	0	1
Grand Total	71,529	139,715	211,244

Source: Miami-Dade Open Data Hub Portal; OCA Analysis

C. APPLICABLE LEGISLATION

Table 8: County Permit Administrative Orders, Code, Legislation, and Directives

Legislation	Title	Summary
A.O. 4-115	Governing the Building Permit Process	It shall be the responsibility of the Building Department to review the plans and specifications for compliance with South Florida Building Code requirements and to route the plans to the Department of Planning and Zoning for zoning review and the Department of Environmental Resources Management for the initial review of new residential and commercial construction. Coordination of the routing between departments shall be the responsibility of the Building Department through the use of its own personnel. The Building Department shall notify the Permit applicant within two (2) days of the completion of the last review that the plans are ready for pick-up. This notice shall be in addition to the notice required under Section 302.1(f) of the South Florida Building Code. After 60 calendar days from the date of such notification, where such additional information has not been submitted or the Permit has not been purchased, the Application, Permit, or both shall become null and void. Where an Application, Permit or both have become null and void, a new Application must be filed and upon payment of any required fees shall be processed as though there had been no previous Application. The applicant shall be responsible for the subsequent routing of the plans to the Fire Department, Department of Public Works, Water and Sewer Department, Department of Planning and Zoning for any required landscape review and any other department or agency as necessary.
I.O. 4-120	Building Permit Process Alternatives	Rescinded and replaced A.O. 4-120, through Resolution R-752-19, updating the policy to consolidate into one Implementing Order previously approved Board actions related to expedited plan review programs for workforce housing, affordable housing, and Property Assessment Clean Energy (PACE) projects, among others.
Chapter 8 of the County Code	Building Permits	The Florida Building Code, as complemented and supplemented by the Administration (Article I) and Enforcement (Article II) provisions of this Chapter, as amended through local technical amendments (Article III), if any, together with the product approval sections

		(Article IV of this Chapter) as amended from time to time, is the Building code for both the incorporated and unincorporated areas of the County and is hereby adopted as a uniform Building code for Miami-Dade County.
Section 8-8.1 of the County Code	Expedited Permit Program for Workforce Housing Units	Codified through Ordinance 8-51 (4/24/2008), implementing a program to expedite the review and approval of permit applications for workforce housing units.
Chapter 33 of the County Code	Zoning Plans Review	The Zoning Plans Processing Section works closely with the Public Works and Waste Management Department to determine if road right-of-way dedications have been completed and whether the site complies with platting requirements. This section also reviews zoning hearings and administrative variance files, administrative site plans, as well as restrictive covenants that pertain to the site to determine compliance with plans submitted for Permitting. Of major concern are setbacks to property lines, lot coverage, floor area ratio, number of stories, height of buildings, parking spaces, permitted uses in each zoning classification and compliance with Chapter 18A, Landscaping Code.
Section 33-8 of the County Code	Certificate of Use	The Certificate of Use (CU) assures that the business is allowed in the zoning district where it is located and verifies that the structure was built for the identified type of business. Prior to opening any business in unincorporated Miami-Dade County, a CU must be obtained. A CU is required when an industrial or commercial building is erected, altered or enlarged, or an existing building goes through a change of occupancy, name or type of business. Most Certificates of Use are issued on a permanent basis. If the business does not move, expand, change ownership, name or business activity, the Certificate remains valid. Some CUs are required, by Code or zoning resolution, to be renewed annually. ⁵⁶
Section 33-8.1 of the County Code	Zoning Improvement Permit (ZIP)	Certain buildings, structures, improvements and installations are exempted by the Florida Building Code from Building Permit issuance, but must otherwise comply with the minimum requirements of this chapter. Therefore, such buildings, structures,

⁵⁶ Building Code, Miami-Dade County Code of Ordinances, <https://library.municode.com>.

		improvements and installations shall be subject to review under the Zoning Improvement Permit (ZIP) standards contained in this section, as well as the regulations of the underlying zoning district. The Code was established to ensure that certain land uses now exempt from the Florida Building Code remain in compliance with the zoning code, Chapter 33. A ZIP is required for the following improvements, further elaborated on the Zoning Improvement Permit website: above-ground pools, balloon signs; cargo containers; chickees by people of the Miccosukee or Seminole Tribes; decorative garden-type fountains; farm buildings; flat wall signs; floating docks; painted wall signs; paving, drainage of existing facilities, established landscape, tennis and basketball courts, guardrails and bollards; portable mini-storage units; residential awnings, canopies, fabric covered framework, trellis, and pergolas; residential chain link fences; residential decorative pools and ponds; residential picket, iron, other fences non-wind resistant; resurfacing (commercial); sealing, stripe painting of existing parking lots; stick on fabric letters, window graphics, and vinyl wall signs; and temporary buildings used for construction, trailer or modular.
Resolution No. R-1-06	Land Use, Permitting and Inspection Process	Resolution directing the County Manager to prepare and submit a plan for the prompt implementation of recommendations developed after an 11-month review of the County's permitting and inspection process and encouraging the Mayor to support the findings and recommendations of the review process and the plan for implementation of its recommendations.
Resolution No. R-347-09	Resolution Amending Local Housing Assistance Plan	Resolution adopting amendment to Local Housing Assistance Plan incorporating the Affordable Housing Advisory Board's recommendations to encourage or facilitate the development of affordable housing.
Resolution No. R-709-13	Prepare a Report Re Permitting and Inspection Processes	Resolution directing the Mayor to prepare a report outlining the best methodology and implementation schedule to streamline and enhance the efficiency, customer service, and accountability of the Miami-Dade County Permitting and inspection processes.
Resolution No. R-144-14	Secret Shopper Program to Monitor and Improve Customer Service to the Public	Resolution directing the Mayor or designee to develop a plan for the creation of a secret shopper program, including the costs associated with implementing such a plan, and a description of the County's prior efforts to implement similar programs.

Resolution No. R-349-18	Resolution Amending Implementing Order 10-8	Resolution updating WASD's Rules and Regulations which included improvements to the approval process.
Resolution No. R-466-18	Affordable Housing Expedited Program	Directs the Mayor to promote and encourage the use of the County's Expedited Permit Program for Workforce Housing Units, develop a marketing strategy, and provide a report to the Board detailing those efforts; provide an annual report to the Board related to the Expedited Permit Program for Workforce Housing Units.
Resolution No. R-752-19	Regulatory Delays in Permitting	Resolution rescinding A.O. 4-120 on Building Permit Process Alternatives; approving I.O. 4-120 on Building Permit Process Alternatives; updating terms and department names and adding the Workforce Housing, Affordable Housing, and Pace Expedited Plan Review Programs
Resolution No. R-1078-19	Study of Permitting Process	Directs the County Mayor to study the permit process for Affordable Housing Projects, including the feasibility and advisability of streamlining permitting timelines and instituting concurrent review; setting policy for prioritizing Permitting review for affordable housing developments; and directing the county mayor or county mayor's designee to provide a report and place the report ⁵⁷ on an agenda of this Board.
Resolution No. R-1083-19	Affordable Housing Dedicated Staff Expedite Permitting	Resolution requesting the Mayor to appoint full-time staff whose sole responsibilities will be to review, process, and monitor matters related to the construction or rehabilitation workforce and affordable housing, including, but not limited to, the areas of planning, zoning, permitting, public works and water and sewer connections.
Resolution No. R-59-20	Enforce Permitting Requirements	Resolution directing the County Mayor or designee to prepare a report to the Board outlining efforts to enforce permitting requirements for utilities and public works construction in County roads and streets right-of-way.
Resolution No. R-416-20	Program for Municipality Trainings	Resolution directing Mayor to create a program for the County to engage with municipalities to improve municipalities' approval processes.
Legistar File No. 210750	Report on Building	In response to Resolution No. R-466-18, a March 24, 2021 annual report on the number of building permit

⁵⁷ Report Pursuant to Resolution No. R-1078-19 - Directive No. 192170, <https://www.miamidade.gov/govaction>.

	Expedited Plan Review Program - Directives No. 151864 and 180853	applications that have used the expedited plan review program for workforce housing units as compared to the standard permit applications and those using other expedited programs
Legistar File No. 202094	Study of the Permitting Process	Pursuant to Resolution No. R-1078-19, a report compiled by RER, DTPW, MDRR, WASD, and PROS was issued pertaining to a study of the permit process for Affordable Housing Projects with a view toward shortening the permit timeline.
Legistar File No. 060303	Land Use and Permitting Process Assessment	Report on land use and permit process assessment, conclusion, and implementation plan.
Legistar File No. 210750	Building Expedited Plan Review	Report on the number of building permit applications using the expedited plan review program for Affordable/Workforce Housing from October 1, 2018 to September 30, 2020.

D. DEFINITIONS AND ACRONYMS

DEFINITIONS

Term	Definition
Affordable Housing Project	An identifying tag on the GoldKEY System to indicate that an application is an Affordable Housing Project, represented by an orange rocket icon and the phrase <i>Affordable Housing Project</i>
Application; Permit Application; or Process Number	A collection of one or more Tasks that may result in a Permit being issued; it may also result in a Revision to a Permit
Initial Review	The first review iteration of a Workflow Cycle that concludes the applicant's plans in Storage
Permit	The granting or approval of a permit issued by an enforcing agency for the construction, erection, alteration, modification, repair, or demolition of any building or structure; issued after the local building code administrator or inspector has reviewed the plans and specifications required by the Florida Building Code; see Florida Statute 553.79 Permits; Applications; Issuance; Inspections
Permit Number	Within the data, a collection of one or more Process Numbers
Rework	A new iteration of a Workflow Cycle after the Initial Review concluding with plans in Storage
Shop Drawing	Includes drawings of doors, railings, panels, etc., submitted after the Permit is issued and when the construction is in progress. The "structural" reviewer reviews them.
Storage	Completion of a Workflow Cycle iteration; a type of Task; may result in a Rework, Permit issuance, expiration due to inactivity, fees assessment, enforcement case, etc.; also known by RER as Workflow Cycle Completed
Subsidiary Permits	Specific subcategories of Permits, such as plumbing, mechanical, roofing, etc., are tied to the master Permit; most do not go through plan review; usually "over the counter" Permits or issued through the e-Permit system to the contractor that requests them; there are a few exceptions that may go through the plan review process
Task	A unit of work that may be assigned to an employee or programmatically completed; may have a due date or expiration date. It may be a placeholder for an activity that must be completed, such as an Owner Quiz; a Task may be approved, disapproved, N/A, or Approved as Noted
Tracking Number	A method of connecting a collection of one or more processes. It may be a set of plans, a project with various Permit types, inspections, etc.

Workflow	A sequence of Tasks that may have dependencies on other Tasks required to achieve a process (Application creation, Import of documents, Task review, payment, etc.)
Workflow Cycle	A collection of Tasks performed during a review iteration; may result in a request for payment, additional documents, inspections, enforcement cases, etc.

Source: Definitions produced by OCA through a compilation of research and RER correspondence.

ACRONYMS KEY

Acronyms	Definition
ACSI	American Customer Satisfaction Index
A.O.	Administrative Order
API	Application Programming Interfaces
CSAT	Customer Satisfaction Score
CU	Certificate of Use
DERM	Department of Environmental Resources and Management
FBC	Florida Building Code
FDOH	Florida Department of Health
FDOT	Florida Department of Transportation
I.O.	Implementing Order
ITD	Information Technology Department
LIMP	Land Improvement Permits
LPGX	Liquified Petroleum Gas
MDFR	Miami-Dade County Fire Rescue Department
MOT	Maintenance of Traffic
OCA	Office of the Commission Auditor
PIC	Permitting and Inspection Center
RER	Regulatory and Economic Resources
WASD	Water and Sewer Department
ZIP	Zoning Improvement Permit

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