



**THE MOBILE
HOME INSTALLATION
PERMITTING PROCESS**

AUGUST 21, 2020

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The Mobile Home Installation Permitting Process

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August 21, 2020

Honorable County Manager,

Per your request, the internal auditor began an inquiry into Community Development's manufactured/mobile home installation permitting process on August 10, 2020. Initially, there was to be an inquiry and review of all mobile home installation permits issued by the County during the May – July 2020 timeframe. However, an immediate concern was the uncertainty as to how the current COVID-19 Pandemic may have affected the permitting process. Therefore, as directed by the County Manager, permits issued during the 3-month period prior to the pandemic (December 2019 - February 2020) were also reviewed. Per guidance from the Assistant County Manager of Operations, the internal auditor contacted the Director of Community Development for assistance. The Director of Community Development responded promptly to the internal auditor's data requests, which allowed for the construction of a timeline for both periods of time.

Mobile Home Installation Permit applications are accepted within Community Development, and routed through the departments and sections below –

- Flood
- Planning (Community Development)
- Addressing (Community Development)
- Utilities

The internal auditor determined the average permitting timeframes for both periods under review, and contacted –

- Flood to account for permit documentation that remained in its area for time periods greater than 4 days
- Community Development's Planning section to account for permit documentation that remained in its area for time periods greater than 10 days
- Community Development's Addressing section to account for permit documentation that remained in its area for time periods greater than 5 days
- Utilities to account for permit documentation that remained in its area for time periods greater than 5 days

Community Development was also contacted to account for any permit numbers that had been skipped or were out of sequence for the two periods under review

Management's Responsibility

Community Development's website outlines its fees and requirements for mobile home installation permits, citing a 5-7 business day review for the issuing of permits. When an applicant meets the requirements as stated on the website, s/he submits an application to the Community Development department. The application is then circulated to the following departments and sections as outlined below, to receive the services indicated

- Flood – Reviews the flood zone map and requires on-lot ponding or an elevation certificate if applicable; this process also involves confirmation of the UDC requirements and compliance with Flood Damage Prevention (S 350-604)
- Planning – Reviews the zoning district for mobile homes as an allowable use, legal access, and required setbacks; ensures clients have the septic and well permits as applicable, or other utility access
- Addressing – Verifies that the address is the official address in the system and issues addresses for vacant lots
- Utilities – Reviews for access to sewer and amounts owed for utility services; reviews permits to insure that they connect into the sewer system in accordance to the ordinance when they meet the criteria; provides quotes to install the sewer service if one was not left on the property when the mainline was originally installed

Scope

A review is substantially less in scope than an audit. This review includes primarily applying analytical procedures to mobile home installation permitting data and making inquiries with key personnel as necessary to understand anomalies.

Testing

Having received data indicating the issuance of a total of 49 mobile home installation permits during the May – July 2020 time period, and a total of 39 mobile home permits during December 2019 – February 2020, a review was conducted for the period of time that permit applications resided in each department/section. While outliers were noted, such occurrences are not the norm and the internal auditor acquired explanations for the irregularities found. Herein, outliers included the rare occasions wherein applications were ‘hand-walked’ through the permitting process (within 1-4 days), as well as two occasions wherein the process indicated 42-day and 97-day processing times, due to one and multiple application disapprovals respectively.

Statistical Data

During the 3-month period prior to COVID-19 Pandemic restrictions, the average time to have a mobile home permit issued was approximately 8 working days. For the 3-month period during the COVID-19 Pandemic restrictions, the average time to have a mobile home permit issued was approximately 13.5 working days. When the outliers (as mentioned above) were removed, the average time to have a mobile home permit issued was approximately 7.5 days (Pre-Pandemic Restrictions), and 12.5 days during the pandemic restrictions.

Although permits were issued within an average of 8 working days, pre-pandemic, on 7 of 39 occasions permits were issued within a 10-12 day period. Delays within the Community Development department that caused permits to be issued beyond a 10-day range during both time periods stemmed from applications being disapproved to applications being put on hold due to missing information. The review indeed noted rare occasions wherein an application was left on an absent employee’s desk, or an influx caused a temporary backlog of applications. Thus, all

of these occurrences caused delays in the process. However, such occasions stood out as anomalies, and not the norm. In addition, some delays were attributable to other departments.

Although the amount of permit applications submitted has increased during the current pandemic, the internal auditor still inquired about possible causes for the elongated permit processing times. Per the Director of Community Development, the department has been short staffed by 1 -2 key positions, since January of 2020. Herein, the Development Technician plays a key administrative role in the permitting process, both inputting and routing application data. In addition, during the periods under review, Community Development utilized only one of their Planners to review permit applications. To address these areas, Community Development has since hired a Development Technician (due to begin August 27, 2020), and is in the process of recruiting an additional Development Technician. Also, instead of having one Planner review all applications, there are now three Planners reviewing the applications.

A group discussion with representatives from all four departments/sections produced the following solution-based plan to address current inefficiencies:

1. Community Development will initiate a pilot program with mobile home installation permits, which will allow for an electronic review process. Herein, all departments/sections will receive the applications simultaneously (electronically), allowing each to sign off on their portions of the application. In preparation, Community Development will administer iWorQ system training to ensure familiarity with the software. Estimated timeframe to begin – September 4, 2020.
2. Community Development will offer pre-application meetings with clients. Estimated timeframe to begin – September 30, 2020.
3. Community Development will coordinate with other departments to develop a ‘Common Discrepancies’ or FAQ bulletin on their website. Thus, clients will be alerted to areas on the applications that most often cause disapprovals and thereby delays. Estimated timeframe to begin – To be determined.
4. Community Development will discuss with other departments, the recommendations purported within the recently completed Efficiency Review (conducted by an outside agency) so the implementation process can be initiated. Estimated timeframe to begin – To be determined.

Conclusion

While the Community Development website purports 5-7 working days to issue a Mobile Home Inspection Permit, the permitting process is effected by departments outside of Community Development. Herein, on occasion the Utilities department will input a service order requiring someone to go into the field to verify the availability of sewer service. Per the Utilities Manager, the verification more often than not involves a third party, possibly adding an additional 10 working days to the process. As for the Flood Department, on-lot ponding is a requirement that

takes approximately 2-3 days to reconcile with the property owner. However, if an elevation certification is required, then completion by a licensed surveyor could take an additional 3-5 days to process, as the perspective permit must await results of the surveyor’s field investigation.

Although Community Development showed consistency in meeting, on average, a 7-8 workday time period (during the pre-pandemic months), a perspective client may interpret the entire process as occurring within 7 working days, and not just Community Development’s portion of the process. In addition, permitting efforts appear to have been adversely-affected by the current pandemic’s restrictions, adding on average an additional 5-working days to the required permitting time. Thus, it is recommended that management consider revisiting the verbiage in its application and on its website (to either clarify that this estimate does not speak to the entire permitting time period, or to expand the estimate to include the total estimated permitting time period), in an effort to better manage expectations.

Per the recently completed Efficiency Review, increasing the inspection capacity should be a primary goal for improvement within Community Development. To its credit, the Review also proposed several additional recommendations to improve the entire permitting process. Because the permitting process time is directly affected by departments outside of Community Development’s span of control, improvement of processing time would require multi-departmental solutions, as indicated within the Efficiency Review. Since testing indicated that not all permit processing delays were caused by the client (due to disapprovals), prudence supports consideration of many of the Efficiency Review’s recommendations, the details of which are beyond the scope of this report.

The chart below serves as an abbreviated example of permits that took extended amounts of time (greater than 12 working days) to be issued, along with explanations for delays. For a complete listing of the mobile home installation permits, issue times, and explanations for delays, a copy of the internal auditor’s working papers may be requested.

	Permit #	Issue Date	Working Days	Explanation
1	19-176	5/5/2020	42	Disapproved, coordination with NMED required
2	20-022	4/22/2020	200+	Application placed on hold, NMED permit for septic tank missing data; Required on-lot ponding
3	20-059	5/5/2020	17	Disapproved due to MH not permitted in zoning district; pending zone change application
4	20-073	6/1/2020	14	No obvious reason for delay
5	20-074	6/1/2020	97	Disapproved due to illegal sewer service; Disapproved again due to an access easement issue
6	20-079	6/15/2020	24	Disapproved due to a special use permit application pending
7	20-082	6/29/2020	17	No obvious reason for delay
8	20-083	6/23/2020	14	Processed during large influx of applications; backlog in Planning
9	20-085	6/29/2020	16	
10	20-087	6/29/2020	23	Disapproved due to unit exceeding size for accessory dwelling
11	20-090	7/13/2020	13	No obvious reason for delay
12	20-091	7/14/2020	20	

13	20-092	7/15/2020	13	
14	20-096	7/21/2020	20	Service order placed to verify sewer services availability; Disapproved for on-lot ponding
15	20-097	7/14/2020	13	No obvious reason for delay
16	20-100	7/21/2020	17	No obvious reason for delay
17	20-102	5/28/2020	13	
18	20-103	5/28/2020	13	

Based on the review conducted, a reduction of the number of disapprovals could greatly improve efficiency, and thereby the consistency of shortened mobile home installation permit processing periods. However, this could require the County to better educate perspective mobile home installation permitting clients. While the internal auditor noted multiple online resources for perspective clients, a listing of ‘Frequently Asked Questions’ (FAQ) was noticeably absent. Such an addition (with input from each department/section), could alert clients to the most frequent causes of application delays, serving to both clarify the process and reduce client frustrations. If a FAQ section is added, the addition of time estimates would also help the client to understand the possible lengths of time that may be added to the process under certain circumstances.

As a final note, the internal auditor agrees with a key recommendation found within the Efficiency Review – hold a pre-application review meeting to allow clients to meet with county officials to discuss their application before submittal. The internal auditor recommends that a pre-application review (meeting) is offered in writing, allowing clients the options of 1) declining the meeting, 2) attending a weekly 30-minute meeting for the general public, or 3) scheduling a private, one-on-four meeting with county officials to discuss client/individual application(s). This act of service would allow clients to acquire the first-hand knowledge they need to possibly avoid application disapprovals, while not obligating more knowledgeable clients to a meeting that is not necessary.

This concludes the internal auditor’s review. The internal auditor acknowledges courteous and professional cooperation from management in all departments involved in the mobile home installation permitting process.



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