



# City of Cleveland

## Construction Permitting Process Improvement: Analysis and Recommendations

March 2024





March 25, 2024

Mr. Jeff Epstein  
Chief of Integrated Development  
City of Cleveland  
601 Lakeside Ave, Room 202  
Cleveland, Ohio 44114

Dear Mr. Epstein:

Baker Tilly is pleased to transmit this report summarizing our assessment of the construction permitting process in Cleveland. Our comprehensive review included an examination of internal processes and procedures, staff interviews, development of workflow process maps, interviews with construction permitting applicants and customers, and a process improvement workshop designed to elicit actionable recommendations from frontline employees, supervisors and managers. Multiple City departments and divisions participated in our assessment, including Building and Housing, City Planning Commission (the department), the Mayor's Office of Capital Projects (MOCAP), Bureau of Transportation and Bureau of Traffic Engineering. Outside stakeholders included current and past customers of the permitting process, including developers, and contractors and one-time or infrequent "do-it-yourselfers."

The primary challenges observed through our analysis of the construction permitting process in Cleveland can be summarized into the following four issues:

- The current system for initiating a development project or application allows **multiple points of entry** including the departments of Building and Housing, Economic Development, Community Development, City Planning Commission, as well as referrals from the Mayor's Office or members of City Council. Multiple points of entry have resulted in process inefficiencies that confuse applicants and City staff, create process delays, impede interdepartmental communication, and frustrate applicants.
- **Staff vacancies**, especially in the inspector ranks, and the lack of position redundancy, in addition to managing workflow, are a persistent challenge that impacts the timely completion of work. This is compounded by the loss of institutional knowledge, which is supplemented in part by part-time employees; however, this is only a partial solution.
- **Lengthy and unpredictable review cycle times** occur due to the lack of citywide utilization of the Accela system and standard review times.
- **Inconsistent use of Accela software and other technology** across different departments prevents staff from properly tracking applications, thereby resulting in reduced ability to stay abreast of application status and location, thereby making timely and accurate updates to applicant inquiries difficult.

This report discusses these issues in detail and provides 39 recommendations and concludes with a detailed To-Be/future state workflow and organization discussion and process maps to assist with implementation. A complete list of our recommendations is included as Attachment A.

We extend our thanks to the dedicated staff members of Building and Housing, City Planning Commission, Mayor's Office of Integrated Development, and Information Technology Services for their focused input and participation in this important endeavor.

Thank you for the opportunity to assist you and the City of Cleveland.

Sincerely,

A handwritten signature in blue ink that reads "Carol Jacobs". The signature is written in a cursive, flowing style.

Carol Jacobs  
Managing Director

<b>Executive Summary .....</b>	<b>1</b>
Application and Intake Process .....	2
Staffing and Training .....	2
Local Codes and Policies .....	2
Technology .....	3
In Summary .....	3
<b>Background .....</b>	<b>4</b>
<b>Methodology .....</b>	<b>6</b>
Employee Interview Themes .....	6
External Stakeholder Interview Themes .....	6
Process Mapping .....	7
Process Improvement Workshop .....	7
Workload and Staffing .....	8
<b>Observations and Recommendations .....</b>	<b>13</b>
Application Intake .....	13
<i>Multiple points of entry to the permitting process.....</i>	<i>13</i>
<i>In-person and online application submittals.....</i>	<i>15</i>
Plan Review.....	16
<i>Order of Application Review.....</i>	<i>16</i>
<i>Pre-Development Review .....</i>	<i>17</i>
<i>Coordination and communication among departments .....</i>	<i>18</i>
<i>30-day state standard for plan review.....</i>	<i>19</i>
<i>External Plan Review .....</i>	<i>19</i>
<i>Project Approvals .....</i>	<i>20</i>
Inspections .....	21
<i>Enforcement of approved design review plans .....</i>	<i>21</i>
<i>Lack of access to real-time information by inspectors in the field.....</i>	<i>21</i>
Record Keeping.....	21
<i>Paper applications and associated documents are maintained as physical records.....</i>	<i>21</i>
<i>City records and information related to previous parcel use.....</i>	<i>22</i>
Staffing and Staff Development.....	22
Cross Training .....	24
Customer Service and Website.....	24
<i>Current website design and usability pose challenges for potential applicants.....</i>	<i>25</i>
Permit Fees .....	25
<i>Inaccurate fee calculation occurs for certain permits.....</i>	<i>25</i>
Legislation .....	26
<i>Permitting process complexity is intricately tied to legislation .....</i>	<i>26</i>
<i>Local design review requires multiple approvals .....</i>	<i>26</i>
<i>Codified fees and the true cost of service .....</i>	<i>27</i>

Use of Technology .....	27
<i>Lack of full Accela system integration</i> .....	27
<i>Tracking permit status is an issue for applicants and staff</i> .....	29
<b>To-Be/Future State Process Workflow .....</b>	<b>30</b>
To-Be Process Maps Overview .....	30
<i>Macro Development Process Summary</i> .....	30
<i>Pre-Development</i> .....	30
<i>Land Use, Design and Landmarks Review</i> .....	31
<i>Development Review (via PetBOT)</i> .....	31
<i>Process Completion (via Accela)</i> .....	32
<i>City Planning Commission To-Be Process</i> .....	32
<i>Fire Protection Systems To-Be Process</i> .....	32
To-Be Workflow Summary .....	33
<b>Conclusion .....</b>	<b>34</b>
<b>Attachment A – List of Recommendations .....</b>	<b>38</b>
<b>Attachment B – “As-is” Workflow Process Maps .....</b>	<b>39</b>
<b>Attachment C – Process Improvement Workshop Participant Briefing Book .....</b>	<b>40</b>
<b>Attachment D – Process Improvement Workshop Results and Recommendations .....</b>	<b>41</b>
Communication and Customer Service .....	41
Workflow Process .....	41
Overview of Staff Recommendations .....	42
<b>Attachment E – To-Be/Future State Workflow Process Maps .....</b>	<b>46</b>

## **Table of Contents**

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## Tables

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Table 1.	Cleveland Permitting Workload Data, FY 2020-20231 .....	8
Table 2.	Cleveland Building and Housing Department – Filled and Vacant Positions (current as of December 2023).....	9
Table 3.	Cleveland City Planning Commission – Filled and Vacant Positions (current as of December 2023) .....	11
Table 4.	Building and Housing Positions and Vacancies (current as of December 2023) .....	23

## Figures

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Figure 1.	Departments and Divisions Involved in Construction Permitting.....	4
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## Executive Summary

This report summarizes the activities completed to date by Baker Tilly to arrive at our observations and recommendations for the City of Cleveland construction permitting process. The processes and functions carried out by staff in the Building and Housing Department to assist applicants in completing the development process—from intake to plan review, inspections, approval of final inspection(s), and issuance of a certificate of occupancy—are addressed in the context of our observations and recommendations.

The mission of the Building and Housing Department is to:

*Ensure that existing and new structures in the City are constructed and maintained in a safe and habitable manner by enforcing the Cleveland Building, Housing, and Zoning Codes, the National Electrical Code, and the Ohio Building, Mechanical, Plumbing, and Elevator Codes. Department staff are responsible for reviewing construction project plans, issuing permits, and inspecting properties. The Department provides quality, timely service to their customers with professionalism and integrity.*

The observations and recommendations are based on our analysis of the staff functions and operations carried out by Building and Housing staff, the organizational management structure, and communication with staff in the department of Planning (City Planning Commission)<sup>1</sup>, the Mayor's Office of Capital Projects (MOCAP), the Bureau of Transportation and outside departments and agencies. The Baker Tilly team also reviewed business practices, customer service and communication protocols, and how staff use the Accela system to assist with each phase of the construction permitting process.

Our analysis began with a document review of all aspects of the construction permitting process, including relevant state and municipal codes, and City policies and procedural documents. The review was followed by interviews with key stakeholder groups including City directors, staff and applicants of the construction permitting process. Major themes from the staff interviews conducted by Baker Tilly include concerns with departmental silos, insufficient inter-departmental communication, the need for shared access to technology, lack of a standardized intake process, and a need for tools to better inform customers on the status of their applications. Baker Tilly was assisted in our external stakeholder interviews by subconsultants from the two local firms of Bialosky and Sixmo Architecture. Similar themes resulted from the interviews with external stakeholders, however, their concerns were primarily focused on lack of inter-departmental communication, a confusing intake process, perceived staffing shortages, and insufficient use of Accela and other development review-related technology.

Baker Tilly's analysis continued with the development of workflow process maps to document and understand current construction permitting processes and operations: the as-is state of work. The as-is process maps show the steps taken by applicants and City staff and track internal workflow across various City departments, divisions and outside agencies. Decision points and sub-processes such as Planning Commission public hearings, local Design Review Advisory Committee meetings and internal City review meetings were also mapped. The as-is process maps are included as Attachment B.

Next, the Baker Tilly team prepared for and conducted a three-day process improvement workshop that included staff from many of the departments having a primary role in construction permitting plan review, permit issuance, inspections and project completion. Process improvement participants included staff from Building and Housing, City Planning Commission, the Mayor's Office of Capital Projects, as well as other City departments and external agencies. During the workshop, staff participants reviewed and used the as-is workflow maps to identify areas for improvement based on goals developed by the City's leadership team. As a result of the process improvement workshop, the staff participants developed 14

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<sup>1</sup> City Planning Commission refers to the planning department and staff that support the non-staff members who serve on the Planning Commission, an approval body comprised of City of Cleveland resident and business representatives.

recommendations, which are incorporated into this report. The briefing book for the process improvement workshop (including goals, participants, agenda, etc.) is included as Attachment C.

Baker Tilly concluded that the most significant issues with the permitting process have four foundational causes that are discussed below.

## Application and Intake Process

The application intake process is one with many points of entry and many layers of staff involvement across a range of departments. While applications primarily come in through the Building and Housing Department, they may also be submitted in City Planning Commission, Economic Development, Community Development, and the Mayor's Office of Capital Projects (MOCAP). Similarly, applicants must physically travel to multiple locations throughout the City to secure approvals along the way before receiving land use approvals, a permit, and/or project approval. This has led to a disconnected permitting workflow that is neither beneficial for applicants nor staff.

Efforts to improve process coordination and communication have been initiated with some success, such as the City Planning Commission, Engineering, Traffic Engineering, and Bureau of Traffic (PetBOT) review body established to advise applicants prior to the submittal of schematic design plans, particularly for projects in the public right-of-way. However, more is required to develop the policy, process and communication infrastructure necessary for long-term success. For example, projects can vary greatly in size and complexity, with some requiring simple review and others needing significantly more due to size and scope. However, the City has not differentiated between these types of projects and has no published timelines for applicants to use as a guide. There are also no uniform application checklists to help staff and the public ensure minimum requirements have been met. This results in application errors and pain-points that require multiple interactions between staff and applicants to prepare a complete packet for review. This is particularly true with smaller projects whose applicants are homeowners or small businesses who lack the sophistication of larger developers. There are also differences in how in-person and online applications are handled.

By reviewing the process from end to end and interviewing staff and users, Baker Tilly was able to provide recommendations to make the process more efficient and easier for staff to manage and applicants to use. Amending the application process, improving communication between departments, and optimizing review processes by establishing workflows in Accela that integrate all relevant reviewers are key strategies for enhancing and improving intake, routing, and workflow.

## Staffing and Training

Staffing is another aspect of construction permitting operations that impacts service delivery. Staff turnover and training gaps magnify the existing problems related to the intake process. Staff vacancies, especially those in the inspector group, contribute to delays. Recent contract negotiations have remedied the inspectors' compensation parity issues with other agencies, but the vacancies will take some time to fill, and new staff will require rigorous onboarding. There are also training gaps that can be addressed to remove some process layers, thereby reducing the time to issue a permit. The most apparent gap relates to the duties of the nine principal clerks whose primary duties include entering application data into the Accela system. However, unlike in other permitting agencies, the principal clerks do not have traditional permit technician training or functions. This restricts their ability to provide more service at the intake point.

The recommendations address these issues and provide a framework for how best to improve construction permitting in the City of Cleveland to maximize efficiency, reduce cycle times and create a logical structure that works well for employees and users alike.

## Local Codes and Policies

Regulatory challenges at the state and local level also affect the permitting process in Cleveland. Ohio law requires City staff to review applications on a first come, first serve basis ("first-in-first out") unless a



municipality passes a local ordinance adopting a different process, which has not occurred in Cleveland. Locally, the municipal code related to design review dictates a process that creates unintentional bottlenecks by requiring several public meetings before development decisions are approved. Fees are also established in the City code in dollar amounts rather than by formula, so fees do not keep up with economic changes over time.

The recommendations included below regarding regulatory restrictions are designed to provide policy direction so that local codes can be updated to provide more flexibility in reviewing applications, create a more efficient system for approving and appealing design review decisions and ensure that fees collected by the City are based on updated task and cycle times for staff to complete a range of development review tasks.

## Technology

While the City uses Accela software to store and manage construction applications, its use varies widely between the departments that participate in the permitting process. Although Accela is used extensively by Building and Housing staff, other departments have limited access and training. There are also different processes for accepting online applications through Accela and in-person applications (at the Building and Housing intake counter) which leads to further problems in tracking application approvals and status. Accela has an applicant portal, Accela Citizen Access (ACA), that currently allows customers to submit permit applications and check application status, but the ACA does not provide applicants with standard review times. Additionally, it is difficult to use the ACA portal to track the progress of an application. The fee calculation feature of ACA is also not optimized and often miscalculates project fees. A common workaround by assistant plan examiners in Building and Housing is to manually confirm that an Accela generated fee is correct.

Our technology and to-be workflow recommendations stress the need for access to and use of Accela for all departments involved in permitting. Adequate staff training, and changes to system settings and public-facing websites are also needed so that applicants can track application status from intake through plans review, permit issuance, scheduling inspections and application close out.

## In Summary

As a result of Baker Tilly's analysis, a total of 39 recommendations in this report address opportunities for improvement for application intake; plan review and inspection; internal communication and record keeping; staffing and staff development; customer service and City website; legislation; codes and fees; and use of technology. Please note that the recommendations in this report are not listed in priority order, nor in order of suggested implementation. Rather, the order in which the recommendations appear are a result of the organization of the report.

As a companion to this report, Baker Tilly has prepared a draft Implementation Action Plan (IAP) that indicates implementation activities, a person with lead responsibility and the relative priority level for each of the 39 recommendations. The draft IAP is a living document that the City should use to guide staff actions, resource allocations, and reassess priorities. This is an inherently iterative and dynamic process that will require periodic review, adjustments and adaptation throughout the implementation process.

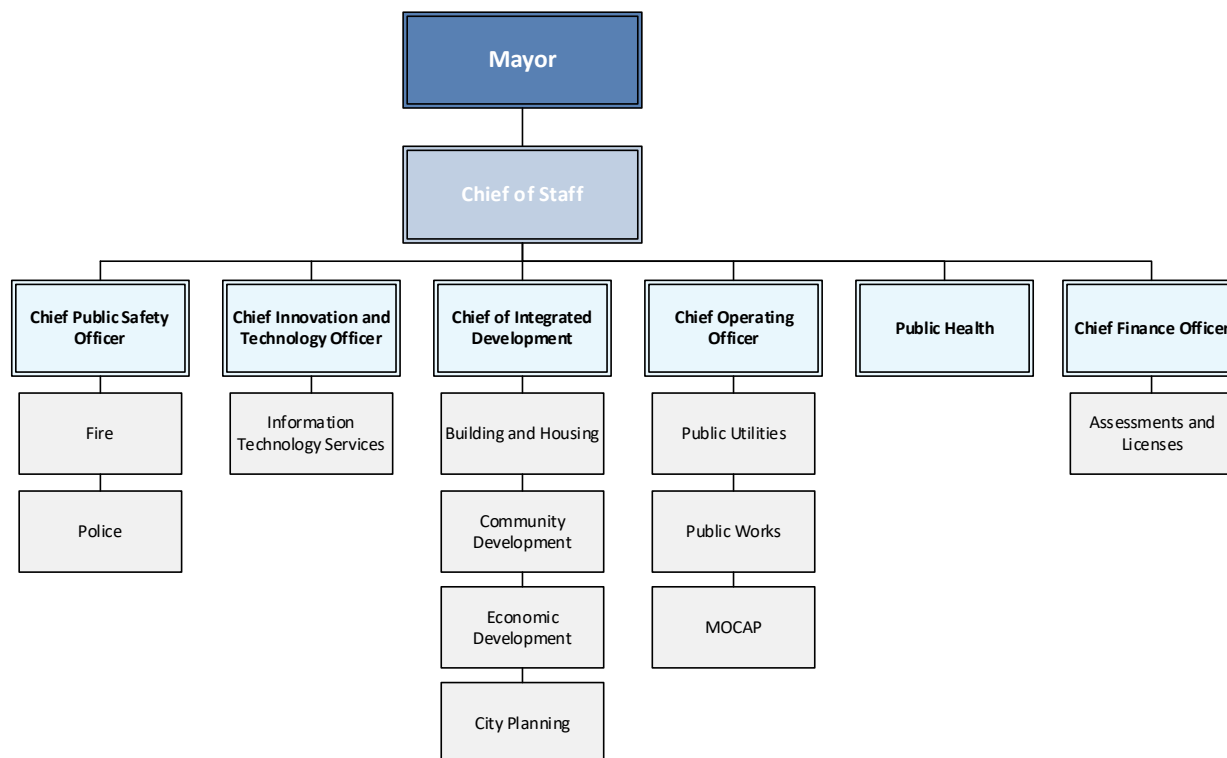
The remainder of this report is organized in the following sections outlined below.

- Background
- Methodology
- Observations and Recommendations
- To-Be/Future State Process Workflow
- Conclusion

## Background

In an effort to increase efficiency, the City of Cleveland engaged Baker Tilly to analyze all components of the construction permitting process and to make recommendations for process and staffing improvements to reduce process times and optimize the use of technology and customer service. Construction permitting for simple development applications might involve one or two departments (Building and Housing and City Planning Commission), while more complex development proposals and applications could involve up to 12 or more departments and/or divisions across the City, as shown in Figure 1, as well as outside agencies.

*Figure 1. Departments and Divisions Involved in Construction Permitting*



Cleveland has seen a very active development environment over the past few years. Projects are underway in downtown and across the City, most notably the construction of a new global headquarters for the Sherwin-Williams paint company and a number of large residential apartment projects including more than 600 units on Scranton Peninsula. In 2023, the City also published a vision for potential lakefront improvements west of North Coast Harbor surrounding a planned renovation of the Cleveland Browns stadium. Procurement for funding has also started for the Cleveland Metroparks' \$300 million Cleveland Harbor Eastern Embayment Resilience Strategy (CHEERS) project to redevelop the waterfront from downtown east to Cleveland Lakefront Nature Preserve near Gordon Park. Alongside this volume of large-scale development, there continues to be a high volume of permit applications for smaller projects initiated by individual homeowners and contractors.

A review of construction permitting activity shows an average of 7,864 applications received annually in each of the past three years. Of those, 71% (5,596) were residential. Similarly, during the same period, there were three times more residential than commercial permits issued by Building and Housing.

This renaissance of development in the City is evidence of effective visioning efforts on the part of local leaders and developers. Within this context of twenty-first century resurgence, redevelopment and construction activity has become more robust, with greater demands placed on Building and Housing and

supporting review and decision-making departments to review plans and process permits in a timely and predictable fashion. The following observations and recommendations are intended to provide the City of Cleveland a roadmap for implementing improvements that fit within the current construction development climate as well as provide lasting benefits to all stakeholders in the development process.

## Methodology

Baker Tilly's approach began with a comprehensive document review of information provided by the City. This included specific materials related to the construction permitting process as well as background materials about the department, such as budgets, organization charts, and data shared from software system reports.

In addition to document review, Baker Tilly conducted a series of interviews with 17 City staff from key departments, notably the director and assistant director of Building and Housing, various commissioners, and other staff from the divisions of Construction Permitting and Code Enforcement. Our team also held on-site meetings with small groups of City staff to discuss existing workflow operations and processes, from initial intake through the completion of plan review, permit issuance, and inspections to successful project completion.

To obtain a customer perspective Baker Tilly subcontracted two local firms, Bialosky and Sixmo Architecture, to conduct interviews with past and present users of the construction permitting process. Of those identified, 17 agreed to an interview and provided input about construction permitting strengths, opportunities and areas for improvement. Common themes were then developed from both the employee and customer input.

### Employee Interview Themes

The Baker Tilly team identified the following common themes from the employee interviews:

- While the construction permitting process is multi-departmental, there is a siloed approach to work that inhibits communication.
- Current distribution of staff duties and a lack of training cause internal process delays.
- Better utilization of Accela across departments to assist with monitoring and tracking applications, plans, inspections, etc. is needed.
- There is insufficient customer-facing information on the website and the Accela Citizen Access portal to keep users apprised of application status.
- Intake and plan review lack standardization in the way applications are processed, organized, routed and reviewed.
- Some regulatory requirements and local codes are contributing to a cumbersome and lengthy approval process.

### External Stakeholder Interview Themes

After gathering input from City staff about the development permitting processes, local subconsultants, Bialosky and Sixmo Architecture, reached out to 24 construction permitting customers and stakeholders. The stakeholder group was comprised of large and small contractors, developers, trade association representatives, Community Development Corporation staff, and other not-for-profit agencies. Seventeen stakeholders contacted (71%) agreed to be interviewed. The following major themes emerged from these interviews:

- Need for inter-departmental communication to enhance efficiency and process consistency.
- Desire for dedicated staff to guide applicants through the development process.
- Need for a "one-stop shop" with onsite scanning services or an application kiosk to submit digitally.
- Need for process clarity through flowcharts and real-time updates on application status.
- Need for proactive problem-solving and ownership among staff.

- Best practice template(s) samples for applicants, including examples of complete submittals with supporting documentation.
- Greater consistency of plan reviewer comments.
- Technology solutions that allow for integrated department and agency reviews.
- Desire for City to consider outsourcing specific tasks (e.g., plans review and inspections) to qualified firms.
- Desire for City to consider broadening the scope of PetBOT to encompass all relevant departments and divisions in the development review process.
- Desire for City to allow remote inspections for work that meets department-identified criteria.
- Perceived need for City to provide additional staff capacity to reduce the time it takes to route and review plans.

After collecting data and input about construction permitting strengths, opportunities and areas for improvement from City employees, applicants and stakeholders, Baker Tilly conducted a series of process mapping sessions with City staff who perform key functions and work activities as a part of one or more construction permitting processes, as described in the following section.

## Process Mapping

In close coordination with the City, it was determined that the following seven development review-related processes would be mapped out in order to better understand existing workflows and surface any and all significant barriers (including technical, technological, staffing-related, etc.) in order to achieve greater efficiency in and help streamline the overall development review process:

- New Commercial Mixed-Use Project
- Residential Rehabilitation
- Planning Entitlements
- Over-the-Counter/Same-Day Permits
- Contractor Registration
- Fire Protection Systems
- Street Opening/Closing Permit

The resulting as-is process maps that Baker Tilly created were then used by City staff during the process improvement workshop to identify pain points, process changes, and opportunities for simplifying or streamlining work functions and operations, as described in the next section.

## Process Improvement Workshop

The Process Improvement Workshop convened City staff over a three-day period to address development review operations. The purpose of the workshop was to streamline, enhance and improve Cleveland construction permitting and land entitlement operations and workflow between multiple departments and external agencies. The staff participants were selected by the leadership team because of their process knowledge including representatives from Building and Housing, City Planning Commission, the Mayor's Office of Capital Projects (MOCAP), and other process stakeholders involved with application intake, land use entitlements, plan review, permitting, inspections and issuing certificates of occupancy.

Prior to attending the workshop, participants were asked to review the *City of Cleveland Construction Permitting Process Improvement Workshop Participant Briefing Book* prepared by Baker Tilly, and the

draft process maps that document the as-is/current workflow steps for the seven processes outlined in the section above and included in Attachment B of the report.

Based on staff review of the as-is processes and ensuing discussion about workflow improvements, workshop participants came up with 14 recommendations, which are included as part of Attachment D. Following the workshop, Baker Tilly created three to-be maps outlining future state workflows and that include recommendations for an integrated and improved construction permitting functions. The to-be maps provide detailed guidance about internal communication, intake and routing, key customer touchpoints and use of the Accela system to align multiple department reviews and sign-offs. The three maps are:

- Macro Development Review
- Planning
- Fire Protection Systems

The Macro Development map provides a beginning to end process overview for construction permitting workflow. This map is supplemented by process maps for City Planning Commission and Fire Protection reviews that currently occur outside of the Accela workflow (see To-Be/Future State Process Workflow section of report, beginning on page 30).

## Workload and Staffing

Throughout the analysis, Baker Tilly gathered and analyzed workload and staffing data to support the development of a well-rounded understanding of the construction permitting landscape. Construction permitting functions are housed in the Department of Building and Housing. In addition to issuing building and over-the-counter permits (for trades and accessory uses), staff are responsible for plan review to ensure compliance with state and local building codes, contractor licensing, and property code enforcement. The department workload for FY 2020-21 to FY 2022-23 is included in Table 1.

The first section in Table 1 outlines the number of building permits reviewed for each of the aforementioned fiscal years, broken down by commercial and residential permits reviewed (including both online and in-person applications). There are significantly more residential building applications (averaging 5,596 per year) reviewed for each of the three fiscal years than there were commercial applications (averaging 2,267 per year). Similarly, as shown in the second section of Table 1, there were on average three times the residential building permits issued than commercial ones. The next three sections of Table 1 list the number of electrical, HVAC/refrigeration, and plumbing permits issued, again with residential outnumbering commercial permits by at least a factor of two for each of the three permit types.

The last two sections of Table 1 show the number of total online applications broken down by commercial and residential (including building, electrical, plumbing, and HVAC/refrigeration permits), as well as the total percentage of online permits issued for the last three fiscal years. On average, the number of online permits issued comprises approximately 45% of total permits issued.

Staffing data for Building and Housing, and City Planning Commission is included in Tables 2 and 3, respectively. We have included staffing tables for the City Planning Commission because city planners and other planning staff lead planning entitlements, including rezoning/zoning, design review, conditional use and variance reviews, etc.

*Table 1. Cleveland Permitting Workload Data, FY 2020-2023<sup>1</sup>*

	FY 2020-21	FY 2021-22	FY 2022-23
<b>Building Permits Reviewed<sup>2</sup></b>			
Commercial	1,923	2,541	2,338

	FY 2020-21	FY 2021-22	FY 2022-23
Residential	5,552	5,484	5,753
<b>Building Permits Issued<sup>2</sup></b>			
Commercial	1,315	1,833	1,367
Residential	4,644	4,630	4,878
<b>Electrical Permits Issued<sup>3</sup></b>			
Commercial	1,109	1,095	1,099
Residential	2,029	2,173	2,251
<b>HVAC and Refrigeration Permits Issued<sup>3</sup></b>			
Commercial	947	1,589	874
Residential	2,043	3,688	1,870
<b>Plumbing Permits Issued<sup>3</sup></b>			
Commercial	470	589	568
Residential	1,903	2,145	2,064
<b>Online Applications Received</b>			
Commercial <sup>4</sup>	2,610	2,917	2,039
Residential <sup>4</sup>	6,448	6,173	4,984
<b>Total</b>	<b>9,058</b>	<b>9,090</b>	<b>7,023</b>
<b>Percentage of Online Applications</b>	<b>54.8%</b>	<b>46.2%</b>	<b>40.9%</b>
<b>Online Permits Issued</b>			
Commercial <sup>4</sup>	2,146	2,455	1,428
Residential <sup>4</sup>	5,428	5,396	4,300
<b>Total</b>	<b>7,574</b>	<b>7,851</b>	<b>5,728</b>
<b>Percentage of Online Permits Issued</b>	<b>52.4%</b>	<b>44.3%</b>	<b>38.3%</b>

<sup>1</sup> Data in the table is based on the fiscal year (July through June).

<sup>2</sup> These counts do not include electrical, plumbing, or HVAC and refrigeration permits. The counts do include both online and in-person applications.

<sup>3</sup> These counts include both online and in-person applications.

<sup>4</sup> These counts include building, electrical, plumbing, and HVAC and refrigeration permits.

Table 2. Cleveland Building and Housing Department – Filled and Vacant Positions (current as of December 2023)

Building and Housing Staffing by Division	Positions (Filled and Vacant)
<b>Construction Permitting Division</b>	
Chief Building Official*	1
Commissioner*	1
Assistant Commissioner*	1
Master Plan Examiner*	5/1 vacant
Residential Plan Examiner*	2 <sup>1</sup>
Project Coordinator*	1
Assistant Plan Examiner*	5/1 vacant <sup>1</sup>
Principal Clerk*	3

Building and Housing Staffing by Division	Positions (Filled and Vacant)
Senior Clerk*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>20/2 vacant</b>
<b>Code Enforcement Division<sup>2</sup></b>	
Bureau Manager Demo*	1
Legal Secretary*	2
Demo Compliance Officer*	2/1 vacant
Bureau Manager Building*	1
Paralegal*	1
Legal Secretary*	4
RBI – Complaint Specialist*	1
Chief Plumbing Inspector*	1
Plumbing Inspector*	4
Chief Electrical Inspector*	1
Electrical Safety Inspector*	4/1 vacant
Chief Mechanical Inspector*	1
Mechanical Inspector*	6
Chief Elevator Inspector*	1
Elevator Inspector*	8/2 vacant
Chief Rental Inspector*	1
Building Inspector*	4/1 vacant
Residential Building Inspector*	7/2 vacant
Administrative Officer*	.5
Principal clerk*	1
District Chief*	4
Building Inspector*	13/2 vacant
Residential Building Inspector*	14/6 vacant
Principal clerk*	2
Vacant Property Unit Chief*	1
Building Inspector*	2
Residential Building Inspector*	6/1 vacant
Board Up RBI*	3
Principal clerk*	2
Main Street Unit Chief*	1
Residential Building Inspector*	4
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>103.5/16 vacant</b>
<b>Director's Office</b>	
Demolition Compliance Officer*	2
Administrative Officer*	.5
Project Coordinator	1



Building and Housing Staffing by Division	Positions (Filled and Vacant)
<b>Fiscal Manager</b>	1/1 vacant
<b>Financial Systems Coordinator</b>	2/1 vacant
<b>Accountant II</b>	2
<b>Principal Cashier*</b>	2
<b>Senior Cashier*</b>	1/1 vacant
<b>Administrator Manager*</b>	1
<b>Principal Cashier*</b>	1
<b>Assistant Plan Examiner*</b>	1
<b>Senior Clerk*</b>	1
<b>Paralegal*</b>	1
<b>Legal Secretary*</b>	4
<b>Program Manager*</b>	1
<b>Environmental Compliance Specialist III (budgeted in Code Enforcement)*</b>	1
<b>Environmental Compliance Specialist II*</b>	2
<b>Business Process Analyst*</b>	2
<b>Database Administrator*</b>	1/1 vacant
<b>Administrative Officer*</b>	1/1 vacant
<b>Principal clerk*</b>	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>29.5/5 vacant</b>
<b>TOTAL</b>	<b>153/22 vacant</b>

Note: Asterisks indicate staff who work on construction permitting-related functions, based on the organization charts shared by the City in May 2023. Information about open or vacant positions is based on organization charts provided by the City.

<sup>1</sup> The City is in the process of filling the assistant plan examiner vacancy.

<sup>2</sup> The City has recently filled and onboarded two inspector positions.

Table 3. Cleveland City Planning Commission – Filled and Vacant Positions (current as of December 2023)

City Planning Commission	Positions (Filled and Vacant)
<b>Administration</b>	
<b>Private Secretary</b>	1
<b>Principal Planner*</b>	1/1 vacant
<b>Assistant Administrator*</b>	1
<b>Administrator*</b>	1
<b>Urban Designer*</b>	1
<b>Project Coordinator*</b>	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>6/1 vacant</b>
<b>Neighborhood Planning</b>	
<b>Administrative Manager*</b>	1
<b>Chief City Planner<sup>1*</sup></b>	2
<b>City Planner*</b>	5/2 vacant
<b>City Planning Intern*</b>	1
<b>Project Coordinator*</b>	1/1 vacant
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>10/3 vacant</b>

City Planning Commission	Positions (Filled and Vacant)
<b>Policy and Strategic Initiatives</b>	
Project Coordinator*	1
Strategic Planning Analyst*	1/1 vacant
TCF Fellow*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>3/1 vacant</b>
<b>Zoning and Technology</b>	
Chief City Planner*	1
Chief City Planner*	1
Senior Assistant Urban Planner*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>3/none</b>
<b>Administrative Support</b>	
Administrator*	1
Secretary*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>2/none</b>
<b>Landmarks Commission</b>	
Secretary to Landmarks Commission*	1
City Planner*	1
Senior Assistant City Planner*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>3/none</b>
<b>Board of Building Standards</b>	
Secretary to Board of Building Standards*	1
Assistant Administrator*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>2/none</b>
<b>Board of Zoning Appeals</b>	
Secretary to Board of Zoning Appeals*	1
Senior Clerk*	1
<b>TOTAL STAFFING/TOTAL VACANCIES</b>	<b>2/none</b>
<b>TOTAL</b>	<b>31/5 vacant</b>

Note: Asterisks indicate staff who work on construction permitting-related functions, based the organization charts shared by the City in May 2023. Information about open or vacant positions is also based on the organization charts sent by the City, and have been updated per staffing updates from City leadership in November 2023.

<sup>1</sup> Only one chief city planner participates in the design review and overall construction permitting process. The other focuses on transportation issues.

## Observations and Recommendations

Baker Tilly's recommendations are based on the following:

- Interactions with staff and observations of how they communicate both within Building and Housing and with staff in other departments or divisions.
- Onsite observations to see which staff interact most often with applicants and members of the public at the intake counter and with those that call in, as well as examinations of the physical layout of intake counters, staff offices, and storage areas.
- Assessment of seating arrangements, the proximity of other divisions and the office outside of the Building and Housing intake counter, and the routing process for walk-in applicants.
- Observations of staff using the Accela system for processing applications, entering comments, and communicating with applicants.
- Review of documents and operational data provided to Baker Tilly by staff.
- Individual interviews with a broad range of Building and Housing applicants.
- Data gathering and information obtained from City staff throughout numerous conversations conducted over the course of the project.
- Baker Tilly's experience with many other development review process improvement projects, and customer service and permitting-related technology improvements.

Our observations and analysis are presented prior to the recommendation(s) and provide context for the improvement. Baker Tilly's recommendations address seven key areas which are central to achieving improved cycle times, process coordination and workflow, including:

1. Application Intake
2. Plan Review
3. Inspections
4. Record-Keeping
5. Staffing and Staff Development and Cross training
6. Customer Service and Website
7. Permit Fees
8. Legislation
9. Use of Technology
10. To-Be/Future State Process Workflow

### Application Intake

#### Multiple points of entry to the permitting process

There are five points of entry to the permitting process. These include:

- Building and Housing
- City Planning Commission
- Economic Development
- Community Development
- Mayor's Office and other elected officials

The aforementioned departments often review projects and advise applicants in different capacities (e.g., Community Development or Economic Development may review projects with financial incentives) prior to Building and Housing receiving permit applications. This is expected, and informal reviews and conversations at these early stages should be maintained as they help applicants better understand the various reviews a project may need, and process details, while also allowing staff to be aware of potential application review issues. However, the current practice of decentralized application submittal creates confusion regarding follow up once an application is submitted. Additionally, multiple points of entry are not conducive to accurate tracking of application status and foster a lack of accountability. In most cases, applications are either submitted directly to Building and Housing or City Planning Commission or are referred to these two departments by other City staff, but there is often confusion about where to start with application submission.

The recommended to-be workflows and related Accela enhancements will help to mitigate issues with tracking of application materials, however, formal permit applications should only be submitted to the Building and Housing Department for routing via the Accela system to all relevant reviewing bodies. The City will need to address any legislative changes that may be required to establish Building and Housing as the single point of entry for permit application submissions.

**Recommendation 1. Establish Building and Housing as the single point of entry for construction and related permitting applications, with information available to all departments through Accela workflow routing.**

Application submittal is the first critical step in a successful permitting process. Applicants need to know what is required of them and the City has the responsibility to provide as much information as early in the process as possible. The Building and Housing Department receives applications for building permits that vary from simple projects, such as replacement of a water heater or reroofing, to more complex commercial and multi-family residential projects. In many instances applications are incomplete and lack required information for a timely review. During our analysis we discovered that checklists are not consistently provided to assist with preparation of complete applications. A best practice is to also ensure that the aforementioned offices, departments and divisions (e.g. Community Development, Mayor's Office, etc.) have access to updated information, such as checklists, workflow charts, and guidelines. This information should be shared with applicants early on in the process, and prior to the submission of any permit application(s).

Due to a lack of checklists or guidelines for applicants, Building and Housing staff report that for smaller residential projects, where the applicant is either a homeowner or a small contractor, an estimated 40% of the applications and plans submitted are incomplete. The current Building and Housing Department policy is to accept all application submittals, regardless of completeness. To ensure alignment with the State of Ohio Building Code, the City should review its policies and practices to comply with the provisions of the State Code with respect to review processes and requirements for construction documents specifically detailed in sections 105, 106, and 107. Additionally, as a matter of best practice, the City should review and update the City Code to ensure alignment with State Code whenever State-level legislative changes are codified.

**Recommendation 2. Assess and update the City Code, where necessary, to align with the State of Ohio Building Code.**

Assistant plan examiners and plan examiners spend many hours a week reviewing incomplete applications. Plan examiners then prepare and issue an adjudication letter documenting what is need for a complete application. This process results in delays in completing reviews for complete application submittals, resulting in processing delays for all applicants. Staff have expressed concerns that if an application is not rejected at the counter due to missing information, and therefore designated incomplete, this gives applicants the false sense that everything has been provided on their end.

Therefore, when additional information is requested from them through an adjudication letter, applicants can become confused and frustrated. This can be overcome by establishing and documenting clear minimum submittal requirements by project type. Additionally, the minimum submittal requirements could also require other supporting information for a complete, thorough review by all relevant City and agency reviewers. As noted previously, comprehensive information about the procedure to obtain a permit should be provided on the City's website and at the public counter in City Hall to assist applicants, particularly homeowners and small contractors.

**Recommendation 3. Establish minimum application submittal requirement checklists based on project type.**

It is a best practice to provide applicants with checklists that detail the minimal requirements for a complete project submittal. The list of submittal requirements becomes the guide to applicants so that they prepare complete applications and assists Building and Housing intake staff so that there is consistency about what constitutes a complete submittal. Intake staff should use the application submittal checklist to ensure only complete applications are accepted and processed.

Additionally, the use of minimum application requirements will be critical as the City shifts increasingly toward an electronic submission process, whereby the Accela system will not accept incomplete submissions. In order to set the submission requirements in Accela, all relevant departments and divisions across the City that are part of the development review process must establish clear minimum submittal requirements.

The compilation of minimum submittal requirements and the creation of supporting documents (checklists, fee schedules, workflow charts, guidelines, etc.) will require full participation and engagement from all relevant reviewing bodies. This should be a joint effort and will require consistent communication between all relevant departments, divisions, and agencies to coordinate and clearly document citywide procedures and guidelines to prepare beginning-to-end applicant guides for the permitting process.

**Recommendation 4. Coordinate all relevant reviewing bodies to develop a written overview of the construction permitting process, including updated fees and/or fee schedules for applicants (for in-person and online submittals).**

Once created and compiled, this information should be provided in an organized fashion on the City's website, on all relevant departmental webpages, as well as at the public counter where they can be accessed by and shared with applicants, residents, and visitors.

**Recommendation 5. Reject applications that do not conform to minimum submittal requirements per City Codes.** Eliminating acceptance of incomplete applications will minimize the number of adjudication letters that need to be written and issued, which would likely reduce plan examiners' workloads, shorten review turnaround times, and reduce customer confusion and frustration.

**In-person and online application submittals**

There is currently a different review sequence for online (electronic) versus in-person (paper) applications. Applications are accepted both in person at the public counter and online through the Accela customer portal. According to anecdotal evidence from staff interviews and discussions, online applicants experience significantly longer processing times compared to those who submit applications in person. While in-person applicants may receive same-day permits, online submissions can take up to a week to process, according to some staff. Moreover, the public counter staff indicated that in-person submittals are prioritized over online submittals.

Despite this reported advantage, the in-person application submittal process can be cumbersome and confusing, as applicants are required to visit multiple departments for reviews, with City staff directing them from office to office to have their applications assessed by (among others) Records Administration,

Plats and Surveys, City Planning Commission, and Bureau of Transportation or Engineering prior to and after application submittal. By comparison, online submittals are processed for intake by Building and Housing staff, then routed electronically to various reviewers through Accela or via email. As proposed in the to-be workflow maps (see To-Be/Future State Process Workflow section of the report), both online and in-person submittals will be treated the same going forward, as in-person paper applications will be uploaded into Accela using scanners or City-owned kiosks.

Acceptance of both electronic and paper applications creates some challenges. The best practice is to have all applications and associated plans submitted electronically for ease of storage and shared communication and access between departments. Baker Tilly recommends the City encourage applicants to submit electronic documents wherever possible in its written and in-person communications, and by making the submission of electronic materials as seamless and user-friendly as possible. We do not advise financial or fee related incentives to encourage online submittals prior to completing an equity assessment to ensure fair treatment of applicants, especially those with the least access to technology and other electronic tools for making online submittals.

Staff noted that many homeowners and small contractors may not have the same computer skills and tend to rely on hand-drawn paper plans. To help address these issues, providing kiosks that are available for public use would allow in person applicants to upload hard copy plans and materials into Accela. Making a public kiosk available to in-person applicants will save staff time and provide consistent documentation that be accessed by all departments using Accela. It will be necessary for the City to provide clear and easy-to-follow instructions, training videos, etc. to assist applicants with using the public kiosk for uploading documents and/or completing permit applications online.

**Recommendation 6. Incentivize use of the Accela Premium Citizen Experience (PCE) by providing a publicly accessible kiosk for in-person application submittals.**

## Plan Review

### Order of Application Review

At application intake there is not a consistent process for sorting applications to determine which ones need further review by other departments and outside agencies prior to construction drawings review by plan examiners. Without checklists or sorting protocols to determine project review type (simple, moderate, complex), development and permit applications currently receive one standard review procedure, whereby both simple and complex development applications enter the same review stream.

Relatedly, the Building and Housing Department currently uses a “first-in, first-out” process to review plans submitted with building permit applications per the Ohio Building Code. The State of Ohio Building Standards Commission requires that applications be reviewed in the order submitted, unless the City posts a written policy outlining an alternative and rational schedule of review. Currently, this default first-in, first-out review process utilized by the City often creates delays for smaller projects that end up behind large or more complicated applications.

Applicants for smaller development projects intuitively have an expectation that the cycle time for the review and issuance of a building permit should not be excessively long, while applicants with larger projects understand the need for longer processing times. Section 107.3 of the Ohio Building Code allows the order of plan review to be modified as called for in the excerpt below:

*“... pursuant to a written policy adopted by the department providing for alternative schedules for plan review based on project size or other, rational basis. Such policy is to be posted on the department’s website and may not give preferential treatment to any one individual, organization, or industry.”*

As an example, the City of Cincinnati has created three distinct levels of plan review service for both commercial and residential projects. Each level of review is addressed on a first-come, first-serve basis during specific times of the day or week. Project permits that can be issued the same day should be identified as such for both online and in-person submittals. The project tiers used by the Cincinnati Building Department categorize permit applications by complexity, project size, and review cycle time. For instance, various application/project tiers for commercial and residential development are included from simple to complex application, from same-day review to small- to mid-sized tenant improvements, fire plans, and small residential accessory improvements, to new construction projects. Each tier has a defined area/square footage that serves as a clarifier for applicants. Per the Cincinnati model, Tier 1 projects are those that can be reviewed as same-day permits at a specific time of day and are less than 400 square feet for residential and commercial projects, and 5,000 or fewer square feet for fire protection systems. Tier 2 projects are larger (tenant space and residential improvements greater than 400 square feet and fire protection systems for commercial spaces of 5,000 to 20,000 square feet). Tier 2 projects require a review appointment with a plan reviewer for up to 45 minutes. Tier 3 projects are the most complex and do not have a same-day or a scheduled review. The benefit of a tiered or similarly structured review model is that small, less complicated, and common development applications could have a shorter review timeline than more complex development projects. Additionally, there is greater certainty to the applicant about review cycle times based on the applicable project tier and this approach provides a way to assess and manage workload and staffing assignments.

Per the Cincinnati model, for in-person applications, Tier 1 projects are those that can be reviewed as same-day permits at a specific time of day (for in-person applications). Tier 2 projects are larger and require review by appointment, and Tier 3 projects are the most complex and would be reviewed on a timeline necessitated by the scale of the development. Baker Tilly does not recommend the specified building square footage parameters listed above in the Cincinnati example; Building and Housing leaders should determine how to most effectively use this model.

**Recommendation 7. Create various levels of plan review (by project type and expected review time).** Each level of plan review should be accompanied by a list of submittal requirements and an estimated time (in workdays) for a complete review. The details pertaining to in-person and online applicants should be available online, in checklist form and at the Building and Housing intake counter.

### **Pre-Development Review**

With larger and/or more complex projects, multiple departments and sometimes outside agencies are frequently involved in the review and approval process. Beyond the Building and Housing Department and City Planning Commission, additional departments and divisions can include:

- Engineering and Construction Design,
- Cleveland Water Department,
- Water Pollution Control,
- Cleveland Public Power,
- Fire Prevention,
- Bureau of Traffic,
- Traffic Engineering, and
- Urban Forestry.

In the Macro Development Review to-be process map (and further explained in the To-Be/Future State Process Workflow section of this report), we recommend establishing and mandating a pre-development review process for all projects above a certain size or scope, different from the ad hoc convening that PetBOT meetings addresses, mostly for projects involving work in the right-of-way. The pre-development

review process recommended by Baker Tilly will require certain applicants submit basic materials (ideally schematic plans wherever possible), get assigned an Accela project number, and receive a comprehensive informal review by all relevant reviewing bodies, with consolidated comments from City staff prior to the submittal of a permit application(s) to Building and Housing. Participation from all relevant reviewing bodies is mandatory, and review turnaround times will be established by the City and clearly communicated with all relevant stakeholders.

This will help improve coordination and communication both between departments and with applicants. The pre-development review process would ensure that applicants receive timely and relevant information prior to submitting a permit application, as well as an overview of the necessary steps and completion cycle time for proposed projects. Not all projects will require this review; for instance, simpler (Tier 1) projects can likely bypass this step, though applicants have the option of requesting a pre-development review should they find it beneficial. As noted previously, the City should establish thresholds, by project tier, that clearly outline the project or application types that would and would not be subject to pre-development review.

**Recommendation 8. Implement a pre-development concept review process that will allow all relevant divisions, departments, and agencies the opportunity to jointly review and discuss project concepts prior to a formal construction permitting application.** After the coordinated pre-development review, a list of required submittal items and additional approvals should be shared with the applicant.

### **Coordination and communication among departments**

Currently, the development review and construction permitting processes are very fragmented and siloed between departments and even divisions in the City. For instance, City Planning Commission staff examine specific elements related only to planning review and approvals and may overlook considerations related to the right-of-way or site plan issues as they lack specialized training in these areas. Consequently, applicants who undergo a planning review may be unaware of potential additional approvals required or mistakenly assume that their application has received full approval. Other specific examples include:

- MOCAP is not fully integrated into the Building and Housing construction permitting review process.
- MOCAP reviewers are unable to see Building and Housing review comments, and therefore do not know when a review is completed.
- MOCAP engineering reviewers use the comments field in Accela to request right-of-way information.
- MOCAP engineers indicate that street opening permit applications are not linked to the Accela master project.

These examples highlight the need for improved coordination and communication between all relevant departments, divisions and reviewing bodies to ensure efficient, comprehensive and accurate reviews and approvals of applications.

**Recommendation 9. Implement procedures to ensure that all relevant reviewers are aware of updates and changes to the project review status, and can access Accela records as needed.**

**Recommendation 10. Explore solutions within Accela to link permit records by parcel address or number to align workflow and improve communication.**



### 30-day state standard for plan review

Currently, the clock for tracking the 30-day plan review process begins as soon as the plan review fee is paid, and the 30-day process is associated with issuance of the building permit. The planning and entitlement process does not have a time standard, and some other departments or divisions reportedly do not have set review times. The requirement for Building and Housing to complete a review of an application within 30 days creates an incentive for the plan examiners to issue a rejection adjudication letter. Issuance of an adjudication letter resets the 30-day review period for incomplete plans. Rather than reaching out to the applicant and providing time to submit what is missing, the adjudication action delays the approval process and ultimately completion of the project.

Moreover, Building and Housing service standards are not being adhered to (i.e., 30 days to complete plan review, 24-hour turnaround for phone calls and emails, etc.). For review processes outside of Building and Housing that do not have established time standards, as noted above, the City should collect and analyze data to determine reasonable review timelines. The individual process times (by department and/or division) should be tracked through use of Accela reports, dashboards, and other methods to assess performance and identify additional areas for improvement.

**Recommendation 11. Expand the use of Accela to all City departments involved in construction permitting and require its use for assignment, routing, plan review, inspections, revisions, approvals, certificates of occupancy, appeals, and other key customer touchpoints.** Ensure adopted to-be maps, workflows, service level agreements (SLA) and timelines are included in Accela workflows.

**Recommendation 12. Establish standard project review timelines for each City department based on the project scope/tier and ensure that timelines are followed.**

Designating a project manager to track, measure, report on and set improvement targets around review timelines is a best practice. The project manager (or similar position title) should ensure that staff are conducting reviews in accordance with the City's standard project review timelines. Moreover, the Accela system can be used to provide tickler notices that alert line staff and the project manager when a project is due for review, once the workflow review timelines have been established. There currently is not an assigned staff member who functions across all reviewing departments to provide oversight and monitor the progress of construction permitting reviews to ensure adherence to the review standards and times set by the City.

A project manager can act as an interdepartmental coordinator to assist in ensuring that project reviews are moving diligently through the process. This oversight capacity should be staffed from the Office of Integrated Development. To ensure this project manager is successful, they should have sufficient position authority to work with department directors to enforce review process policies and standards.

**Recommendation 13. Assign a project manager to work across departments and coordinate the review of Accela workload reports to ensure that online and in-person applications are handled consistently and in accordance with review time standards.** The project manager should use the PowerBI reporting tool to review, monitor and share information with all relevant stakeholders regarding application status and to ensure adherence to review standards.

### External Plan Review

Many jurisdictions around the country offer applicants an option to expedite plan review for financial or other reasons. The City does not currently have an expedited review option and may want to consider offering applicants the opportunity to receive an external review for a faster turnaround for specific types of development projects that the City has designated as eligible for this expedited review. The simpler, more straightforward projects are generally those that benefit from an external review. Larger and more

complex projects often require multiple department reviews, communication with City staff throughout the development project and application process, and diligent City oversight. The latter types of projects are likely not good candidates for external review.

If the City chooses to offer customers this option for an external review, City staff will need to vet and approve a list of qualified external reviewing entities to ensure quality control.

While this external review service usually comes with an additional expense charged to applicants who choose this option, the City should conduct an equity analysis to ensure applicants are treated fairly and that the associated fee is not overly prohibitive for the City's primary customers. Part of this equity analysis may entail using the additional fees generated from those applicants who are able to pay for the external review to hire additional City staff (for example, master plan examiners), so that applicants who do not have the financial means to expedite their projects are still benefitting from this option.

Moreover, in our interviews with Cleveland customers, having the option of an external plan review was a commonly requested service that customers would like to see the City implement in order to improve efficiency of plan reviews. However, as noted previously, the City will need to consider equitable treatment of all applicants, as well as ways to ensure the high quality of external plan reviews.

Should the City proceed with implementing external reviews, the to-be workflow illustrates how and where an expedited review would fit into the review process (see To-Be Macro Development Review map, page 4).

**Recommendation 14. Explore an external plan review option and fee for designated types of development.**

### **Project Approvals**

Another area of confusion for applicants is that the use of the term "approval" to denote the completion of an interim process step. Use of the term "approval" before a final project approval is issued is misleading and confusing to applicants. For instance, some developers begin construction following Building and Housing's master plan examiners' "approval" of schematic designs, when the project has not gone through full review by all required departments and divisions (e.g., Fire Prevention Bureau, Urban Forestry, etc.). Therefore, in print materials and conversations with applicants, it is important to clarify the difference between interim and final project actions during the review process. Specifically for project approvals, City staff must clarify with applicants that completion of a department, division, or agency review step does not necessarily indicate a final approval for the project or development. Rather, it indicates that a project has received permission to advance to the next step in the review process. For example, when zoning approves a conditional use, the developer/applicant would still need to apply for and secure building permits and subsequent approvals from various reviewers such as Urban Forestry, Health, Fire, and others, as needed.

**Recommendation 15. Clarify the difference between interim and final approvals in written communication and in conversations with applicants.**

### **Consolidated Plan Review**

The to-be workflows largely address this issue, as all relevant reviews should be conducted, and feedback shared, concurrently with the applicant. This is a best practice that will frontload all relevant department reviews, consolidate all review comments, and reduce confusion for applicants around interim versus final approvals. In the to-be process maps (see To-Be Macro Development Review map, pages 4 and 5), we refer to this consolidated review as the PetBOT meeting and recommend having PetBOT transition to a typical development review body. In the meantime, PetBOT can act as the convener and organizer of this integrated development review across all departments, divisions, and agencies that need to provide input and give approvals for submitted schematic plans and construction drawings. Eventually, the City should move away from the PetBOT branding, since it does not include all relevant reviewers in its name, and instead simply refer to it as the development review body.

**Recommendation 16. Transition the Planning, Engineering, Traffic Engineering, and Bureau of Traffic (PetBOT) review function to a traditional development review meeting.**

## Inspections

### Enforcement of approved design review plans

Previously, there was no mechanism to enforce adherence to the approved design once the design review plans are approved and a building permit is issued, as there were no site plan inspectors, only building inspectors whose focus is to ensure the project is built in compliance with the building code. Building and Housing inspectors generally review the design in the field for compliance with the approval granted by the Design Review Board. Where deviations from the approved plans are identified, building inspectors instruct contractors to seek direction from the planner in charge of the project. In some cases, the deviations are minor, but the building inspectors are not equipped or authorized to exercise discretion in the field. Many times, the referral to the planner in charge causes delays in the construction process as it is placed on hold while the modification(s) is reviewed and confirmed. To alleviate this, in the proposed to-be workflows, inspectors will have access to the approved design plans via Accela and on their mobile devices and will be able to note any issues and mark the appropriate workflow in Accela so that communications with planners is seamless. From the office or via mobile device, the assigned planner can approve, deny or request additional information or materials from applicants using via the Accela system. The addition of an electronic review software would enhance the process.

**Recommendation 17. Require that planners use Accela to notify inspectors and applicants about deviations that require a resubmittal.**

**Recommendation 18. Grant planners' discretion to approve minor deviations or modifications in the field based on established criteria.**

### Lack of access to real-time information by inspectors in the field

Compounding the problem is the fact that there is a lack of accessibility to real-time information for Building and Housing inspectors, which includes project plans. The challenge lies in the dual acceptance of applications and building plans, either digitally or in paper format. Currently, building plans submitted in paper form are not digitized and therefore not attached to the corresponding Accela record for that application. This bifurcation presents several operational obstacles, impeding the ability of inspectors to readily access building plans for applications submitted in paper format.

Building and Housing inspectors require access to comprehensive project plans in real time to perform efficient and effective inspections. The absence of digitized building plans for paper submissions necessitates manual handling, leading to inefficiencies, potential delays, and increased operational complexity.

## Record Keeping

### Paper applications and associated documents are maintained as physical records

The disparity in record-keeping practices contributes to the existence of paper and digital documentation. As noted, walk-in customers historically file their applications and plans in paper form and Building and Housing staff do not have the equipment or the resources to scan the plans and create an electronic version that can be easily routed to different departments during the review process. Once paper plans are approved, they are copied and sent to Records Administration along with the issued permit. However, inspection staff are not provided copies of approved paper plan sets for use in the field and must walk to another building to access and then copy a set of plans from Records Administration to take on their inspections to ensure the project is being constructed as approved.

**Recommendation 19. Develop a plan to convert existing permit applications (plans, permits and related documents) to digital format that can be accessed via Accela or another centralized repository (e.g., GIS).** All plans should be converted to a digital format, maintained in the Accela software with the project permit and made accessible to inspectors in the field.

Additionally, the Building and Housing storage area for paper plans and documents is not properly managed or maintained. The space is not set up to easily track and retrieve paper documents. A notebook and sign in/out sheet are used to track plans and jackets that are removed from the area. Building and Housing staff currently has a cordoned off storage area where plans that have been checked or approved are stored with notes in an assignment book. This assignment book is available to the counter staff to assist in answering questions from applicants. This condition is not ideal and will result in lost plans and errors in retrieval. Again, there is a need for equipment such as electronic kiosks for either staff or applicants to scan, upload or complete application materials in the Accela system for streamlined access, routing and transmittal, and review.

**Recommendation 20. Provide intake counter staff with resources, training and the appropriate equipment to scan and upload plans in a digital format.** Once paper submissions are digitized, they can be used by the plan examiners and inspectors for plan review and in-field inspections. Scanned plans entered into the Accela system should be linked to the appropriate permit allowing smooth transfer of project documents to relevant reviewing staff.

### **City records and information related to previous parcel use**

Years of multiple forms of record keeping have created the need for review by Records Administration. The review adds a required step to search each application address to determine its last legal use either by sending applicants to a specified room in City Hall or by accessing the information online. To access records not available on Accela, staff must research microfiche, then archives and other legacy systems, a time-intensive, manual process. If they cannot find any information about the parcel they note that there is "No record." When information is found, it is notated in Accela. This review by Records could be eliminated if all pertinent historical information on properties were systematically and fully digitized.

**Recommendation 21. Develop a plan to convert historic Records Administration Division data to electronic format that can be accessed through a Geographic Information System (GIS) layer.**

### **Staffing and Staff Development**

There are 157 funded positions in the Building and Housing Department including three divisions: the Director's Office, Construction Permitting, and Code Enforcement. Several key positions in Building and Housing are vacant which affects the workflow efficiency. As of December 2023, there were 21 vacant positions throughout Building and Housing with the greatest number of vacancies (15) in inspection services. There are three vacant building inspector positions, nine vacant residential building inspectors, two elevator inspectors, and one electrical safety inspector. The shortage of inspectors could delay projects if construction is required to halt while waiting for an inspection. Staff noted that the inspectors' pay band was not competitive, which contributed to the difficulty in filling those positions. Recently, a union contract has been ratified that corrects this disparity. Table 4 includes a listing of funded and vacant positions in Building and Housing.

*Table 4. Building and Housing Positions and Vacancies (current as of December 2023)*

Division	Vacancies
<b>Director's Office</b> 33 Funded Positions	Fiscal Manager (1) Financial Systems Coordinator (1) Database Administrator (1) Senior Cashier (1)
<b>Construction Permitting</b> 19 Funded Positions	Master Plan Examiner (1) Assistant Plan Examiner (1)
<b>Code Enforcement</b> 105 Funded Positions	Building Inspector (2) Residential Building Inspector (9) Elevator Inspector (2) Electrical Safety Inspector (1) Demo Compliance Officer (1)
<b>TOTAL</b>	<b>21 vacancies</b>

The assistant plan examiners perform a key role at the intake counter, but also have many other functional roles. There are five assistant plan examiner positions in the Construction Permitting Division, with one vacancy due to a promotion to the project coordinator position. The assistant plan examiners handle the intake process, assist customers in person at the counter, review applications for conformity with basic zoning requirements, route online applications, handle telephone inquiries, and respond to customer emails. The high demand for their time and attention can sometimes constrain the level of assistance available to customers visiting the office in person, but the best practice is to have continuous coverage during open counter hours. As the City creates comprehensive and detailed process guides and informational handouts and other customer-focused resources and tools, the time associated with many of the aforementioned tasks should decrease significantly (e.g., fielding customer inquiries). Moreover, as workflows are built out in Accela and plans are increasingly submitted in electronic format, assistant plan examiners should not need to review applications for completeness prior to submission into the City's system, nor will they have to manually route applications to outside of Building and Housing.

In addition to the assistant plan examiners, there are nine principal clerks, commonly called "typists," throughout the department; three are assigned to construction permitting. The assistant plan examiners and the principal clerks share duties that in other cities are carried out by permit technicians. Permit technician duties typically include providing technical and administrative support by reviewing development permit applications for completeness, assisting applicants with making complete applications and answering customer questions via phone call or email, and checking the status of business licenses, scan and upload files, etc.

The primary duties of the construction permitting principal clerks is to enter application information into the Accela system prior to the issuance of permits. Their responsibilities also encompass processing both paper and online applications, ensuring accurate data entry, and verifying the presence of essential information needed for application routing. Currently, principal clerks do not assist with customer service, including helping to scan and upload application materials into Accela. Moreover, their responsibilities also do not include traditional permit technician training, which restricts their capacity to assist assistant plan examiners at the permit counter with customer service and routine development review inquiries.

As the City expands use of the Accela system and moves increasingly toward electronic plans and application submittals, it will be helpful to ensure principal clerks are receiving the training and certifications needed to best meet construction permitting workload needs through enhanced customer service.

While principal clerks currently perform many duties related to the paper-based processes, many of these duties/functions will decrease over time as with greater use of Accela functions and workflow (e.g., calculating and collecting permit fees). As this transition to a full Accela implementation is underway, the

duties of the principal clerks should be transitioned gradually so that they are prepared to support assistant plan examiners and customers at the counter with the scanning of documents, answering basic development review and construction permitting-related questions, and uploading the large volume of existing paper documents into Accela.

**Recommendation 22. Expand the job specification and role of the principal clerk to include permit technician training and certification.**

### Cross Training

Some construction permitting processes, like the review of street opening and closing permit applications, are staffed by only one representative per department/division. For example, there is only one staff person each in the Bureau of Traffic, Traffic Engineering, and MOCAP who conduct street opening and closing permit application reviews. When these staff are out of office or unavailable, delays can occur that push completion of the review beyond the 14-day time standard. Similarly, there are only two fire suppression plan examiners, one for fire alarms and one for fire sprinklers, so when these staff are out of the office or unavailable, this also disrupts timely completion of the review. Fire (30-day review standard per ordinance).

**Recommendation 23. Cross train employees and determine the need for additional positions based on workload and required staff redundancy.** The City will need to review all key roles in the development review process (including plan reviewers, inspectors, etc.) and identify and train back-up staff to fill those functions in the absence of key staff. In some instances, hiring of additional staff may be needed.

### Customer Service and Website

Customers need to know how long it will take for their project to be reviewed and approved to anticipate the construction timeline. Process and task cycle times for each phase are unknown. This lack of information increases the number of phone calls and emails to City staff to obtain information. All staff and customers should be able to see where an application is in the process.

**Recommendation 24. Use Accela Citizen Access (ACA) to publicize submittal requirements, fees, review times, provide ticklers to alert applicants of review and submittals/resubmittals, upcoming meetings, and application status.**

Another customer pain point occurs when applicants arrive in-person at the Building and Housing public service/application intake counter, but do not receive the staff attention or help that they need. Although hours published on the City's website are 8:00 a.m. to 5:00 p.m., the counter is not always staffed because assistant plan examiners often get pulled away for other equally important duties. This causes customer service to suffer. Principal clerks and the cashier do not interface with customers except when they are paying fees, even though they are in full view of those waiting at the counter. This creates a negative perception to customers that the City does not care. The seating arrangement of the principal clerks could be modified so they are not visible at all times to the public. This is also true for the cashier who may have different hours than the counter staff.

Recommendations 25 and 26 address these issues by setting a clear schedule for Building and Housing staff to manage their time and workload in a more predictable manner for existing projects, while also assisting walk-in customers who need assistance at specific times during the day. Additionally, reconfiguring the office will improve customer service by locating assistant plan examiners to a visible location for customer assistance, while relocating the principal clerks to a less visible space to maintain their focus on administrative work.



**Recommendation 25. Establish morning-only counter hours for walk-in (same-day) permit applications and afternoon hours, by appointment only, for all other application types to provide Building and Housing staff additional time to conduct project reviews and communicate with applicants.**

**Recommendation 26. Designate a back-of-house area for principal clerks to complete their work or reconfigure their work area to avoid the appearance that they are available to serve the public.**

### **Current website design and usability pose challenges for potential applicants**

The website lacks intuitive navigation, which makes it difficult to locate specific information for completing applications. The first page of the City's website does not direct the user to any location related to construction. Selection of the "City Hall" tab may direct the user to the Building and Housing Department, but there is no clear guidance about how to proceed. Selection of "Permit Requirements" directs the user to an area indicating when a permit is required but does not describe the process. If the user then selects the "Site Plan Approval Policy," the text indicates that an applicant must have approval of a lot split/consolidation, design approval, and/or zoning approval prior to applying for a building permit. No further information is provided that directs the user on how to obtain approval of a lot split/consolidation, design review, and/or zoning. Overall, website enhancements are needed to improve the user experience and facilitate finding relevant information efficiently and reliably.

**Recommendation 27. Conduct a comprehensive review of the City website and remove outdated information about construction permitting review processes.** Consistent formatting and dedicated public portals are needed to support an integrated, cohesive process.

**Recommendation 28. Ensure application materials and permit checklists are available and accessible online (for example, on the City's website, via Accela Citizen Access, and elsewhere as needed).**

## **Permit Fees**

### **Inaccurate fee calculation occurs for certain permits**

The online permit system allows applicants to input the square footage of their project as part of the application process, even when it is not a relevant factor for calculating the permit fee. While some permit types utilize square footage for fee determination, several others do not, rendering this information unnecessary. The problem arises when applicants, unaware of whether square footage applies to their specific permit type, input this data into the online system. In such cases, the system automatically calculates a fee based on the provided square footage, which may not align with the actual fee structure for that permit.

This issue necessitates manual intervention by City staff to rectify the incorrect fee calculation, which, in turn, may lead to the need for refunds to the applicant. Such discrepancies not only create administrative burdens but also potentially result in dissatisfaction among applicants. In fact, staff reported that they receive a significant number of applicant inquiries related to fees calculations and incorrect fee assessments.

To help mitigate this issue, City staff from all relevant reviewing departments and divisions, as well as representatives from outside agencies, must update fee schedules (see Recommendation 4) so the correct fees and the method of calculation can be input into Accela's fee calculation structure for the various permit types. Accela's intake process should be designed to only request information from applicants by permit type to accurately calculate permit cost and applied to related fees.

**Recommendation 29. Ensure the Accela Citizen Access portal accurately calculates fees by permit type and requires the inputs necessary from the applicant and staff to do so.**

## Legislation

### Permitting process complexity is intricately tied to legislation

The Cleveland Code of Ordinances, or the Code, identifies city planning as part of the City Planning Commission which is one of eight offices under the Mayor but acts as a department. The Code states that upon receipt of an application for a building permit, the Director of Building and Housing shall determine whether the proposed action requires design review and if so, shall promptly transmit the application to the Director of the City Planning Commission. This code requirement implies that Building and Housing is the gatekeeper to send applicants to other divisions or departments as required, although staff has indicated that some development projects are better served if they begin with City Planning Commission, as shown in the to-be process maps. It is a best practice in cities for land use approvals such as design review or landmarks to be approved prior to issuance of a building permit.

The to-be map recommends zoning reviews occurring first, in line with best practices, by City Planning Commission rather than in Building and Housing. However, the Code currently states that the Zoning Code shall be enforced by the Division of Building Housing. Therefore, the City should regularly review and update the Code to reflect substantive changes to construction permitting and development review process.

Please note that the manual routing function can be eliminated once Accela is fully adopted and in use by all the relevant departments, divisions, and agencies for construction permitting and development review processes.

**Recommendation 30. Update relevant legislation to reflect changes to construction permitting and the development review process (e.g., to allow City Planning Commission to conduct a zoning review rather than Building and Housing).** Updating City legislation should occur in coordination with aligning the City Code with the Ohio Building Code (see Recommendation 2).

### Local design review requires multiple approvals

During the design review process, city planners assess whether an applicant's proposed exterior changes are significant and require Planning or Landmarks Commission approval or are relatively straightforward and can be administratively approved. If a project requires Planning or Landmarks Commission review and approval, it first goes to the local Design Review Advisory Committees (DRAC) for consideration. DRACs are established for each design review district, and DRAC representatives are appointed by the City Planning Commission. A majority of the DRAC members appointed shall be architects or other recognized design professionals, with the remaining members representing businesses, organizations or residents within that local area. The local DRAC reviews the project; recommends approval, approval with modifications or conditions, or disapproval of the project application, based on final design plans. After the DRAC meeting a written record of its recommendation to the Planning Commission, is prepared.

In some instances, Building and Housing staff will refer an applicant to the City Planning Commission for DRAC scheduling without adequate communication, which can lead to applicant confusion and frustration. It is not uncommon for projects to require a minimum of two meetings by a local DRAC, with another two meetings by the Planning Commission before final design plans can be approved. This review requirement can significantly impact the total cycle time for projects in design review or landmarks/historic districts.

One option could be to reduce and streamline the reviews conducted by the local Design Review Advisory Committees, thereby reducing the administrative workload of city planners with greater



standardization of what the Planning Commission reviews across the various design review districts. City Planning Commission staff currently manage 13 separate design review advisory committees.

Design review is a necessary, yet time-intensive process that could potentially be reduced through the broader use of administrative approvals, by Planning Commission staff, under certain conditions and according to specific criteria. The City should explore these and other ways to streamline and reduce the number of local design review meetings, and amend the Code as needed.

**Recommendation 31. Explore options to reduce or consolidate the number of local Design Review Advisory Committees (DRAC).**

**Codified fees and the true cost of service**

Several fees are prescribed by City Code; instead, the City should codify the method of calculating fees and refer to a schedule of fees that can be adjusted to reflect the current cost of providing services by function. One example is Section 329.05 Fees, effective in 2003. It identifies specific fees for any applicant applying to the Board of Zoning Appeals. The amounts cited may reflect the cost of the service in 2003, but do not represent the amount of staff time to deliver the current service over twenty years later. The lower fees could encourage requests for variances. Staff also mentioned a flat fee of \$150 for zoning review which also may no longer reflect the true cost of the service.

Utilizing a fee schedule that can be updated regularly would allow the City to assess and revise or update fees in accordance with changing customer needs and service demands in coming years. A fee study of the current true cost of providing the full range of construction permitting and other services related to development review is needed.

Some current services undertaken by City staff during construction permitting reviews functions are not assessed a charge. For example, there is no fee for preparation of zoning verification letter which can take approximately seven to fourteen working days for staff to complete. Additionally, the City can, but reportedly does not, charge a design review fee, which is a significant portion of development review work for certain projects, nor does it currently charge reinspection fees.

Following a fee study and the assessment of the full cost of development review-related services, the City may decide to update certain fees and begin charging for services where there is little or inadequate cost recovery. In general, it is best practice for construction permitting and development review services to fully recapture costs through fees and charges to the applicant.

**Recommendation 32. Review construction permitting development fees and identify those that are fixed or calculated and update the methodology for each, as needed.**

**Recommendation 33. Conduct a fee study to determine the true cost of construction permitting/development review services across all City departments (and outside agencies, as relevant).** The City should regularly revisit fees to ensure full cost recovery for the services.

## Use of Technology

### Lack of full Accela system integration

The Accela system is not uniformly used across all departments within the organization for managing permit intake, review, inspections and approval. This lack of integration has given rise to a myriad of challenges that ripple throughout the development review process. There are workflow inefficiencies, as different departments resort to their own methods and systems for tasks that should be seamlessly managed through Accela.

Building and Housing staff have used the Accela system for several years to assist with construction permitting intake and application reviews. Permit applications originate in Building and Housing and an Accela record is created for it. Currently if an applicant begins the development review process with a different department (e.g., City Planning Commission, Economic Development, Community Development, etc.), an Accela record will not get created until a permit application is submitted to Building and Housing. Departments have therefore developed workarounds, such as Excel spreadsheets and other databases, to track the workflow of a particular application. Not embracing the technological solutions available creates a duplication of effort that not only consumes valuable time, but also results in redundancy, silos, disjointed communication, inaccurate information, and inconsistencies in processes.

The underutilization of the Accela system across all departments involved in construction permitting and development review is not merely a software issue; it is a systemic challenge that affects productivity, interdepartmental cooperation, and overall service quality, as well as the customer experience. Particularly, the City Planning Commission has not fully implemented Accela and relies on multiple alternative tools and databases to track their projects. The Fire plans examiner who sits in Building and Housing uses Accela solely for plan review, but the Accela system is not consistently used by other staff reviewers in the Fire Prevention Bureau. The Accela system also is not integrated for use with many Building and Housing and other department inspections; consequently, inspections are primarily paper-based. MOCAP Engineering and Construction have implemented Accela but have room for further development in its utilization. The Division of Water and Water Pollution Control employs Accela for permitting purposes but does not utilize it for electronic reviews or communication between divisions. Other examples include:

- Building and Housing is not using Accela report functions to assess/manage workflow.
- City Planning Commission does not use Accela because they cannot create department specific project records.
- City Planning Commission, Fire, and MOCAP each use spreadsheets to track the status of projects. Updates to the spreadsheets are not made on a consistent basis, and other departments do not have access to these spreadsheets, making it difficult to track project status across departments.
- Plan review comments from departments are not consistently tracked in Accela, and staff have reported difficulty leaving annotations and comments with their review due to limited functionality in the current Accela system.

In addition to integrating all reviewing entities into Accela, additional tools, such as Electronic Document Review solutions should be made available to all pertinent users. These tools are useful to ensure compliance with local regulations and codes and to standardize reviews. Additionally, these tools promote time savings due to their ease of use and allow for review comments that are easily accessible across departments. To assure full implementation and adoption of Accela for citywide construction permitting and development review a user group will be needed to guide planning, implementation and sustained use.

**Recommendation 34. Create an overall project plan/roadmap to implement Accela resources citywide for construction permitting.** Ensure timelines and priorities are established and tracked.

**Recommendation 35. Establish an Accela governance structure and workgroups to assist with decision-making, provide best practice guidelines, and identify “Accela Champions” to support the implementation.**

**Recommendation 36. Provide comprehensive training to all departments on Accela's capabilities and mandate its uniform use throughout the organization.**

**Recommendation 37. Ensure departments use Accela to consistently update and accurately track project records.**

**Tracking permit status is an issue for applicants and staff**

Communication gaps have emerged as a direct consequence of this fragmented approach. Departments and divisions operating in silos find it arduous to share vital information and updates, leading to misunderstandings and delays in decision-making.

The lack of software integration has taken a toll on customer service standards too. Customers, who naturally expect a unified and efficient experience, are often subjected to confusion and frustration due to disjointed interactions with different departments and a lack of insight into where their application might be in the process. Applicants often face challenges in obtaining information about the status of their permits, leading to frequent inquiries via calls and emails. Building and Housing personnel are unable to provide insights into the status of applications or where in the process a particular applicant may be if their project is under review by a different department, resulting in limited ability to address customer questions regarding the progress of their applications during the planning review and approval stages.

Regarding resubmittals, departments and divisions outside of Building and Housing are notified by the department when revised/updated plans or supporting information is received. Many times, the applicant informs staff reviewers in other departments that revisions have been submitted. Additionally, because many departments cannot access or use Accela, they do not receive an electronic notice when resubmittals/supporting information is uploaded to the Accela record.

**Recommendation 38. Assign a central point of contact to handle customer inquiries about permit status.** This will eliminate the need for applicants to contact multiple departments about the status of a review.

**Recommendation 39. Ensure outside agencies can access Accela to support clear communication and timely notice of plan submittals/resubmittals.**

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## To-Be/Future State Process Workflow

To address many of the process bottlenecks, gaps and inefficiencies, and most manual and/or time-intensive processes outlined in the preceding analysis, Baker Tilly recommends the following to-be and future state workflow improvements.

Following the process improvement workshop with City staff in December 2023, Baker Tilly synthesized the primary ideas, key pain points shared by staff, and recommendations that emerged from the workshop into revised construction permitting workflows as shown in the following three to-be process maps:

1. Macro Development Review
2. Planning
3. Fire Protection Systems.

The accompanying to-be process maps are included in Attachment E. An overview of the major recommendations and revisions shown in the to-be/future state enhancements to the City's existing workflow for construction permitting review follows. Some of the recommended improvements are also addressed earlier in the report, where relevant.

The to-be process maps represent improved operations, workflow and communication to applicants, City staff and outside agency reviewers based on analysis conducted by Baker Tilly and appropriate best practices. Baker Tilly has included a "draft" watermark on the to-be/future state process maps. The "draft" maps will require additional refinement to depict agreed upon future state operations and processes using a multi-department approach led by the Office of Integrated Development, Building and Housing, Information Technology Services and multiple City and agency stakeholders. The refinement process will continue throughout the implementation of the future state construction permitting improvements.

### To-Be Process Maps Overview

#### Macro Development Process Summary

The To-Be Macro Development Review map illustrates the overall process of applying for any development project within the City of Cleveland. In the workflow, there are references to "project tiers" for various levels of review, based on project/application complexity (from simple to complex), as described above. Baker Tilly recommends the City, through Building and Housing, devise a tiered system for project reviews similar to the approach used by the City of Cincinnati. The tiered system, described on page 17, will allow for efficiencies in application reviews and improve review cycle times.

#### Pre-Development

As noted in the Plan Review section of the report, prior to submittal of a permit application, Baker Tilly recommends the City offer a free and optional, but highly encouraged, pre-development review for development proposals and projects that may be complex or sensitive. The pre-development meeting is a new component in the review process and is a best practice (shown in the To-Be Macro Development Review map, page 1). The pre-development review could occur in the form of a meeting (in-person or virtual) or as a remote ("desk") review. For more complex projects, the review should occur in the form of an in-person meeting whenever possible and be mandatory (see Plan Review section regarding project tiers). The pre-development review could also be used for less complicated projects, when applicants desire City staff input prior to submission of a formal permit application. This would not be mandatory, and this could occur as a remote review.

The benefit of the pre-development review is that it would provide an opportunity for applicants, particularly with larger, more complex projects, to present and discuss conceptual or schematic plans with City staff from all relevant reviewing departments, divisions, and agencies, including but not limited to City Planning Commission, Building and Housing, Fire, Urban Forestry, and Water Pollution Control. The

result of the discussion would be clarity about plan submittal and review requirements, along with cycle time estimates for land-use, planning and other development approvals related to site plan, construction and inspection phases.

The pre-development phase would also allow City staff to share and discuss comments and offer guidance to assist the applicant in developing the appropriate and necessary materials for a formal submittal. A key advantage in using pre-development review is the ability to identify unique project characteristics requiring special considerations to adequately prepare the applicant and City staff to address these needs (e.g., tree preservation plan requirement). It should be clearly noted in written and verbal comments to applicants that pre-development reviews do not result in approvals. Their primary purpose is to convene a joint discussion and/or remote review (by each required reviewer) regarding a potential project and solicit relevant feedback from City staff to guide an applicant's submittal into the permitting process.

During this phase, applicants would also be alerted to any zoning issues, such as the need for a zoning variance or a rezoning, as well as whether design review or Landmarks review is required. If a proposed project is located either in a Design District or a Landmarks District, committee meetings will be required as a pre-requisite to a building permit application. All projects that receive a pre-development review would be assigned a project number in Accela, and all submitted plans and documents along with reviewer comments would be part of this record as the project moves through the approvals process.

Applicants who do not opt for the pre-development review should still have access to pre-development meeting information via the City's website, in printed materials at the Building and Housing Department's public counter, as well as online in the Accela Citizen Access portal (see Customer Service and Website section of this report for more details).

### **Land Use, Design and Landmarks Review**

Projects that will require zoning and/or design or Landmarks review will first go through City Planning Commission reviews, with zoning conducted first (as shown in the To-Be Planning map, pages 1 to 12). Following this, the applicant may submit a formal application for a building permit into the Building and Housing Department (as shown in the To-Be Macro Development Review map, pages 2 and 3). The process maps illustrate a high-level future state workflow premised on the full use of the Accela system (including having all future applicants upload paper applications into the Accela system for electronic routing and review).

The Accela system will automatically check the application for completeness and should not allow a submission if required materials are missing. Once a permit application is accepted in Accela, the relevant fees are assessed and collected electronically, preferably. The City should retain options to pay fees in person (as shown in the various as-is maps). The to-be maps show all payments via the Accela Citizen Access portal only. Once all application materials are deemed complete and fees are paid, the Accela system will route the materials to all relevant reviewers in the workflow (by application type), including outside agencies (e.g., for stormwater review). The order of the review will be determined by pre-established workflows, considering any dependencies; for instance, the Plats and Surveys Section and Records Administration Division currently review prior to other reviews. However, it is best practice to allow for concurrent reviews whenever possible, as this expedites the review and reduces cycle time.

### **Development Review (via PetBOT)**

Once all relevant reviewers have completed a review and uploaded comments to a project review template in the Accela system, they will convene to discuss the project (for specific project tiers). While the convening body is referred to as PetBOT in the to-be maps, it is recommended that PetBOT be transitioned into a standard development review meeting that allows City staff to coordinate their comments and responses to development applications and to provide a cohesive review of projects (as shown in the To-be Macro Development Review map, pages 4 to 5). The development review meeting should be facilitated as a component of the Accela workflow, with comments from each reviewer entered into the project record. All relevant City staff and reviewers from outside agencies should be required to

participate in the development review meeting to ensure that a complete review is conducted in a timely manner. Moreover, alternate representatives should be identified from each reviewing department or agency to ensure full representation at the development review meeting.

### **Process Completion (via Accela)**

The remaining steps of the workflow (payment and permit issuance, building and other inspections, life safety and final inspection, and issuance of a certificate of occupancy) should be streamlined in the Accela-based to-be workflows since many of the manual and in-person steps and processes will be eliminated or replaced by automatic routing, along with the assessment and collection of fees, and issuance of permits and certificates of occupancy through Accela workflow and routing.

In this revised workflow, all actions that are taken on a project (for instance, Board of Zoning appeals, approval for or denial of a conditional use or variance, etc.) will have its own separate record that is linked to the original project number in Accela such that other reviewers who need visibility into these actions will be able to easily access them in the system. Most important to note is that reviewers should not keep separate databases or tracking systems in place of using Accela going forward.

### **City Planning Commission To-Be Process**

The second to-be/future state map recommends that the zoning review be conducted first for all projects (see To-Be Planning map, page 1). It should be noted that the Accela's geographic information system (GIS) interface should automatically populate the correct zoning information when an application is submitted. This will eliminate the need for staff to perform this step manually; however, a staff review for conformance with the zoning code and a determination of needed variances, etc., will continue. Baker Tilly recommends that all zoning reviews be conducted exclusively by City Planning Commission staff, rather than in both Building and Housing and City Planning Commission. One item of note when building out or updating Accela's land management, GIS and related capabilities is to allow online applicants to input verified addresses that are not already in the City's system.

The remainder of the workflows shown on the City Planning Commission to-be/future state map illustrates what the Accela system-based workflow would entail. All project records should be tied to the original project number assigned, either at the pre-development review phase or at the first submission of project materials. This is premised on the expansion of the Accela system such that all relevant reviewing bodies are provided access to Accela and based on each reviewing body developing the necessary workflows within Accela for every review that is needed.

While the timelines for the design review process are estimates based on current City practices (as shown on the to-be map), Baker Tilly recommends that the City consolidate and/or reduce the number of reviews by the local Design Review Advisory Committees (DRAC). Reducing the number of DRAC reviews will significantly reduce review cycle times for applicants and lessen the administrative burden on City Planning Commission staff.

### **Fire Protection Systems To-Be Process**

The third to-be/future state map illustrates the Fire Protection Systems review and workflow (see To-Be Fire Protection Systems map). This process map is meant to show not only the Accela-based workflow for the Fire Prevention Bureau plan review and inspection processes, but also to illustrate how it could work for the other reviewing bodies, such as Water Pollution Control, Health, etc. This map outlines what other reviewing departments, divisions, and agencies can typically expect when conducting a review and/or inspection after full integration into the Accela system. Most notably, all relevant application materials – for instance, fire suppression plan(s), sewer plans, etc. – will be required at the permit application submission stage via Accela (as shown in the To-Be Macro Development Review map, pages 2 to 3). Plans will be routed, via the workflow, to the relevant reviewers using pre-established checklists and built into Accela. Reviewers such as the Fire Prevention Bureau would receive the relevant application materials, including plans and other key project information, with tracking of review comments, inspection

notes, etc. using an attached record to the original project number in the Accela system (as shown in the To-Be Fire Protection Systems map, pages 1 and 2).

### To-Be Workflow Summary

Use of the Accela system will ensure that all reviewers and applicants can track the progress of each project throughout the review, permitting inspections and project completion (i.e., the construction permitting “lifecycle”). Full adoption of the Accela system will provide the City with one central repository for all related construction permitting and development review actions (or records) for a project, from the initial submittal to the issuance of various permits and multiple inspections, including resubmittals by applicants.

To enable full integration and use of Accela in the City’s development review process, the City will need to invest the right resources, including staff and training, to ensure workflows are built out to meet the specific needs of the various reviewers, and that those reviewing bodies that are newer to the Accela system have the administrative and technical supports to fully utilize Accela.

## Conclusion

Baker Tilly's analysis and supporting recommendations focus on the operational, technical and staffing/organizational elements that are needed to move the City toward a streamlined construction permitting and development review process. These recommended improvements are based on full implementation of the future state, including access to and consistent use of the Accela system to support improved internal and customer-focused communication, website improvements and legislative updates, staff development and training, and improved workload management.

This report and the supporting data tables represent a "point in time," based on a current state that is changing and moving ahead with operational improvements based on Baker Tilly's draft report that was delivered in January 2024. Baker Tilly applauds the construction permitting project team for moving forward with initial implementation activities including upgrades to the City website, initial steps to streamline some land use approvals and the appointment of a technology working group to assist with the ongoing Accela implementation and associated change management.

To support a structured approach for prioritizing the 39 recommendations and the future state workflow, a draft Implementation Action Plan (IAP) has been prepared and delivered as a standalone document. The draft IAP becomes final after the Building and Housing director in collaboration with the project team (the Office of Integrated Development, Information Technology Services, City Planning Commission, the Mayor's Office of Capital Projects, Fire Marshal, Urban Forestry and others) integrate the action steps into actual plans of work with planned completion dates and staff assignments. The action plan offers an important management tool for accomplishing the work needed to streamline and improve the construction permitting process.



**Recommendation 1. Establish Building and Housing as the single point of entry for construction and related permitting applications, with information available to all departments through Accela workflow routing.**

**Recommendation 2. Assess and update the City Code, where necessary, to align with the State of Ohio Building Code.**

**Recommendation 3. Establish minimum application submittal requirement checklists based on project type.**

**Recommendation 4. Coordinate all relevant reviewing bodies to develop a written overview of the construction permitting process, including updated fees and/or fee schedules for applicants (for in-person and online submittals).**

**Recommendation 5. Reject applications that do not conform to minimum submittal requirements per City Codes.**

**Recommendation 6. Incentivize use of the Accela Premium Citizen Experience (PCE) by providing a publicly accessible kiosk for in-person application submittals.**

**Recommendation 7. Create various levels of plan review (by project type and expected review time).**

**Recommendation 8. Implement a pre-development concept review process that will allow all relevant divisions, departments, and agencies the opportunity to jointly review and discuss project concepts prior to a formal construction permitting application.**

**Recommendation 9. Implement procedures to ensure that all relevant reviewers are aware of updates and changes to the project review status, and can access Accela records as needed.**

**Recommendation 10. Explore solutions within Accela to link permit records by parcel address or number to align workflow and improve communication.**

**Recommendation 11. Expand the use of Accela to all City departments involved in construction permitting and require its use for assignment, routing, plan review, inspections, revisions, approvals, certificates of occupancy, appeals, and other key customer touchpoints.**

**Recommendation 12. Establish standard project review timelines for each City department based on the project scope/tier and ensure that timelines are followed.**

**Recommendation 13. Assign a project manager to work across departments and coordinate the review of Accela workload reports to ensure that online and in-person applications are handled consistently and in accordance with review time standards.**

**Recommendation 14. Explore an external plan review option and fee for designated types of development.**

**Recommendation 15. Clarify the difference between interim and final approvals in written communication and in conversations with applicants.**

**Recommendation 16. Transition the Planning, Engineering, Traffic Engineering, and Bureau of Traffic (PetBOT) review function to a traditional development review meeting.**

**Recommendation 17.** Require that planners use Accela to notify inspectors and applicants about deviations that require a resubmittal.

**Recommendation 18.** Grant planners' discretion to approve minor deviations or modifications in the field based on established criteria.

**Recommendation 19.** Develop a plan to convert existing permit applications (plans, permits and related documents) to digital format that can be accessed via Accela or another centralized repository (e.g., GIS).

**Recommendation 20.** Provide intake counter staff with resources, training and the appropriate equipment to scan and upload plans in a digital format.

**Recommendation 21.** Develop a plan to convert historic Records Administration Division data to electronic format that can be accessed through a Geographic Information System (GIS) layer.

**Recommendation 22.** Expand the job specification and role of the principal clerk to include permit technician training and certification.

**Recommendation 23.** Cross train employees and determine the need for additional positions based on workload and required staff redundancy.

**Recommendation 24.** Use Accela Citizen Access (ACA) to publicize submittal requirements, fees, review times, provide ticklers to alert applicants of review and submittals/resubmittals, upcoming meetings, and application status.

**Recommendation 25.** Establish morning-only counter hours for walk-in (same-day) permit applications and afternoon hours, by appointment only, for all other application types to provide Building and Housing staff additional time to conduct project reviews and communicate with applicants.

**Recommendation 26.** Designate a back-of-house area for principal clerks to complete their work or reconfigure their work area to avoid the appearance that they are available to serve the public.

**Recommendation 27.** Conduct a comprehensive review of the City website and remove outdated information about construction permitting review processes.

**Recommendation 28.** Ensure application materials and permit checklists are available and accessible online (for example, on the City's website, via Accela Citizen Access, and elsewhere as needed).

**Recommendation 29.** Ensure the Accela Citizen Access portal accurately calculates fees by permit type and requires the inputs necessary from the applicant and staff to do so.

**Recommendation 30.** Update relevant legislation to reflect changes to construction permitting and the development review process (e.g., to allow City Planning Commission to conduct a zoning review rather than Building and Housing).

**Recommendation 31.** Explore options to reduce or consolidate the number of local Design Review Advisory Committees (DRAC).

**Recommendation 32.** Review construction permitting development fees and identify those that are fixed or calculated and update the methodology for each, as needed.

**Recommendation 33. Conduct a fee study to determine the true cost of construction permitting/development review services across all City departments (and outside agencies, as relevant).** The City should regularly revisit fees to ensure full cost recovery for the services.

**Recommendation 34. Create an overall project plan/roadmap to implement Accela resources citywide for construction permitting.**

**Recommendation 35. Establish an Accela governance structure and workgroups to assist with decision-making, provide best practice guidelines, and identify “Accela Champions” to support the implementation.**

**Recommendation 36. Provide comprehensive training to all departments on Accela's capabilities and mandate its uniform use throughout the organization.**

**Recommendation 37. Ensure departments use Accela to consistently update and accurately track project records.**

**Recommendation 38. Assign a central point of contact to handle customer inquiries about permit status.**

**Recommendation 39. Ensure outside agencies can access Accela to support clear communication and timely notice of plan submittals/resubmittals.**

## **Attachment A – List of Recommendations**

## **Attachment B – “As-is” Workflow Process Maps**

## **Attachment C – Process Improvement Workshop Participant Briefing Book**

## Attachment D – Process Improvement Workshop Results and Recommendations

The Process Improvement Workshop convened City staff over a three-day period to address development review operations. The purpose of the workshop was to enhance and improve Cleveland construction permitting and land entitlement operations and workflow within and across Building and Housing, Planning, the Mayor's Office of Capital Projects (MOCAP), other City departments and external agencies.

Departmental leadership convened the workshop participants on the first day by welcoming them to the process and issuing the charge of working to develop recommendations to improve the City's development review process. The participants then worked for three days to conduct their review and develop a set of operational recommendations. The participants completed the workshop by sharing their recommendations in a presentation to departmental leadership on the final day.

Baker Tilly staff facilitated the workshop utilizing the GE Work-Out process to solicit feedback from participants and support their development of recommendations. Prior to attending the workshop, participants were asked to review the "City of Cleveland Construction Permitting Process Improvement Workshop Participant Briefing Book" to be fully prepared to participate. Through small group discussions, Johari Window prioritization exercises, and the development of action plan matrices, workshop participants reviewed the City's development review process, developed recommendations for improvement, and built their final presentation.

Workshop participants were initially divided into two groups to focus on the key themes of "Communication and Customer Service" and "Workflow Process." The initial team activities focused efforts on reviewing and reflecting on the process maps, proposing recommendations based on the reflections, anticipating the necessary resources to operationalize the recommendations, and prioritizing the recommendations for staff actions. The workshop included small group discussions, prioritization exercises, and the creation of action plan matrices. The workshop resulted in 14 recommendations action steps that address communication and customer service and internal operations and workflow. The resulting staff generated process improvements have been incorporated into the overall analysis and recommendations that follow.

Within the two teams, participants worked according to the guidelines of the goals and barriers identified below.

### Communication and Customer Service

**Goal 1:** Identify ways to improve customer experience and internal communication about application intake (including plans review) and entitlements processes during permit issuance, inspections, and at key customer touchpoints.

#### Barriers to Accomplishing Goal 1:

Lack of knowledge;  
Lack of resources and capacity;  
Siloed processes and practices between departments;  
Some customers have no or limited internet access; and,  
Language barriers between City staff and customers.

### Workflow Process

**Goal 2:** Identify streamlined workflow processes (including Building and Housing, planning entitlements, PetBOT (Planning, Engineering, Transportation, and Bureau of Traffic), MOCAP (Mayor's Office of

Capital Projects), other department reviews, and outside agency reviews from pre-application to project completion to eliminate processing delays, reduce applicant confusion and promote greater efficiency.

### **Barriers to Accomplishing Goal 2:**

Lack of staffing and resources;  
Siloed processes and practices between departments;  
Lack of staff training (in use of technology, process steps, etc.);  
Staff reliance on non-digitized records;  
Departmental culture that has developed over time; and,  
Language barriers between City staff and customers.

## **Overview of Staff Recommendations**

From these initial conversations, the workshop participants developed 43 recommendations based on the process maps and their professional experiences. To further develop the ideas, action plan matrices were completed for each recommendation to identify the desired outcome for the recommendation, necessary action steps to implement the recommendation, responsible party for each action, and the resources necessary to complete the work. Of the original 43 ideas for improvement, 14 consolidated recommendations were developed in the five categories below. These recommendations were incorporated into this overall report to accurately reflect the perspectives and needs of City staff. Notes are included in the list below to direct readers to the appropriate material in the Observations & Recommendations section.

### **A. Customer Service & Communications**

*Refer to recommendations in the following sections: Application Intake, Plan Review, and Inspections; Internal Communication, Coordination, and Record Keeping; Staffing and Staff Development; and Customer Service and Website.*

1. Improve cross-departmental communication.
2. Identify additional opportunities for inspectors to conduct virtual inspections, when applicable.
3. Develop a commonly accepted review timeline.
4. Authorize outside plan examiner for expedited review only.

### **B. Information & Knowledge**

*Refer to recommendations in the following sections: Application Intake, Plan Review, and Inspections; Internal Communication, Coordination, and Record Keeping; and, Customer Service and Website.*

1. Update and enhance development review-related information, processes, and tools for external and internal use to increase user-friendliness and efficiency.

### **C. Staffing & Training Resources**

*Refer to the recommendations in the Staffing and Staff Development section.*

1. Develop standard operating procedures and training program to manage applicant workflow and maintain performance of City staff.
2. Conduct a review of HR recruitment and hiring process. Review staffing levels.
3. Hire or train a business process analyst for Accela to respond to specific needs of departments for software build-out and maintenance.

### **D. Accela Enhancements**

*Refer to recommendations in the following sections: Customer Service and Website; and, Use of Technology.*



1. Implement citywide use of Accela platform by all departments.
2. Implement citywide the ability to view Accela Permitting System.
3. Enhance the resources available to the public via the Internet.

E. Workflow Integration

*Refer to recommendations in the following sections: Application Intake, Plan Review, and Inspections; Staffing and Staff Development; and, Customer Service and Website.*

1. Follow the same process for walk-in and online permits.
2. Develop a seamless process of workflows to provide information sharing for all development from beginning to end.
3. Establish and integrate a pre-development meeting and review into the PetBOT process.

To prioritize these recommendations, the workshop participants identified four quick wins that could be addressed immediately. These include:

**Quick Wins**

- A.1:** Improve cross-departmental communication.
- C.1:** Develop standard operating procedures and training program to manage applicant workflow and maintain performance of City staff.
- D.2:** Implement citywide ability to view Accela Permitting System.
- E.3:** Establish and integrate a pre-development meeting and review into the PetBOT process.



**Figure 1:** Workshop Day 1 – Breakout Session & Review of Process Maps



**Figure 2:** Workshop Day 2 – Large Group Discussion & Reporting of Results



**Figure 3:** Workshop Day 2 – Small Group Discussion & Development of Action Plan Matrices

## **Attachment E – To-Be/Future State Workflow Process Maps**