

Toronto Building Division:

Audit of Intake and Plan Review of Applications for Building Permits

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**AUDITOR
GENERAL**

TORONTO

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Executive Summary

Building Code sets minimum standards for public health and safety, fire protection, and structural sufficiency

The Ontario Building Code (Building Code) sets minimum standards for the design and construction of buildings in the province to minimize risk to the health and safety of occupants. The Building Code includes standards for public health and safety, fire protection, structural sufficiency, and barrier-free accessibility to buildings.

Role of the CBO in enforcing the Building Code

The City’s Chief Building Official (CBO) and inspectors play an important role in enforcing the *Building Code Act, 1992* (the Act) and the Building Code. This includes establishing operational policies for the enforcement of the Act and the Building Code and coordinating and overseeing their enforcement. In their enforcement role, CBOs and inspectors are responsible for exercising powers and performing other duties under the Act and the Building Code, including reviewing plans, inspecting construction, and exercising their discretion in applying appropriate enforcement tools, such as issuing of orders.

Auditor General’s multi-phased operational review of Toronto Building

The Auditor General’s 2021 Work Plan included a multi-phased operational review of activities and services delivered by the Toronto Building Division (Toronto Building).

Phase 1 focused on building inspections and issuing of orders

In February 2023, the Auditor General presented the results of the first phase of the operational review in the report “[Building Better Outcomes - Audit of Toronto Building’s Inspection Function.](#)” Phase 1 focused on Toronto Building’s operational policies and processes for inspecting construction and issuing orders to enforce compliance with the Act, Building Code, and building permits.

Phase 2 focuses on Toronto Building’s review of applications for building permits

This report presents the results of the second phase of the Auditor General’s review, which focuses on Toronto Building’s operational policies and processes for reviewing applications for building permits, including plans and drawings, for compliance with the Building Code, Zoning by-laws, and other Applicable Law¹.

Audit objectives

In reviewing Toronto Building policies and processes for building permit applications, this audit aimed to answer the following questions:

¹ The provisions of Acts and regulations, statutory requirements, by-laws, and other laws as defined in Article 1.4.1.3 of Division A of the Building Code that may apply to a project or proposed construction are called Applicable Law.

- Are applications for building permits reviewed, and approved or refused, within the legislated² or internal service level time frames?
- Are Toronto Building’s plan review processes adequately designed to determine whether proposed construction is in compliance with the Building Code, Zoning by-laws, and other Applicable Law?
- Are there ways to leverage data and technology to improve the efficiency of the plan review processes?

Opportunities for continuous improvement

We found opportunities for improvement in the following areas:

A. Reinforcing Quality and Consistency in Reviewing Building Permit Applications and Compliance with Legislated Time Frames

Opportunities for the CBO to strengthen processes to review applications for building permits, including plans and drawings, include:

Improve service levels for processing building permit applications

- **Improving service levels for the overall processing of building permit applications** – We found that the review of building permit applications for compliance with the Building Code, Zoning by-laws, and other Applicable Law was not always completed within the legislated or internal service level time frames. According to Toronto Building’s [2024 Budget Notes](#), 89 per cent of complete permit applications were reviewed within the legislated time frames in 2022. However, in our review of 58 building permit applications, selected to cover all four districts and four key building permit types, we found that 32 applications (55 per cent) did not meet the legislated or internal service level timelines.³ For these 32 applications, on average, it took about 17 business days over and above the legislated or internal service level time frames to complete the plan reviews. Currently, the reasons for delays are not tracked. Applications not being processed within the prescribed timelines can impact the applicant’s customer service experience.

² The Building Code requires that an application for a building permit, meeting the criteria set out in the Building Code, be reviewed within a certain time frame. For example, the time frame for Toronto Building staff to review a complete building permit application for a house is 10 days. For a more complex building, the time frame to review a complete building permit application is 30 days.

³ 17 out of 27 complete applications (63 per cent) did not meet legislated time frames. The delays ranged from 1 to 52 business days over and above the legislated time frames. 15 out of 31 incomplete applications (48 per cent) did not meet internal service level time frames. The delays ranged from 1 to 153 business days.

Improve the timeliness and quality of application intake

- **Improving the timeliness and quality of the review of application submissions at intake** – We found that Toronto Building did not always meet the legislated or internal service level time frames for completing application intake and determining whether submissions were sufficient to make a building permit application. We analyzed data from the Integrated Business Management System (IBMS) on all building permit applications received between January 1, 2018 and March 31, 2023 and found that over 38 per cent of applications took more than two business days for the intake process to be completed.^{4,5} We also found that documents required to be submitted with the building permit application were not always obtained or were insufficient. Where this is not identified and addressed at the intake stage, processing of applications may be delayed later on in the plan review process and may not be the most effective use of Plan Examiners' time.

Strengthen plan review documentation and record retention

- **Strengthening the documentation and retention of centralized records of plan review activities** – We found that Plan Examiners do not have a consistent understanding of the Division's expectations for documenting their reviews of plans for compliance with the Building Code, Zoning by-laws and other Applicable Law; how to document and communicate the identified deficiencies; and what documentation should be retained on file. While it is important to complete reviews within the legislated or internal service level time frames, it is also important to be able to demonstrate that code and zoning reviews have been performed properly and that Plan Review staff have fulfilled their duties under the Act within those time frames. Toronto Building also needs to reinforce to staff the importance of adhering to good record retention practices and retaining key records in IBMS.

⁴ The statistics do not include Occupancy Permits, Alternative Solutions, Preliminary Zoning Reviews, Sign Permits, Certified Plans and Minor Variances.

⁵ The Building Code requires the Chief Building Official to advise the applicant of their determination of whether the application submission is acceptable and provide in writing the reasons for the determination within two days. Toronto Building issues a Submission Status Letter to notify the applicant of their determination. The Submission Status Letter issue date is not captured in IBMS in a format that can be easily used for data analysis. As a result, the statistic presented reflects the total processing time for application intake, which includes the payment of the initial fees, rather than the time frame up until the Submission Status Letter was issued.

Ensure timely review of resubmissions and inactive permit applications

- **Ensuring timely review of resubmissions of additional information and inactive permit applications** – Toronto Building has not established service levels for processing and completing reviews of resubmissions or additional submissions after the initial review and Notice(s)⁶ are sent to applicants. The actual turnaround time for receiving, processing, and reviewing resubmissions cannot be easily determined due to system limitations. In our interviews with staff, some Examiners indicated they do not update IBMS immediately upon receipt of resubmissions. We also found the Division did not always follow operational policies and procedures for closing permit applications that have become inactive.

B. Enhancing Operational Policies and Strengthening Management Oversight

Reinforce consistency by enhancing operational policies and strengthening management oversight

During our audit, through our interviews with a cross-section of Customer Experience and Plan Review staff, and in our review of a selection of permit files, we observed some inconsistencies in staff's understanding of the Division's expectations for application intake and plan review activities, as noted in **Section A**. These inconsistencies indicate that Toronto Building has opportunities to enhance its operational policies and procedures, supervision, monitoring and quality assurance processes, and to improve onboarding and ongoing training for staff. Specifically, the Division can:

Implement and/or update operational policies and procedures that establish the Division's expectations for application intake and plan review activities

- **Strengthen operational policies and procedures to support consistent reviews of building permit applications for compliance with the Building Code, Zoning by-laws and Applicable Law** – We found there were no policies or guidelines that provide staff with direction on documenting their reviews for Building Code and Zoning by-law compliance; documenting and tracking deficiencies identified during reviews; conducting initial intake reviews of building permit application submissions; and monitoring and tracking resubmissions. Additionally, some operational policies have not been reviewed and updated in 10 or more years.

⁶ The Examiner will send a Notice to the applicant when the Examiner has identified deficiencies or outstanding items during the review of the building permit application (including plans and drawings).

Increase supervisory oversight and monitoring of compliance

- **Enhance quality assurance through increased supervisory oversight and ongoing monitoring of compliance** – We found there is no requirement for management to monitor or conduct quality assurance reviews of the building permit applications to ensure completeness, accuracy, and quality of staff reviews for compliance with the Building Code, Zoning by-laws, and other Applicable Law. Staff indicated that supervisory oversight and monitoring is limited. Regular monitoring of Examiners’ activities can help ensure completeness and accuracy of building permit files and prevent issues related to consistency of reviews, quality of documentation, and record retention that we identified in **Section A**.

Improve onboarding and ongoing training and development

- **Improve onboarding, professional development, and training to increase staff competency and consistent adoption of good practices for plan examination** – We found that Toronto Building does not have a formal onboarding program and available training and development activities are generally informal and inconsistent. While Toronto Building requires staff to obtain a Building Code Identification Number (BCIN) and to complete relevant exams to be qualified and registered with the Ministry of Municipal Affairs and Housing (as a Chief Building Official, Supervisor, Manager, Plan Examiner, or Inspector), the on-going technical training opportunities offered by the Division are mostly optional and some staff have not attended the scheduled training sessions. Toronto Building should adopt a regular, ongoing program of continuous professional development to ensure that Examiners stay current on Building Code, Zoning by-law, and Applicable Law requirements and changes. A new version of the Building Code is expected to be released in 2024. Management has advised that they will make technical training on the significant upcoming changes mandatory for relevant staff.

C. Modernizing Technology and Data Needed to Better Support Building Permit Application Intake and Plan Review Processes

IBMS does not always meet the Division’s needs

Toronto Building uses IBMS to process building permit applications including payment of fees and issuing of building permits. The system was implemented in 1999 and does not always meet the Division’s business needs. For example, we found the current system does not support the direct submission of permit applications, including plans, drawings, and other information, directly into IBMS. Consequently, this may delay entering of submissions into IBMS, which can impact customer service and the Division’s ability to review application submissions within the legislated time frame.

The Auditor General’s February 2023 report, “[Building Better Outcomes - Audit of Toronto Building’s Inspection Function.](#)” also highlighted that, since the time IBMS was first implemented, there have been advances in technology that are not available or implemented in the aging IBMS system.

Enhance system functionality to support better data collection and more efficient and improved processes

This audit further highlights the need to:

- enhance system functionality to support better data collection and more efficient and improved building permit application intake and plan review processes
- improve quality and reliability of data to support decision making

Conclusion

The Building Code governs the construction of new homes and the renovation of existing buildings in Ontario to minimize risk to the health and safety of occupants. A building permit is a formal permission to start construction.⁷ By reviewing and approving building permit applications before any work is done, the City can ensure that any proposed construction complies with the Building Code, Zoning by-laws, and other Applicable Law.

Our audit highlights that the Toronto Building Division can strengthen its building permit application intake and plan review processes to better enforce compliance with the Act and the Building Code and improve customer service. Specifically, we identified opportunities to:

- improve compliance with the legislated or internal service level time frames and identify root causes for delays in issuing building permits
- strengthen plan review policies, procedures, and processes to determine whether proposed construction is in compliance with the Building Code, Zoning by-laws, and other Applicable Law
- develop ways to leverage data and technology to improve efficiency of the intake and plan review processes.

⁷ Certain types of construction may not require a building permit. Toronto Building’s website provides guidance on when a building permit is required <https://www.toronto.ca/services-payments/building-construction/apply-for-a-building-permit/when-do-i-need-a-building-permit/>

In our view, implementing the 11 recommendations contained in this report will enable Toronto Building to improve its policies and processes for building permit application intake and plan reviews. In particular, the recommendations identify opportunities to reinforce quality and consistency in reviewing building permit applications within legislated timelines by:

- enhancing operational policies and procedures and strengthening management oversight to support consistency of the application intake and plan review processes
- improving onboarding, professional development, and training to ensure staff competency and consistency in carrying out application intake and plan reviews
- modernizing the technology to capture and leverage performance data for workflow improvement and informed business decision-making.

**Thank you to
management and staff**

We would like to express our sincere appreciation for the co-operation and assistance we received from the Chief Building Official and the management and staff of the Toronto Building Division.

Background

Legislative framework governing construction, renovation, and demolition

The *Building Code Act, 1992* (the Act) is the legislative framework governing the construction, renovation, demolition, and change of use of buildings in the province of Ontario. The Ontario Building Code (Building Code) is a regulation made under the Act that sets out detailed technical and administrative requirements.

Building Code sets minimum standards for public health and safety, fire protection, and structural sufficiency

The Building Code sets the minimum standards for the design and construction of buildings to minimize risk to the health and safety of occupants. The Building Code includes standards for public health and safety, fire protection, structural sufficiency, and barrier-free accessibility of buildings. The Building Code is used by architects, engineers, designers, builders, home owners, Chief Building Officials and inspectors.

Compliance with the Act and Building Code is a shared responsibility

It is the role of every person who causes a building to be constructed, to cause the building to be constructed in accordance with Act, the Building Code, and with any building permit issued.

The Act outlines a shared responsibility for Building Code compliance by defining roles and responsibilities of relevant stakeholders. The roles and responsibilities of owners, builders, designers, manufacturers, Chief Building Officials, and inspectors are defined by legislation.

Toronto Building Division’s role in enforcing the *Building Code Act* and the Ontario Building Code

City’s authority to administer and enforce the Act and Building Code

Pursuant to the Act, City Council appoints a Chief Building Official (CBO) and such inspectors as are necessary for the enforcement of the Act in the City of Toronto. The CBO is responsible for the administration and enforcement of the Act. [Chapter 363 of the Toronto Municipal Code, Building, Construction, and Demolition](#), passed largely pursuant to the Act, including the processes followed by Toronto Building in administering the Act.

CBO establishes policies to enforce the Act

The role of a CBO includes establishing operational policies for the enforcement of the Act and the Building Code and coordinating and overseeing their enforcement.

In their enforcement role, CBOs and inspectors are responsible for exercising powers and performing other duties under the Act and the Building Code, including reviewing plans, inspecting construction, and exercising discretion in applying appropriate enforcement tools, such as issuing of orders.

Building permits are needed to construct a building

The Act requires a building permit when someone is constructing a new building or is demolishing a building, making material alterations to, or changing the use of, an existing building.⁸ Certain types of construction or demolition may not require a building permit. Toronto Building guidance on when a building permit is needed can be found at: <https://www.toronto.ca/services-payments/building-construction/apply-for-a-building-permit/when-do-i-need-a-building-permit/>

Toronto Building staff review plans to confirm they comply with the Building Code before issuing a building permit

Toronto Building staff must review applications for building permits (including plans and drawings)⁹ to confirm they comply with the Building Code, Zoning by-laws, and other Applicable Law¹⁰. This audit focuses on building permit application intake and plan review processes, as part of the Auditor General’s multi-phased operational review of the Toronto Building Division.

Once a permit is issued, inspections are required at different stages of construction

The Building Code sets out each stage of construction requiring an inspection once a building permit is issued. It is the responsibility of the permit holder to notify the CBO that the construction is ready to be inspected. Upon notification by the permit holder, an inspector is required to carry out the inspection within the legislated time frame specified by the Building Code.

In February 2023, the Auditor General completed the first phase of the operational review of the Toronto Building Division, focusing on inspection processes. The results of that audit are detailed in the Auditor General’s report “[Building Better Outcomes: Audit of Toronto Building’s Inspection Function.](#)”

⁸ “Building” is defined in the Act. A building permit is only required when constructing or demolishing a “building” as defined in the Act, or for changes of use that result in an increase in hazard as defined in the Building Code.

⁹ [Plan Review Process – City of Toronto](#)

¹⁰ The provisions of Acts and regulations, statutory requirements, by-laws, and other laws as defined in Article 1.4.1.3 of Division A of the Building Code that may apply to a project or proposed construction are called Applicable Law.

Enforcing Building Code Compliance through Plan Review and Building Permit Issuance

Documentation, forms, and fees required for submitting a building permit application

Building permit applications — including all forms, drawings, documents, reports, specifications, calculations, and plans — are electronically submitted to Toronto Building. The Division's guidelines listing the required documentation for a building permit can be found at: <https://www.toronto.ca/services-payments/building-construction/apply-for-a-building-permit/building-permit-application-guides/>

CBO must notify applicants of insufficient application submissions within two business days

The Building Code requires an applicant to ensure that the application submission meets the criteria set out in the Building Code. If the submission is insufficient, the Building Code requires the CBO to advise the applicant of his or her determination on the application submission and provide in writing the reasons for the determination within two days.

Building permit application intake process

As part of the intake process for building permit applications, Customer Experience staff are expected to review the submissions to check whether all the required documents have been submitted.

- Where staff have assessed that the application is sufficient and upon payment of the initial fees by the applicant, the application is assigned to the appropriate Plan Examiner.
- If an application is assessed as insufficient, the applicant is notified of the reasons in writing. Under certain circumstances,¹¹ Toronto Building may still accept an application into the Plan Review stage when it does not contain all the initial required documentation.

Building Code specifies time frames for the review of complete building permit applications for compliance

Toronto Building has two application streams: a **complete** application stream and an **incomplete** application stream.¹² The Building Code specifies time frames for the review of complete building permit applications as follows:

- 10 business days for a house
- 15 business days for a small building
- 20 business days for a large building
- 30 business days for a complex building

¹¹ For example, applications may still be accepted without a Municipal Road Damage Deposit form if a Site Plan Approval is submitted.

¹² As set out in the Toronto Municipal Code, Chapter 363, sub-section 363-3.2, where an application for a building permit is made with a Zoning Applicable Law Certificate along with all the required information, the building permit application shall be deemed by the Chief Building Official to be **complete**. Where an application for a building permit is made to the Chief Building Official without a Zoning Applicable Law Certificate, or where the drawings submitted with the building permit application are not in accordance with the approved Zoning Applicable Law Certificate drawings, the building permit application shall be deemed by the Chief Building Official to be **incomplete**.

Within the legislated time frames, Toronto Building must either issue the permit or refuse it and provide the applicant with the reasons for denial

Within the legislated time frames, Plan Review staff are expected to review building plans for compliance with the Building Code, Zoning by-laws, and other Applicable Law, and the Division must either issue the building permit or refuse it and provide the applicant with the reasons for denial. Once the applicant is issued a Notice (and/or is notified of the refusal in writing by email), the legislated time frames no longer apply. The applicant must remedy the deficiencies and resubmit relevant documents.

Incomplete applications are not subject to legislated time frames

There is no legislated time frame for the review of incomplete applications; however, where possible, Toronto Building aims to meet similar service time frames for the review of incomplete applications as for complete applications.

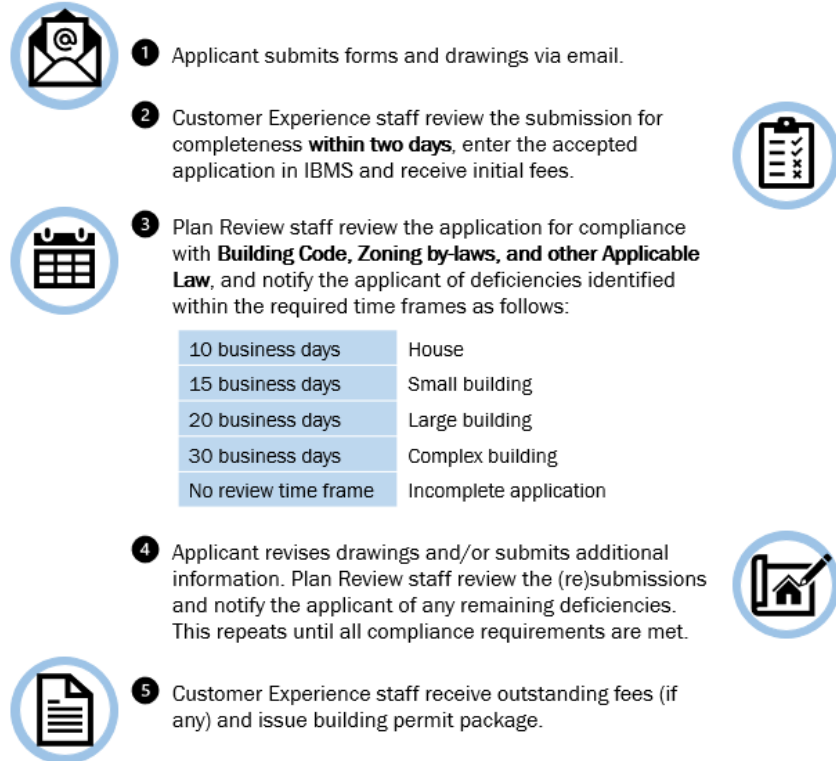
No target processing timelines established for resubmissions

Additionally, there are no legislated or internal service level time frames to process resubmissions or additional information by the applicants to address deficiencies identified by the Examiner during the plan review.

Plan Review process

Figure 1 below provides a high-level summary of the key steps in the process for reviewing applications for building permits. The review of (re)submissions continues until compliance with the Building Code, Zoning by-laws, and other Applicable Law is determined, the application is approved, and a permit is issued.

Figure 1: Process for Reviewing Complete Applications for Building Permits



Financial and Operational Highlights

2023 building permit activities

In 2023, Toronto Building¹³:

- received over 36,000 new building permit applications
- reviewed submissions related to almost 42,000 building permit applications
- issued over 37,000 new building permits

2023 operating budget

The Toronto Building Division's 2023 operating budget of over \$72 million (gross), as summarized in **Table 1**, included funding for 572 positions of which 254 are dedicated to Customer Experience (including building permit application intake) and Plan Review. Almost 20 per cent of the Customer Experience and Plan Review positions were vacant at the beginning of 2023.

Table 1: Toronto Building Division's 2023 Operating Budget

Service Areas	Gross Expenditures (\$000s)	Revenue (\$000s)	Net Expenditures (\$000s)
Building Compliance	34,331	41,054	(6,723)
Building Permission and Information (e.g., preliminary plan review, building permit issuance)	38,312	47,736	(9,424)
Total Budget	72,643	88,790	(16,147)

Source: [2023 Program Summary - Toronto Building](#)

Toronto Building plans to change operating model in response to 2021 Program Review

Currently, the Division organizes its staff and services through a geographic, district-based operating model where Customer Experience (e.g., building permit application intake, fees and payments) and Plan Review services (e.g., zoning review, code review) are provided by each district. In response to its 2021 Program Review, Toronto Building plans to move from its current district-based operating model to a functional-based model. In this functional operating model, Toronto Building plans to organize its staff, services, and other resources into centralized functional units to provide its core services city-wide, rather than by community council districts.

¹³ The statistics for 2023 do not include Conditional Permits, Occupancy Permits, Alternative Solutions, Preliminary Zoning Reviews, and Sign Permits.

Audit Results

A. Reinforcing Quality and Consistency in Reviewing Building Permit Applications and Compliance with Legislated Time Frames

Complete applications must be processed within the legislated time frames

The Building Code requires the Toronto Building Division to review a complete building permit application within a certain time frame where the application meets the criteria set out in the Building Code. For example, the time frame to process a building permit application for a house is 10 days. For a more complex building, the time frame is 30 days. Within this time frame, the Division must either issue the permit or refuse it and provide the applicant with the reasons for denial. Once the applicant is issued a Notice (and/or is notified of the refusal in writing by email), the legislated time frames no longer apply.

Incomplete applications are not subject to the legislated time frames

While incomplete applications are not subject to the legislated time frames, Toronto Building advised that the established internal service level time frames for processing incomplete applications are the same as the time frames for complete applications.

55% of applications we reviewed did not meet the prescribed service levels

According to Toronto Building's [2024 Budget Notes](#), 89 per cent of complete permit applications were reviewed within the legislated time frames in 2022. However, in our review of 58 building permit applications, selected to cover all four districts and four key building permit types, we found that 32 applications (55 per cent) did not meet the legislated or internal service level timelines.¹⁴ For these 32 applications, on average, the delay to process an application was about 17 business days over and above the legislated or internal service level time frames. Currently, the reasons for delays are not tracked.

On average, the delay to process an application was 17 days

Applications not being processed within the prescribed time frames can impact an applicant's customer service experience.

¹⁴ 17 out of 27 complete applications (63 per cent) did not meet legislated time frames. The delays ranged from 1 to 52 business days over and above the legislated time frames. 15 out of 31 incomplete applications (48 per cent) did not meet internal service level time frames. The delays ranged from 1 to 153 business days.

A.1. Review Building Permit Application Submissions within Prescribed Time Frames

Application intake service levels were not always met

Toronto Building did not always meet the legislated¹⁵ or internal service level time frames to intake the building permit application submissions. Toronto Building's website indicates that staff will review the application submissions within one business day. The purpose of the application intake review is to confirm that all the required documents, including forms, drawings, reports, specifications, and plans are submitted and to determine whether the submission is sufficient to make an application.

In our review of 58 building permit applications, we found that the application intake for at least four of the files (seven per cent) was not completed within the legislated and internal service level timelines. The non-compliance rate may be higher, but this is not easily determined because of the way Toronto Building tracks the receipt of application submissions and how they are entered into IBMS. This is further discussed in **Section C.1**.

38% of applications received took more than two days to complete the intake process

More broadly, we analyzed IBMS data on all building permit applications received between January 1, 2018 and March 31, 2023 and found that it took more than two business days for the intake process to be completed for over 38 per cent of the approximately 236,000 applications received.^{16,17}

Opportunity to clarify processing time frames on Submission Status Letters

In reviewing Toronto Building's determination of whether submissions were sufficient to make a building permit application, we noted that the Submission Status Letter notifying the applicant of the determination on the application submission could more clearly identify whether the application was considered 'complete' or 'incomplete.' It could also explain that the legislated time frames to process an application and complete the review for compliance with the Building Code, Zoning by-laws, and other Applicable Law do not apply to 'incomplete' applications.

¹⁵ The Building Code requires the Chief Building Official to advise the applicant of their determination of whether the application submission is acceptable and provide in writing the reasons for the determination within two days. (O.Reg. 332/12, Division C, Part 1, Section 1.3.1.3 (6))

¹⁶ The statistics do not include Occupancy Permits, Alternative Solutions, Preliminary Zoning Reviews, Sign Permits, Certified Plans and Minor Variances.

¹⁷ Toronto Building issues a Submission Status Letter to notify the applicant of their determination of whether the application submission is acceptable. The Submission Status Letter issue date is not captured in IBMS in a format that can be easily used for data analysis. As a result, the statistic presented reflects the total processing time for application intake, which includes the payment of the initial fees, rather than the time frame up until the Submission Status Letter was issued.

Quality of Initial Review of Submissions at Application Intake

Required documents not obtained at the intake stage can cause delays

We also found that documents required for submission with the building permit application were not always identified as missing, poor quality, or otherwise insufficient and addressed at the intake stage. This can delay the application review process for applicants and also use up Plan Examiners' time.

21% of applications were missing documentation and should not have advanced to Plan Review stage

These applications advanced to the Plan Review stage, which meant the Plan Examiners needed to issue Notices requesting applicants to submit documents that should have been obtained at the intake stage. For example, in our review of 58 permit applications, we noted that 12 applications (21 per cent) that advanced to the Plan Review stage were missing required documents.

Improving operating procedures, monitoring, and training can reinforce the quality and consistency of the intake reviews

Currently, operational policies to support consistent determination of application submission requirements and exceptions to those requirements, and monitoring or quality assurance processes to ensure the quality and completeness of building permit files, are very limited. Additionally, Toronto Building does not provide specific training to Customer Experience staff on application submission requirements. As noted in **Section B**, Toronto Building should develop more robust operational policies and procedures and/or checklists, quality assurance processes, and a training program for intake staff to reinforce the quality and consistency of the intake reviews of application submissions.

Recommendation:

- 1. City Council request the Chief Building Official and Executive Director, Toronto Building Division to implement a process to identify, on a periodic basis, areas where applications are frequently determined to be insufficient and proactively educate applicants and the industry on the application submission requirements and ways to avoid processing delays.**

A.2. Document and Retain Centralized Records of Plan Review Activities

Good record retention practices need to be reinforced

Toronto Building needs to reinforce to staff the importance of adhering to good record retention practices and retaining key records in IBMS. This is important to be able to demonstrate that code and zoning reviews have been performed properly and that Plan Review staff have fulfilled their duties under the Act. Documenting relevant notes in sufficient detail in IBMS is important for capturing an understanding of what has occurred, particularly if cases or claims arise that raise questions of potential legal liability, sometimes many years after the fact.

Not all documentation is retained on file

Plan Examiners do not have a consistent understanding about what documentation (including email records and records of phone conversations) should be retained on file. While we appreciate that an email can at times be an efficient way to communicate with the applicant and obtain information, we found that in nine (41 per cent) of 22 interviews, the Examiners indicated they do not attach all email communications with the applicant to the IBMS file. Some emails remain in the Examiners' own email accounts, which increases the risk that the information may unintentionally get deleted or lost.

36% of files we reviewed did not have relevant email communications attached in IBMS

In our review of permit applications, we also found that in 21 (36 per cent) of 58 files, not all relevant email communications from applicants were retained in IBMS. Emails are electronic records that should be maintained on file as evidence of what actions were taken, what (and with whom) information was communicated, and what decisions were made.

For example, when emails and records of phone conversations are not attached to the file, it is not always possible to verify that the applicant was notified on a timely basis that an application is missing information or has a deficiency (i.e., not compliant with the Building Code, Zoning by-laws, or other Applicable Law). To show that Toronto Building staff have exercised appropriate due diligence, it is important to retain relevant records of activities performed.

Records Related to Review of Plans for Building Code Compliance

Checklists are often not used to demonstrate all items on the appropriate checklist were completed during the review

Through our interviews, we learned there is no clear understanding among the Examiners on how to document their review of plans for Building Code compliance and what documents should be retained on file as evidence of the review. Some Examiners stated that they document their work using checklists developed by the Division, some said they use their own checklist, and the majority (68 per cent) of staff interviewed said they do not use any checklists. The Examiners who use checklists indicated they may or may not attach them to the file. An excerpt of a checklist included in the "Building Code, Part Nine, Plan Review" policy¹⁸ is shown in **Figure 2**.

¹⁸ According to the "Building Code, Part Nine, Plan Review" policy, completion of the review of all items on the appropriate checklist(s) will constitute a completed review. However, when significant errors and/or omissions or unusual situations are identified during the plan review stage, the examiner shall undertake additional review if deemed necessary.

Figure 2: An Excerpt of a Checklist Included in the “Building Code, Part Nine, Plan Review” Policy

Toronto Building Toronto Building

Housing Checklist
Building Code Part 9/0.Reg 403/97

Examiner	Date	Application Number
1 Building Information		
<input type="checkbox"/>	1	P.Eng. designed drawings
<input type="checkbox"/>	2	Request Letter of Undertaking & General Review Commitment Certificate
<input type="checkbox"/>	3	Building height
<input type="checkbox"/>	4	Building area
2 Spatial Separations		
<input type="checkbox"/>	1	Maximum % of glazing
<input type="checkbox"/>	2	Construction of exposing building face
3 Fire Protection		
<input type="checkbox"/>	1	Fire stopping
<input type="checkbox"/>	2	Maximum travel distance to a single exit
<input type="checkbox"/>	3	Openable window each level at bedrooms
<input type="checkbox"/>	4	Smoke alarms
4 Footing and Foundations		
<input type="checkbox"/>	1	Soil bearing capacity
<input type="checkbox"/>	2	Size of footing
<input type="checkbox"/>	3	Frost protection
<input type="checkbox"/>	4	Max. foundation wall height
<input type="checkbox"/>	5	Angle of repose
<input type="checkbox"/>	6	Underpinning

Toronto Building policy requires checklists be completed to confirm compliance with the Building Code

In our review of IBMS records for 58 building permit applications, we found no checklists were retained in IBMS to support the Examiners’ review of plans for compliance with the Building Code. We note that for buildings/structures or parts thereof designed under Part 9 of the Building Code, the Division’s “Building Code, Part Nine, Plan Review” policy requires Examiners to complete the appropriate checklists to confirm compliance with the Building Code.¹⁹ As noted in **Section B**, this policy has not been reviewed and updated since 2003. In addition, there are no quality assurance processes in place to monitor for compliance with this policy.

Records Related to Review of Plans for Zoning Compliance

Toronto Building should set clear expectations to reinforce consistent documentation of zoning review practices across files

Toronto Building does not have an operational policy or guidance setting out expectations for how to document reviews for compliance with Zoning by-laws or other Applicable Law. In only four (seven per cent) of the 58 files we reviewed, a Zoning Info Sheet was attached to support the Examiner’s review of compliance with the applicable Zoning by-laws. It is important to have clearly documented guidelines to reinforce the quality and consistency of reviews among staff and across files.

¹⁹ Thirty-six of the 58 building permit applications we reviewed were for buildings/structures or parts thereof designed under Part 9 of the Building Code.

Documenting and Tracking Deficiencies Identified during Review of the Permit Applications

Deficiencies arise when proposed construction does not comply with applicable regulations

A deficiency can arise when proposed construction does not comply with the Building Code, Zoning by-laws, and other Applicable Law. A building permit will not be issued until the applicant makes the necessary changes to get the project to comply.

Different methods are used to document and track deficiencies

Through our interviews with Examiners and review of IBMS records for 58 building permit applications, we found that staff were using different methods to document and communicate identified deficiencies.²⁰ This can impact the Division's ability to track deficiencies to ensure their proper resolution and the Division's ability to analyze data for trends and to provide consistent customer service. For example:

- In 40 (69 per cent) of 58 files, the Examiners created their own deficiencies instead of using the pre-established list of deficiencies available in IBMS. The pre-established lists are outdated and in need of a refresh.
- In 21 (36 per cent) of 58 files, the Examiners combined several deficiencies under one record.
- In one file, the Examiner deleted the deficiency after it was resolved.
- In three files, the Examiners communicated deficiencies by email and not through a formally issued Notice. Consequently, there is no record of these deficiencies in IBMS, as they were not entered as deficiencies in IBMS, and the email communications were not attached to the files in IBMS.
- In 21 (36 per cent) of 58 files, the Examiners used the deficiency function in IBMS to record observations that were not in fact deficiencies.²¹

²⁰ We recognize there can be a broad range of possible deficiencies from minor to major, and how these are communicated may vary depending on the significance of the deficiency. However, we noted the Division has not established clear criteria for what is considered a minor deficiency and how the applicant should be notified of the deficiency.

²¹ The 21 files where the Examiners used the deficiency function in IBMS to record observations that were not deficiencies are not the same 21 files where the Examiners combined several deficiencies under one record. There are 11 files where both these observations were noted.

Few files included notes to clearly document how deficiencies were resolved

Additionally, we found that the Examiners are not documenting in IBMS how deficiencies were resolved or recording the resolution dates. In the 58 files we reviewed, we found that, of the 152 deficiency records that had been closed, only four had notes in IBMS explaining the actions taken to address the non-compliance issues noted in the deficiencies. Management advised that the Examiners are not required to document in the notes how the deficiency was resolved because in most cases it can be confirmed by reviewing the revised drawings.

IBMS control was not always functioning as intended to prevent permits from being issued with open deficiencies

Additionally, in our review of 58 files, there were 30 files where a building permit had been issued. Of those, one file had an open Zoning deficiency, while another was reverted to 'under review' status after the permit was issued and has four open Zoning deficiencies. Based on our analysis of IBMS data for all applications received between January 1, 2018 and March 31, 2023, we identified 323 applications where the building permits were issued with 484 deficiency records still open and unresolved in IBMS. Staff advised that there is supposed to be a system control in place that prevents a building permit from being issued unless all the deficiencies are closed — we found this is not the case. Management advised us that they reviewed the exceptions and that there are no outstanding deficiencies related to these applications.

Improving operating procedures, monitoring, and training can reinforce good practices for documentation and record retention

As noted in **Section B**, the Division should establish operational policies, guidelines, and training that set out good practices for documenting reviews and communicating and following up on deficiencies through to their resolution. In addition, the Division should establish monitoring or quality assurance processes to help ensure completeness and accuracy of permit files.

Recommendations:

2. City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer where required, to:
 - a. Review and update the items on the Division's checklists used to demonstrate a complete review of building permit applications to confirm compliance with the Building Code, Zoning by-laws and other Applicable Law, and make the checklists available centrally to ensure staff have access to and are using the most current versions of the checklists
 - b. Review and update the pre-established lists of deficiencies in the building permit information system
 - c. Establish a protocol for periodic review of the checklists and pre-established lists of deficiencies to ensure they include up-to-date Building Code and Zoning by-law requirements.
3. City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer, to review and ensure that the control built into the building permit information system is functioning properly to prevent a building permit from being issued for files with open deficiencies.

A.3. Ensure Timely Review of Resubmissions and Inactive Building Permit Applications

Deficiencies are typically documented in a Notice and sent to the applicant

After Plan Examiners have completed their review of the application submission, they issue a Notice advising the applicant of any deficiencies identified during the review. The deficiencies can result from an insufficient application (e.g., missing documents or forms) or non-compliance with the Building Code, Zoning by-laws, or other Applicable Law. In addition, the applicant may also submit additional information or changes to plans or drawings at any time while an application is under review.

Ensure Timely Review of Resubmissions

No service levels established for completing reviews of resubmissions

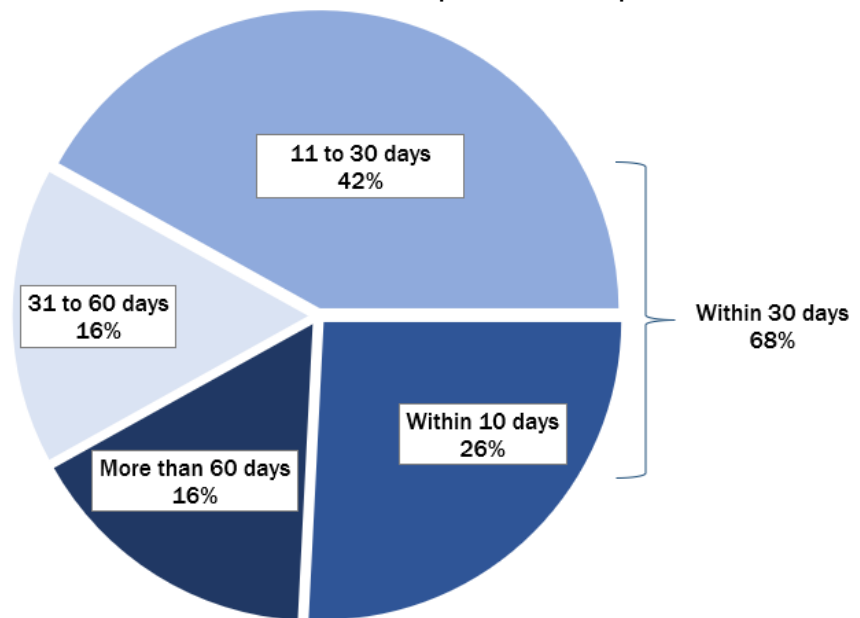
Unlike the time frames for completing an initial review of the building permit application, the Building Code does not have prescribed time frames for completing a review of resubmissions or additional submissions after the initial review and Notice is sent to applicants. Toronto Building also has not established internal service level time frames for reviewing resubmissions.

Due to system limitations, it is difficult to determine the time it takes to process resubmissions

In our review of 58 building permit applications, we noted that on 41 of the files, Toronto Building staff issued 83 Notices requesting information and/or revisions to plans to bring them into compliance. Some of the Notices had not yet been responded to at the time of our audit. Based on the information available in IBMS, the actual turnaround time for receiving, processing, and reviewing any resubmissions or additional information cannot be easily determined because resubmissions are often sent directly to Examiners by email and are not automatically recorded into IBMS. The limitations of IBMS are further discussed in **Section C.1**.

In the files we reviewed, for the 62 Notices that applicants had responded to at the time of our audit, it took on average 26 business days (min: 1 day; max: 184 days) after a Notice date for resubmissions to be entered into IBMS. Once the resubmissions were entered into IBMS, it took, on average, an additional eight business days to complete the review (min: 0 days, meaning the resubmissions were reviewed prior to or at the time they were entered into IBMS; max: 89 days). As shown in **Figure 3** below, 68 per cent of the responses to Notices were received and processed within 30 business days, while 16 per cent took more than 60 business days to complete this cycle.

Figure 3: Time Frame for Processing a Resubmission from When a Notice was Issued Until the Review of the Response was Completed in IBMS



IBMS is not always immediately updated when resubmissions are received

In our interviews with staff, some Examiners indicated they do not update IBMS immediately upon receipt of resubmissions. For example, one Examiner said: “We don’t have to log resubmissions immediately. I receive resubmissions by email, and I track them outside IBMS by the order of when I receive the resubmissions and review from the earliest. Typically, the Manager told us to keep the turnaround of resubmissions completed within four weeks.”

As a result, there is a risk that some resubmissions may take a long time to process or may be missed and not get processed at all. The risk increases when the Examiners leave the Toronto Building Division, and the resubmissions remain in their individual email accounts.

Improve monitoring of service levels for resubmissions

As noted in **Section B**, currently there are no operational policies or guidelines to set out the Division’s expectations for how staff should be tracking and recording (re)submissions of additional information relevant to building permit applications in IBMS. Implementing policies and quality assurance processes can help Toronto Building better monitor for timely processing of such (re)submissions.

Quantify the Time Spent Completing Reviews

Time spent on a file is not consistently tracked in IBMS

In our review of files, including initial application submissions and resubmissions, we found the Examiners did not regularly and consistently document in IBMS the time spent to review an application, as Toronto Building does not require detailed time tracking.

Capturing data on time spent on files can support more effective analysis of workloads, resourcing, and productivity

Keeping track of the time spent on files and analyzing data can help Toronto Building ensure that staff workloads are balanced, assess whether the optimal number of resources are in place, and at a more detailed level, benchmark the productivity and efficiency of reviews.

Opportunity to apply extra fees for some applications where Examiners spend extra time reviewing plans

There is also a potential opportunity to charge an additional fee where Examiners spend extra time over and above the typical number of hours (e.g., five hours) it takes to review building permit applications. If the Examiners correctly enter the information on additional time spent reviewing plans in IBMS, the system will generate the applicable fee. However, without proper and consistent time tracking across all files, Toronto Building cannot verify whether all possible additional fees are being charged, and whether applicants are being treated consistently when additional fees are being charged.

Better data supports better decision making

Without tracking the time spent reviewing applications, Toronto Building cannot assess whether certain types of files (e.g., files with many deficiencies and need for resubmissions) consume more staff time, and whether reviews are being efficiently completed. In addition, tracking the time spent on files would provide the Division with the data needed to make better decisions on whether or not to charge additional fees and under what circumstances it may be appropriate to charge those fees.

Cancel/Close Applications After a Period of Inactivity

44% of open building applications in the Plan Review stage had no activity for more than six months

As of March 31, 2023, over 12,000 open building permit applications received since January 1, 2018 were in the Plan Review stage.²² Our analysis of IBMS data indicates that 44 per cent of these open building permit applications had no activity recorded in IBMS for six months or more. It is hard to determine why these permit applications are still open because the reasons for inactivity are not tracked in IBMS. The need to enhance system functionality to support better data collection and analysis is further discussed in **Section C.2**.

Toronto Building implemented a policy for closing inactive applications in 2021

In February 2021, Toronto Building implemented a policy for closing inactive building permit applications. The policy requires the Plan Examiner to send a Five Month Notice Letter reminding the applicant to take the necessary steps to re-activate the application. If the applicant does not respond within 30 days, the application will be cancelled. There are exceptions where building permit applications will be considered active and not deemed to have been abandoned despite the passage of six or more months of inactivity (e.g., an application submitted to the Committee of Adjustment, an outstanding Order to Comply issued for work without a permit). However, the policy is silent on how exceptions should be documented in IBMS. Without capturing data on whether an application would be eligible for an exception, Toronto Building is unable to easily monitor whether files can remain open or should be cancelled or closed.

Policy has not been effectively implemented partly due to resourcing challenges

We reviewed 60 building permit applications that have been open for more than a year and found that 17 files (28 per cent) do not appear to meet the exceptions in the policy (for continuing to be considered active) and the Five Month Notice Letter was not issued to the applicants. Management advised that this occurred because of the resourcing challenges Toronto Building has experienced the last couple of years. Staff have been asked to focus on new permit applications where there are legislated time frames for completing reviews.

²² The statistics do not include Occupancy Permits, Conditional Permits, Certified Plans, Minor Variances, Preliminary Zoning Reviews and Sign Permits.

While we did not observe this in the 60 sampled building permit applications that have been open for more than a year, when applications remain open with no activity for a long period of time, there is a potential risk that the applicant may start to build without a permit.

Recommendations:

- 4. City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer where required, to:**
 - a. Consider implementing a process to have resubmissions and additional information related to building permit applications received centrally and uploaded upon receipt into the building permit information system**
 - b. Improve monitoring of the timely processing and review of resubmissions and additional information**
 - c. Analyze data for trends and ways to improve resubmission review.**
- 5. City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer where required, to consider:**
 - a. Keeping track of the time spent on files and analyzing data to help the Division manage staff workloads and to assess productivity and whether the optimal number of resources are in place**
 - b. Whether there is an opportunity for the Division to charge an additional fee for the review of permit applications where the examiners have spent extra time over and above the typical number of hours (e.g., five hours) and circumstances where it may be appropriate to charge additional fees.**
- 6. City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer, to improve compliance with the Closing Inactive Permit Applications policy and implement system functionality to support the tracking of files where exceptions under the policy apply.**

B. Enhancing Operational Policies and Strengthening Management Oversight

Opportunities to develop, update, and reinforce compliance with operational policies

As discussed in **Section A**, through our interviews with a cross-section of Customer Experience and Plan Review staff, and in our review of a selection of building permit application files, we observed some inconsistencies in staff's understanding of the Division's expectations for application intake and plan review activities. These inconsistencies indicate that Toronto Building needs to enhance operational policies and procedures, strengthen quality assurance through increased supervisory oversight and ongoing monitoring of compliance, and increase its focus on onboarding new staff and providing ongoing training, especially in the following main areas:

- documenting reviews for Building Code and Zoning by-law compliance
- documenting and tracking deficiencies identified during the review of permit applications
- conducting initial intake reviews of building permit application submissions
- monitoring and tracking resubmissions.

B.1. Enhance Operational Policies and Procedures to Support Consistent Reviews of Building Permit Applications

Areas where additional policies or guidance may be needed

During our audit, we found there were no operational policies or guidelines that provide direction to Toronto Building staff on matters such as:

- what staff are expected to review with respect to compliance with Zoning by-laws
- what supporting documentation and records (including email records, records of phone conversations, and appropriate checklists) must be recorded and retained in IBMS
- what staff should be documenting, communicating, and following up on, for building permit applications where deficiencies are identified during the Plan Review stage. This includes what should be documented and communicated regarding applications where clearance or permits from other Divisions are pending (e.g., Heritage Toronto and Toronto and Region Conservation Authority approvals)

- how staff should be tracking and recording (re)submissions of additional information relevant to building permit applications in IBMS and expectations for timely processing of such (re)submissions
- consistent determination of application submission requirements and exceptions to those requirements. While the Toronto Building website provides general information to applicants and lists the documentation and forms required when submitting a building permit application, information on the website is not always consistent.

Some operational policies have not been reviewed and updated in 10 or more years

We found Toronto Building had several operational policies which provide some guidance on expectations when Toronto Building staff review building permit applications (plans and drawings) for compliance with the Act, Building Code, Zoning by-laws, and other Applicable Law. However, many of these policies have not been reviewed and updated in 10 or more years, even though there have been significant changes to the Building Code and/or the policy does not reflect the current practices of the Division. For example:

- In April 2003, the Division’s “Building Code, Part Nine, Plan Review” policy was created to establish a uniform service level for the plan review of buildings/structures or parts thereof designed under Part 9 of the Building Code. The policy includes checklists to be completed to confirm compliance with the Building Code, as noted in **Section A.2**. The operational policy has not been updated to reflect significant changes to the Building Code.
- In October 2009, the “Building Code Compliance Using Alternative Solutions” policy was implemented to address the processing and retention of alternative solutions, including how alternative solutions will be evaluated by Toronto Building. During our audit, we found that this policy does not reflect the actual practices of the Division. Updates to the policy were drafted in 2019; however, the draft has not yet been signed off by the CBO and made readily available to all staff²³.
- There are seven additional operational policies that we reviewed during our audit (e.g., Plan Review Permit Notes policy, Commercial Xpress policy, Residential Fastrack policy, Customer Services Audit policy) that have not been updated in 10 or more years, and in some cases more than 20 years.

²³ An evaluation of staff compliance with the draft policy was not included within the scope of this audit.

Toronto Building is currently reviewing and updating certain policies

The Division has advised us that some of these policies (e.g., Alternative Solutions, Plan Review Permit Notes) are undergoing review and update. Going forward, Toronto Building should ensure operational policies are regularly reviewed and revised to align with current expectations and operational practices, as well as any changes to Building Code requirements.

Recommendation:

- 7. City Council request the Chief Building Official and Executive Director, Toronto Building Division to reinforce quality and consistency in reviewing building permit applications by:**
 - a. Developing operational policies, procedures, or guidelines for Plan Review and Customer Experience staff when reviewing application (re)submissions, including plans and drawings, for compliance with the Building Code, Zoning by-laws, and other Applicable Law**
 - b. Implementing a protocol for periodic review and update of such operational policies, procedures, or guidelines.**

B.2. Strengthen Quality Assurance through Increased Supervisory Oversight and Ongoing Monitoring of Compliance

No requirement to monitor or conduct quality assurance reviews

There is no requirement for management to monitor or conduct quality assurance reviews to ensure that staff reviews of the building permit applications for compliance with the Building Code, Zoning by-laws and other relevant regulations are complete, accurate, and meet quality standards. As noted in **Section A**, supervisory oversight and monitoring is limited. The Toronto Building Customer Services Audit and Plan Review Audit policies focus on monitoring of fees and overtime, and do not include a requirement to review:

- whether the Examiner completed all the required steps and applicable checklists to confirm compliance with the Building Code, Zoning by-laws and other Applicable Law
- records of code and zoning reviews retained in IBMS to assess the sufficiency of the Examiner's notes and other relevant records (including email records, records of phone conversations, appropriate checklists, and notes on actions taken to confirm identified deficiencies are resolved before issuing a building permit)

- the timeliness of processing (re)submissions and other additional information related to applications for building permits
- a specified number of files or scope of files to be reviewed for each Examiner and the frequency of such file reviews or audits

The policies also do not address how the feedback on areas for continuous improvement should be provided to the Examiner.

Limited management oversight of application intake and plan review activities

Our interviews with Customer Experience and Plan Review staff also indicated that managers do not typically review files for accuracy and completeness. Instead, managers rely on staff to raise any matters of concern as needed. As an example, some staff stated:

“There is no formal review of work, but there are ongoing communications with the Manager if the Examiner has questions during reviews.”

“There is no real oversight in a sense that someone picks random files to check. It is more like, I reach out to peer Examiners, Plan Consultants, and Manager for input.”

Regular monitoring of Examiners’ activities can help ensure completeness and accuracy of permit files. It can also prevent issues related to consistency of reviews, quality of documentation, and record retention that we identified in **Section A** of this report.

Recommendation:

- 8. City Council request the Chief Building Official and Executive Director, Toronto Building Division to:**
 - a. Identify key areas of focus and implement a risk-based approach for supervision and monitoring over building permit application intake, review, and approval. Such an approach should include providing timely and constructive feedback to Customer Experience and Plan Review staff for continuous improvement.**
 - b. Enhance existing Customer Experience and Plan Review audit policies and processes and/or implement additional quality assurance processes including file reviews to verify staff are completing all the required steps and applicable checklists to confirm compliance with the Building Code, Zoning by-laws and other Applicable Law, and are consistently documenting and retaining records of their reviews in the building permit information system.**

B.3. Improve Onboarding, Professional Development, and Training to Increase Staff Competency and Consistent Adoption of Good Practices for Plan Examination

Further training is needed to reinforce quality and consistency

Based on records provided by management, we found that during 2022 and 2023, training activities were limited and ad-hoc in nature. When a new employee joins the Toronto Building Division, it is important to provide them with training related to their role and responsibilities. It is also important for existing employees to receive training to improve their skills or refresh their knowledge. Based on our findings discussed in **Section A**, further training should be provided to Customer Experience and Plan Review staff to reinforce quality and consistency in reviewing building permit applications.

Toronto Building staff indicated that training opportunities are limited

More specifically, in our interviews, some Customer Experience and Plan Review staff indicated that they were not adequately supported in training, and that more learning and development opportunities were needed. As an example, staff stated:

“The team is not made aware/trained on recent [Building] Code changes (there was a training session years ago). When a request is made by staff for new training/resources of new changes, there is no response from management. For new [Building] Code changes, it is up to staff to self-learn.”

“There is no formal training for onboarding. I learned IBMS when I was an Application Examiner. The system was not very user friendly – there are different things that, unless I asked about them, there is no way to be aware. There was a one-hour basic video training on how to mark up the drawings. At the start of the job, it was tough because everything is unknown. It is more on-the-job training. There was almost no oversight – I know how to navigate IBMS to see what other people’s files look like to complete mine.”

A formal onboarding program would help familiarize staff with operational policies and processes

In the absence of a formal onboarding program, new staff often have to rely on their peers for onboarding and on-the-job training and/or advice. To support the development of new staff, Toronto Building should develop and implement a training program to ensure new staff are familiarized with operational policies and procedures governing application intake and plan review (zoning and/or code review) requirements.

While Toronto Building requires staff to obtain a Building Code Identification Number (BCIN)²⁴ and to complete the relevant exams to be qualified and registered with the Ministry of Municipal Affairs and Housing (as a Chief Building Official, Supervisor, Manager, Plan Examiner, or Inspector), the on-going technical training opportunities offered by the Division are mostly optional and some staff have not attended scheduled training sessions.

More technical training can help ensure staff keep up-to-date on Building Code amendments

During our audit, management indicated that legislative changes are one of the factors used to determine training needs. We found that between January 1, 2022 and March 31, 2023, Customer Experience and Plan Review staff were offered a total of 16 training sessions mostly related to administrative policies, use of technology, and by-laws and other Applicable Law. Only one session offered during this time was related to a technical topic based on the Building Code. Five amendments to the Building Code were made within the time period under review where no formal training was provided to staff on these changes. A new version of the Building Code is expected to be released in 2024. Management has advised that they will make technical training on the significant upcoming changes mandatory for relevant staff.

Toronto Building should adopt a regular, ongoing program of continuous professional development to ensure that Examiners stay current on the Building Code, Zoning by-laws, and other Applicable Law requirements and changes.

²⁴ Ontario requirements to become a registered building practitioner including obtaining of Building Code Identification Number (BCIN) <https://www.ontario.ca/page/become-registered-building-practitioner>

Some staff have not completed the mandatory training and have opted not to complete a Building Code-related training session

In addition, in our review of available training records, we found that the mandatory Conflict of Interest (COI) and the optional Building Code-related training were not completed by all staff. Based on divisional records, 19 individuals (10 per cent) did not complete the mandatory COI training, and 29 individuals (33 per cent) did not complete the Building Code-related training which was not mandatory but relates to technical aspects of permit application reviews.

Training records are incomplete and not centrally retained

We also found that training records are not centrally retained, and that complete attendance records could not be provided for four courses delivered in 2022.

Expedite the implementation of Program Review recommendations

A Program Review of Toronto Building was conducted by an external consultant between 2019 and 2021. The review identified that Toronto Building's training and development activities were generally informal and inconsistent, particularly across operational districts. The Program Review included a recommendation for Toronto Building to "Invest in a dedicated staff training and development program to improve consistency, staff retention and a shared understanding of Toronto Building's regulatory mandate." It is important that Toronto Building works expediently to address recommendations from its Program Review.

Recommendations:

- 9. City Council request the Chief Building Official and Executive Director, Toronto Building Division to develop a program of continuous professional development to ensure Customer Experience and Plan Review staff continue to refresh their technical knowledge of Building Code, Zoning by-laws, and other Applicable Law requirements. In developing such a program, Toronto Building Division should:**
 - a. Identify what training should be made mandatory for all staff**
 - b. Ensure all training records are centrally retained and accessible for review**
 - c. Monitor that staff have completed all required training within a reasonable time frame.**

10. City Council request the Chief Building Official and Executive Director, Toronto Building Division to develop a formal onboarding program to ensure new staff are familiarized with operational policies and procedures governing building permit application intake and plan review (zoning and/or code review) requirements. As part of this onboarding program, there should be management or supervisory oversight to ensure new staff have completed the required learning and have obtained the necessary base level knowledge and skills.

C. Modernizing Technology and Data Needed to Better Support Building Permit Application Intake and Plan Review Processes

IBMS does not support the Division's needs

Toronto Building uses the IBMS to process building permit applications including payment of fees and issuing permits. The system was implemented in 1999 and does not always meet the Division's business needs.

C.1. Enhance System Functionality for More Efficient and Improved Processes

Applicants cannot submit permit applications directly into IBMS

Through staff interviews and our file reviews of building permit applications, we noted that the current system does not support the direct submission of building permit applications, including plans, drawings, and other information, directly into IBMS. Instead, the applicant sends the initial application to a centralized email inbox. The application is then assigned to an Application Examiner who is responsible for entering it into IBMS. As a result, there may be delays in submissions being entered into IBMS, which can impact the customer experience and whether the two-day legislated time frame to review the application submissions is met.

Delays in this step may impact the reported compliance rate with legislated time frames for application intake. Specifically, the non-compliance rate to review the application submission may be higher than what we observed in our sample file reviews based on records retained in IBMS (as discussed in **Section A.1**) because the time it takes from the receipt of application submissions by email to when it is uploaded into IBMS is not tracked. In our review of a sample of 23 emailed application submissions, we found that 19 (83 per cent) took more than two business days to be entered into IBMS or for the applicant to otherwise be notified that the submission was not sufficient to make a building permit application and would not be accepted for intake in its current state.

Resubmissions cannot be monitored until they are entered in IBMS

Furthermore, based on the current technology and business processes, applicants often respond to Notices and/or submit additional information or changes to the initial application directly to an Examiner’s individual email account (as discussed in **Section A.3**). Consequently, resubmissions cannot be tracked, and the timeliness of reviews cannot be monitored by management until the Examiner enters the information received into IBMS.

The Auditor General’s February 2023 report, “[Building Better Outcomes - Audit of Toronto Building's Inspection Function.](#)” highlighted that modernizing systems supporting building permission, inspections, and Building Code compliance and enforcement would provide Toronto Building with the opportunity to improve the efficiency and effectiveness of inspection processes for inspection staff, builders, and the industry. This is equally relevant for Toronto Building’s process to receive and review submissions related to building permit applications.

As noted in the February 2023 report, since IBMS was first implemented in 1999, there have been many advances in technology that are not available or implemented in the aging IBMS system. For example, more modern systems may provide the ability to provide self-serve access for clients to submit, track, and receive documents and information related to their building permit application as well as check for status updates and receive and respond to Notices.

C.2. Enhance System Functionality to Support Better Data Collection

Ensure quality and reliability of data to support decision making

Through our file reviews and analysis of IBMS data, we identified opportunities for Toronto Building to improve the quality and reliability of its data, such as data used to determine compliance with legislated time frames. In addition, we observed examples where Examiners did not always process submissions under the correct application stream (i.e., as ‘complete’ or ‘incomplete’ applications). We also observed examples where information entered in IBMS did not match the information provided by applicants in their building permit applications and the source of the information recorded in system was not clear.

Opportunity to improve operational efficiency and effectiveness through better data collection

Better data can help Toronto Building identify opportunities to streamline operations and improve customer service. For example, currently, IBMS does not have the capability to:

- track and identify common reasons for delays in processing building permit application submissions and resubmissions, as discussed in **Section A**. Capturing and analyzing this information can help Toronto Building make informed decisions on Customer Experience and Plan Review workloads. It can also help Toronto Building to identify areas where the Division can provide customers with education and more guidance on how to improve the quality of the application submissions, and how to reduce the need for resubmissions and additional reviews.
- track the reasons for not closing or cancelling open building permit applications in the Plan Review stage where there has been no activity for six months or longer, as discussed in **Section A.3**. As of March 31, 2023, over 12,000 open building permit applications received since January 1, 2018 were in the Plan Review stage.²⁵ Of these, 44 per cent have no activity recorded in IBMS for six months or more. Toronto Building’s policy for closing inactive building permit applications includes exceptions where an application can remain open while being inactive for longer than six months; however, since the exceptions to the policy are not tracked in IBMS, it is not easy to determine and monitor how many of those open and inactive applications should have been closed or cancelled.

As noted in the Auditor General’s February 2023 report, “[Building Better Outcomes - Audit of Toronto Building’s Inspection Function](#),” Toronto Building’s Program Review identified that the Division needs to strengthen its capacity for analyzing and presenting data to guide service delivery, planning, and management. Developing the capability to leverage data will be key to identifying and addressing opportunities to improve operational efficiency and effectiveness.

²⁵ The statistics do not include Occupancy Permits, Conditional Permits, Certified Plans, Minor Variances, Preliminary Zoning Reviews and Sign Permits.

Need to accelerate the modernization

Throughout the report, we have identified examples of how IBMS does not support effective and efficient delivery of plan review processes. As noted in the Auditor General’s February 2023 report, [“Building Better Outcomes - Audit of Toronto Building’s Inspection Function,”](#) Toronto Building’s Program Review identified the need to accelerate the modernization of the business management system used to manage and issue building permits. The Program Review specifically identified the modernization of IBMS as a critical factor to successfully achieve business transformation.

Modernizing technology requires the support of Technology Services and other divisions

Toronto Building relies heavily on the support of the Technology Services Division to address system and technology improvements and workflow requirements. Furthermore, IBMS is a corporate system used by many other divisions, so any system changes will require coordination with those divisions.

Recommendation:

- 11. City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer, to ensure that any necessary enhancements to existing system functionality or new modern technology solutions are implemented to:**
 - a. Improve workflow management, tracking, recordkeeping, and monitoring of building permit application intake and plan review processes**
 - b. Support Toronto Building’s ability to collect and analyze data to improve the efficiency, effectiveness, and economy of the building permit application intake and plan review processes.**

Conclusion

The Building Code governs the construction of new homes and the renovation of existing buildings in Ontario to minimize the risk to the health and safety of occupants. A building permit is a formal permission to start construction.²⁶ By reviewing and approving building permit applications before any work is done, the City can ensure that any proposed construction complies with the Building Code, Zoning by-laws, and other Applicable Law.

Our audit highlights that the Toronto Building Division can strengthen its building permit application intake and plan review processes to better enforce compliance with the Act and the Building Code and improve customer service. Specifically, we identified opportunities to:

- improve compliance with the legislated time frame or internal service levels and identify root causes for delays in issuing building permits
- strengthen plan review policies, procedures, and processes to determine whether proposed construction is in compliance with the Building Code, Zoning by-laws, and other Applicable Law
- develop ways to leverage data and technology to improve efficiency of the intake and plan review processes.

In our view, implementing the 11 recommendations contained in this report will enable Toronto Building to improve its policies and processes for building permit application intake and plan reviews. In particular, the recommendations identify opportunities to reinforce quality and consistency in reviewing building permit applications within legislated timelines by:

²⁶ Certain types of construction may not require a building permit. Toronto Building's website provides guidance on when a building permit is required <https://www.toronto.ca/services-payments/building-construction/apply-for-a-building-permit/when-do-i-need-a-building-permit/>

- enhancing operational policies and procedures and strengthening management oversight to support consistency of the application intake and plan review processes
- improving onboarding, professional development, and training to ensure staff competency and consistency in carrying out application intake and plan reviews
- modernizing the technology to capture and leverage performance data for workflow improvement and informed business decision-making.

Audit Objectives, Scope, and Methodology

Auditor General's Work Plan included a multi-phased review of Toronto Building

The Auditor General's 2021 Work Plan included a multi-phased operational review of activities and services delivered by the Toronto Building Division.

In February 2023, the Auditor General presented the results of the first phase of the operational review in the report "[Building Better Outcomes - Audit of Toronto Building's Inspection Function](#)," which focused on Toronto Building's operational policies and processes for inspecting construction and issuing orders to enforce compliance with the *Building Code Act*, Ontario Building Code, and building permits.

This report presents the second phase of the operational review, which focuses on Toronto Building's operational policies and processes for reviewing applications for building permits for compliance with the Building Code, Zoning by-laws, and other Applicable Law.

Audit Objectives

This audit aimed to answer the following questions:

- Are applications for building permits reviewed, and approved or refused, within the legislated²⁷ or internal service level time frames?
- Are Toronto Building's plan review processes adequately designed to determine whether proposed construction is in compliance with the Building Code, Zoning by-laws and other Applicable Law?
- Are there ways to leverage data and technology to improve the efficiency of the plan review processes?

Scope

This audit focused on intake and plan review activities related to building permit applications received between January 1, 2018 and March 31, 2023. A sample of building permit applications selected for review covered the period from January 1, 2022 to March 31, 2023.

²⁷ The Building Code requires the Toronto Building Division to review a complete permit application within a certain time frame where the application meets the criteria set out in the Building Code. For example, the time frame to review a permit application for a house is 10 days. For a more complex building, the time frame to review an application is 30 days.

Areas not covered within the scope of this audit

A review of building permit fees charged and collected was not included within the scope of this audit. The Auditor General's Office previously reviewed permit fees in 2012 and issued a report, "[Toronto Building Division – Building Permit Fees, Improving Controls and Reporting](#)," containing 11 recommendations. As of December 2023, Recommendations #1, #2, and #8 have not yet been fully implemented.

The Auditor General's Office also issued a report in 2017, "[Toronto Building Division – Strengthening System Controls to Safeguard Cash Receipts](#)," containing six recommendations. As of December 2023, Recommendations #4, #5, and #6 have not yet been fully implemented. Management reported Recommendations #1, #2, and #3 as Fully Implemented; however, the Auditor General has not yet verified the status of the recommendations.

Methodology

Our audit methodology included the following:

- reviewing the *Building Code Act, 1992* and Ontario Regulation 332/12: Building Code
- reviewing Toronto Municipal Code Chapter 363, Building Construction and Demolition and Chapter 441, Fees and Charges
- reviewing relevant Toronto Building operational policies and procedures
- reviewing the Toronto Building Program Review report
- interviewing 24 Toronto Building managers, application examiners, code examiners, zoning examiners, building consultants, engineers, and other City staff
- analyzing building permit data extracted from IBMS, including analysis of:
 - plan review processing times and trends and volume of overdue processes
 - reasonability of Examiners' workloads
 - cancelled application volumes
 - deficiency volumes and trends, including identifying and following up on issued permits with open deficiencies
 - inactive applications

- reviewing Examiners’ notes, documents and records retained in IBMS for 148 building permit applications selected to cover the four Toronto Building operating districts, including:
 - 58 building permit files—purposefully selected to cover all four districts and New Building, New House, Building Addition/Alteration, and Small Residential permit types and, where applicable, the associated permits such as Plumbing, HVAC, and Conditional Permit—for completeness, accuracy, timeliness, and quality of staff reviews
 - 5 Alternative Solutions permit applications for compliance with the Alternative Solution policy
 - 60 building permit applications with no activity for six months or more for compliance with the Closing Inactive Permit Applications policy
 - 25 application submissions to the general email box for timeliness of processing into IBMS

- reviewing Google Maps images for certain properties where permits have yet to be issued and applications had no recent activity in order to assess whether construction had started without a building permit

- reviewing training records for the period from January 2022 to March 2023 to assess if Toronto Building has an ongoing continuous professional development program to ensure staff stay current with legislation requirements and changes

- other procedures deemed relevant

Limitations

Our findings and conclusions were based on the information and data available in IBMS at the time the audit was completed. Our review of records related to permit applications was limited to what was retained in IBMS. Additional records that are not part of the official records retained in IBMS for the building permit application were not considered (e.g., records that might exist outside the system in Examiners’ individual email accounts or personal network folder).

Compliance with generally accepted government auditing standards

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

Appendix 1: Management’s Response to the Auditor General’s Report Entitled: “Toronto Building Division: Audit of Intake and Plan Review of Applications for Building Permits”

Recommendation 1: City Council request the Chief Building Official and Executive Director, Toronto Building Division to implement a process to identify, on a periodic basis, areas where applications are frequently determined to be insufficient and proactively educate applicants and the industry on the application submission requirements and ways to avoid processing delays.

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: The Division agrees with this recommendation. The Division acknowledges that business processes in this area can be strengthened and will enhance current strategies to address and improve the accessibility and clarity of public-facing information for all applicants. Planned initiatives include a review of current public facing application submission information, review of frequent reasons for non-compliance with application submission requirements, expansion of the application intake portal to drive consistency, and review/develop tools and/or training for staff to ensure standard interpretations of intake requirements with a goal of developing comprehensive guidance and supporting resources to applicants and staff on what constitutes a complete application. Timeline to completion: Q2 - 2024 to Q1 - 2025

Recommendation 2: City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer where required, to:

- a. Review and update the items on the Division’s checklists used to demonstrate a complete review of building permit applications to confirm compliance with the Building Code, Zoning by-laws and other Applicable Law, and make the checklists available centrally to ensure staff have access to and are using the most current versions of the checklists
- b. Review and update the pre-established lists of deficiencies in the building permit information system
- c. Establish a protocol for periodic review of the checklists and pre-established lists of deficiencies to ensure they include up-to-date Building Code and Zoning by-law requirements.

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: The Division agrees with this recommendation. A & B. The Division will review and update its checklists and pre-established lists of deficiencies and make them available centrally for staff. The Division is currently in the process of implementing its

Program Review, which includes a quality assurance (QA) program to develop, manage and implement frameworks, procedures, and standards to promote consistent, high quality service delivery and mitigate operational and other risks.

C.

The Division is currently in the process of establishing a new 'Building Policy area', which is one of the Program Review recommendations. The Policy area will be responsible for establishing the necessary terms of reference for divisional technical teams to develop protocols for the periodic review of checklists and pre-established lists of deficiencies related to Building Code and zoning bylaw requirements.

Timeline to completion: Q3 - 2024

Recommendation 3: City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer, to review and ensure that the control built into the building permit information system is functioning properly to prevent a building permit from being issued for files with open deficiencies.

Management Response: Agree Disagree

Comments/Action Plan/Time Frame:

The Division agrees with this recommendation.

The Division will review, enhance and strengthen IBMS system control requirements and processes to ensure their modernization and ensure optimal functionality for Q2-2024. The Division will also work with the Chief Technology Officer to assess and develop a plan for implementation, including a timeline for delivery.

Timeline to completion: Q2 - 2024

Recommendation 4: City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer where required, to:

- a. Consider implementing a process to have resubmissions and additional information related to building permit applications received centrally and uploaded upon receipt into the building permit information system
- b. Improve monitoring of the timely processing and review of resubmissions and additional information
- c. Analyze data for trends and ways to improve resubmission review.

Management Response: Agree Disagree

Comments/Action Plan/Time Frame:

The Division agrees with this recommendation.

- A. The Division will investigate and define a process to have resubmissions and additional

information related to building permit applications received centrally and uploaded upon receipt into IBMS by Q3-2024 to be used by the Chief Technology Officer to assess and develop a plan for implementation and identify a timeline for delivery.

- B. The Division will develop an enhanced process for the review of resubmissions ensuring timely response by Q3-2024.
- C. The Division will work with the Chief Technology Officer, where any technology changes are required, to ensure the appropriate data is collected to analyze trends for continuous improvement and to assess and develop a plan for implementation, including a timeline for delivery.

Timeline to completion: Q3 - 2024

Recommendation 5: City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer where required, to consider:

- a. **Keeping track of the time spent on files and analyzing data to help the Division manage staff workloads and to assess productivity and whether the optimal number of resources are in place**
- b. **Whether there is an opportunity for the Division to charge an additional fee for the review of permit applications where the examiners have spent extra time over and above the typical number of hours (e.g., five hours) and circumstances where it may be appropriate to charge additional fees.**

Management Response: Agree Disagree

Comments/Action Plan/Time Frame:

The Division agrees with this recommendation.

The recommendations identified through this audit will be included in the development of revised service levels associated with the review of application files and establishing baseline review times for the varying application types allowing for proper re-allocation of resources when necessary.

While building permit fees are assessed on a global basis, the division will review its service fees and will explore further improvements to address this recommendation.

The Division will also investigate enhancements to system functionality and will work with the Chief Technology Officer, as may be required, to assess and develop a plan for implementation, including a timeline for delivery.

Timeline to completion: Q1 - 2025

Recommendation 6: City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer, to improve compliance with the Closing Inactive Permit Applications policy and implement system functionality to support the tracking of files where exceptions under the policy apply.

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: <p>The Division agrees with this recommendation.</p> <p>The Division will review existing strategies in the deployment of the 2021 "Closing Inactive Permit Applications" policy to address gaps identified through this audit.</p> <p>In addition, the Division will explore and identify gaps to enhance system functionality, through the IBMS transformation project, to further improve tracking capabilities. Required enhancements will be reviewed with the Chief Technology Officer to assess and develop a plan for implementation, including a timeline for delivery.</p> <p>Timeline to completion: Q4 - 2024</p>

Recommendation 7: City Council request the Chief Building Official and Executive Director, Toronto Building Division to reinforce quality and consistency in reviewing building permit applications by:

- a. **Developing operational policies, procedures, or guidelines for Plan Review and Customer Experience staff when reviewing application (re)submissions, including plans and drawings, for compliance with the Building Code, Zoning by-laws, and other Applicable Law**
- b. **Implementing a protocol for periodic review and update of such operational policies, procedures, or guidelines.**

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: <p>The Division agrees with this recommendation.</p> <p>The recommendations identified through this audit will be included in the ongoing implementation of the Division's Program Review to further enhance and strengthen Plan Review and Customer Service policies, processes and guidelines. The Division will also implement protocols for periodic review, and update of the same, through development and implementation of a new Policy Section and policy management framework.</p> <p>Timeline to completion: Q2 - 2025</p>

Recommendation 8: City Council request the Chief Building Official and Executive Director, Toronto Building Division to:

- a. Identify key areas of focus and implement a risk-based approach for supervision and monitoring over building permit application intake, review, and approval. Such an approach should include providing timely and constructive feedback to Customer Experience and Plan Review staff for continuous improvement.
- b. Enhance existing Customer Experience and Plan Review audit policies and processes and/or implement additional quality assurance processes including file reviews to verify staff are completing all the required steps and applicable checklists to confirm compliance with the Building Code, Zoning by-laws and other Applicable Law, and are consistently documenting and retaining records of their reviews in the building permit information system.

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: The Division agrees with this recommendation. The Division will review and enhance its quality assurance policies related to customer service and plan review functions to identify possible improvements to address this recommendation. This recommendation will strengthen the existing strategy that is underway. In 2019, the Chief Building Official (CBO) initiated a division-wide Program Review to identify Toronto Building’s challenges impacting the effectiveness, efficiency and sustainability of the Division’s operating model. This work has resulted in a new functional-based service delivery model and supporting organizational structure, which is currently being implemented. The new operating model includes establishing dedicated resources for the development of formalized quality assurance programs that will further improve quality assurance and monitoring of customer service and plan review staff. Timeline to completion: Q3 - 2024 to Q2 - 2025

Recommendation 9: City Council request the Chief Building Official and Executive Director, Toronto Building Division to develop a program of continuous professional development to ensure Customer Experience and Plan Review staff continue to refresh their technical knowledge of Building Code, Zoning by-laws, and other Applicable Law requirements. In developing such a program, Toronto Building Division should:

- a. Identify what training should be made mandatory for all staff
- b. Ensure all training records are centrally retained and accessible for review
- c. Monitor that staff have completed all required training within a reasonable time frame.

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: <p>The Division agrees with this recommendation.</p> <p>The recommendations identified through this audit will be included as part of the ongoing implementation of the Division’s Program Review which aims to enhance and strengthen continuous professional development, including annual refresher training wherever required. Furthermore, the Division is actively working with Legal Services to develop and deliver required training focused on best practices in order to empower staff to consistently apply consistent standards in their day-to-day work activities.</p> <p>Timeline to completion: Q3 - 2024</p>

Recommendation 10: City Council request the Chief Building Official and Executive Director, Toronto Building Division to develop a formal onboarding program to ensure new staff are familiarized with operational policies and procedures governing building permit application intake and plan review (zoning and/or code review) requirements. As part of this onboarding program, there should be management or supervisory oversight to ensure new staff have completed the required learning and have obtained the necessary base level knowledge and skills.

Management Response: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree
Comments/Action Plan/Time Frame: <p>The Division agrees with this recommendation.</p> <p>The recommendations identified through this audit will be included as part of the ongoing implementation of the Division’s Program Review. The Divisional management and supervisory team will work with its new Workforce Planning and Development team to establish an enhanced and formalized onboarding program and ensure staff have completed the required training.</p> <p>Timeline to completion: Q3 - 2024</p>

Recommendation 11: City Council request the Chief Building Official and Executive Director, Toronto Building Division, in collaboration with the Chief Technology Officer, to ensure that any necessary enhancements to existing system functionality or new modern technology solutions are implemented to:

- a. Improve workflow management, tracking, recordkeeping, and monitoring of building permit application intake and plan review processes
- b. Support Toronto Building’s ability to collect and analyze data to improve the efficiency, effectiveness, and economy of the building permit application intake and plan review processes.

Management Response: Agree Disagree

Comments/Action Plan/Time Frame:

The Division agrees with this recommendation.

Toronto Building in collaboration with the Chief Technology Officer will explore and assess opportunities to ensure that any necessary enhancements to existing system functionality and/or modern technology solutions, and a plan for implementation and time for delivery, is developed. These improvements will strengthen workflow management, tracking, recordkeeping, and monitoring, as well as improve building permit application review and issuance efficiency, effectiveness, and economy.

Timeline to completion: Q2 - 2026

**AUDITOR
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