City of Coral Gables

Development Services Department

Document Title:	Private Provider Audit Program
Document ID:	DS-SOP-PP-003
Version:	0.9b
Status:	Draft
Document Owner:	Development Services Director
Approved By:	Doug Ramirez, Development Services Acting Director
Approval Date:	September 14, 2026
Effective Date:	September 14, 2026

Document Control

Document Title	Private Provider Audit Program
Document ID	DS-SOP-PP-003
Document Type	Standard Operating Procedure
Version	0.9b
Status	Draft
Document Owner	Development Services Director
Prepared By	Samuel Lawson, Sr. Business Analyst
Review Cycle	Annual or As Needed
Approval Authority	Development Services Director
Approved By	Doug Ramirez, Development Services Acting Director
Approval Date	September 14, 2026
Effective Date	September 14, 2026

Revision History

Version	Date	Prepared By	Description	Status
0.1	March 24, 2026	Samuel Lawson	Initial draft created	Draft
0.2	March 30, 2026	Samuel Lawson	Revised to incorporate Director comments	Draft
0.3	April 10, 2026	Samuel Lawson	Final draft following Director review	Draft
0.4	June 23, 2026	Samuel Lawson	Revision to streamline process, remove finding objection cycle and internalize forms as EnerGov subprocesses	Draft
0.5	June 25, 2026	Samuel Lawson	Changes for 803	Draft
0.6	June 30, 2026	Samuel Lawson	Minor process flow change	Draft
0.7	July 1, 2026	Samuel Lawson	Audit Criteria; Appendix A	Draft
0.8	July 1, 2026	Samuel Lawson	Edit 7 and 7.2.2	Draft

0.9	July 23, 2026	Samuel Lawson	Edits from Director, changes to 11.2, also added 7.1.3 and modified 7.2.2	Draft
0.9b	August 1, 2026	Samuel Lawson	Changes suggested as per: Jaime D. Gascon, P.E., Board and Code Administration Division, Miami-Dade County Department of Regulatory and Economic Resources	Draft

Contents

1 Purpose

1.1 Purpose

The purpose of this procedure is to establish the City of Coral Gables standard operating procedure for formal audits of Private Provider building code inspection services pursuant to FS § 553.791. This procedure is intended to satisfy the statutory condition precedent to auditing, to define how audits are initiated and performed, to distinguish formal audits from routine QA/QC plan reviews or inspection-log verification, to establish objection and response procedures, and to define how findings and public reporting will be handled. Consistent with the statutory definition of "audit," this procedure encompasses verification of both plan review affidavits and inspection records; it does not authorize replication of the private provider's technical plan review or field inspections, as required by FS §553.791(1)(b).

2 Scope

2.1 Scope

This procedure applies only to formal audits of Private Provider building code inspection services performed within the City's jurisdiction. It applies to internal inspection and review staff involved in audit planning, execution, findings, supervisory review, records management, and public reporting. It does not govern routine construction-phase QA/QC log verification, ordinary permit intake verification, or general building and zoning code enforcement activity except where those matters give rise to an audit trigger. Each audit is documentation-based and covers both plan review affidavit verification and inspection record review; it does not extend to replicating or second-guessing the private provider's technical plan review conclusions or field inspection determinations, consistent with FS §553.791(1)(b) and FS §553.791(8)(a).

3 Authority and required statutory elements

3.1 Statutory basis

FS § 553.791 provides that a local building code enforcement agency may not audit Private Provider building code inspection services until the agency has created standard operating Private Provider audit procedures for the agency's internal inspection and review staff. The statute requires the procedure to include, at a minimum, the audit purpose and scope, Private Provider audit criteria, an explanation of audit processes and objections, and detailed findings of areas of noncompliance. The statute defines "audit" to include confirming that the required plan review affidavit was properly completed and submitted, as well as confirming that required inspections were performed and recorded, while expressly prohibiting the local building official from replicating the plan review or inspection being performed by the private provider as required by FS §553.791(1)(b).

3.2 Public availability requirement

This procedure shall be made publicly available online and a printed copy shall be kept readily accessible in agency buildings. Audit results of staff for the prior two quarters shall also be publicly available. All audits shall be conducted in accordance with this posted procedure.

3.3 Limitation and non-delay rule

The same Private Provider or Private Provider firm may not be audited more than four times in a rolling year unless the Building Official determines that a condition of a building constitutes an immediate threat to public safety and welfare and communicates that determination in writing to the provider or provider firm.

Work may proceed after inspection and approval by a Private Provider, and work may not be delayed for completion of an inspection audit by the City. The Private Provider or Private Provider firm must be given written notice of each audit at least 5 business days before the audit may commence, pursuant to FS § 553.791(22).

4 Definitions

4.1 Audit

"Audit" means the process to confirm that the building code inspection services have been performed by the Private Provider, including ensuring that the required affidavit for the plan review has been properly completed and submitted with the permit documents and that the minimum mandatory inspections required under the building code have been performed and properly recorded. The local Building Official may not replicate the plan review or inspection being performed by the Private Provider, unless expressly authorized by FS § 553.791.

4.2 Audited entity

The audited entity is the Private Provider or Private Provider firm. Audit counting and annual limitations apply at the provider or provider-firm level, not at the individual permit level.

4.3 QA/QC verification

QA/QC verification means routine City plan code compliance verification and site visits during construction to confirm that inspection logbooks and associated records are being maintained. QA/QC verification is administrative, is not a formal audit, does not replicate plan reviews or inspections performed by the Private Provider, and must not be counted as an audit under this procedure.

4.4 Audit file

The audit file is an electronic record maintained in the City's records system, consisting of the audit selection record, audit notice, permit list, reviewed documents, findings memorandum, objections submitted by the Private Provider during the allotted 14 day submission window, supervisory approvals, and public reporting record.

4.5 Private Provider

"Private provider" means a person licensed as a building code administrator under part XII of chapter 468, as an engineer under chapter 471, or as an architect under chapter 481. For purposes of performing inspections under this section for additions and alterations that are limited to 1,000 square feet or less to residential buildings, the term "Private Provider" also includes a person who holds a standard certificate under part XII of chapter 468, as defined in FS § 553.791(1)(n).

5 Roles and responsibilities

5.1 Building Official

The Building Official approves the audit program, authorizes extraordinary audits beyond the four-per-year limit when the statutory immediate-threat threshold is met, issues or approves written threat determinations, considers Private Provider audit finding objections submitted during the 14 day response window and determines if any objection warrants a revision to the initial findings report, approves, writes, and transmits the Final Audit Report to the Private Provider. The Building Official also determines whether a disciplinary referral to the applicable professional board under Chapter 468, 471, or 481 is warranted following an audit, consistent with FS §553.791(21).

5.2 The City's Private Provider Analyst

The City's Private Provider Analyst manages the administrative lifecycle of the audit from initiation through publication. Responsibilities include opening the audit record, gathering and uploading required documents, forwarding the audit file to the Building Official, attaching provider submissions to the audit file, notifying the Building Official of provider responses or non-response, and publishing the selected final audit results online in accordance with FS §553.791(22).

5.3 Review staff and inspection staff

Assigned review staff and inspection staff support the audit by providing permit records, reviewing technical issues within their competence, and documenting observations in the audit working papers.

5.4 Records and web support staff

Assigned administrative staff support retention of the audit file, publication of the current procedure, and posting of quarterly audit results on the City website and in printed form for public access.

6 Audit purpose and scope

6.1 Purpose

The purpose of the audit program is to provide a structured and legally defensible oversight mechanism for confirming compliance with FS §553.791 and for confirming that Private Provider building code inspection services were performed and documented as required. Consistent with the statutory definition of "audit," this encompasses both verification that required plan review affidavits were properly completed and submitted, and verification that required inspections and plan reviews were properly performed and recorded, as required by FS §553.791(1)(b).

6.2 Scope

Unless otherwise expanded by written authorization of the Building Official, each audit is documentation-based and includes review of the relevant permit records, notice to Building Official, confirmation of FBC compliance of plans to verify validity of required affidavits, applicable inspection logs, supporting closeout documents, and related records necessary to determine whether the required inspections and records exist and are properly documented. The audit does not duplicate the Private Provider's technical plan review or field inspections and does not function as a substitute inspection program, consistent with FS §553.791(1)(b). The Building Official retains separate authority, outside of the audit program, to review plans for compliance with local ordinances, floodplain management regulations, site review requirements, and other administrative or life-safety matters unrelated to building code compliance, as authorized by FS §553.791(8)(a)

7 Audit criteria

7.1 Core criteria

Without replicating plan reviews or inspections performed by the Private Provider, the audit shall evaluate the permit record for compliance with statutory and program requirements. The Building Official can determine the full breadth and scope of the audit, and may elect to perform a more limited audit than what is outlined below.

The audit shall confirm that the Private Provider was properly identified in the permit record and that all required statutory forms were submitted.

Where the Private Provider performed plan review, the audit shall verify that plan compliance affidavits were submitted, properly completed, and consistent with the approved plans and applicable Florida Building Code requirements. To this end, plans may be administratively audited for code compliance provided that private provider plan reviews are not replicated.

The audit shall also confirm that the Private Provider maintained records demonstrating that all required minimum mandatory inspections were performed, properly recorded, and conducted in the proper construction sequence consistent with the actual progression of construction as permitted.

The audit shall also confirm that all revisions, deferred submittals, and subsidiary permits were reviewed and approved/issued by the City prior to inspections taking place related to revisions, deferred submittals, and subsidiary permits.

Finally, the audit shall evaluate whether the closeout documentation supports the certificate of compliance and whether the permit file reflects internal consistency across the provider's records.

7.1.1 Plans Review Criteria

- Plan compliance affidavit submitted
- Affidavit properly completed (all elements present)
- Affidavit consistent with approved plans and FBC
- Affidavit bears required signature or seal
- Provider identified on affidavit matches permit record
- All required plan review disciplines covered
- All approved plans, revisions, and deferred submittals comply with Building Code

7.1.2 Inspection Record Criteria

- Required minimum mandatory inspections performed
- Inspection records properly maintained and complete
- Inspections conducted in proper construction sequence
- Records consistent with actual progression of construction
- Pass/fail documented for each inspection phase
- Correction notes present where required
- Inspection records align with approved plans, revisions, and deferred submittals
- Certificate of compliance present and properly executed

7.1.3 Required Documents Reviewed (Permit-Level)

For each permit included in the audit, the audit shall review, at a minimum & at the Building Official's discretion, the permit application record and construction plans- including revisions and deferred submittals, Form A.1 (Notice to Building Official), the Fee Owner's Authorization to Building Official where the Private Provider was retained by a contractor, Form B (Plan Compliance Affidavit) for each applicable trade under the plan-review path, Form C.1 (Job Site Directory), Form C.2 (Inspection Report), the official log of completed inspections and statement of inspection, Form E (Certificate of Compliance / Request for Certificate of Occupancy), and the system permit file maintained in EnerGov. The audit record shall note whether each item is present or missing; a missing item shall be documented as a finding under Section 11 but shall not, standing alone, halt or delay the audit.

7.2 Additional criteria

Where applicable, the audit may also evaluate whether duly authorized representatives identified in the permit record were consistent with those on file through the City's registration system, whether job site directory records were consistent with the registered provider team, whether deficiencies identified through City QA/QC visits were addressed, whether the provider's records reveal unexplained gaps or inconsistencies, whether the scope of work performed was within the disciplines covered by the provider's registration on file with the City, whether special inspector work and threshold inspection logs were properly maintained and audited by the Private Provider where required, and whether the reports generated by the Private Provider contain sufficient detail to address the scope of work inspected.

7.2.1 Additional criteria list

- Designated Authorized Representatives in permit record consistent with registration
- Job site directory consistent with registered provider team
- Prior QA/QC deficiencies addressed
- No unexplained gaps or inconsistencies in records
- Scope of work within provider's registered disciplines
- Special inspector / threshold logs properly maintained
- Provider reports contain sufficient detail for scope reviewed

7.2.2 Credential status review

Independent of the number of permits reviewed, the audit shall include a provider-level review of registration and credential status, completed once per audit for the Private Provider or firm as a whole. This review consists of Form R.1 (Private Provider Registration), Form R.2 (Employment Affidavit), Form A.2 (Personnel Identification), the Florida license for the business entity (Certificate of Authorization), Florida licenses for all Private Providers, resumes for the qualifier and all Private Providers, occupational license, driver license, and certificates of insurance for professional liability and for general liability/workers' compensation. Consistent with FS § 553.791(11), this review is limited to status and expiration information already on file through registration and to publicly available licensing board records; the Private Provider is not required to submit updated documentation, and the audit record shall indicate findings based on the information available.

8 Audit initiation and selection

8.1 Standard initiation methods

Audits may be initiated through random selection, complaint-based selection, or staff concerns approved by the Building Official. The initiation basis shall be recorded in the audit selection record.

8.2 Annual audit count control

Before opening an audit, the City's Private Provider Analyst shall verify the provider's audit count for the current rolling year and shall confirm that the audit will not exceed 4 audits for the year. If the limit would be exceeded, the audit may proceed only upon the Building Official's written immediate-threat determination.

8.3 Immediate-threat exception

If the Building Official determines that a condition of a building constitutes an immediate threat to public safety and welfare, either prior to or during the course of an audit, the Building Official shall issue a written notice to the Private Provider or Private Provider firm describing the basis of the determination. That written notice shall be included in the audit file.

9 Audit process

9.1 Audit opening

Upon receipt of a referral from the Building Official by email, and upon confirmation by the City's Private Provider Analyst that the provider's current audit count is acceptable in accordance with Section 8.2, the City's Private Provider Analyst shall open an audit record in the City's records system identifying the audited entity, affected permit or permits, and the initiation basis. Upon creation of the audit record, the City's records system shall automatically transmit written email notice to the Private Provider that an audit has been opened. This notice starts a mandatory 5-business-day waiting period, as required by FA 553.791(22), during which the audit may not commence. During this waiting period, the City's Private Provider Analyst shall take no further action on the audit file beyond opening the audit record and transmitting the notice as described in this subsection.

9.2 Record collection

Upon confirmation that the 5-business-day waiting period has elapsed since the electronic notice was transmitted, the City's Private Provider Analyst shall gather and upload all required records to the audit file in the City's records system. Documents are drawn from existing records in the City's records system, provider email submissions, and any physical materials on file. Required records include a list of all projects under review, the corresponding permit records, City review and closeout records, provider affidavits, inspection logs, certificate of compliance, notice to Building Official forms, and any other materials necessary to evaluate the audit criteria. The City's Private Provider Analyst shall note in the audit record which required documents are present and which are missing. The audit proceeds regardless of whether all documents are present, the City's Private Provider Analyst shall not request missing documents from the provider.

Upon completing document gathering, the City's Private Provider Analyst shall forward the complete audit file to the Building Official via the City's records system.

9.3 Document review

The Building Official shall assign review tasks to trade reviewers by discipline, which may include Building, Electrical, Mechanical, Plumbing, and Structural, as applicable to the scope of the audit. Trade reviewers shall evaluate the collected records against the audit criteria set forth in Section 7 and enter findings to the online system, documenting the evidence reviewed, the issue observed, the criteria applied, and the preliminary conclusion. Each issue shall be separately documented so that the basis for each finding is traceable. Following completion of all trade reviews, the Building Official shall conduct a supervisory review and make all preliminary findings determinations.

9.4 Preliminary Audit Report

If the Building Official's review identifies apparent deficiencies, the Building Official shall author a Preliminary Audit Report. The Preliminary Audit Report shall include an abstract, introduction, statement of provocation, findings, and Building Official recommendation. The Building Official shall transmit the Preliminary Audit Report directly to the Private Provider via the City's records system, opening a 14-day period for the provider to submit objections or supporting documentation.

9.5 Provider response

If the provider submits a written response, explanation, objection, or corrective documentation within the 14-day period, the City's Private Provider Analyst shall attach all submitted materials to the audit file in the City's records system and shall notify the Building Official that a submission has been received. If the provider does not respond within the 14-day period, the City's Private Provider Analyst shall note the non-response in the audit record and shall notify the Building Official via the City's records system that the response window has closed.

9.6 Final Audit Report

The Building Official shall review any provider submissions attached to the audit file and shall amend the Preliminary Audit Report if warranted, at the Building Official's discretion. There is no iterative response cycle, this is a single one-time review. The Building Official shall then author, approve, and transmit the Final Audit Report to the Private Provider via the City's records system.

9.7 Publish findings online

The City's Private Provider Analyst shall publish the selected final audit results on the City's Private Provider webpage and shall close the audit record in the City's records system.

10 Audit processes and objections

10.1 Right to object

The audited provider may submit a written response, explanation, objection, or supporting documentation within the 14-day period stated in the Preliminary Audit Report. The submission may address the factual basis, scope, classification, or characterization of any preliminary finding.

10.2 Objection review

The Building Official shall review all materials submitted during the response period and shall determine whether any preliminary finding warrants revision based on the evidence submitted. The Building Official may revise findings at his or her discretion. The basis for any revision, or for declining to revise a finding, shall be documented in the audit file.

10.3 Non-response

If the provider does not submit a response within the 14-day period, the Building Official shall finalize the findings based on the record available at the time of review.

11 Findings and areas of noncompliance

11.1 Findings structure

Each finding shall state the permit or provider involved, the requirement or criterion at issue, the evidence reviewed, the observed condition, the conclusion, and any required corrective action.

11.2 Standard finding classifications

For each document, credential, or item reviewed, the reviewer shall indicate whether the document/credential/item is present or missing and shall indicate and whether a deficiency exists. Where a deficiency is indicated, the reviewer shall provide a narrative description of the deficiency. Any document/credential/item reviewed and found compliant is not carried forward.

11.3 Detailed findings of areas of noncompliance

Areas of noncompliance may include, without limitation, missing notice to Building Official forms, missing or incomplete plan compliance affidavits, missing certificate of compliance records, missing inspection logs, incomplete or internally inconsistent inspection records, failure to document required minimum mandatory inspections, use of personnel not properly documented as duly authorized representatives where such documentation was required, records suggesting inspection activity outside the provider's licensure scope, or other record deficiencies that prevent the City from confirming compliance with FS § 553.791.

11.4 Corrective action and referrals

Where deficiencies are identified, the Building Official may require corrective documentation, may note the issue for future provider monitoring, may escalate the matter internally, and may refer matters to the applicable professional board or regulatory body where warranted.

12 Public reporting and publication

12.1 Publication of procedure

This procedure shall be posted on the City's public website in the Private Provider Program section and shall also be kept in printed form at the Development Services Department so that it is readily accessible in agency buildings.

12.2 Quarterly audit results

At the close of each audit, the City shall post audit results on the website.

12.3 Records retention

Detailed audit files shall be retained internally for a minimum of seven years in accordance with applicable Florida records retention requirements.

13 Controls and prohibitions

13.1 No use of audits to delay work

Audits may not be used to delay work that is proceeding after Private Provider inspection and approval.

13.2 No duplication beyond statutory authority

Audit staff shall not use the audit process to replicate the Private Provider's technical plan review or ordinary field inspections beyond the authority allowed by law.

13.3 Separation from QA/QC

Routine QA/QC plan reviews or inspection-log verification visits shall not be counted as audits, reported as audits, or described publicly as audits.

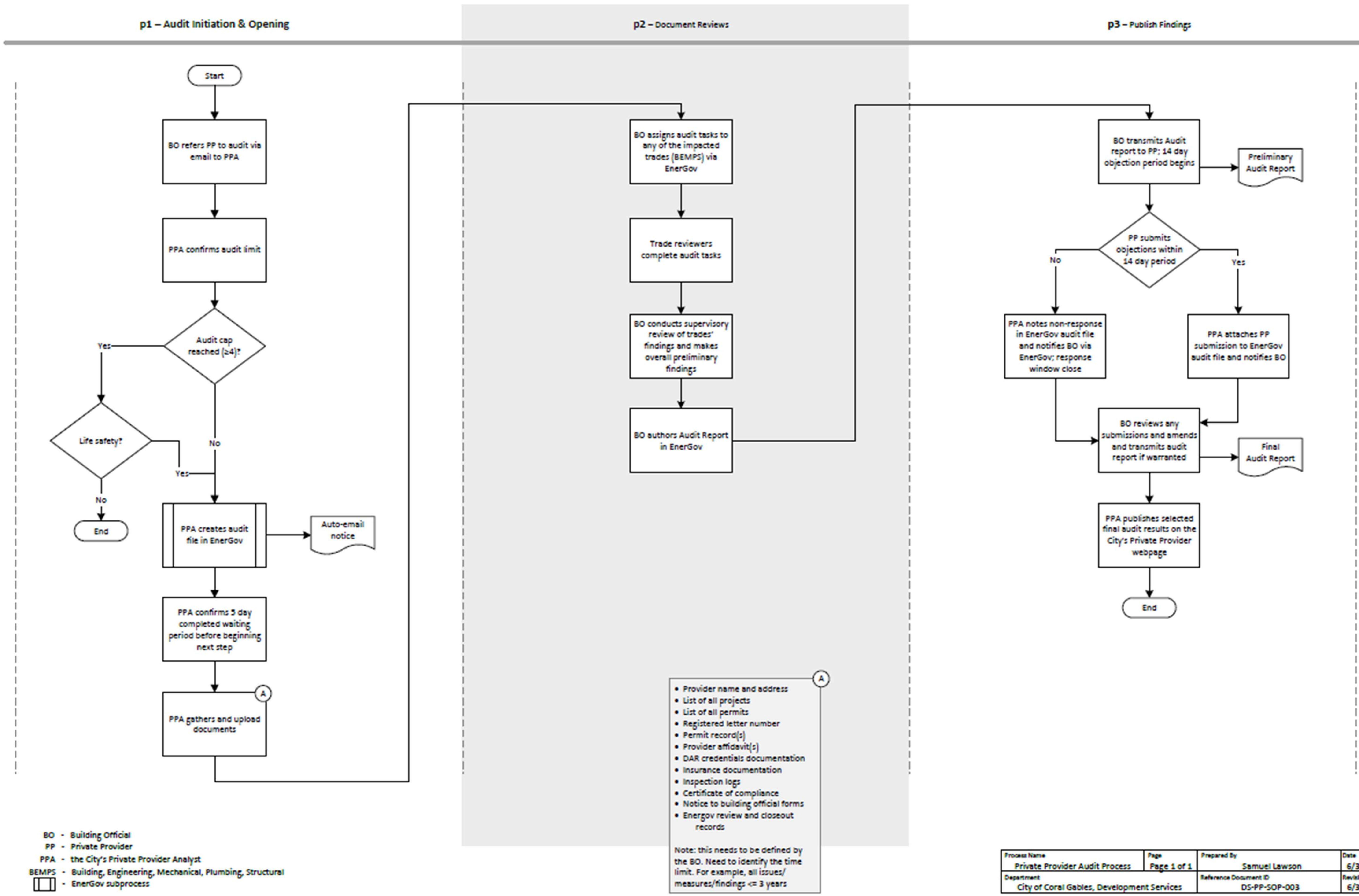
13.4 Actions that do not constitute an audit

The following actions do not constitute a formal audit and are not subject to the annual audit limit: investigation of complaints reported to the Building Official regarding a Private Provider's performance, and site visits conducted to verify that the Private Provider is performing required inspections. These activities are authorized by FS § 553.791, and shall not be counted against the annual audit limit applicable to any Private Provider or Private Provider firm.

13.5 No discouragement of Private Provider use

The City, the Building Official, and all building code enforcement personnel shall not prohibit or discourage the use of a Private Provider or Private Provider firm, consistent with FS § 553.791(23).

APPENDIX – Private Provider Flowchart



BO - Building Official
PP - Private Provider
PPA - the City's Private Provider Analyst
BEMPS - Building, Engineering, Mechanical, Plumbing, Structural
▭ - EnerGov subprocess

Process Name	Page	Prepared By	Date
Private Provider Audit Process	Page 1 of 1	Samuel Lawson	6/3/26
Department		Reference Document ID	Revision
City of Coral Gables, Development Services		DS-PP-SOP-003	6/30/26