



Audit of Fire Prevention

Follow-Up Review

The Fire Department continues to use a risk-based approach to prevention activities, including creating community-specific fire education materials; however, inspection documentation and performance inconsistencies still exist. Additional guidance on documenting routine fire inspections and fire protection system testing has been developed, but documentation of failed fire inspection follow-ups could still be improved. New fire investigation procedures have been established, and investigation-related documentation and evidence storage practices have significantly improved.

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Follow-Up at a Glance

Why we did this Follow-Up:

This report is intended to provide information on what changes have been made in response to the Audit of Fire Prevention issued in September 2023. The original audit evaluated controls of the City's fire prevention program including routine inspections, public education practices, and fire investigations.¹ This follow-up review was included on the City's Fiscal Year 2025-2026 Annual Internal Audit Plan as approved by the City Council.

What we Found:

The Fire Department has implemented several standard operating procedures and policies to better document specific Fire Prevention processes and expectations including (1) fire inspection plans, (2) documenting inspections, (3) follow-up inspections, (4) fire protection system testing reviews, and (5) investigations. However, reviews of completed inspections found some refinement is still needed. Fire Prevention has begun creating and providing targeted education to the public related to fire and life safety. Further, while the fire protection system testing reviews process has been formalized, the related vendor contract information still needs updates to include the profit-sharing specifics, and the associated reconciliation process still needs to be formalized. Finally, investigation documentation is being moved to a secure, CJS-compliant digital storage location, and evidence has been moved to a new secure location. The status of each recommendation is summarized below:

Recommendation	Mgmt. Response	Status
1. Use building hazard risk levels to guide inspection activities and develop a process to ensure buildings are being inspected per NFPA frequency guidelines.	Concur	In-Progress
2. Develop guidance on how to create Fire Routine permits and record annual inspection results. Guidance should address how often a new permit should be created, what activities should be categorized under each inspection type, and how inspection results should be recorded. Consider how custom screens in the inspections management system can be further utilized.	Concur	Implemented
3. Create a process to ensure inspections with failed results receive follow-up until deficiencies are corrected.	Concur	In-Progress
4. Develop checklists or quick reference guidance for different types of occupancies to help ensure inspection consistency and facilitate efficient supervisory reviews. It may be most effective to develop guidance for common or higher-risk occupancies.	Concur	Implemented
5. Use fire type and location information to develop focused education programs.	Concur	Implemented
6. Consider reviewing all associated costs of fire prevention activities to ensure established fees are in alignment with cost recovery goals.	Concur	Implemented

¹ The fire code plan review process was excluded from the scope of this audit.

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7. Develop written guidance on the fire protection system testing report review process including when to follow up on deficiencies and updating the contact information of registered business.	Concur	Implemented
8. Create a process to ensure testing reports with issues or deficiencies receive a follow-up review or inspection and that those follow-up actions are documented in the database for consistent tracking.	Concur	Implemented
9. Ensure all fees associated with the fire system testing service is clearly documented in writing and perform periodic reconciliations to ensure the fees received by the contractor coincide with the number of accepted reports.	Concur	In-Progress
10. Implement written policies and procedures for all fire investigation activities including case documentation and evidence storage, scene coordination, and requirements and responsibilities for appropriate use and review of body cameras.	Concur	Implemented
11. Provide adequate security for fire investigation case documentation that complies with CJIS requirements. Consider implementing a records management system that allows for easy tracking like the Police Department's electronic case management practices.	Partially Concur	Implemented
12. Move all physical fire investigation evidence to a secure, climate-controlled, well-ventilated, and pest free area that includes processing and temporary storage locations. Consider partnering with the Police Department to minimize the costs of complying with evidence management standards.	Concur	Implemented

Recommendation Status Update

This report summarizes the Audit of Fire Prevention recommendations, management responses, and the City Auditor's Office's follow-up findings, which describe to what extent City management has implemented the City Auditor's Office's recommendations since the publication of the original report in September 2023.

Fire Risk Assessment Information Could be Further Utilized; Additional Inspection Guidance Needed

- 1. **Use building hazard risk levels to guide inspection activities and develop a process to ensure buildings are being inspected per NFPA frequency guidelines.**

Management Response: Concur
 Fire Prevention Division Comments: This recommendation is already in progress. The target hazard list for buildings in the City was distributed to fire inspectors in March 2023, with emphasis placed on ensuring all high hazard occupancies are inspected first.

Audit Follow-Up Finding: In-Progress

During the original audit, the Fire Prevention Division had not implemented a procedure to conduct inspections based on hazard risk levels. Safety inspections were historically scheduled based on each inspector's judgment and workload. However, an initial building hazard risk assessment, including a geographic information system—or GIS—map, was developed, and the Department had started using hazard risk scores in 2023.

Two written procedures related to risk-based inspections were implemented in 2025. The Target Hazard Inspection procedure provides details on the usage of the GIS tool, and the creation of inspection lists every three years based on the risk score. As detailed in Table 1, the total risk score determines the inspection frequency. Since the GIS data has some inconsistencies, additional written guidance has been provided to inspectors to help ensure any buildings missing from the analysis are captured.

Table 1: Required Inspection Frequency

Risk Score ²	Inspection Frequency
80 and Higher	Annual
40-79	Bi-Annual
39 and Lower	Triennial

² The risk score is calculated based on multiple factors including building occupancy type and size, as well as life, safety, and economic impacts.

A review of all fourteen high-risk occupancies found that while many properties received an inspection in both 2024 and 2025, further improvement is needed to ensure the highest-risk occupancies receive a documented inspection as required.³ Specifically, twelve of the fourteen occupancies had a documented inspection in 2024 while eleven of the fourteen occupancies had a documented inspection in 2025. Fire Prevention staff reported that one of the occupancies was County-owned, causing some confusion over responsibility and another property had reportedly received multiple inspections, but these were not clearly documented in the City’s building inspection system.

- 2. Develop guidance on how to create Fire Routine permits and record annual inspection results. Guidance should address how often a new permit should be created, what activities should be categorized under each inspection type, and how inspection results should be recorded. Consider how custom screens in the inspections management system can be further utilized.**

Management Response: Concur

Fire Prevention Division Comments: Due to the upcoming replacement of Community Development (CD), it may not be worthwhile to invest time into creating new custom screens for fire inspections. The Fire Prevention Division will create policy and procedural documents for fire inspections.

Audit Follow-Up Finding: Implemented

During the original audit, the Fire Prevention Division had not developed written guidance on recording inspections in the City’s building inspection system. Specifically, it was not previously clear when a new “permit” should be created, how inspection results should be documented, or what inspection type should be used for what activities. A review of guidance developed in 2025 found that specific, written instructions are now provided to staff. Furthermore, the guidance provides definitions of inspection result types and requires supervisors to review at least two random inspections per month for each inspector.

Custom screens in the building inspection system were not implemented by the Fire Prevention Division. As reported in the Division’s Management Response, due to the pending system replacement, management determined it would not be beneficial to invest time in creating new custom screens for fire inspections.

- 3. Create a process to ensure inspections with failed results receive follow-up until deficiencies are corrected.**

³ All properties with a risk score of 80 and higher as listed in the 2023 Target Hazard lists were reviewed.

Management Response: Concur

Fire Prevention Division Comments: This recommendation is already in progress. Any time an inspection is failed, fire inspectors schedule a follow up inspection in Community Development as a reminder and appointment for a reinspection. The Fire Prevention Division will also include this practice in the above-referenced procedural documents.

Audit Follow-Up Finding: In-Progress

The Fire Prevention Division implemented a Failed Inspection Procedure in November 2025 that details the documentation and timing expectations for follow-up inspections. This procedure was not formally implemented until late 2025, due to plans to implement a new building inspection system. The current building inspection system was not designed to track or manage routine fire inspections, creating technical barriers to tracking the Fire Prevention inspection process.

A statistical review of 90 failed initial fire inspections between October 2023 and December 2025 found that while follow-ups were recorded for 81 percent, 50 percent of the 90 inspections had documentation inconsistencies, limiting the ability to verify if the occupancy eventually received a passed inspection.

4. Develop checklists or quick reference guidance for different types of occupancies to help ensure inspection consistency and facilitate efficient supervisory reviews. It may be most effective to develop guidance for common or higher-risk occupancies.

Management Response: Concur

Fire Prevention Division Comments: While the Fire Prevention Division already has multiple checklists in place for various fire inspections, we can update and consolidate those checklists and guides. We will incorporate a process for supervisor reviews and include that process in the above-referenced procedural documents.

Audit Follow-Up Finding: Implemented

Fire Prevention Division management has implemented multiple inspection checklists and inspection guidance documents for different occupancy types since 2023. This guidance includes information for some higher-risk occupancies, including schools and places of assembly that were not readily available for inspectors during the original audit. The written guidance appears to provide detailed information and will likely help improve inspection practice consistency across different inspectors.

5. Use fire type and location information to develop focused education programs.

Management Response: Concur

Fire Prevention Division Comments: The Fire Prevention Division will develop a process for using local fire trends to create community education programs.

Audit Follow-Up Finding: Implemented

The Fire Prevention Division has begun providing targeted educational activities. Since August 2025, [monthly public newsletters](#) have been created that appear to target real-time concerns like holiday safety in December or winter safety during the January 2026 winter storm. In addition, many accidental fire common causes were addressed in published newsletters such as candles, kitchen practices, and heater usage, and an educational video was created to address the fire-related dangers of hoarding in 2025.

Overall, while operational fire data could be further used to inform the education program, Fire Prevention has demonstrated it is now producing targeted educational information for the public.

6. Consider reviewing all associated costs of fire prevention activities to ensure established fees are in alignment with cost recovery goals.

Management Response: Concur

Fire Prevention Division Comments: The Fire Prevention Division will contact the Finance Department to request a fee study for all prevention fees and make recommended changes to the Prevention fee schedule.

Audit Follow-Up Finding: Implemented

Previously, there was no specific review conducted to determine Fire Prevention fees, such as basing fees on the actual cost of providing fire prevention services. Due to budgetary constraints, the Fire Department has not conducted a formal cost analysis of fire prevention services; however, multiple Fire Department fees, including some Fire Prevention re-inspection fees, were assessed and revised for Fiscal Year 2025-26. Specifically, the second follow-up inspection fees were increased, indicating that the Fire Department is being more proactive in its cost recovery for activities that require the Fire Prevention Division to repeat its efforts.

Compliance System Helps Ensure Fire Protection Systems Receive Testing; Inspector Review Process Could be Improved

- 7. Develop written guidance on the fire protection system testing report review process including when to follow up on deficiencies and updating the contact information of registered business.**

Management Response: Concur

Fire Prevention Division Comments: The Fire Prevention Division will create policy and procedural documents for reviewing and following up on the reports submitted to the compliance company.

Audit Follow-Up Finding: Implemented

During the original audit, routine reviews of submitted fire protection system testing reports were generally effective, however, there were no documented procedures to guide staff submitted reports or documenting follow-up actions.

A written procedure was finalized in 2025 that lists inspectors' responsibilities regarding non-compliant reports, including scheduling a 'Code Check' inspection. Additionally, the procedure states that the contractor is responsible for entering up-to-date contact information for the business owner and inspectors are required to verify contact information during any follow-up inspections at that address.

- 8. Create a process to ensure testing reports with issues or deficiencies receive a follow-up review or inspection and that those follow-up actions are documented in the database for consistent tracking.**

Management Response: Concur

Fire Prevention Division Comments: This recommendation is already in progress. Whenever a deficiency report has been submitted, a fire inspector creates an inspection to follow up on the deficiency. The Fire Prevention Division includes this process in the above-referenced policy and procedural documents.

Audit Follow-Up Finding: Implemented

As detailed in Recommendation 7, a written procedure has been developed that provides instructions for following up on deficient fire protection system testing reports. Specifically, once a severe deficiency is reported, a Code Check Inspection should be scheduled and assigned to an inspector. Upon inspecting the property, the inspector should enter the information into the system and conduct any follow-up inspections as needed. A review of a statistical sample of 51 addresses with a deficient report found only two addresses with a major or vital deficiency did not have a documented Code Check Inspection.

9. **Ensure all fees associated with the fire system testing service is clearly documented in writing and perform periodic reconciliations to ensure the fees received by the contractor coincide with the number of accepted reports.**

Management Response: Concur

Fire Prevention Division Comments: While the City already receives and reviews quarterly revenue reports from the compliance company, the Fire Prevention Division can provide quarterly upload reports to the Finance dept for reconciliation. Please note that depending on the dates the fire protection system was tested, the dates the contractors paid their fees, and the dates the fees were billed, the reconciliation may not be exact. The Fire Prevention Division will defer to the Purchasing dept and Legal for guidance on contract language.

Audit Follow-Up Finding: In-Progress

During the original audit, it was unclear if the City was receiving appropriate revenue from the compliance system vendor because the City's contract with the vendor did not state the percentage of the report submission fee that the vendor would retain.⁴

Despite renewing the City's contract with this vendor in the summer of 2025, the contract still does not include a clear price term, though it does accurately describe the profit-sharing model in use.

During this follow-up review, Fire Department management provided a 2026 pricing sheet that showed the profit-share that is currently in use, indicating that vendor is likely remitting revenue to the City per its agreement with the Fire Department.

Further, there was previously no documented reconciliation between the revenue received from the vendor and the number of reports approved and accepted. While the Fire Department implemented a quarterly reconciliation procedure in 2025, documentation of these reconciliations has not been retained.

⁴ As reported in the original audit, the City charges \$35 for each submitted fire protection system testing report; this fee is collected by the compliance system vendor, who then remits this revenue to the City after retaining its profit-share portion.

Fire Investigations Lack Written Policies & Compliant Security Procedures; Evidence Facility Conditions Are Inadequate

- 10. Implement written policies and procedures for all fire investigation activities including case documentation and evidence storage, scene coordination, and requirements and responsibilities for appropriate use and review of body cameras.**

Management Response: Concur

Fire Prevention Division Comments: The Fire Prevention Division will create policy and procedural documents for case management, evidence storage, and body-worn camera.

Audit Follow-Up Finding: Implemented

Multiple written policies related to the investigation process were implemented in 2024, which should help improve consistent practices. The written policies include the following specifics:

- Body Armor
- Body Worn Cameras
 - Addresses multiple items related to cameras, including review of footage.
- Case Documentation
 - Provides guidelines regarding retention, documentation requirements, case folders, and reviews.
- Police & Fire Joint Operations
- Scene Coordinator
- Property & Evidence Handling
 - Provides guidelines regarding custody practices, logging procedures, and explosives.

Furthermore, an onsite visit to the evidence storage location indicated that staff are following the written policy related to evidence handling and are actively working to streamline the evidence handling process.

- 11. Provide adequate security for fire investigation case documentation that complies with CJIS requirements. Consider implementing a records management system that allows for easy tracking like the Police Department's electronic case management practices.**

Management Response: Partially Concur

Fire Prevention Division Comments: Due to the upcoming replacement of Police Department's records and case management system, it may not be worthwhile to implement that system for fire investigators. The Fire Prevention Division will work with Tech Services to explore other CJIS compliance systems for case management.

Audit Follow-Up Finding: Implemented

The original documentation retention location did not meet Criminal Justice Information System—or CJIS—standards and limited tracking of cases by staff. Fire Prevention Division and Technology Services Department staff began working to transition all items to a secure, CJIS-compliant digital storage location in February 2026. While there has been a delay due to the large amount of data involved, this project is expected to be completed by the summer of 2026.

- 12. Move all physical fire investigation evidence to a secure, climate-controlled, well-ventilated, and pest free area that includes processing and temporary storage locations. Consider partnering with the Police Department to minimize the costs of complying with evidence management standards.**

Management Response: Concur

Fire Prevention Division Comments: The Fire Prevention Division will work with the Police Department to determine the feasibility of sharing evidence storage.

Audit Follow-Up Finding: Implemented

During the original audit, physical evidence from fire investigations were stored insecurely as shown in Picture 1, including the evidence storage area having multiple unsecured access points, limited surveillance, potentially inappropriate ventilation, and multiple contamination events.

The Fire Prevention Division moved all intact fire investigation evidence to a new secure location in February 2024. As shown in Picture 2, the new storage facility has greatly improved, including appropriately regulated access points, increased surveillance, appropriate ventilation, and available space for evidence processing and temporary storage.

Picture 1: Org. Evidence Room



Picture 2: New Evidence Room



Audit Project Background

The City Auditor's Office is responsible for providing: (a) an independent appraisal⁵ of City operations to ensure policies and procedures are in place and complied with, inclusive of purchasing and contracting; (b) information that is accurate and reliable; (c) assurance that assets are properly recorded and safeguarded; (d) assurance that risks are identified and minimized; and (e) assurance that resources are used economically and efficiently and that the City's objectives are being achieved.

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.

Management Responsibility

City management is responsible for ensuring that resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

Objectives, Scope, and Methodology

The City Auditor's Office has completed a follow-up review of the Audit of Fire Prevention, which evaluated the controls implemented to ensure the City's fire prevention activities including; (1) routine inspections, (2) public education practices, and (3) fire investigations are effective, efficient, and in compliance with applicable regulations. This report is intended to provide a progress update on recommendations from the [Audit of Fire Prevention](#).

Audit fieldwork was conducted during February 2026. The scope of review varied depending on the procedure being performed. The following list summarizes major procedures performed during this time:

- Reviewed documentation from the issued audit review to develop criteria including industry standards, best practices, policies, and procedures;
- Interviewed Fire Department and Technology Services staff;

⁵ The City of Denton City Auditor's Office is considered structurally independent as defined by generally accepted government auditing standard 3.56.

- Reviewed new policies and standard operating procedures related to fire inspection plans and guidance, inspections management system usage, follow-up inspections, fire protection system testing reviews, and investigations;
- Determined if all high-risk occupancies, as identified in the 2023 Hazard Risk Assessment, were inspected annually;
- Reviewed a statistical sample of 90 failed initial fire inspections to assess follow-up practices;⁶
- Reviewed a statistical sample of 51 deficient fire protection system testing reports to determine if the reports were followed-up on as required by the Fire Prevention Division's standard operating procedure;⁷
- Reviewed and reviewed education materials provided to the public;
- Reviewed fire-related fee updates and the fire protection system testing vendor contract; and
- Conducted an onsite visit to the new evidence storage facility.

⁶ This sample size provides with 95 percent confidence that the true population mean is within ± 10 percent of the sample estimate.

⁷ This sample size provides with 95 percent confidence that the true population mean is within ± 10 percent of the sample estimate.