



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

20
25

Audit of the Chicago Fire Department's Annual Fire Prevention Inspections and Tests

October 23, 2025

DEBORAH WITZBURG | INSPECTOR GENERAL FOR THE CITY OF CHICAGO

Table of Contents

I Executive Summary	5
A Conclusion	5
B Findings	5
C Recommendations	6
D CFD Response	6
II Background	8
A What is Fire Prevention?	8
B The Fire Prevention Bureau	9
C Annual Inspections	10
D Annual Tests of Water-based Fire Suppression Systems	12
E Recommended Practices	14
F KPMG's Past Review of FPB	15
III Objectives, Scope, and Methodology	16
A Objectives	16
B Scope	16
C Methodology	16
D Standards	17
E Authority and Role	17
IV Findings and Recommendations	18
Finding 1: FPB is not in compliance with the Fire Code's annual inspection requirements, and it does not have a complete and accurate inventory of buildings requiring annual inspections.	18
A FPB Does Not Perform All Required Inspections Of Building and Tenant Spaces	19
B FPB Does Not Maintain a Complete and Accurate Inventory of Buildings and Does Not Capture All Data Required by the MCC	22
Finding 2: FPB conducted re-check inspections for 87.8% of failed annual inspections, with a median time between a failed inspection and FPB's initial re-check of 5.2 months. The City does not consistently collect re-check fees.	26
Finding 3: Independent contractors tested 73.7% to 79.6% of premises with fire suppression systems within a 12-month period. FPB does not have a complete and accurate inventory of systems for which annual tests are required.	31
Finding 4: CFD had never created or submitted the MCC-mandated annual report of fires until OIG's audit.	34
Finding 5: FPB destroyed paper inspection forms without Local Records Commission approval.	35
V Conclusion	37
Appendix A Inspection Control Form	38
Appendix B Pump Test Form	39
Appendix C Complete Management Response	43

Acronyms

CFD	Chicago Fire Department
DOB	Department of Buildings
DTI	Department of Technology and Innovation
FPB	Fire Prevention Bureau
IPS 11	Infor Public Sector 11
MCC	Municipal Code of Chicago
NFPA	National Fire Protection Association
TCE	The Compliance Engine
OBM	Office of Budget and Management
OIG	Office of Inspector General

The Chicago Office of Inspector General (OIG) promotes economy, effectiveness, efficiency, and integrity in the administration of programs and operation of City government. In that, OIG conducts audits, reviews, and evaluations of the operations and policies of City departments, programs, and functions. Such audits, reviews, and evaluations result in the identification of opportunities for operational improvement. This audit report identifies such opportunities related to the operations of the Chicago Fire Department's (CFD) Fire Prevention Bureau (FPB).

OIG acknowledges the important work of FPB, and of CFD as a whole, and the deep tragedies of recent on-duty deaths of CFD members. We appreciate the courage and dedication of firefighters, their commitment to public safety, and their willingness to risk their lives for others and in the service of the City. We offer this report, not to detract from the important role that each CFD member fulfills, but to inform CFD's implementation of operational improvements and further ensure member safety in CFD's work procedures and environment.

Mental Health Resources

CFD's Employee Assistance Program provides confidential counseling services, available to all CFD members and their immediate families. You can reach them at (312) 746-6977 or visit 1338 South Clinton Street, Room 500, Chicago, Illinois.

If you are experiencing a mental health crisis, please call or text 988 to reach the Suicide and Crisis Lifeline, or use the chat at 988lifeline.org. If you or someone else is at risk of imminent harm, please call 911.

For non-crisis mental health and substance use resources, as well as other social services, call 211 or visit <https://211metrochicago.org/>.

The Chicago Department of Public Health connects users with additional mental health resources, such as walk-in support services, at https://www.chicago.gov/city/en/depts/cdph/supp_info/behavioral-health/cdph-suicide-prevention-initiative/mental-health-crisis-resources-in-chicago.html.

City of Chicago Office of Inspector General

Audit of the Chicago Fire Department's Annual Fire Prevention Inspections and Tests



The Fire Prevention Bureau (FPB) is charged with carrying out the Chicago Fire Department's (CFD) fire prevention function through annual building inspections and enforcement of the Fire Code.

OIG found:

CFD's Fire Prevention Bureau does not complete all required annual inspections intended to protect life and property.

17%

of buildings in FPB's database received an inspection in a 12-month period.

50%

of buildings in FPB's database had not been inspected in five years or more.

88%

of buildings with Fire Code violations were re-checked, with a median completion time of 5 months.



I | Executive Summary

The City of Chicago Office of Inspector General (OIG) conducted an audit of the annual inspection and testing processes of the Chicago Fire Department's (CFD) Fire Prevention Bureau (FPB).

The objectives of the audit were to determine whether FPB,

1. conducts annual inspections that are required to ensure compliance with the Fire Code and protect against the loss of life and property;¹
2. maintains a proper record of fire safety inspections as required by Municipal Code of Chicago (MCC) § 2-36-280(a);
3. notifies property owners of noncompliance and conducts re-check inspections of known issues; and
4. ensures that independent contractors complete required annual tests of fire sprinklers, fire pumps, and standpipes.²

A | Conclusion

OIG concluded that FPB does not fulfill its annual inspection and testing mandates. This increases the risk that it will not discover hazardous conditions that could increase the risk of harm to building occupants and first responders. Fundamental issues with organizational strategy and procedures—as well as the quality of FPB's data—limit FPB's ability to ensure that buildings from hospitals to hotels to high-rises are safe places to work, visit, and live.

B | Findings

OIG found that FPB does not complete annual inspections of buildings required by the Fire Code. Additionally, due to missing and inaccurate data, FPB does not have or maintain a complete and accurate inventory of buildings that require inspections. Of the buildings and tenant spaces in FPB's database, 16.8% received an annual inspection within a 12-month period.³ Additionally, FPB had not inspected nearly half of buildings in five years or more. OIG found that FPB's records of annual inspections do not contain the date of any Fire Code violation notices or a final disposition status, which are elements required by the Fire Code.

Of annual building inspections that failed, FPB conducted at least one re-check inspection for 87.8% of those failed building inspections. The median time between the initial finding of violations and subsequent re-check was 5.2 months. The City collected only 13.2% of the fees owed for re-checks of violations, leaving \$1.1 million unrecovered over a ten-year period.

¹ Regulations within the Municipal Code of Chicago (MCC) related to protecting people and structures from the hazards of fire are collectively referred to as the Fire Code. Specifically, MCC § 15-4-010 states, "Title 14F, Chapter 2-36, Chapter 15-8, Chapter 15-16, and Chapters 15-20, 15-24, 15-26 and 15-28 of this Code shall be known as the Fire Code [. . .]." In this report, we reference the Fire Code generally, but also cite MCC sections when discussing specific requirements.

² The Fire Code requires fire sprinklers, fire pumps, and standpipes to "be inspected annually by an independent contractor licensed under the Illinois Fire Sprinkler Contractor Licensing Act." It is the responsibility of the building owners to contract with such inspectors. MCC §§ 15-16-210, 15-16-260, 15-16-1160, and 15-16-1170.

³ FPB conducts separate inspections of the common elements of a structure ("building inspections") and of any commercial tenant spaces within ("tenant inspections"). For example, in a large office building, a building inspection would include common stairwells, lobbies, and other common spaces. The tenant inspection would include office suites leased by different tenants.

In addition, OIG found that independent contractors do not annually test all water-based fire suppression systems as required by the Fire Code and that FPB's data on systems that require annual tests is inaccurate and incomplete. In a 12-month period, independent contractors submitted annual test reports to FPB for 73.7% of premises with sprinkler systems, 79.6% of fire pumps, and 77.8% of premises with standpipes.

OIG also found that CFD was not in compliance with MCC § 2-36-220, which requires it to create and submit an annual report to the Mayor and City Council about the causes and extent of fire loss throughout the city. Lastly, FPB destroyed paper inspection reports without prior approval by the Cook County Local Records Commission.

C | Recommendations

OIG recommends that CFD work with relevant City departments to identify a complete and accurate inventory of existing buildings subject to Fire Code inspections. CFD should also develop procedures to ensure it conducts the required inspections and monitors progress toward the completion of inspections. CFD should also ensure it maintains proper records as required by the Fire Code by documenting the notice of violation date and memorandum of final disposition related to inspections. Related to re-check inspections, FPB should develop and document procedures to ensure it conducts re-check inspections and assesses re-check fees.

FPB should also develop procedures to monitor and ensure property owners obtain tests of all water-based fire suppression systems on an annual basis, as required by the Fire Code. Further, it should work with City departments to identify and maintain a complete and accurate inventory of fire suppression systems subject to the tests.

OIG also recommends that CFD create and submit the annual report of fires mandated by MCC § 2-36-220. Lastly, CFD should consult with the Department of Law (DOL) or the Cook County Local Records Commission regarding any remediation actions necessary based on the fact that it destroyed inspection forms, develop procedures for retaining inspection records, and provide guidance to CFD members regarding legal requirements related to document retention and destruction.

D | CFD Response

In response to OIG's audit findings and recommendations, CFD largely disagreed with OIG's recommendations. Regarding the lack of a complete and accurate building inventory, CFD stated that while it works with other City departments to ensure accuracy of building information, it "is not responsible for identifying, creating, or maintaining an inventory of buildings [. . .]". CFD explained that it had suspended some inspections during the COVID-19 pandemic, but did not address the need for documented procedures to address monitoring its progress, the prioritization of inspections, or the standardization of the process and related recordkeeping. CFD stated it was developing a training regarding in-service inspection requirements.

Regarding the maintenance of annual inspection data points within Infor Public Sector 11 (IPS 11) inspection records, CFD referred to systems outside of IPS 11 and did not address why the inspection records in IPS 11 do not include all the required data.

On the subject of re-check inspections, CFD committed to develop procedures to document and track the inspections. CFD also stated it would issue guidance to FPB staff regarding the assessment of re-check fees.

Regarding the development of procedures to ensure property owners obtain tests of water-based suppression systems, CFD noted that automated notifications are sent to property owners. CFD did not acknowledge the need for FPB procedures to address property owners who do not obtain the required tests, stating, “[. . .] there is no corrective action that could be taken.” CFD provided the same response regarding the need for a complete and accurate inventory of fire suppression systems.

CFD confirmed that it has prepared and submitted the annual report of fires since 2023.

Finally, regarding compliance with the Illinois Local Records Act, CFD committed to consulting with the Department of Law about any required remediation, and drafting guidance for all FPB members to ensure compliance.

The specific recommendations related to each finding and CFD’s response are described in the “Findings and Recommendations” section of this report.

II | Background

Chicago's experiences with tragic fires have played a role in the adoption of modern safety standards that have reduced the risk of loss of life and property to fire. For example, the 1903 Iroquois Theater fire was the impetus for many safety reforms, among them lighted exit signs in theaters that had a source of light independent of the building's electricity.⁴ The 1958 fire at Our Lady of the Angels Catholic School spurred the requirement for all schools to have sprinkler systems.⁵ Chicago's history underscores the importance of ongoing commitment to the standards that protect residents, visitors, first responders, and the city's infrastructure.

A | What is Fire Prevention?

Firefighting includes two key components: fire suppression and fire prevention. Fire suppression is the act of putting out fires. Fire prevention stands in contrast to fire suppression and is an integral part of firefighting. It includes structural elements such as fire walls and fire doors, public education, and Fire Code compliance inspections. Its goal is to reduce the risk of fire and, should a fire occur, to enable a quick response and limit the fire's spread.

Regular building inspections are key to ensuring ongoing conformity with the City's Fire Code, which sets forth the required design elements, mechanical systems, inspection and testing requirements, and hazardous materials precautions that must be used to reduce the risk of fire in new and existing structures.⁶ According to the Office of the Illinois State Fire Marshal, "routine fire safety inspections not only ensure that buildings are safe," but also "provide an opportunity to pre-plan and reconnoiter [. . .] so firefighters know what to expect during an emergency."⁷ An inspection may vary depending on the *occupancy* of a building (the purpose for which it was constructed) and its *use* (the current purpose of the building, including the characteristics of its users).⁸ No matter a building's occupancy and use, inspections commonly address standards related to,

"[R]outine fire safety inspections not only ensure that buildings are safe," but also "provide an opportunity to pre-plan and reconnoiter [. . .] so firefighters know what to expect during an emergency."

- Office of the IL State Fire Marshal

- exit paths (including emergency exit doors and lighted signage);
- fire protection systems (such as smoke detectors and sprinkler systems);
- emergency response equipment (such as fire hoses and fire phones);

⁴ According to the National Fire Protection Association (NFPA), the Iroquois Theater fire remains the "deadliest public assembly and nightclub fire in U.S. history." NFPA, "Safety in Nightclubs and Other Assembly Occupancies," accessed August 12, 2025, <https://www.nfpa.org/education-and-research/building-and-life-safety/nightclubs-assembly-occupancies>.

⁵ Paul E. Teague, M.A., Ronald R. Farr, "Life Safety Code Handbook, Supplement 1, Case Histories: Fires Influencing the Life Safety Code," NFPA, January 1, 2009, 1154, accessed August 12, 2025, <https://laforceinc.wordpress.com/wp-content/uploads/2017/06/case-histories-fires-influencing-the-life-safety-code-nfpa.pdf>.

⁶ The Municipal Code of Chicago (MCC) § 15-4-010 establishes that the Fire Code is comprised of MCC Title 14F and Chapters 2-36, 15-4, 15-8, 15-16, 15-20, 15-24, 15-26, and 15-28.

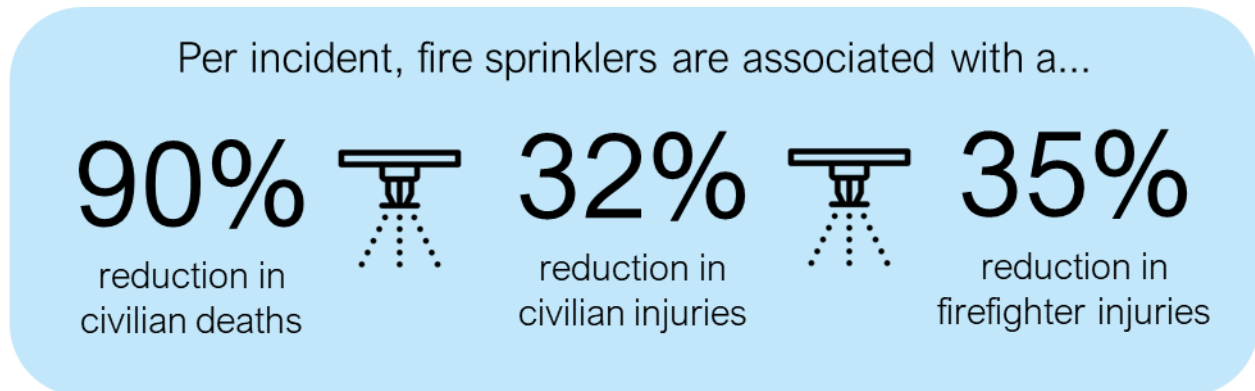
⁷ The Office of the Illinois State Fire Marshall works statewide to promote fire safety through activities including inspections, arson investigations, education, and training. Illinois State Fire Marshal, "Applicability of the State-Adopted Life Safety Code," October 25, 2023, accessed August 12, 2025, <https://sfm.illinois.gov/content/dam/soi/en/web/sfm/sfmdocuments/documents/municipalitynoticeregardingapplicabilityoflife-safetycode2021.pdf>.

⁸ MCC § 14B-3-302.

- mechanical and electrical hazards; and
- the proper use and storage of flammable, combustible, or otherwise hazardous materials.

The inspection, testing, and maintenance of fire protection systems are important components of fire prevention. The National Fire Protection Association (NFPA) published research on “US Experience with Sprinklers” and found that, when functioning properly, smoke detectors and sprinkler systems can greatly reduce the loss of life in a fire.⁹ NFPA reports that between 2017 and 2021, civilian deaths and injuries per fire were lower by 90 percent and 32 percent, respectively, in properties with sprinkler systems compared to those without them. Fire sprinklers were also associated with a 35 percent reduction in firefighter injuries, as depicted in Figure 1.¹⁰

Figure 1: Sprinkler Systems Can Help Save Lives and Prevent Injuries in the Event of a Fire



Source: NFPA, “US Experience with Sprinklers.”

B | The Fire Prevention Bureau

The Fire Prevention Bureau (FPB) is charged with carrying out the Chicago Fire Department’s (CFD) fire prevention function of protecting against the loss of life and property through enforcement of the Fire Code. FPB is divided into two sections.

- The inspections section inspects buildings for compliance with the Fire Code. FPB members in the inspections section are sworn firefighters.
- The engineering section reviews mechanical plans and oversees the testing of water-based fire suppression systems, including fire sprinklers, fire pumps, and standpipes. FPB members in the engineering section include both sworn firefighters who oversee systems tests and civilian engineers who review and approve technical designs for code compliance.

⁹ NFPA is an international organization with a mission “to help save lives and reduce loss with information, knowledge, and passion.” It has become a leading “global advocate for the elimination of death, injury, property, and economic loss due to fire, electrical, and related hazards.” It provides “more than 300 codes and standards, innovative research, professional training, public education, and outreach and advocacy.” The sections of the MCC that make up the Fire Code and the Electrical Code incorporate many NFPA standards, either directly or through the MCC’s incorporation of the International Building Code which has incorporated NFPA standards. NFPA, “About Us,” accessed August 12, 2025, <https://www.nfpa.org/about-nfpa>.

¹⁰ NFPA, “US Experience with Sprinklers,” March 31, 2024, accessed August 12, 2025, <https://www.nfpa.org/education-and-research/research/nfpa-research/fire-statistical-reports/us-experience-with-sprinklers>.

Between 2021 and 2024, FPB had 89 budgeted positions, representing 1.7% of CFD's personnel budget. FPB management reported to OIG that the Bureau has not had an analysis of its staffing needs in the last 20 years. Many annual inspections are assigned to on-duty firefighters in fire companies across the city, referred to as "in-service inspections," rather than members of FPB. These firefighters' primary job is emergency response and fire suppression.¹¹ Many jurisdictions use these in-service inspections to leverage department-wide resources, thus increasing inspection rates, and also help ensure that fire companies are familiar with the buildings in their area.

C | Annual Inspections

Section 15-4-030 of the Municipal Code of Chicago (MCC) requires the fire commissioner to conduct inspections of the following premises annually:

- (1) all theaters, churches, schools, public assembly units, and open air assembly units; and
- (2) all buildings over one story in height, except (i) single dwellings, (ii) multiple-use buildings, consisting of business and dwelling units two stories or less in height, and (iii) multiple dwellings three stories or less in height, unless such multiple dwellings are lodgings or roominghouses with sleeping accommodations for 20 or more persons.

The MCC does not require FPB to inspect single-family homes or residential buildings under four stories in height, with certain exceptions. In addition to MCC § 15-4-030, CFD also considers MCC § 2-36-340, which requires "regular" inspections to be made "with sufficient frequency to secure efficient supervision, of: (1) all buildings, structures or places that are used for manufacturing or commercial purposes or that are occupied or frequented by large numbers of people; and (2) all school buildings, public halls, churches, institutional buildings, theaters and multiple dwellings; and (3) all places of amusement, recreation or employment . . ." Though CFD may rely on both MCC sections to determine inspection requirements, OIG refers to the more specific annual inspection mandate set out in MCC § 15-4-030. Figure 2 provides examples of the types of buildings FPB must inspect on an annual basis.

¹¹ CFD Special Directive 95-002 directs fire companies to conduct in-service inspections during defined hours on weekdays unless prevented by weather or other orders.

Figure 2: Many Types of Buildings Over One Story Require Annual Inspections¹²

Fire Code Requirement		Examples
	Theaters	Movie theaters, performance halls
	Churches	Places of religious meeting/worship
	Schools	Public and private schools, universities
	Public Assembly Units	Restaurants, bars, clubs, civic buildings
	Open Air Assembly Units	Sports arenas, open-air concert venues
	Multiple-use buildings, 3+ stories	Residential mid-rises with ground-level stores
	Multiple dwellings, 4+ stories	Residential mid- and high-rises
	Lodginghouses/Roominghouses, 1+ story, 20+ people	Shelters, low-rise motels
	All other buildings 2+ stories not exempted by the MCC	Office buildings, industrial buildings, hotels

Source: OIG visualization based on MCC § 15-4-030 and CFD's operational definitions.

During an inspection, an FPB inspector meets with a property's representative and inspects the property for Fire Code compliance. The inspector brings an Inspection Control Form, which contains basic building information (see Appendix A). Throughout the process, the inspector may use the blank reverse side to write down violations. However, FPB does not use checklists or standard operating procedures to define the items to be inspected. OIG observed inspectors reviewing public areas and mechanical rooms for violations such as blocked stairs, faulty exit signs, and improperly stored hazardous materials.



Lighted exit signs help building occupants and first responders find exit paths in an emergency. Source: OIG photo.

¹² Per MCC § 15-4-030, all buildings over one story in height require annual inspections except "(i) single dwellings, (ii) multiple-use buildings, consisting of business and dwelling units two stories or less in height, and (iii) multiple dwellings three stories or less in height, unless such dwellings are lodginghouses or roominghouses with sleeping accommodations for 20 or more persons."

FPB conducts separate inspections of the common elements of a structure (“building inspections”) and of any commercial tenant spaces within (“tenant inspections”).¹³ For example, in a large office building, a building inspection would include common stairwells, lobbies, and other common spaces. The tenant inspection would include office suites leased by different tenants.

Notices of Violation and Re-check Inspections

MCC § 15-4-040 requires CFD to send a building’s owner or representative a notice of any violations discovered during an inspection. The property owner must bring the building into compliance within 15 days of receiving the notice. Inspectors described sending notices of violation by email or postal mail.

The MCC provides that CFD “may” re-inspect to verify that violations have been corrected, and that the City shall assess a \$50 fee each time FPB returns for a re-check inspection of outstanding violations, regardless of whether the violation has been corrected.

D | Annual Tests of Water-based Fire Suppression Systems

In addition to conducting annual inspections, FPB is required to certify that property owners have obtained the required annual tests of water-based fire suppression systems. Property owners must hire independent contractors licensed under the Illinois Fire Sprinkler Contractor Licensing Act to conduct the annual tests.¹⁴ The Fire Code requires annual tests of three types of water-based fire suppression systems: fire pumps, standpipes, and fire sprinklers.¹⁵ These systems are described below and shown in Figure 3. Tests of these systems ensure they are in working order in the event of a fire.

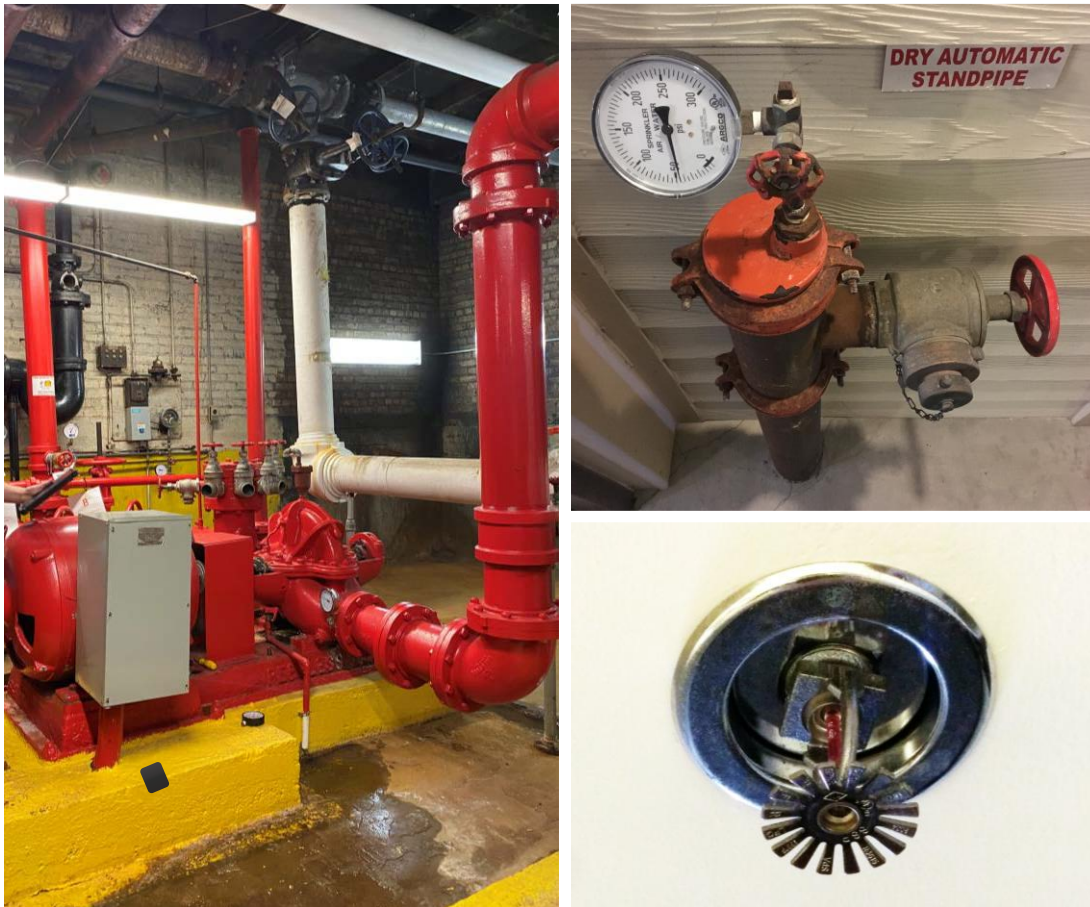
- **Fire pumps** are machines used to increase water supply pressure from water mains, gravity tanks, reservoirs, or other sources. They may be used to push water through a building to feed a standpipe or fire sprinkler system when the underlying water source does not provide adequate pressure. Fire pumps are commonly found in buildings that require higher water pressures, such as high-rises or large warehouses.
- **Standpipe systems** are a series of pipes in a building that can be connected to hose lines to provide a pressurized water supply. They provide access to water for the direct suppression of a fire by making it easier to connect hoses to water sources at various locations. Standpipe systems are common in multistory buildings or large warehouses and factories.
- **Fire sprinkler systems** are networks of pipes and sprinkler heads installed in buildings to extinguish or control fires. These systems are activated when sprinkler heads are triggered by heat. Once triggered, they automatically spray water to suppress and limit the spread of a fire.

¹³ MCC § 15-4-030 makes it the “duty of every owner, agent, lessee or occupant of any such building and of the person in charge or control of the same to permit the making of such annual inspection” by the Fire Department.

¹⁴ The Fire Code requires fire sprinklers, fire pumps, and standpipes to “be inspected annually by an independent contractor licensed under the Illinois Fire Sprinkler Contractor Licensing Act.” It is the responsibility of the building owners to contract with such inspectors. MCC §§ 15-16-210, 15-16-260, 15-16-1160, and 15-16-1170.

¹⁵ MCC §§ 15-16-210, 15-16-260, and 15-16-1170, regarding independent contractor’s inspections of fire sprinklers, fire pumps, and standpipes, respectively, stated that “such inspections [. . .] may be overseen by or in the presence of the Fire Commissioner.” MCC § 15-16-1160, regarding independent contractor’s inspections of fire pumps states, “such tests “shall be performed [. . .] in the presence of the fire commissioner,” seemingly redundant and contradictory to MCC § 15-16-260. OIG did not review for the attendance of CFD at any tests.

Figure 3: Independent Contractors Test Fire Pumps, Standpipes, and Fire Sprinkler Systems to Ensure That They Are Functional in the Event of a Fire



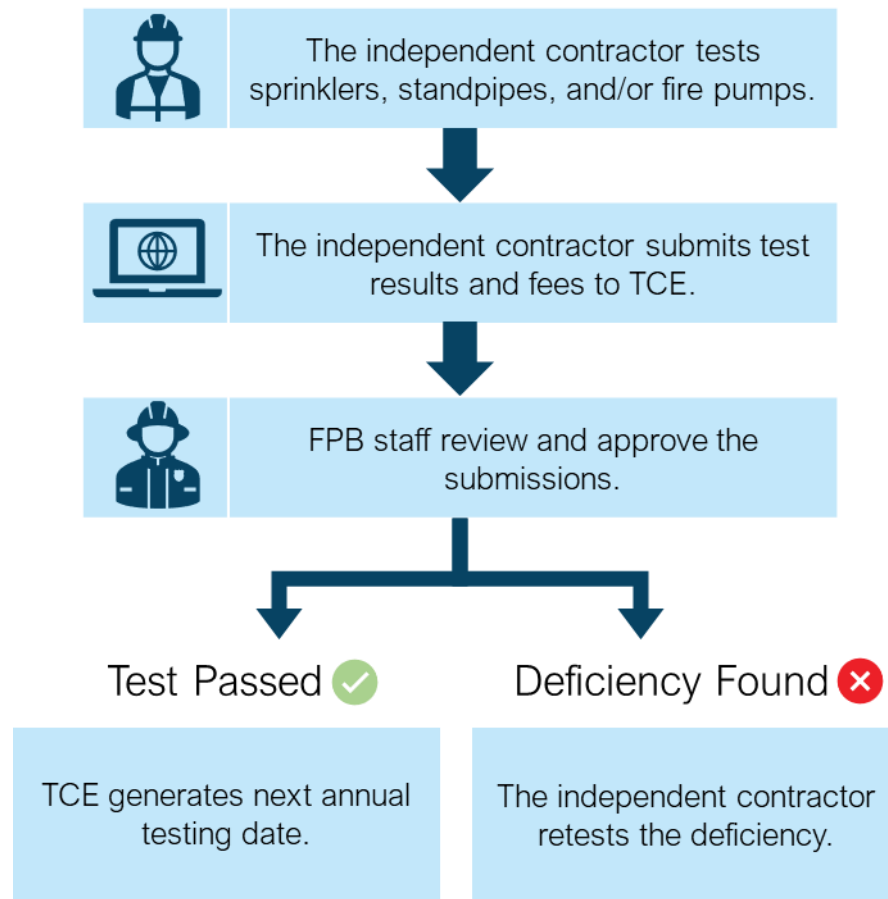
Source: OIG photo of a fire pump (left). Other photos obtained from the nonprofit organization Creative Commons, which requires the following attributions and links: Photo of standpipe (top right) by photographer Mark Cross, licensed under [CC BY 4.0](#); Photo of fire sprinkler head (bottom right) by photographer HomeSpot HQ, licensed under [CC BY 2.0](#).

The City uses The Compliance Engine (TCE) database to record the outcomes of fire suppression system tests. Independent contractors hired by building owners use TCE to inform FPB of scheduled tests and, once tests are completed, to submit results and City-required fees collected from the property owners.¹⁶

During tests of suppression systems, contractors ensure that the systems meet certain specifications. For example, contractors test a fire pump's automatic start function and determine whether it can produce the rated gallons per minute of pressure. If contractors identify deficiencies, TCE can send automatic phone and email reminders to the property owners to correct them. In buildings without automatic sprinkler systems, FPB inspectors personally witness the fire pump tests conducted by the independent contractors (see Appendix B for a sample of a Pump Test Form). Figure 4 depicts the testing and review processes.

¹⁶ MCC § 15-16-210 requires a \$300 fee for inspections certifying sprinkler systems to be in good working order and in compliance with the Fire Code. Similarly, MCC § 15-16-1160 addresses fire pump tests and requires a fee of at least \$315 for each fire pump tested and MCC § 15-16-1170 requires a \$50 fee each standpipe tested.

Figure 4: Independent Contractors Conduct Tests of Fire Suppression Systems and Submit Results to CFD; FPB Staff Review the Submissions



Source: OIG visualization of FPB processes as described by FPB.

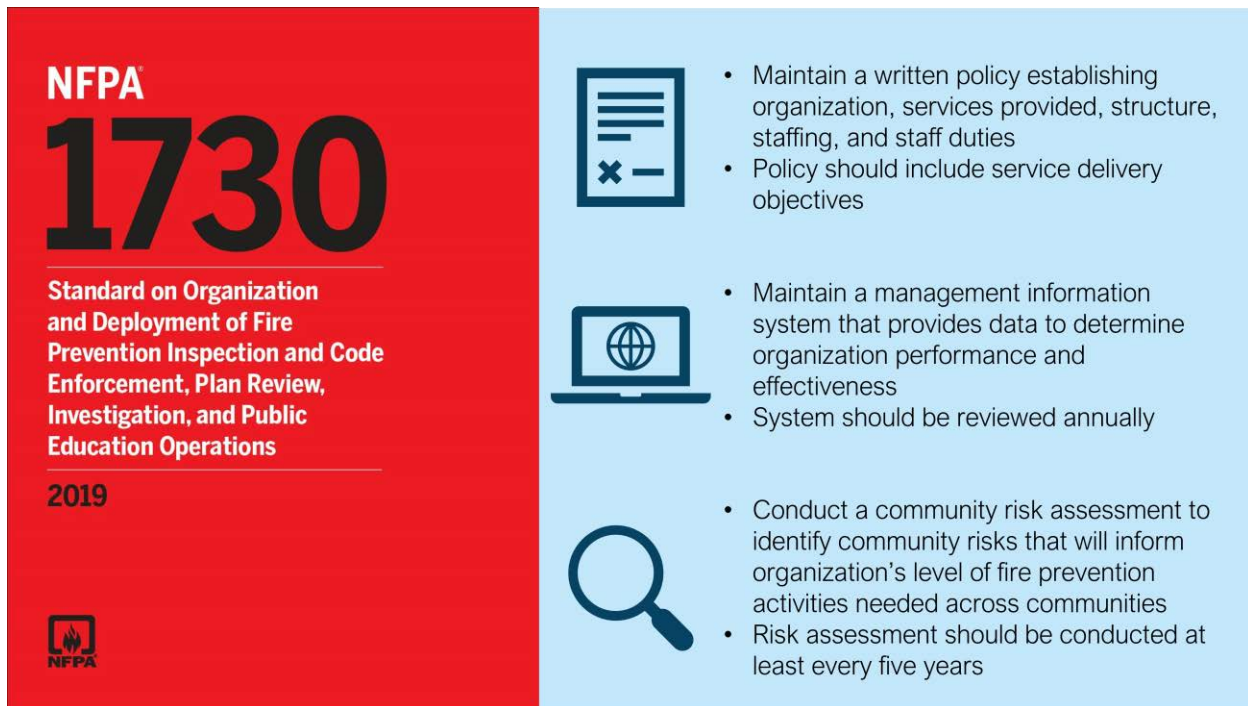
E | Recommended Practices

NFPA offers “codes, standards, recommended practices, and guides” which are “developed through a consensus standards development process approved by the American National Standards Institute.”¹⁷ NFPA 1730 provides recommended practices on topics such as code enforcement, plan review, investigation, and public education operations.

As depicted in Figure 5, NFPA 1730 addresses several components of an effective fire prevention organization.

¹⁷ NFPA, “NFPA 1730: Standard on Organization and Deployment of Fire Prevention Inspection and Code Enforcement, Plan Review, Investigation, and Public Education Operations,” 2019, accessed August 12, 2025, <https://www.nfpa.org/codes-and-standards/nfpa-1730-standard-development/1730>.

Figure 5: NFPA 1730 Provides Recommended Practices for Fire Prevention Organizations



Source: NFPA 1730 with OIG's summary. NFPA refers to its codes, standards, recommended practices, and guides collectively as "NFPA Standards." Thus, the NFPA cover above uses the term "Standard," inclusive of the recommended practices highlighted by OIG.

F | KPMG's Past Review of FPB

On February 4, 2004, the consulting firm KPMG issued findings and recommendations related to key areas of CFD that the City's Office of Budget and Management (OBM) had asked it to review. One of the key areas was "a review of the process and manpower for [FPB] for the purpose of identifying issues and recommending efficiencies." OIG references the findings of the 2004 report where they remain in alignment with OIG's current findings. While KPMG's review was requested by OBM, current CFD management stated that they had never seen the KPMG report. OIG provided CFD a copy of the report.

III | Objectives, Scope, and Methodology

A | Objectives

The objectives of OIG's audit were to determine whether FPB,

1. conducts annual inspections that are required to ensure compliance with the Fire Code and protect against the loss of life and property;
2. maintains a proper record of fire safety inspections as required by MCC § 2-36-280(a);
3. notifies property owners of noncompliance and conducts re-check inspections of known issues; and
4. ensures that independent contractors complete required annual tests of fire sprinklers, fire pumps, and standpipes.

B | Scope

The scope of the audit included annual inspections of buildings and tenant spaces and tests of water-based fire suppression systems. OIG reviewed records associated with building and tenant space inspections from January 2011 to the date of OIG's data pull, November 22, 2022. OIG reviewed water-based fire suppression system tests from April 2018 through December 31, 2022. OIG assessed whether inspections took place as required but did not assess the quality or accuracy of the inspections. OIG also considered relevant re-check inspections of violations and their related fees.

OIG assessed FPB's role in ensuring that independent vendors submit testing results to TCE, but did not evaluate the quality or accuracy of independent contractors' tests.

C | Methodology

To gain an understanding of FPB's operations, OIG interviewed FPB staff and leadership and reviewed FPB's policies and training materials. OIG also observed inspections conducted by an FPB inspector and tests of fire pumps and standpipes witnessed by FPB members.

To assess FPB's completion rate of annual inspections, OIG identified active building and tenant records in the City's inspection and permitting system, Infor Public Sector 11 (IPS 11), and calculated the length of time between their most recent annual inspections and November 22, 2022, the date of OIG's data pull. To determine the number of failed annual inspections that were re-inspected, OIG calculated the number of annual inspections with a result of "recheck 1" (indicating that FPB identified the need for a re-check) that also had a subsequent inspection record. To derive the time to a re-check after a failed annual inspection, OIG calculated the time between the date of a failed initial inspection and any subsequent inspection for the same location.

To determine whether FPB maintains a proper record of inspections as required by MCC § 2-36-280(a), OIG reviewed IPS 11 for the existence of required fields. For those fields that exist, OIG determined the extent to which FPB completed them.

To determine whether FPB collected fees for re-check inspections as required in MCC § 15-4-040, OIG calculated the amount that could have been collected based on the number of re-check

inspections and compared that amount to the amount actually collected according to the City's Monthly Collection by Department reports.

To determine whether FPB ensured water-based fire suppression systems were tested annually, OIG reviewed water-based fire suppression system test reports in TCE submitted by independent contractors between the launch of TCE in 2018 and December 31, 2022.

In TCE, each fire pump system had its own unique identifier, which made it possible to distinguish each individual fire pump requiring an annual test. However, fire sprinklers and standpipes did not have unique identifiers. Some buildings in the population may have had multiple fire sprinkler and standpipe systems. OIG grouped test reports for these systems by address. OIG confirmed this approach with FPB staff. To determine whether each system or address had received an annual test within a 12-month period, OIG calculated the time elapsed in days between a system's most recent test date and December 31, 2022.

D | Standards

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

E | Authority and Role

The authority to perform this audit is established in the City of Chicago Municipal Code § 2-56-030 which states that OIG has the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations.

The role of OIG is to review City operations and make recommendations for improvement.

City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

IV | Findings and Recommendations

Finding 1: FPB is not in compliance with the Fire Code's annual inspection requirements, and it does not have a complete and accurate inventory of buildings requiring annual inspections.

The Fire Code requires FPB to conduct inspections of the following premises annually:

- (1) all theaters, churches, schools, public assembly units, and open air assembly units; and
- (2) all buildings over one story in height, except (i) single dwellings, (ii) multiple-use buildings, consisting of business and dwelling units two stories or less in height, and (iii) multiple dwellings three stories or less in height, unless such multiple dwellings are lodgishouses or roominghouses with sleeping accommodations for 20 or more persons.

FPB is not in compliance with this requirement.¹⁸ FPB inspected only 16.8% of the buildings and tenant spaces in its database within a 12-month period.¹⁹ Furthermore, FPB has not inspected mid- and high-rise residential buildings in decades because it mistakenly believed that the City's Department of Buildings (DOB) was conducting the necessary inspections in those buildings and tenant spaces. In addition, FPB does not have a complete and accurate inventory of buildings and tenant spaces which are subject to inspection, without which they cannot comprehensively ensure Fire Code compliance.

Consistent annual inspections are associated with reduced incidence of fire and reduced losses from fires that occur.²⁰ Due to the high number of annual inspections that remain outstanding and the overall decline in its inspection rate, FPB may not discover hazardous conditions. This could increase the risk of harm to building occupants and first responders. At its current inspection rates, FPB cannot comprehensively fulfill its mission of protecting life and property through enforcement of the Fire Code.

¹⁸ While the MCC defines the inspections required annually, NFPA 1730 allows fire prevention organizations to "conduct a community risk assessment to identify community risks that will inform organization's level of fire prevention activities needed across communities." Relying on the MCC-defined requirements, FPB has not conducted a community risk assessment.

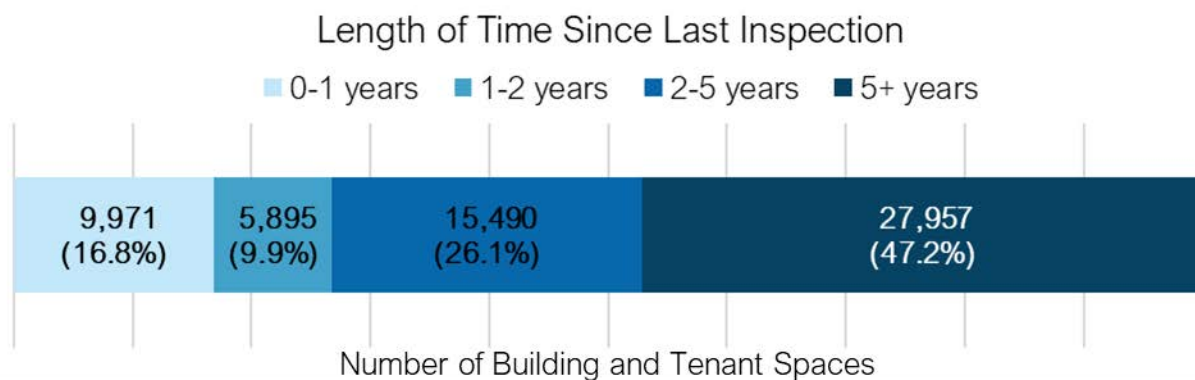
¹⁹ As explained in the background, FPB conducts separate inspections of the common elements of a structure ("building inspections") and of any commercial tenant space within ("tenant inspections").

²⁰ David Diamantes and A. Maurice Jones Jr., *Principles of Fire Prevention: Fourth Edition* (Burlington, MA: Jones & Bartlett Learning, 2021), 97

A | FPB Does Not Perform All Required Inspections Of Building and Tenant Spaces

As discussed above, FPB's annual inspections include both building inspections focused on overall structure and common elements of buildings, and tenant inspections focused on commercial tenant spaces within buildings. OIG reviewed inspection records for 59,313 buildings and tenant spaces within IPS 11.²¹ Of those, FPB had inspected only 9,971, or 16.8%, in the 12 months prior to our review. Furthermore, FPB had not inspected 27,957, or 47.1% of the buildings and tenant spaces in at least five years, as shown in Figure 6.

Figure 6: FPB Has Not Inspected Nearly Half of Buildings and Tenant Spaces in the Previous Five Years

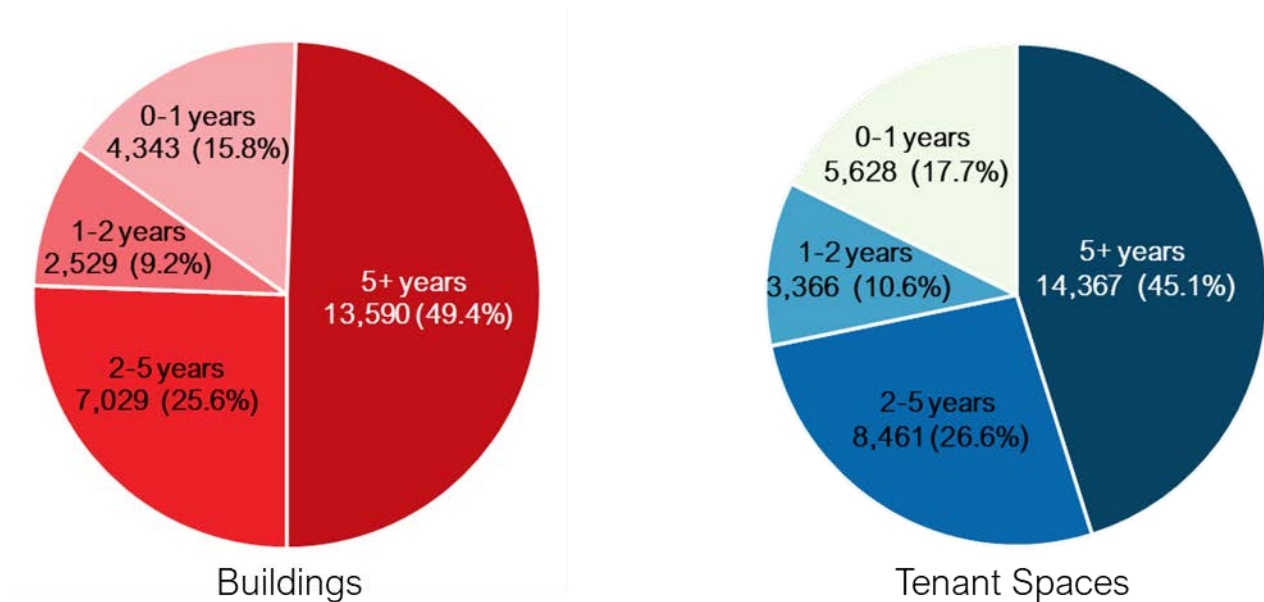


Source: OIG visualization of IPS 11 data.

These 59,313 buildings and tenant spaces included 27,491 buildings and 31,822 tenant spaces. Of the 27,491 buildings that OIG reviewed, only 15.8% received an annual inspection in the 12 months prior to OIG's data pull in November 2022. This represents FPB's rate of compliance with the MCC's annual inspection requirement. As depicted in Figure 7, FPB had not inspected nearly half of buildings in five years or more, and FBP inspected a quarter of buildings between two and five years ago. Therefore, FPB did not comply with the annual inspection requirement for 75% of buildings within its database. Additionally, OIG reviewed 31,822 tenant space records in IPS 11. Similar to building inspections, only 17.7% of tenant spaces received an annual inspection in the 12 months prior to OIG's data pull. Additionally, FPB had not inspected nearly half of tenant spaces in five years or more, as depicted in Figure 7.

²¹ OIG reviewed inspection records for 59,313 distinct buildings and tenant spaces with an active status that had received at least one inspection between January 1, 2011, and the date we obtained IPS 11 data, November 22, 2022. OIG limited its review to buildings that had at least one inspection record to ensure buildings reviewed were actually confirmed as existing by FPB staff. Building records without an inspection are potentially invalid records and, thus, were not reviewed.

Figure 7: Nearly Half of Buildings and Tenant Spaces in FPB's Database Had Their Last Annual Inspection Five or More Years Prior



Source: OIG visualization of IPS 11 data.

Completion rates varied by the group assigned responsibility for annual inspections. The buildings FPB assigned to fire companies to complete as in-service inspections were the most overdue. In-service inspections represented 27.1% of all buildings, but 39.9% of those whose annual inspections had not been conducted in five or more years. Additionally, 72.8% of the buildings FPB assigned to fire companies had their last annual inspection more than 5 years prior.

In 2004, KPMG reported that fire companies assigned in-service inspections had “the greatest number of outstanding inspections [. . .] accounting for 44% of the Fire Prevention Bureau’s total outstanding number of annual inspections.” It further noted that, since the companies were “not providing annual inspections for many businesses within their district, consequently they are not able to ensure that properties within their district are free of dangerous fire-causing hazards.” As noted in the background of this report, current CFD management stated that they have never seen the KPMG report.

FPB Mistakenly Expected the Department of Buildings to Conduct Fire Code Inspections Required of FPB

OIG learned that, in addition to failing to conduct all required annual inspections of those buildings and tenant spaces in FPB’s database, there is also a group of buildings that FPB has been intentionally not inspecting.²² As a matter of practice, FPB does not conduct annual inspections of residential buildings more than three stories in height, even though it is required by MCC § 15-4-030 to ensure inspections of those buildings:

²² Many of these buildings may have water-based fire suppression systems which require their own inspections. These are discussed in Finding 3.

The fire commissioner shall cause the following buildings or structures to be inspected annually: (1) all theaters, churches, schools, public assembly units, and open air units; and (2) all buildings over one story in height, except (i) single dwellings, (ii) multiple-use buildings, consisting of business and dwelling units two stories or less in height, and (iii) multiple dwellings three stories or less in height, unless such multiple dwellings are lodgishouses or roominghouses with sleeping accommodations for 20 or more persons.

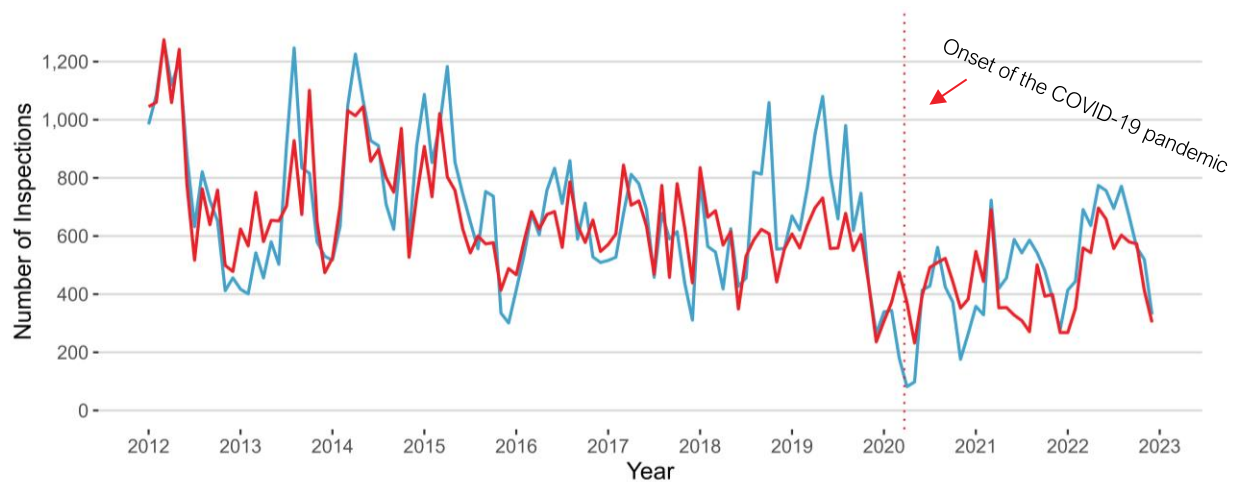
As noted above, while the MCC carves out exceptions for FPB inspections of buildings three stories or less in height, it makes no exception for residential buildings more than three stories in height.

CFD reported to OIG that, for the past thirty or forty years, FPB operated with the understanding that DOB conducted annual inspections of residential buildings more than three stories in height, which would satisfy the Fire Code. OIG inquired with DOB about inspections of these buildings. DOB stated that it conducts inspections for Building Code compliance but does not conduct inspections for Fire Code compliance. Residential buildings more than three stories in height have likely gone for decades without annual Fire Code inspections.

The Number of FPB's Inspections has Generally Declined Over the Past Decade

Over the past decade, FPB has completed fewer inspections, with a notable drop-off since the onset of the COVID-19 pandemic. Figure 8 depicts the trend in inspection completion from 2012 through 2022.

Figure 8: FPB's Inspections Decreased 34.3% Over a Decade



	Inspection Type											
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Building	10,112	8,355	9,857	8,043	7,477	7,630	7,065	6,853	4,855	4,857	6,103	81,207
Tenant	10,235	7,815	10,079	9,035	7,728	7,092	7,633	8,601	3,683	5,690	7,260	84,851
Total	20,347	16,170	19,936	17,078	15,205	14,722	14,698	15,454	8,538	10,547	13,363	166,058

Source: OIG visualization of monthly IPS 11 data.²³

²³ These numbers include both annual building and tenant space inspections and re-check inspections.

FPB's Lack of Compliance Results from Persistent Organizational and Management Challenges

Throughout OIG's audit, FPB inspectors and leadership repeatedly confirmed that the Bureau does not complete all required annual inspections, citing staffing constraints, high turnover, and the increase in construction over recent decades. Correspondingly, FPB lacks essential administrative tools for managing its performance and measuring its compliance with the annual inspection requirement. FPB does not have,

- goals at the Bureau or individual level for the number of inspections inspectors should complete;
- standard operating procedures that set expectations for how inspections should be scheduled, conducted, and documented;
- up-to-date training materials or data entry guidelines for IPS 11; or
- standard processes for assigning annual inspections to fire companies or ensuring that they are completed as assigned.

As mentioned in the Background, NFPA 1730 addresses several components of an effective fire prevention organization. FPB is not in alignment with several key components of these recommended practices. Specifically, FPB has not conducted a community risk assessment or set goals for its inspectors.

The organizational gaps identified in this audit are not new. In fact, many of the administrative challenges identified in this audit were noted in the 2004 KPMG report. As noted in the background of this report, current CFD management stated that they have never seen the KPMG report.

B | FPB Does Not Maintain a Complete and Accurate Inventory of Buildings and Does Not Capture All Data Required by the MCC

FPB does not have a complete and accurate inventory of buildings and tenant spaces subject to inspection. Of particular concern, FPB staff stated that, based on their familiarity with the city, they are aware of the existence of certain specific buildings which have not been entered into IPS 11. FPB staff do not have a process to ensure these buildings are added to IPS 11, which could involve notifying DOB. Therefore, those buildings have never received annual fire prevention inspections. Conversely, IPS 11 contains building records associated with buildings that no longer exist. Thus, some FPB staff use resources like Google Maps to confirm a building's existence before scheduling or conducting inspections. Staff may refer to either of these situations—existing buildings which have not been entered into IPS 11 or addresses that exist in IPS 11 though the building no longer exists—as “ghost buildings.”

FPB staff work with data that may be duplicative, outdated, or contain errors; this hampers their ability to plan their work. Further complicating matters, IPS 11 may also contain duplicative variations of the same address. FPB staff use their familiarity with the city to fill in gaps within IPS 11 and keep their own notes about buildings. This missing and inaccurate data prevents FPB from accurately assessing which buildings exist and which of those need annual inspections.

FPB's Database, IPS 11, Does Not Have the Fields to Capture the Data Points Required by the MCC in Order to Maintain a Proper Record of Its Inspections

MCC § 2-36-280(a) directs CFD to maintain a “proper record” of each inspection, which must include:

- the date of the inspection;
- a summary of any violations found to exist;
- the date a notice of violation was served; and
- a memorandum of the final disposition of all existing violations.

While IPS 11 includes fields for the date and results of an inspection, it lacks the following fields:

- **Notice of Violation Date:** Without the date FPB notified the building owner of the violation, FPB cannot determine its overall compliance with the requirement that it notify building representatives upon discovering violations of the Fire Code. Further, it may encounter difficulty in establishing the timeline of its enforcement actions for purposes of administrative or legal proceedings.
- **Memorandum of Final Disposition:** Violations in IPS 11 do not have unique identifiers or a field that captures their ultimate outcomes. Tracking the outcome of a violation requires manually reviewing successive inspection records.

| Recommendations

1. CFD should work with the relevant City departments, including the Department of Technology and Innovation (DTI) and DOB, to identify a complete and accurate inventory of existing buildings, including mid- and high-rise residential buildings, and “ghost buildings,” that are subject to annual Fire Code inspections.
2. CFD should develop procedures, for FPB and CFD members involved with in-service inspections, to ensure it conducts the required inspections, create a process for monitoring progress, implement a prioritization policy for inspections, and standardize the annual building inspection process and related recordkeeping. Alternatively, CFD could use NFPA 1730 as a guide to conduct a community risk assessment to strategically address the city's Fire Code enforcement needs.
3. CFD should take the measures necessary to document the notice of violation date and memorandum of final disposition, thus maintaining a proper record of fire prevention inspections as required by MCC § 2-36-280(a).

| Management Response²⁴

1. *“The FPB has/does work with other City agencies departments to ensure accuracy of the information on the buildings we inspect. However, FPB is not responsible for identifying, creating, or maintaining an inventory of existing buildings, including mid- and high-rise residential buildings. Under the MCC (14A-6-602.4), inspection of mid-rise and high-rise*

²⁴ See Appendix C for CFD's complete Management Response.

residential buildings is the sole responsibility of DOB, not CFD.²⁵ The official register of buildings, including mid- and high-rise buildings, is created and maintained by DOB; which is also responsible for assigning addresses to buildings.”

“With three (or more) diverse and non-communicating systems, discrepancies between the various systems exist. In addition, the origin of building addresses, done by DOB does not always accurately reflect a building (due to redevelopment, remapping, etc.). There are times when a “ghost building” still exists. For example, the original building was razed and graded and another building has been built on the same property and City’s Maps and Plats and GIS sections have not changed the information in the system, which inaccurately reports the original building still exists. Further, at times, updated building demographic information is not being updated into the Hansen V7 system (owned and managed by DOB).

“CFD has and will continue to report inaccurate addresses to DOB, when identified. Any changes necessary to improve the currency and accuracy of official inventory of buildings must be undertaken by the DOB. CFD stands ready to participate in any improvement efforts DOB elects to pursue.”

2. *“Initially, CFD cannot utilize NFPA 1730 as a guide because this standard has not been codified by City Council. Further, incorporating NFPA 1730 into the Municipal Code would require including various and numerous other sections of NFPA.*

“In-service inspections (TOCs) were routinely completed prior to 2020. During COVID, it was necessary to suspend in-service inspections. In 2024, CFD issued a revised order, resuming in-service inspections. The Fire Prevention Bureau identifies buildings appropriate for TOC inspection and provides lists to each District (1, 2, 4, 5) in the Bureau of Operations. District leadership assigns the TOC inspections to the appropriate battalions and companies, which also provide opportunity to become familiar with the buildings and their areas and any hazards that may be present in those buildings. Battalions and companies are expected to complete the TOC inspection and return the necessary documentation to District within 30 days to FPB for entry into the inspection databases.

“CFD is currently developing re-training to be distributed via Vector Solutions (CFD’s online training portal) to reinforce the obligations and processes for the Bureau of Operations to complete the necessary TOC inspections.

“CFD has also requested DTI update the code violation information in Hansen V7 to allow for accurate TOC inspection results and information to be entered. To date DTI has not completed the requested update. Under the existing system the companies cannot write violations, if they are found during TOC inspections, because the codes that are currently in the system are MCC codes and not the International Building Code codes that are used by CFD.

²⁵ **OIG Reply:** As explained in the Finding above, MCC § 15-4-030 requires CFD to inspect residential buildings more than three stories in height for purposes of the Fire Code. DOB stated that it conducts inspections for Building Code compliance, but does not conduct inspections for Fire Code compliance.

3. *“The documentation of the notice of violation date and memorandum of final disposition are functions that are incorporated in and being done by Hansen V7 and Brycer. IPS 11 is the system that is used to perform these functions.”*

Finding 2: FPB conducted re-check inspections for 87.8% of failed annual inspections, with a median time between a failed inspection and FPB's initial re-check of 5.2 months. The City does not consistently collect re-check fees.

MCC § 15-4-040 requires property owners with Fire Code violations to come into compliance within 15 days of receiving notice of the violations.²⁶ However, the Code does not require FPB to re-inspect delinquent properties or specify how soon re-checks should take place if they occur.

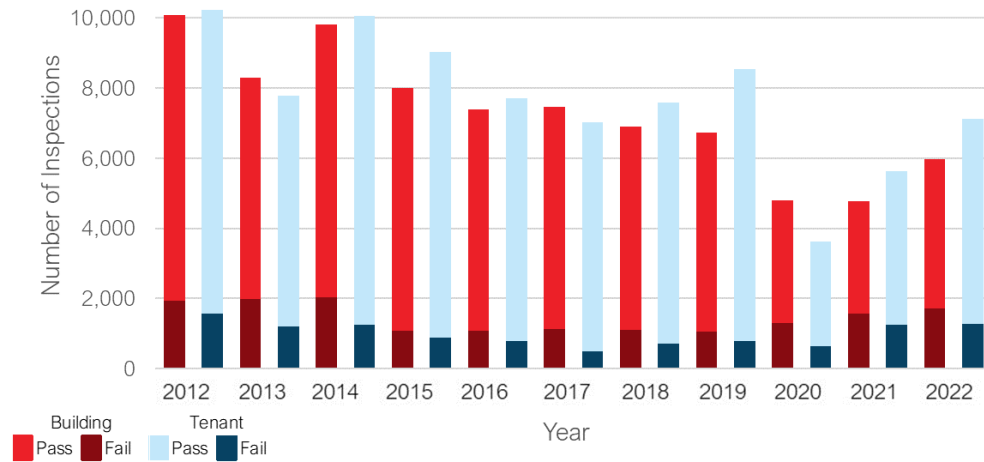
If an inspection conducted by the fire commissioner shows that the inspected building fails in any respect to comply with the building provisions of this Code, it shall be the duty of the fire commissioner to notify the owner, agent, lessee, or occupant of such building of this fact and to specify wherein such building fails to comply with the requirements of the building provisions of this Code; and it shall thereupon become the joint and several duty of such owner, agent, lessee, or occupant to proceed forthwith to make whatever changes or alterations may be necessary to make such a building comply with applicable provisions of this Code, and to complete such changes and alterations within 15 days after the receipt of such notice.²⁷

Fire Code inspections result in either a pass or a re-check status. The re-check status indicates that FPB found violations, the inspection failed, and the building or tenant space would require a re-check inspection to verify that violations have been corrected. OIG found that between January 1, 2011, and November 22, 2021, 19,452 annual building and tenant inspections failed. Figure 9 depicts the proportion of annual inspections that had passing or failing results between 2012 and 2022.

²⁶ MCC 2-36-310(a) requires CFD to maintain records of its official notices: "The fire commissioner shall sign, or cause to be signed, all orders, notices and certificates that must be issued by the fire department or any bureau or division thereof, and shall keep a record of the same."

²⁷ MCC § 15-4-040.

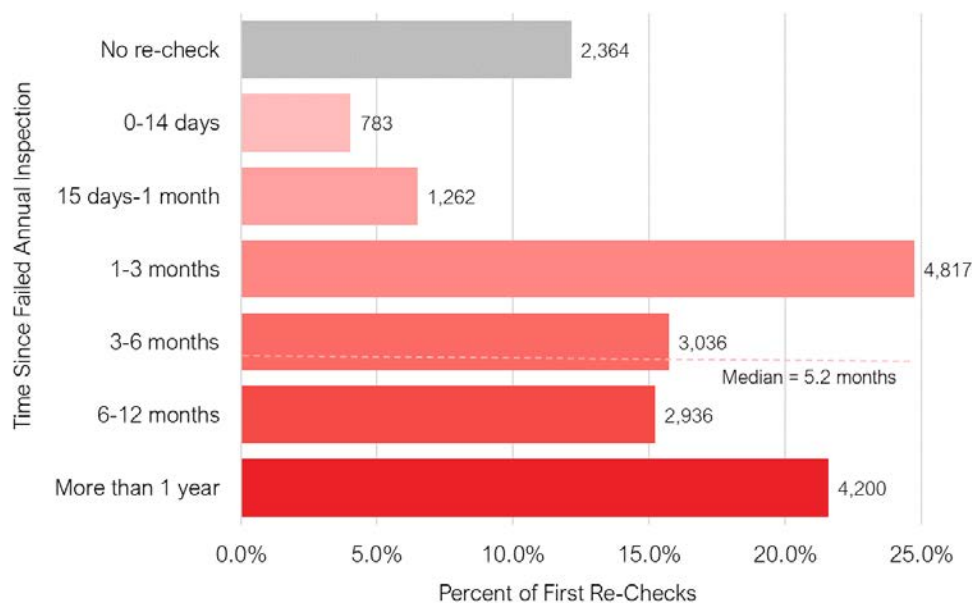
Figure 9: On Average, 20.0% of Building and 12.9% of Tenant Inspections Failed



Source: OIG visualization of IPS 11 data.

FPB conducted at least one re-check for 87.8% (17,088) of failed annual inspections.²⁸ In practice, FPB stated it does not have defined expectations around when or whether it should conduct a re-check. The median length of time between a failed annual inspection and FPB's first re-check was 5.2 months.²⁹ Figure 10 depicts the time elapsed between a failed initial inspection and the first re-check.

Figure 10: The Median Time to the First Re-Check of a Building or Tenant Space was 5.2 Months After the Failed Inspection



Source: OIG visualization of IPS 11 data.

²⁸ To allow a full 12-month period after failed annual inspections in which re-checks could take place, this test included annual inspections that took place up until November 22, 2021 and re-checks that took place until November 22, 2022. OIG's calculations used a 31-day month.

²⁹ The median is less susceptible than the mean to the effect of outliers. The mean time to first re-check was 9.0 months.

While the MCC requires that the building owner make changes or alterations to correct the violation within 15 days of notice, FPB does not currently define a timeframe in which a re-check should occur or the types of violations that require an urgent response. FPB staff stated that after sending violation notices by postal mail or email, they often could not confirm when or whether notices were received by property owners. Inspectors described informally prioritizing re-checks based on the nature of violations. For example, an offline fire alarm in a school might be re-checked within the same day, but another fire alarm needing new parts might not be re-checked for several months because the property owner needs to order parts. However, FPB does not have a process to ensure consistency between staff's prioritizations. Without a re-check inspection, FPB cannot ensure that building conditions are safe for occupants or hold property owners accountable for the condition of their buildings. Also, the longer the time between a violation and re-check inspection, the greater the risk of liability to the City. As noted in the 2004 KPMG report, "The City of Chicago's liability is increased because it is aware of an existing problem, but [does not] ensure that it [is] being corrected." As noted in the background of this report, current CFD management stated that they have never seen the KPMG report.

The City Does Not Consistently Collect Re-check Fees

MCC § 15-4-040 requires the City to collect a \$50 fee for each re-check inspection.

The fire commissioner may cause an additional inspection or inspections to be made in order to determine whether the owner, agent, lessee, or occupant has completed the necessary work. The fee for each such additional inspection shall be \$50.00.³⁰

Between January 1, 2011, and November 22, 2022, FPB conducted 25,023 re-checks. At \$50 per re-check, the City would have collected \$1,251,150 in re-check fees during that time period. However, the City collected only about \$165,000, or 13.2%, of the potential fees related to re-checks between 2011 and 2022, as shown in Figure 11.³¹

Failure to collect re-check fees was also noted in the 2004 KPMG report. The report states that FPB management at the time, "indicated that the impediment to their ability to charge and collect fees is the lack of an automated billing and collection tool [. . .]." As noted in the background of this report, current CFD management stated that they have never seen the KPMG report.

³⁰ MCC § 15-4-040.

³¹ After CFD assesses a fee, it is the responsibility of the Department of Finance to ensure it included in the City's standardized billing processes and, if necessary, the City's standardized debt collection processes.

Figure 11: The City Collected Only 13.2% of Potential Fees for Re-checks of Violations



Source: OIG visualization of collections data reported within the City's Monthly Collections by Department reports and the potential re-check fees based on the number of re-check inspections as calculated by OIG.

FPB does not have written orders or policies concerning the collection of fees. Although FPB staff stated that, in practice, they waive fees for a variety of reasons, CFD management stated that FPB staff do not have the ability to waive fees. IPS 11 shows, however, that FPB members can flag re-check fees to be waived, resulting in a \$0 fee amount.

The screenshots show the 'Fees' tab in IPS 11. The 'Fees' tab is highlighted with a red box. Below it, a table shows fee transactions. The 'Lien', 'Waived', and 'Paid Date' fields are highlighted with a red box. The fee transaction table is also highlighted with a red box.

Job Description	Application Details	Reviews	Inspections	Conditions	Fees	Bonds	Applicants	Sites	Employees	Related Records
Total Fees	\$0.00	Amount Due Now	\$0.00	Refund						
Unpaid Fees	\$0.00	Overpayments	\$0.00	Apply						
Paid Fees	\$0.00	Total Credits	\$0.00							

Account #	Status	Fee Code	Fee Desc	Value	Quantity	Amount	Penalty	Unpaid Amount	Fee Class
[REDACTED]	Paid	FPB_Recheck	Recheck Fee	\$50.00	1.00	\$0.00	\$0.00	\$0.00	Standard

Source: Screenshots from IPS 11. Red boxes added by OIG. The excerpted box to the right is an extension of the full screen. OIG adjusted for readability.

FPB staff described waiving fees in the following situations:

- Re-checks of government buildings, as allowed by the MCC;³²
- Re-checks conducted more than 365 days after the notice of violation because the age of those violations renders them "stale;"

³² MCC § 2-8-065

- Re-checks occurring before 15 days had passed;
- Violations that consisted only of the fact that a required annual inspection had not been performed; or
- Initial re-checks that resulted in a passing status;
- Re-checks that would result in a cumulative fee of more than \$200, in effect capping the overall fee a property owner would pay; and
- Re-checks on properties for which FPB could not identify an owner.

MCC § 15-4-040, quoted above, requires a \$50 fee and does not address any authority for FPB to waive or cap fees. Waived fees neither incentivize compliance with the Fire Code nor compensate the City for the time spent on repeated visits.

| Recommendations

4. FPB should develop and document procedures for conducting re-check inspections. This could entail establishing categories of response based on risk to ensure that safety hazards are brought into compliance within a defined timeframe.
5. FPB should develop and document standard procedures for assessing re-check fees based on defined criteria and in accordance with the MCC.

| Management Response

4. *"At least since the 1999 Tri Data report, there has been a known need for additional inspection positions at the FPB. In all the intervening years, CFD's budgeted positions have been reduced, not increased. In 2000, there were 156 budgeted positions in the FPB, per the Appropriations Ordinance. In 2025, that number had been reduced to 86, of which 62 are assigned to all inspection duties.*

"Whenever possible, CFD includes requests for additional positions. However, to date, inspection positions have only been removed during the budgeting processes.

"Within the constraints of the limited personnel available, the FPB will develop procedure to document and track re-check inspections, after issuing notices of violations, by bureau memorandum or order. The FPB will require each area office with area office supervisors to develop and maintain records of re-check inspections assigned and will continue to employ a specific focus on prioritizing high hazard occupancies."

5. *"The IPS11 includes standard procedures to assessing re-check fees in accordance with the MCC. To the extent re-check fees can or should be assessed beyond the current limitations of the IPS 11 system, any changes would require action by the Department of Finance.*

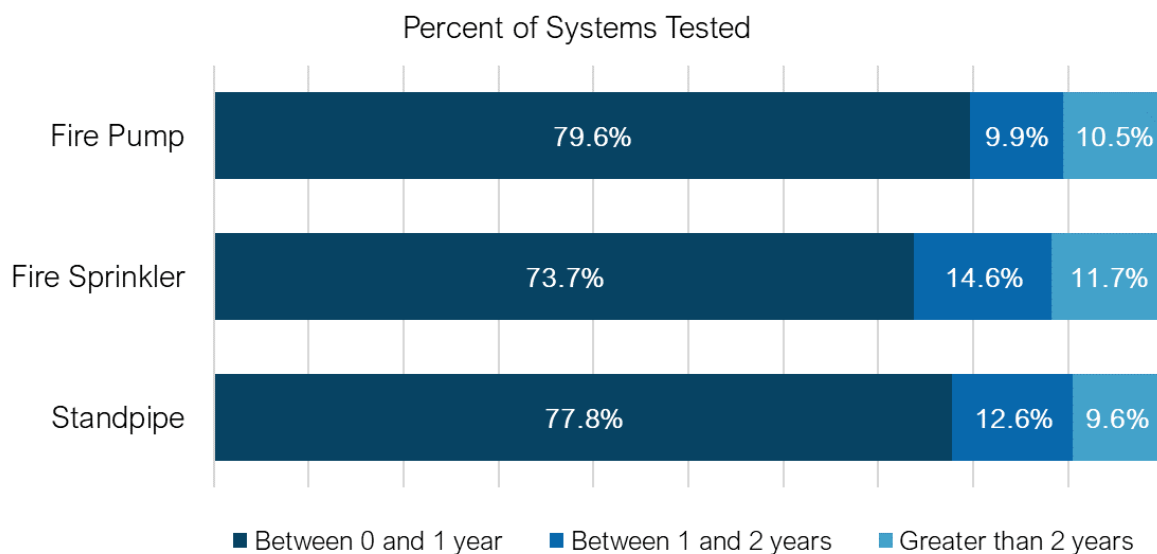
"To the extent this audit suggests FPB members exercised any individual discretion in assessing re-check fees, CFD will issue direction in the form of memorandum or orders to ensure re-check fees are indicated whenever permitted under the MCC."

Finding 3: Independent contractors tested 73.7% to 79.6% of premises with fire suppression systems within a 12-month period. FPB does not have a complete and accurate inventory of systems for which annual tests are required.

FPB does not ensure that property owners engage independent contractors to test all water-based fire suppression systems on an annual basis, as required by the Fire Code. Lack of such testing creates a risk that defects in the fire suppression systems will not be detected and addressed in advance of emergency situations that would require their use. Furthermore, FPB does not know the population of fire suppression systems that require annual testing. Rather, it is only aware of the water-based fire suppression systems present in its database. TCE's population is comprised of water-based fire suppression systems initially transferred from DOB's main database, Hansen 7, and systems which independent contractors have tested since that initial transfer.

In 2022, independent contractors tested 4,345 of 5,459 known premises with fire pumps (79.6%), 4,821 of 6,538 known premises with fire sprinklers (73.7%), and 1,311 of 1,685 known premises with standpipes (77.8%), as depicted in Figure 12.

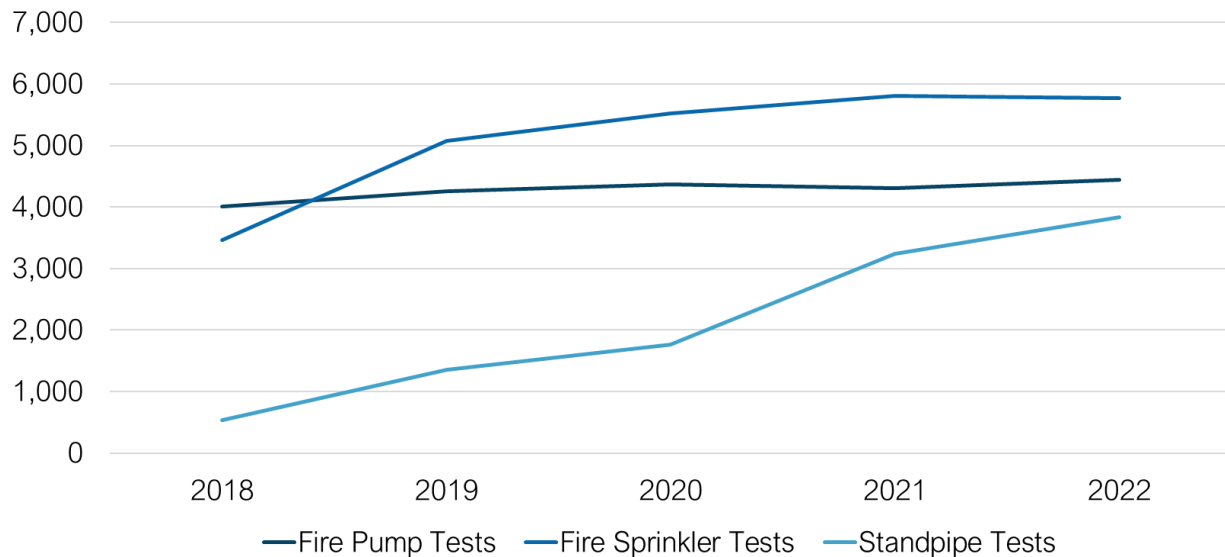
Figure 12: Most of the Premises with Fire Suppression Systems in FPB's Database Received an Annual Test within a 12-Month Period, but Not All Systems Were Tested



Source: OIG analysis of TCE data as of December 31, 2022.

FPB uses TCE to record the outcomes of fire suppression system tests. Since 2018, when FPB began using TCE, independent contractors have submitted 57,745 annual suppression system tests for FPB to review. Figure 13 provides a breakdown of those tests by year.

Figure 13: The Number of Annual Fire Sprinkler and Standpipe Tests Reported Has Increased Since 2018, While the Number of Fire Pump Tests Reported Has Remained Relatively Constant



Year	Fire Pump Tests	Fire Sprinkler Tests	Standpipe Tests	Total Tests
2018	4,005	3,457	531	7,993
2019	4,260	5,081	1,358	10,699
2020	4,374	5,516	1,763	11,653
2021	4,307	5,804	3,238	13,349
2022	4,441	5,770	3,840	14,051
Total Tests	21,387	25,628	10,730	57,745
Total Premises	5,459	6,538	1,685	13,682

Source: OIG visualization of TCE data as of December 31, 2022.

FPB leadership reported to OIG that the use of TCE has improved its operations, increasing the number of systems FPB is able to oversee and streamlining aspects of the testing process. For example, TCE now provides electronic notices to remind property owners when a required test is approaching. Relatedly, contractors can now schedule tests online through TCE; they previously needed to schedule tests in person at FPB's offices.

However, TCE is not integrated with other data systems that FPB uses for its operations, such as IPS 11 or DOB's Hansen 7. This requires FPB staff to manually enter information across multiple databases. For example, when FPB staff issue a violation, they must manually enter duplicative information into Hansen 7. This is an inefficient use of staff time and creates the opportunity for errors.

| Recommendations

6. FPB should develop procedures to monitor and ensure property owners obtain tests of all water-based fire suppression systems on an annual basis, as required by the Fire Code.
7. FPB should work with the appropriate City departments, including DTI and DOB, to identify and maintain a complete and accurate inventory of fire suppression systems subject to annual systems tests.

| Management Response

6. *"The Brycer compliance engine is already doing this, which sends deficiency notices when the annual inspection is due and when any inspection reports have not been timely submitted. Therefore, there is no corrective action that could be taken."*
7. *"As noted in response to Recommendation No. 6, the Brycer compliance engine is already doing this, which sends deficiency notices when the annual inspection is due and when any inspection reports have not been timely submitted. The Brycer compliance engine also stores and maintains the records of all fire suppression systems subject to annual testing. Therefore, there is no corrective action that could be taken."*

Finding 4: CFD had never created or submitted the MCC-mandated annual report of fires until OIG's audit.

In 2016, the Chicago City Council enacted MCC § 2-36-220, which states,

Each year, on or before the first day of March, the fire commissioner shall prepare and submit to the mayor and city council a report identifying: (1) the location of all fires to which the fire department was dispatched that occurred within the city during the preceding fiscal year; and (2) the causes of each such fire, to the extent that such causes can be ascertained; and (3) the number and description of all buildings injured or destroyed as a result of such fires.

On December 8, 2022, CFD stated that it “was unable to find any record [that] it provided the report to City Council as contemplated by MCC [§] 2-36-220, in recent years. CFD received no communications from City Council requesting the report.” CFD was, therefore, non-compliant with the ordinance, leaving elected officials without necessary information to support oversight and legislative action. In September 2025, CFD provided evidence that it prepared and submitted three reports to the Committee on Police and Fire and the Deputy Mayor of Community Safety on the following dates:

- February 28, 2023: Report on Chicago Building Fires in 2022
- February 26, 2024: Report on Chicago Building Fires in 2023
- May 28, 2025: Report on Chicago Building Fires in 2024

The reports, however, do not appear on the City Clerk's website and, thus, are not publicly available like other reports filed with City Council or its committees.

| Recommendations

8. CFD should annually prepare and submit a report of fires as required by MCC § 2-36-220.

| Management Response

8. *“CFD has reported to City Council in accordance with the ordinance at least since March 2023.”*

Finding 5: FPB destroyed paper inspection forms without Local Records Commission approval.

FPB inspectors bring paper Inspection Control Forms to annual inspections and use the blank reverse side to document observed violations before entering the information into IPS 11. FPB staff had a practice of shredding these paper Inspection Control Forms. Staff conducted this practice without approval from the Local Records Commission. During this audit OIG alerted CFD, and FPB stopped its practice of shredding paper Inspection Control Forms.

The Illinois Local Records Act (50 ILCS 205) requires government agencies to define how long records of public business will be preserved and seek permission from the Local Records Commission before discarding records.³³ CFD's records retention schedule specifies that "fire inspection files" should be retained for a period of ten years, as shown in Figure 14.

Figure 14: CFD Policy Requires a Ten-Year Retention Period for Fire Inspection Files

<u>FIRE PREVENTION</u>	
126.	<u>FIRE INSPECTION FILES</u> Inspection reports, extra alarm report, death or injury reports, demolition slips, Compliance Board records, "Hard Cards", pump tests, sprinkler reports, etc. relating to inspections of buildings for fire hazards - high rises, commercial buildings Dates: 1973 - Volume: 476 cu. ft. Annual Accumulation: 47.6 cu. ft. Arrangement: By street/Chronological by day Recommendation: Retain 10 years and dispose of providing no claims or litigation are pending. <u>NON-STATUTORY:</u> Retain permanently.+

Source: CFD (OIG highlights).

| Recommendations

- CFD should consult with DOL or the Cook County Local Records Commission regarding any remediation actions necessary based on the fact that it destroyed inspection records without permission from the Commission.
- CFD should create and implement procedures for collecting and retaining fire prevention inspection records in compliance with the Local Records Act.

³³ 50 ILCS 205/10 and 50 ILCS 205/7

11. CFD should provide guidance to its members on the department's responsibilities under the Local Records Act, including its obligation to seek and receive approval from the Local Records Act Commission before destroying or discarding inspection records.

| Management Response

9. *"CFD will consult with DOL regarding any possible remediation required. To the extent any records may have been destroyed, FPB has amended its procedures to ensure paper copies of inspection reports are saved even after an electronic copy is made."*
10. *"CFD will draft orders or memorandum (as appropriate) specifically identifying the requirements of the Local Records Act for distribution to all members. FPB has already amended its procedures to ensure paper copies of inspection reports are saved even after an electronic copy is made."*
11. *"CFD will draft orders or memorandum (as appropriate) specifically identifying the requirements of the Local Records Act for distribution to all members. FPB has already amended its procedures to ensure paper copies of inspection reports are saved even after an electronic copy is made."*

V | Conclusion

The Fire Prevention Bureau does not fulfill its annual inspection and testing mandates. This increases the risk that it will not discover hazardous conditions that could increase the risk of harm to building occupants and first responders. Fundamental issues with organizational strategy and procedures—as well as the integrity of FPB's data—impede FPB from providing Chicagoans with assurance that buildings from hospitals to hotels to high-rises are safe places to work, visit, and live. Although required to conduct inspections of buildings and tenant spaces annually, FPB has not inspected nearly half of buildings and tenant spaces in the previous five years. Furthermore, FPB does not maintain a complete and accurate inventory of buildings, and FPB's records of annual inspections do not contain the date of any Fire Code violation notices or a final disposition status, which are elements required by the Fire Code.

Regarding completed inspections, FPB conducted re-check inspections for 87.8% of failed annual inspections, but collected only 13.2% of the required re-check fees. Similar to inspections for buildings and tenant spaces, the Fire Code requires annual tests of water-based fire suppression systems. In a 12-month period, independent contractors tested approximately three-quarters of premises with such systems. FPB, however, does not have a complete and accurate inventory of systems. Finally, CFD has never created or submitted the annual report of fires required by the MCC and destroyed paper inspection forms.

OIG recommends that CFD work with relevant City departments to identify a complete and accurate inventory of existing buildings subject to Fire Code inspections. CFD should also develop procedures to ensure it conducts the required inspections and monitors progress toward the completion of inspections. CFD should also ensure it maintains proper records as required by the Fire Code by documenting the notice of violation date and memorandum of final disposition related to inspections. Related to re-check inspections, FPB should develop and document procedures to ensure it conducts re-check inspections and assesses re-check fees.

FPB should also develop procedures to monitor and ensure property owners obtain tests of all water-based fire suppression systems on an annual basis, as required by the Fire Code. Further, it should work with City departments to identify and maintain a complete and accurate inventory of fire suppression systems subject to the tests.

OIG also recommends that CFD create and submit the annual report of fires prescribed by MCC § 2-36-220. Lastly, CFD should consult with DOL or the Cook County Local Records Commission regarding any remediation actions necessary based on the fact that it destroyed inspection forms without seeking permission from the Cook County Local Records Commission, develop procedures for retaining inspection records, and provide guidance to CFD members regarding legal requirements related to document retention and destruction.

Appendix A | Inspection Control Form

FPB inspectors may bring paper Inspection Control Forms to annual building or tenant inspections and use the blank reverse side to note down violations. Identifying information is redacted.

		CHICAGO FIRE DEPARTMENT FIRE PREVENTION BUREAU REPORT OF INSPECTION			
AP#: FPBBLD [REDACTED]		INSPECTION TYPE: BLDG ANNUAL		STATUS: ORIGINAL	
ICN: [REDACTED]		DATE SCHEDULED: 03/01/2019		PRIMARY OCCUPANCY CLASS: C100	
AREA OFFICE: C01		LAST INSPECTION DATE: 03/01/2018		SECON. OCCUPANCY CLASS: M001	
		LAST INSPECTED BY: [REDACTED]		SCHOOL TYPE:	
INSERV NBR: E42 T3		CITY TIE BOX NBR: N/A		YEAR BUILT:	
HAZARDOUS MATERIAL:		FACILITY ID: [REDACTED]		DATE PRINTED: 10/09/2020	

<u>BUILDING PREMISE ADDRESS</u> [REDACTED]		SEND NOTICE TO: ☐ Owner ☐ Tenant ☐ Responsible Party ☐ All		Floor #: Room #: Room Name:	
<u>RESPONSIBLE PARTY</u> [REDACTED]		<u>TENANT BUSINESS NAME</u> [REDACTED]			
<u>BUILDING OWNER INFO</u> [REDACTED]		<u>TENANT PREMISE ADDRESS</u> [REDACTED]			

WIDTH	LENGTH	HEIGHT	BSMT	WATER	EX	FA	AS	SP	FP	HD	CONSTRUCTION TYPE	TRUSS ROOF	TRUSS FLOOR
00095	00162	005	001	CITY	Y	Y	Y	Y	Y	Y	NONE	U	U

OTHER BLDG USE		MISCELLANEOUS		SCHOOL TYPE ☐ Public ☐ Private	
----------------	--	---------------	--	---	--

BOOK NO.	INSPECTORS SIGNATURE:	DATE:	INSPECTION TIME HRS MIN
USER ID			

BOOK NO.	SUPERVISORS SIGNATURE:	DATE:	RESULT OF INSPECTION

Appendix B | Pump Test Form

FPB Pumps inspectors use paper forms to capture test information during fire pump tests. Identifying information is redacted.

Page 1 of 2

PUMP = 8/17/21 / SP A = 1-18-22 / SAK 3-15-22 / FA 11-2-21

DATE PRINTED 08/02/2022

CHICAGO FIRE DEPARTMENT
FIRE PREVENTION BUREAU
INSPECTION CONTROL REPORT

RECOM-CD 15D

ICN [REDACTED]

Bldg Comments: MANDATORY WITNESS. PUMP SUPPLIES [REDACTED] 60/70/80. SPRINKLERS WET GARAGE EVEN YEARS FLOW S/P A LOCATED [REDACTED] AND ALSO S/P C LOCATED [REDACTED] ODD YEARS FLOW S/P E LOCATED [REDACTED] AND S/P G LOCATED [REDACTED] SCISSOR STAIRWELL. [REDACTED]

4 separate Bldgs?
4 separate Areas?

LAST INSPECTION	LAST INSPECTION DATE	STATUS	YEAR BUILT	OCCUPANCY CLASS	INSP TYPE	AREA OFFICE
[REDACTED]	10/13/2021	FAILED	1951	A2-F	ANNUAL	CENTRAL

PREMISE ADDRESS [REDACTED] = SRA
INSPECTION LOC: M00432 - CAP 1000 60 = SPC
PUMP LOCATION: 70 = SPC
80 = G & H SCISSOR STAIR

BLDGNAME: FRONT
← SW Designations

OWNER/TENANT		RESPONSIBLE PARTY	
[REDACTED]	Send Notice YES	[REDACTED]	Send Notice YES

WIDTH	LENGTH	HEIGHT	BSMT	WATER	EX	FA	AS	SP	FP	HD	CONSTRUCTION TYPE	TRUSS
200	200	0	Y				Y	Y	Y		1	

AP NUMBER	ISSUE DATE	PUMP FEE
[REDACTED]		\$630.00

BOOK NO.	INSPECTOR'S SIGNATURE	DATE	START TIME	END TIME
[REDACTED]	[REDACTED]	8/16/22	0800	

BOOK NO.	SUPERVISOR'S SIGNATURE	DATE

SEQ. NO.	VIOL NO.	DESCRIPTION	COMMENTS	CD
1	FP2108	SEC. 15-16-970, 15-16-090 PROVIDE APPROVED ONE AND ONE HALF (1 1/2) INCH HOSE WHERE SAME IS MISSING OR DAMAGED.	PROVIDE FOR MISSING 1 1/2" HOSE AND MAINTAIN UNTIL SUCH TIME THAT THE BUILDING IS FULLY SPRINKLED	✓
2	FP2116	SEC. 15-16-970 PROVIDE A SUITABLE CABINET OR COVER TO PROTECT ONE AND ONE HALF (1 1/2) HOSE ON STANDPIPE SYSTEM.	PROVIDE A CABINET OR COVER FOR SAID 1 1/2" HOSE	✓

PB001 RD053017

Page 2 of 2

DATE PRINTED
08/02/2022



CHICAGO FIRE DEPARTMENT
FIRE PREVENTION BUREAU
INSPECTION CONTROL REPORT

RECOM-CD
15D

ICN
[REDACTED]

Bldg Comments: MANDATORY WITNESS PUMP SUPPLIES [REDACTED] 60/70/80.
SPRINKLERS WET GARAGE EVEN YEARS FLOW S/P A LOCATED
[REDACTED] AND ALSO S/P C LOCATED [REDACTED] ODD YEARS FLOW
S/P E LOCATED [REDACTED] AND S/P G LOCATED [REDACTED] SCISSOR
STAIRWELL

LAST INSPECTION	LAST INSPECTION DATE	STATUS	YEAR BUILT	OCCUPANCY CLASS	INSP TYPE	AREA OFFICE
[REDACTED]	10/13/2021	FAILED	1951	A2-F	ANNUAL	CENTRAL

PREMISE ADDRESS [REDACTED]
INSPECTION LOC: M00432 - CAP 1000
PUMP LOCATION:

BLDGNAME: FRONT

OWNER/TENANT

Send Notice

YES

RESPONSIBLE PARTY

Send Notice

YES

WIDTH	LENGTH	HEIGHT	BSMT	WATER	EX	FA	AS	SP	FP	HD	CONSTRUCTION TYPE	TRUSS
200	200	0	Y				Y	Y	Y		1	

AP NUMBER	ISSUE DATE	PUMP FEE
[REDACTED]		\$630.00

3	FP2120	SEC. 15-16-970 PROVIDE APPROVED NOZZLE(S) ON ALL ONE AND ONE HALF (1 1/2) INCH HOSE.	PROVIDE FOR 1 1/2" NOZZLES FOR MENTIONED HOSE ✓
---	--------	--	---

PB001 RD053017

CHICAGO FIRE DEPARTMENT--BUREAU OF FIRE PREVENTION			
PUMP TEST SPECIFICATION REPORT			
 AREA LOCATION OWNER ADDRESS	N048W008 PHONE: () - OWNER: ADDRESS: SAME AS ABOVE OWNER ADDRESS	PUMP NUMBER PHONE PUMP TEST DATE INSPECTOR ZIPCODE	Run Date 8/2/2022 8/17/2021 12:00:00AM BADGE #
MOTOR SERIAL NUMBER <u>NONE</u> NAME <u>ELLIOTT</u> H.P. <u>100</u> VOLTS <u>222/440</u> AMPS <u>256</u> TYPE <u>BALL</u> RPM <u>1760</u> ENC <u>1</u> VENTILATED <u>SELF</u> NO. CONDUCTORS <u>3</u> SIZE <u> </u> LEAD COVERING <u> </u> UNDERGROUND <u>YES</u> RACEWAY <u>2"</u> NO. MOTOR MAINS <u>3</u> SIZE <u> </u> LEAD COVERING <u> </u> RACEWAY <u>2"</u>			
PUMP SERIAL NUMBER <u>N/A</u> NAME <u>PEERLESS</u> CAP <u>1000</u> GALS. PRESSURE <u>115</u> PSI IMPELLERS <u>N/A</u> STAGES <u>1</u> PIPE SUCTION <u>8</u> DISCHARGE <u>8</u> OS&Y VALVES: SUCTION <u>8</u> DISCHARGE <u>8</u> BY-PASS <u>0</u> DETECTOR <u>0</u> CHECK VALVES: SUCTION <u>8</u> DISCHARGE <u>0</u> PUMP RELIEF VALVE <u>1</u> SIZE <u>0.75</u> RPM <u>1750</u> GAUGES SUCTION <u>-30+300</u> DISCHARGE <u>0+3</u> RELIEF CONE <u>0</u>			
FIRE PUMP CONTROLLER SERIAL NUMBER <u>6954</u> NAME <u>LEXINGTON</u> H.P. <u>100</u> VOLTS <u>208</u> AMPS <u> </u> AUTO <u>1</u> MANUAL <u>1</u> ENCLOSED IN STEEL CABINET: <u>Y</u> GOVERNOR: NAME <u>MERCOID</u> PRESSURE: <u> </u> VOLTS: <u>600</u> C.B.: NAME: <u>I.T.E.</u> VOLTS: <u> </u> AMPS: <u> </u>			
JOCKEY PUMP NAME <u>TEEL</u> VOLTS <u>208</u> H.P. <u> </u> ALARMS; PUMPS RUNNING <u>0</u> POWER FAILURE <u>0</u> F.P. IN <u>115</u> F.P. OUT <u>130</u> J.P. IN <u>140</u> J.P. OUT <u>165</u>			
COMMENTS <u>115/74 or 109/70</u> Added			

FPB002A RD103009

 CHICAGO FIRE DEPARTMENT
FIRE PREVENTION BUREAU
PUMP TEST ANNUAL REPORT

Run Date: 8/2/2022

PUMP NUMBER: M00432

ADDRESS: [REDACTED] ZIP CODE: [REDACTED]

PHONE: () - [REDACTED]
OWNER: [REDACTED]
ADDRESS: SAME AS ABOVE

8/17/2021 9:40:00A

MOTOR SERIAL NUMBER: NONE LAST PUMP TEST DATE:
PUMP SERIAL NUMBER: N/A
CONTROLLER SERIAL NUMBER: 6954
LOCATION:

1. GUARD COVERING: YES ☒ NO ☐ 6. EMERGENCY START: YES ☒ NO ☐
2. PUMP ALARM RUNNING: YES ☒ NO ☐ 7. AUTO AIR RELIEF VALVE: YES ☒ NO ☐
3. PUMP ALARM FAILURE: YES ☒ NO ☐ 8. CASING RELIEF VALVE: YES ☒ NO ☐
4. AUTO START OPERATIVE: YES ☒ NO ☐ 9. INSPECTOR'S TEST VALVE: YES ☐ NO ☒
5. MANUAL START OPERATIVE: YES ☒ NO ☐ 10. SPRINKLER TEST: YES ☐ NO ☒

PUMP TEST RESULT PASSED ☒ FAILED ☐ No. of STANDPIPES: 4 No. of SPRINKLERS: [REDACTED]

VOLT	AMPS	RPM	SUC-TION	DIS-CHRG	NET PRESS	OIL	WATER	HOSES	NOZZLE PRESSURE									GPM	RMKS							
									1	2	3	4	5	6	7	8	9									
		1783	49	179	129																					
		1742	38	158	117			4	8	8	8	8													1000 (100)	
		1728	27	118	91			4	18	18	18	18													1531 (150)	
		1782	50	180	130																					
		1762	49	173	126			1	32																503 (50)	
		1771	49	178	129																					
		1761	44	168	125			1	32																	503 (50)
		1780	50	180	130																					

REMARKS: A C

COMMENTS: 2@ 65' 2@ 30' 1@ 15'

WITNESSED BY: [REDACTED] DATE: [REDACTED]

(5P) ow 140
out 150
(FP) 120
6 min fines

FPB002B RD103009

Appendix C | Complete Management Response



Deborah Witzburg
Inspector General

OFFICE OF INSPECTOR GENERAL City of Chicago

4750

231 S. LaSalle St. 12th Floor
Chicago, Illinois 60604
Telephone: (773) 478-7799
Fax: (773) 478-3949

Management Response Form

Project Title: Audit of the Chicago Fire Department's Annual Fire Prevention Inspections and Tests

Project Number: C2022-000043822

Department Name: Chicago Fire Department

Date: October 1, 2025

Department Head: Commissioner Annette Nance-Holt

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
1. CFD should work with the relevant City departments, including the Department of Technology and Innovation and DOB, to identify a complete and accurate inventory of existing buildings, including mid- and high-rise residential buildings, and "ghost buildings," that are subject to annual Fire Code inspections.	Disagree with OIG's definition of "ghost buildings." CFD considers "ghost buildings" to be addresses without a building. Disagree	The FPB has/does work with other City agencies departments to ensure accuracy of the information on the buildings we inspect. However, FPB is not responsible for identifying, creating, or maintaining an inventory of existing buildings, including mid- and high rise residential buildings. Under the MCC (14A-6-602.4), inspection of mid-rise and high-rise residential buildings is the sole responsibility of DOB, not CFD. The official register of buildings, including mid- and high-rise buildings, is created and maintained by DOB; which is also responsible for assigning addresses to buildings.	TBD by the Department of Buildings	DOB

Page 1 of 7

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
	with the implied finding CFD does not work and coordinate with DTI and DOB	With three (or more) diverse and non-communicating systems, discrepancies between the various systems exist. In addition, the origin of building addresses, done by DOB does not always accurately reflect a building (due to redevelopment, remapping, etc.). There are times when a "ghost building" still exists. For example, the original building was razed and graded and another building has been built on the same property and City's Maps and Plats and GIS sections have not changed the information in the system, which inaccurately reports the original building still exists. Further, at times, updated building demographic information is not being updated into the Hansen V7 system (owned and managed by DOB). CFD has and will continue to report inaccurate addresses to DOB, when identified. Any changes necessary to improve the currency and accuracy of official inventory of buildings must be undertaken by the DOB. CFD stands ready to participate in any improvement efforts DOB elects to pursue.		
2. CFD should develop procedures, for FPB and CFD members involved with in-service inspections, to ensure it conducts the required inspections, create a process for monitoring progress, implement a prioritization policy for inspections, and standardize	Disagree	Initially, CFD cannot utilize NFPA 1730 as a guide because this standard has not been codified by City Council. Further, incorporating NFPA 1730 into the Municipal Code would require including various and numerous other sections of NFPA. In-service inspections (TOCs) were routinely completed prior to 2020. During COVID, it was	Jan. 1, 2026 for CFD retraining TBD by DTI for system updates	CFD DTI

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
the annual building inspection process and related recordkeeping. Alternatively, CFD could use NFPA 1730 as a guide to conduct a community risk assessment to strategically address the city's Fire Code enforcement needs.		necessary to suspend in-service inspections. In 2024, CFD issued a revised order, resuming in-service inspections. The Fire Prevention Bureau identifies buildings appropriate for TOC inspection and provides lists to each District (1, 2, 4, 5) in the Bureau of Operations. District leadership assigns the TOC inspections to the appropriate battalions and companies, which also provide opportunity to become familiar with the buildings and their areas and any hazards that may be present in those buildings. Battalions and companies are expected to complete the TOC inspection and return the necessary documentation to District within 30 days to FPB for entry into the inspection databases. CFD is currently developing re-training to be distributed via Vector Solutions (CFD's online training portal) to reinforce the obligations and processes for the Bureau of Operations to complete the necessary TOC inspections. CFD has also requested DTI update the code violation information in Hansen V7 to allow for accurate TOC inspection results and information to be entered. To date DTI has not completed the requested update. Under the existing system the companies cannot write violations, if they are found during TOC inspections, because the codes that are currently in the system are MCC codes and not the International Building Code codes that are used by CFD.		

Page 3 of 7

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
3. CFD should take the measures necessary to document the notice of violation date and memorandum of final disposition, thus maintaining a proper record of fire prevention inspections as required by MCC § 2-36-280(a).	Disagree	The documentation of the notice of violation date and memorandum of final disposition are functions that are incorporated in and being done by Hansen V7 and Brycer. IPS 11 is the system that is used to perform these functions.	n/a	CFD
4. FPB should develop and document procedures for conducting re-check inspections. This could entail establishing categories of response based on risk to ensure that safety hazards are brought into compliance within a defined timeframe.	Agree and disagree	At least since the 1999 Tri Data report, there has been a known need for additional inspection positions at the FPB. In all the intervening years, CFD's budgeted positions have been reduced, not increased. In 2000, there were 156 budgeted positions in the FPB, per the Appropriations Ordinance. In 2025, that number had been reduced to 86, of which 62 are assigned to all inspection duties. Whenever possible, CFD includes requests for additional positions. However, to date, inspection positions have only been removed during the budgeting processes. Within the constraints of the limited personnel available, the FPB will develop procedure to document and track re-check inspections, after issuing notices of violations, by bureau memorandum or order. The FPB will require each area office with area office supervisors to develop and maintain records of re-check inspections assigned and	Jan. 1, 2026	CFD

Page 4 of 7

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
		completed. FPB will continue to employ a specific focus on prioritizing high hazard occupancies.		
5. FPB should develop and document standard procedures for assessing re-check fees based on defined criteria and in accordance with the MCC.	Disagree	The IPS 11 includes standard procedures to assessing re-check fees in accordance with the MCC. To the extent re-check fees can or should be assessed beyond the current limitations of the IPS 11 system, any changes would require action by the Department of Finance. To the extent this audit suggests FPB members exercised any individual discretion in assessing re-check fees, CFD will issue direction in the form of memorandum or orders to ensure re-check fees are indicated whenever permitted under the MCC.	Jan. 1, 2026	CFD
6. FPB should develop procedures to monitor and ensure property owners obtain tests of all water-based fire suppression systems on an annual basis, as required by the Fire Code.	Disagree	The Brycer compliance engine is already doing this, which sends deficiency notices when the annual inspection is due and when any inspection reports have not been timely submitted. Therefore, there is no corrective action that could be taken.	n/a	
7. FPB should work with the appropriate City departments, including the Department of Technology and Innovation and DOB, to identify and maintain a complete and accurate inventory	Disagree	As noted in response to Recommendation No. 6, the Brycer compliance engine is already doing this, which sends deficiency notices when the annual inspection is due and when any inspection reports have not been timely submitted. The Brycer compliance engine also stores and maintains the records of all	n/a	

Page 5 of 7

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
of fire suppression systems subject to annual systems tests.		fire suppression systems subject to annual testing. Therefore, there is no corrective action that could be taken.		
8. CFD should annually prepare and submit a report of fires as required by MCC § 2-36-220.	Disagree	CFD has reported to City Council in accordance with the ordinance at least since March 2023.	n/a	
9. CFD should consult with DOL or the Cook County Local Records Commission regarding any remediation actions necessary based on the fact that it destroyed inspection records without permission from the Commission.	Agree	CFD will consult with DOL regarding any possible remediation required. To the extent any records may have been destroyed, FPB has amended its procedures to ensure paper copies of inspection reports are saved even after an electronic copy is made.	Nov. 1, 2026	CFD
10. CFD should create and implement procedures for collecting and retaining fire prevention inspection records in compliance with the Local Records Act.	Agree	CFD will draft orders or memorandum (as appropriate) specifically identifying the requirements of the Local Records Act for distribution to all members. FPB has already amended its procedures to ensure paper copies of inspection reports are saved even after an electronic copy is made.	Jan. 1, 2026	CFD
11. CFD should provide guidance to its members on the department's responsibilities under the Local Records Act, including its obligation to seek and receive approval from the Local Records Act Commission before	Agree	CFD will draft orders or memorandum (as appropriate) specifically identifying the requirements of the Local Records Act for distribution to all members. FPB has already amended its procedures to ensure paper copies of inspection reports are saved even after an electronic copy is made.	Jan. 1, 2026	CFD

Page 6 of 7

OIG Recommendation	Agree/ Disagree	Department's Proposed Action	Implementation Target Date	Party Responsible
destroying or discarding inspection records.				



Anne O'Brien
Senior Performance Analyst

Sam Díaz
Senior Performance Analyst

Sanford Roth
Chief Assistant Inspector General

Kathleen O'Donovan
Chief Performance Analyst

Darwyn Jones
Deputy Inspector General, Audit and Program Review

The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government.

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and -240.

For further information about this report, please contact the City of Chicago Office of Inspector General, 231 S. LaSalle Street, 12th Floor, Chicago, IL 60604, or visit our website at igchicago.org.

Talk to Us
(833) TALK-2-IG/(833) 825-5244
talk2ig@igchicago.org
igchicago.org/talk2ig

OIG Business Office
(773) 478-7799

Cover photo courtesy of Canva Pro.
Alternate formats available upon request.

